

# PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

As part of the production of the Local Development Plan, a 'Main Issues Report' was published in January 2019. The responses from these consultations have helped to inform the content of the Proposed Local Development Plan ("the Proposed Plan").

The Aberdeenshire Local Development Plan will direct decision-making on land-use planning issues and planning applications in Aberdeenshire for the 10-year period from 2021 to 2031. The Proposed Plan was agreed by Aberdeenshire Council in March 2020 as the settled view of the Council. However, the Proposed Plan will be subjected to an independent examination and is now open for public comment.

**This is your opportunity to tell us if anything should be changed in the Proposed Plan, and why.**

When writing a response to the Proposed Plan it is important to specifically state the modification(s) that you would wish to see to the Plan.

This is the only remaining opportunity to comment on the Proposed Plan. The reasons for any requested changes will be analysed and reported to Scottish Ministers. They will then appoint a person known as a Reporter to conduct a public examination of the Proposed Plan, focusing particularly on any unresolved issues and the changes sought.

Ministers expect representations (or responses) to be concise (no more than 2000 words) and accompanied by limited supporting documents. It is important to ensure that all of the information that you wish to be considered is submitted during this consultation period as there is no further opportunity to provide information, unless specifically asked.

Please email comments to [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk) or send this form to reach us by 17 July 2020.

We recommend that you keep a copy of your representation for your own records.



## ACCESSIBILITY

If you need information from this document in an alternative language or in a Large Print, Easy Read, Braille or BSL, please telephone 01467 536230.

Jeigu pageidaujate šio dokumento kita kalba arba atspausdinto stambiu šriftu, supaprastinta kalba, parašyta Brailio raštu arba britų gestų kalba, prašome skambinti 01467 536230.

Dacă aveți nevoie de informații din acest document într-o altă limbă sau într-un format cu scrisul mare, ușor de citit, tipar pentru nevăzători sau în limbajul semnelor, vă rugăm să telefonați la 01467 536230.

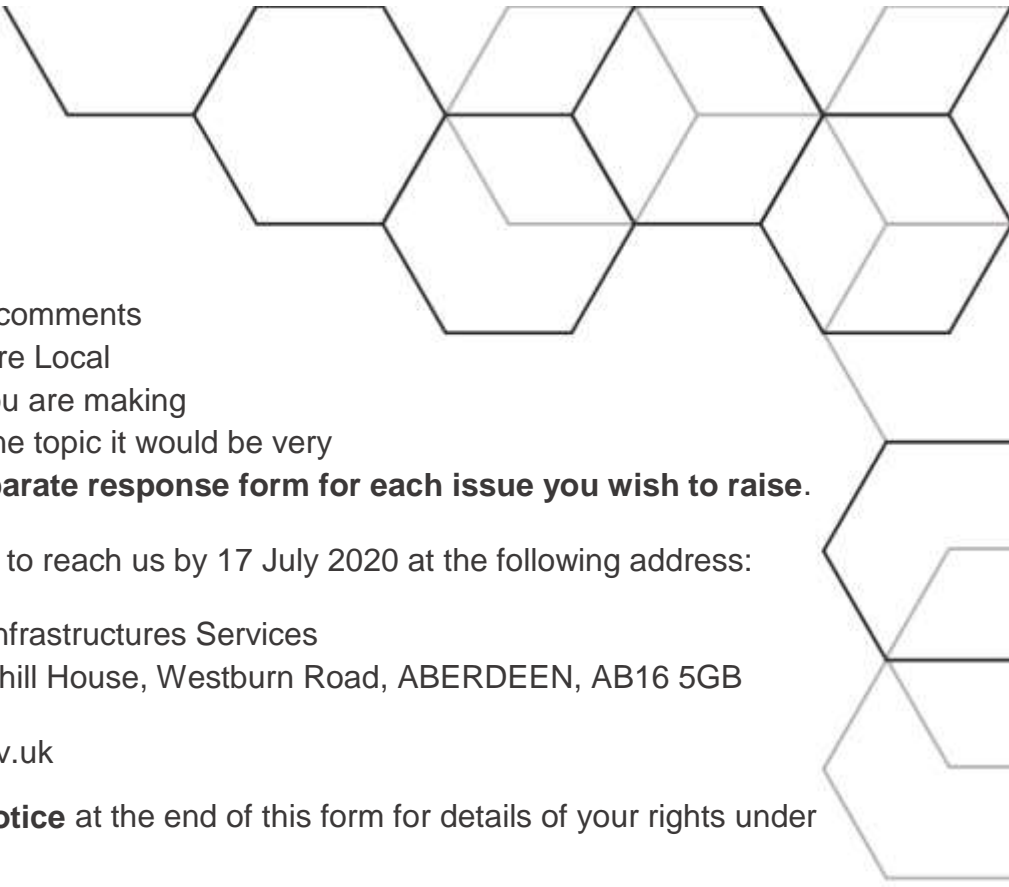
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

Ja jums nepieciešama šai dokumentā sniegtā informācija kādā citā valodā vai lielā drukā, viegli lasāmā tekstā, Braila rakstā vai BSL (britu zīmju valodā), lūdzu, zvaniet uz 01467 536230.

Aberdeenshire Local Development Plan  
Woodhill House, Westburn Road, Aberdeen, AB16 5GB

Tel: 01467 536230  
Email: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)  
Web: [www.aberdeenshire.gov.uk/ldp](http://www.aberdeenshire.gov.uk/ldp)  
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If you wish to contact one of the area planning offices, please call 01467 534333 and ask for the relevant planning office or email [planning@aberdeenshire.gov.uk](mailto:planning@aberdeenshire.gov.uk).



Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020. If you are making comments about more than one topic it would be very helpful if you could fill in **a separate response form for each issue you wish to raise**.

Please email or send the form to reach us by 17 July 2020 at the following address:

Post: Planning Policy Team, Infrastructures Services  
Aberdeenshire Council, Woodhill House, Westburn Road, ABERDEEN, AB16 5GB

Email: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)

Please refer to our **Privacy Notice** at the end of this form for details of your rights under the Data Protection Act.

## YOUR DETAILS

Title:	Mr
First Name:	Michael
Surname:	Lorimer
Date:	30/7/20
Postal Address:	Ryden LLP, [REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	[REDACTED]

Are you happy to receive future correspondence only by email? Yes ☒ No ☐

Are you responding on behalf of another person? Yes ☒ No ☐

If yes who are you representing? **Drumrossie Land Development Company Ltd**

☐ ☒ Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

*An acknowledgement will be sent to this address soon after the close of consultation.*

# YOUR COMMENTS

Please provide us with your comments below. We will summarise comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

**Modification that you wish to see** (please make specific reference to the section of the Proposed Plan you wish to see modified if possible, for example Section 9, paragraph E1.1):

Appendix 7d – Settlement Statement – Garioch (Whiteford pages 628 – 629) should be modified to include a small extension to the settlement boundary to encompass land at Whiteford Road, which is subject to an extant planning permission for 3 homes.

The Planning Objectives set out within the Settlement Statement for Whiteford should be modified to include provision for a small affordable housing development to meet established demand and sustain local facilities including the primary school and village hall.

Alternatively, the land could be identified as an Opportunity 'OP' Site, allocated for up to 9 affordable homes, to be delivered following the adoption of the next Local Development Plan (LDP) 2021. Table 3: Housing Allocations in the RHMA of Proposed Plan Appendix 6 should be modified to include 9 houses at Whiteford.



### Reason for change:

On behalf of our client, Drumrossie Land Development Company, objection is taken to the failure of the Proposed Local Development plan to identify land at Whiteford Road as either a small extension to the settlement boundary of Whiteford, or an Opportunity Site within the Proposed LDP. The site was not submitted as a formal 'Development Bid' at pre-Main Issues Report (MIR) stage, however a representation was submitted to the MIR (Appendix 1) specifically identifying the land lying to the immediate west of the settlement and requested that the settlement boundary be extended to accommodate the site, or that it be designated an Opportunity Site within the Proposed Plan, to accommodate a development of 9 affordable homes.

As noted within the MIR representation (Appendix 1) and acknowledged within the Council's response contained within the associated Schedule 4 'Issues and Actions Papers', the site benefits from an extant planning permission for three detached dwelling houses, which has been partially implemented on site and therefore remains in perpetuity under Planning Ref: APP/2013/2710. A copy of the approved layout was included with the MIR at Appendix 1, which illustrates the 3 relatively large, executive 5-bedroom homes.

It is therefore disappointing that Officers have failed to encompass a small extension to the settlement boundary to reflect the extant permission, given this is a fairly common practice in the preparation of LDPs in recognition of committed development. Indeed, such an approach has been applied within the Proposed Plan at Kirkton of Durris, whereby Officers have sought to extend the settlement boundary in recognition of an extant and implemented permission for two houses and to allow for a small infill development. Accordingly, our client would request that a similar approach is adopted in respect of the land sought at Whiteford, to facilitate a modest extension of the settlement boundary to accommodate the site subject to the extant planning permission.

Drumrossie Land Development Company have a proven track record of successful delivery of affordable housing throughout the North East and have built strong relationships with a number of Housing Associations, with whom they work closely to identify opportunities to deliver such developments in partnership. Indeed, positive discussions have been pursued with a number of Housing Associations in respect of Whiteford, subject to achieving the necessary consents. Extending the settlement boundary to encompass the site associated with the extant planning permission would provide a degree of flexibility to reconfigure the density and layout of the site to accommodate a viable affordable housing scheme of up to 9 homes. This could be pursued under relevant Infill Development Policy as per Proposed Policy P3 Infill Developments within Settlements and Householder Developments. Alternatively, allocating the site specifically for 9 affordable homes would be equally welcomed.

The indicative site layout which accompanied the MIR representation (Appendix 1) highlights that a proposed layout of 9 homes could more than adequately be accommodated within the site, utilising the approved access arrangement associated with extant permission (APP/2013/2710) and ensuring sufficient parking, plot ratios and open space are achieved. The site is free from constraints and would pose no detrimental impacts to surrounding amenity.

The settlement of Whiteford comprises around 60 properties, with a local primary school and village hall. It was previously earmarked for a fairly significant expansion within the former Aberdeenshire Local Plan 2006. Indeed, the proposed site formed part of a previous allocation for residential development within 2006 Plan, identified as part of site 'FH1' for 15 units, to be delivered as future housing land in the period 2006-2015. A further site to the north east of Whiteford was also allocated for around 74 houses as 'Site eh1', which would have more than doubled the size of the existing village. Extracts of the 2006 Local Plan are included at Appendix 2. However, the subsequent 2012 LDP removed both allocations, instead adopting a stance that the amenity of the settlement should be protected. This position was rolled forward into the extant 2017 LDP and continues to be the direction of travel within the Proposed LDP. Officers attempt to justify this position within the Schedule 4 Issues and Actions paper, highlighting that perceived, ***“constraints associated with the lack of services in the locality resulting in high car-dependency and concerns regarding the A96 junction remain”***.

It should however be stressed that Whiteford benefits from existing services, with a primary school and village hall both located within the village envelope and with direct linkage to the surrounding footpath network. Supplementing the village with a modest affordable housing development of 9 homes would in fact help sustain these rural facilities. The Proposed LDP allocates new housing to other small settlements in the Garioch area, with a similar number and type of existing services (village hall, school, church etc), such as Millbank (35 homes), Midmar (12 homes) and Keithhall (36 homes) on the basis that new housing would sustain the small number of services contained within those settlements. This demonstrates an inconsistency with the restrictive approach adopted for Whiteford within the Proposed Plan. Officers' perception of a lack of services is therefore unjustified, considering the approach to growth in settlements of a similar size and nature.

Concerns have been raised in respect of the A96 junction, however Officers fail to specify exactly what they relate to. One must assume it relates to reduced visibility to the east, however this is a pre-existing situation and the junction serves in excess of 60 existing homes within the settlement of Whiteford. The allocation of land for development would provide the opportunity to address that issue to the benefit of the wider community, through developer contributions toward local transport improvements.

Officers also suggest that, *“There has been no material change in circumstances since preparation of the current LDP 2017, particularly in addressing comments raised by the Reporter in examining a wider proposal for 15 homes (2013 bid reference Ga043).”* This however is not strictly true. The previous bid was for 15 homes and encompassed a larger area of land, which the Reporter felt would result in *“a built-up area that juts out into the countryside”*. It should be stressed that this representation relates to a much smaller area as sought within the indicative site layout submitted at MIR stage (Appendix 1). The site encompassed the south eastern portion of the area previously pursued as a Bid to the preparation of the 2017 Plan. The area sought is subject to an extant planning permission and the Reporter previously acknowledged that the southern part of the site was ***“well-defined by the road and roadside trees”***. As such, there would be no detrimental intrusion into the countryside as part of this proposal. It effectively amounts to a reconfiguration of an extant permission to allow for an increased density of development to accommodate 9 modest affordable homes to meet local demand, as opposed to 3 executive, 5-bedroom detached properties, where market demand is more limited in the settlement.

The local Logie Durno Primary School is recognised within the Proposed Whiteford Settlement Statement as “**a key facility in the settlement**”. Perceived capacity issues at the primary school were previously highlighted by the Reporter as a concern, however these overcapacity issues have not materialised. The school is currently operating well below its capacity of 45 pupils. The 2019 school roll forecasts (Appendix 3) identify only 31 pupils for the current year (2020), which will increase to 38 pupils by 2026. The school therefore has sufficient capacity to accommodate pupils generated by a small development of 9 affordable homes and as argued at MIR stage, would form an important contribution to the future sustainability of this rural service. With regard to secondary education, as noted within the settlement statement all development will be expected to contribute to the provision of additional capacity at Meldrum Academy. This would be secured through developer contributions as part of any future planning application.

The proposed Settlement Statement identified flood risk as a further constraint for the village, however, as was stressed within the representation to the MIR (Appendix 1), this would not apply to the proposed site. Permission exists for the development of the site for 3 units, with no flood risk identified as part of the associated planning application process for that consent. Increasing the capacity of the site to accommodate 9 affordable units would have no increased risk of flooding, as it would be developed within the approved boundary associated with the extant permission. The SEPA flood Maps (Appendix 4) illustrate that flood issues relate to the area to the south of the village, associated with the River Urie floodplain. The proposed site lies a considerable distance from this.

Officers have also suggested that there has been a lack of community engagement undertaken in respect of the proposal as further reasoning for not including the site. Given the relatively small-scale nature of the proposal and the fact it utilises the same site area associated with an extant planning permission, formal public engagement was not deemed necessary or proportionate to the scale of development proposed. It should be noted that there was no public objections submitted to previous planning application APP/2013/2710 for the erection of 3 large, detached properties on the site. Pre-application engagement has been undertaken, by way of positive discussions with the Council's Housing Service and a number of Housing Associations, which have been positive in respect of the site being taken forward as a 100% affordable housing development, to help meet existing chronic demand across the Aberdeenshire.

In summary, the proposed site at Whiteford Road should be included as part of the identified settlement boundary for Whiteford, for the delivery of 9 affordable homes within the next LDP. This would require a small extension to the current settlement boundary to encompass the land associated with implemented consent APP/2013/2710, or alternatively a specific 'OP' designation for 9 affordable units. The site sits immediately adjacent to the existing defined settlement boundary and has no associated constraints as confirmed through previous consented and partially implemented residential development. The site will be delivered in the short term and would accommodate an entirely affordable scheme, to meet local demand and help sustain existing services within the village.

# PRIVACY NOTICE

## LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

The Data Controller of the information being collected is Aberdeenshire Council.

The Data Protection Officer can be contacted at Town House, 34 Low Street, Banff, AB45 1AY.

Email: [dataprotection@aberdeenshire.gov.uk](mailto:dataprotection@aberdeenshire.gov.uk)

Your information is being collected to use for the following purposes:

- To provide public comment on the Aberdeenshire Local Development Plan. The data on the form will be used to inform Scottish Ministers and individual(s) appointed to examine the Proposed Local Development Plan 2020. It will inform the content of the Aberdeenshire Local Development Plan 2021.

### Your information is:

Being collected by Aberdeenshire Council	X
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### The Legal Basis for collecting the information is:

Personal Data	
Legal Obligations	X

Where the Legal Basis for processing is either Performance of a Contract or Legal Obligation, please note the following consequences of failure to provide the information:

It is a Statutory Obligation under Section 18 of the Town and Country (Scotland) Act 1997, as amended, for Aberdeenshire Council to prepare and publish a Proposed Local Development plan on which representations must be made to the planning authority within a prescribed period of time. Failure to provide details requested in the 'Your Details' section of this form will result in Aberdeenshire Council being unable to accept your representation.

Your information will be shared with the following recipients or categories of recipient:

Members of the public are being given this final opportunity to comment on the Proposed Aberdeenshire Local Development Plan. The reasons for any changes that the Council receives will be analysed and reported to Scottish Ministers. They will then appoint a person to conduct a public examination of the Proposed Plan, focusing particularly on the unresolved issues raised and the changes sought.

Your name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your

submission) will be published alongside a copy of your completed response on the Proposed Local Development Plan website (contact details and information that is deemed commercially sensitive will not be made available to the public).

In accordance with Regulation 22 of the Town and Country (Development Planning) (Scotland) Regulations 2008 where the appointed person determines that further representations should be made or further information should be provided by any person in connection with the examination of the Proposed Plan the appointed person may by notice request that person to make such further representations or to provide such further information.

Your information will be transferred to or stored in the following countries and the following safeguards are in place:

Not applicable.

The retention period for the data is:

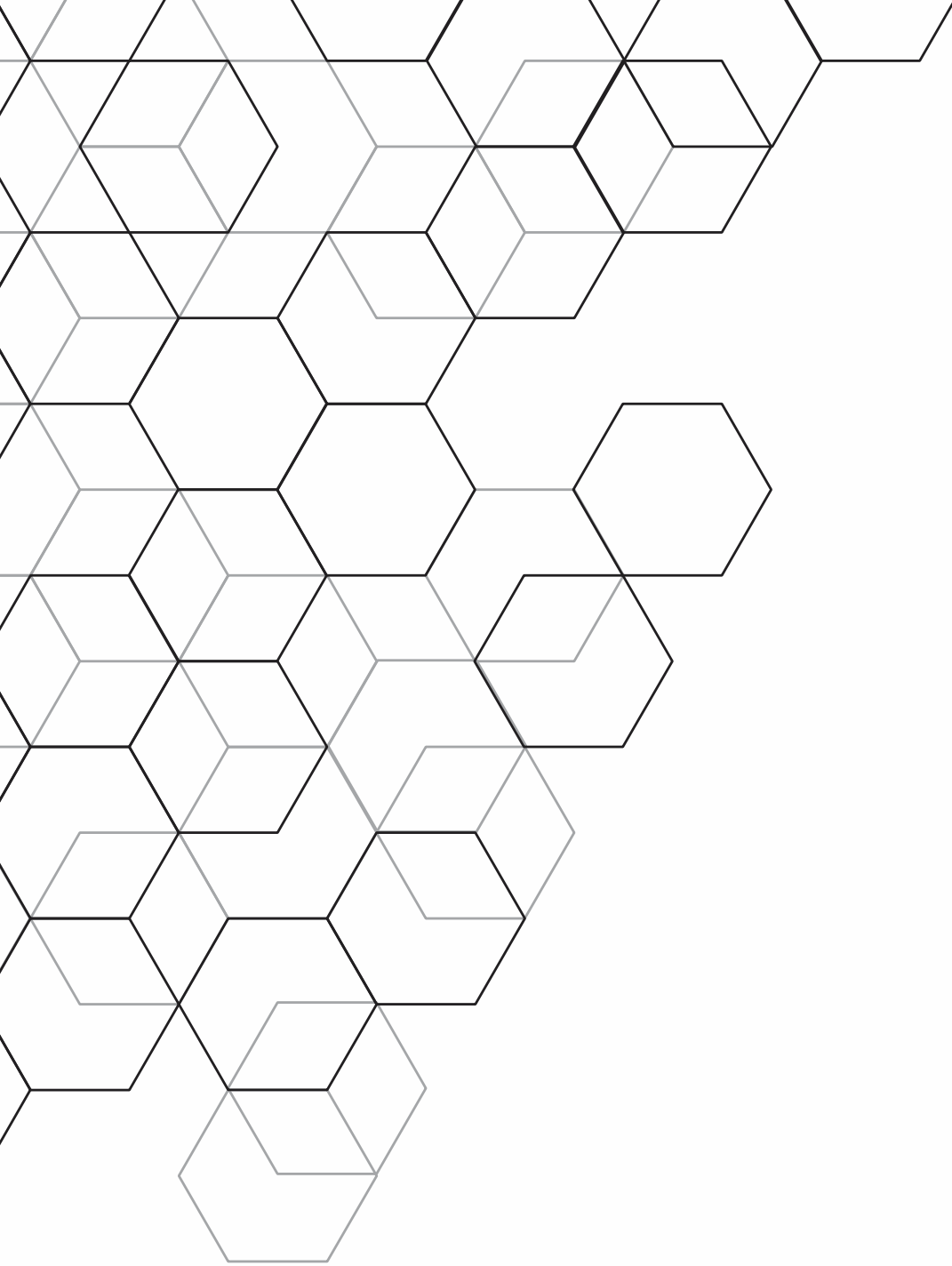
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037.

The following automated decision-making, including profiling, will be undertaken:

Not applicable.

Please note that you have the following rights:

- to withdraw consent at any time, where the Legal Basis specified above is Consent;
- to lodge a complaint with the Information Commissioner's Office (after raising the issue with the Data Protection Officer first);
- to request access to your personal data;
- to data portability, where the legal basis specified above is:
  - (i) Consent; or
  - (ii) Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.



# **APPENDIX 1**

## **MIR Representation**

## **Aberdeenshire Local Development Plan 2021: Main Issues Report 2019**

### **Main Issues Report Response Form**

#### **Important Information: Please Read**

The Main Issues Report (MIR) is a key stage in preparing the Aberdeenshire Local Development Plan 2021 (LDP 2021). The MIR sets out options for how the LDP 2021 could be improved both in terms of the policies that Aberdeenshire Council will use to determine planning applications as well as identifying land allocations for development. The MIR has been published along with a Monitoring Report and Interim Environmental Report of the Strategic Environmental Assessment. These, along with other supporting documents are available at: <https://www.aberdeenshire.gov.uk/planning/plans-and-policies/ldp-2021/main-issues-report/>.

**Comments are sought on the MIR and Interim Environmental Report, or indeed any other matter that you feel that we need to consider, by 5pm on Monday, 8 April 2019.** Responses can be emailed to us at [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk) or received via post, Planning Policy Team, Infrastructure Services, Aberdeenshire Council, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

Please note that in order for comments to be considered as valid you must include your contact details.

We will use these details to confirm receipt of your comments and to seek clarification or request further information as required. Should you have any concerns regarding the holding of such information please contact [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk). Anonymous comments will not be considered as part of the consultation process. Petitions will only be noted in the name of the person submitting the document.

All comments received will be carefully assessed and will be used to inform the preparation of the Proposed Aberdeenshire Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in December 2019.

<b>Name</b>	[REDACTED]
<b>Organisation (optional)</b>	Ryden LLP
<b>On behalf of (if relevant)</b>	Drumrossie Land Development Company Limited
<b>Address</b>	[REDACTED]
<b>Postcode</b>	[REDACTED]
<b>Telephone (optional)</b>	[REDACTED]
<b>E-mail (optional)</b>	[REDACTED]

Doing things digitally is our preference. Tick the box if you are not happy to receive correspondence via email:

☐

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

☒

## Fair processing notice

Please tick to confirm your agreement to the following statements:

☒

By submitting a response to the consultation, I agree that Aberdeenshire Council can use the information provided in this form, including my personal data, as part of the review of the Aberdeenshire Local Development Plan. This will include consultation on the Main Issues Report (including any subsequent Proposed Plan).

I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037

### Your Data, Your Rights

You have got legal rights about the way Aberdeenshire Council handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data.

If you are unhappy with the way that Aberdeenshire Council or the Joint Data Controllers have processed your personal data then you do have the right to complain to the Information Commissioner's Officer, but you should raise the issue with the Data Protection Officers first. The Data Protection Officers can be contacted by writing to:

- [REDACTED], Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

If you have difficulty understanding this document and require a translation, or you need help reading this document (for example if you need it in a different format or in another language), please phone us on 01467 536230.



<b>Which document(s) are you commenting on?</b>	Main Issues Report	<input checked="" type="checkbox"/>
	Draft Proposed Aberdeenshire Local Development Plan	<input checked="" type="checkbox"/>
	Strategic Environmental Assessment Interim Environmental Assessment	<input type="checkbox"/>
	Other	<input type="checkbox"/>

## Your comments

### **Representation to the Aberdeenshire Local Development Plan 2021: Main Issues Report 2019 on behalf of Drumrossie Land Development Company Ltd**

#### **Land at Whiteford Road, Whiteford**

This representation is submitted on behalf of Drumrossie Land Development Company (Drumrossie) for their land interests at Whiteford Road, to the immediate west of the settlement boundary of Whiteford, Inverurie. The site was not previously pursued as a development bid as part of Aberdeenshire Council's Call for sites in 2018, therefore does not have a specific site reference within the MIR. The site does however benefit from an extant planning permission for the erection of three detached dwelling houses, which has partially been implemented on site and remains in perpetuity under Planning Ref: APP/2013/2710. This was confirmed by the Council's Development Management Service via email dated 17<sup>th</sup> August 2017 and a copy of the approved Site Layout Plan is attached at Appendix 1. This representation seeks an extension to the existing settlement boundary at Whiteford to encompass the land associated with this extant permission within the next LDP. The original ordnance survey Site Plan is attached at Appendix 2 identifying the extent of the site as approved under APP/2013/2710.

The site formed part of a previous allocation for residential development within the adopted Aberdeenshire Local Plan (ALP) 2006. It was identified as 'Site fh1' for 15 units to be delivered as future housing land in the period 2006-2015. A further site to the north east of Whiteford was also allocated for around 74 houses as 'Site eh1'. The subsequently adopted 2012 LDP removed both allocations, instead adopting a stance that the amenity of the settlement should be protected. In the intervening period between ALP and the 2012 LDP, two planning applications were pursued in 2011 for the site, APP/2011/1926 for the erection of 3 dwellings and APP/2011/1927 for the full 15 unit ALP allocation. Both applications were presented to Garioch Area Committee with a recommendation of approval by Officers on the 28<sup>th</sup> August 2012 with the former being approved as a slight departure from the then newly adopted 2012 LDP. The application for 15 units (APP/2011/1297) was however refused planning permission and subsequently dismissed at appeal by Scottish Ministers on the basis there was no related housing allocation for the site within the 2012 LDP.

Matters were progressed through a further application proposing three dwellings on site (APP/2013/2710), which was submitted to rationalise some of the more onerous requirements associated with APP/2011/1297, which flowed from the previous aspirations to pursue a larger scheme of 15 units. This permission has been partially implemented on site and therefore remains in perpetuity. In recognition of this extant permission, my client would kindly request that a small adjustment is made to the settlement boundary of Whiteford in cognisance of said implemented consent. This would require the Draft Proposed LDP to be amended to include the land outlined within the attached Site and Location Plans (Appendix 1 & 2). This adjustment should be carried forward to the Proposed LDP as the Council's settled view for a slightly revised settlement boundary for Whiteford, to be formally adopted within the next LDP. This is a typical approach adopted within previous LDPs to reflect committed development in and around settlements and should therefore be applied on the same basis at Whiteford.

Since approval and subsequent implementation of the consent for three dwellings, market conditions have dictated a slight delay in delivering the completed units on site. However as economic recovery is now being felt across the North East, full implementation can progress accordingly. Inclusion of the site within the settlement boundary will also provide greater flexibility for potential amendments to the scheme to adjust housetypes/tenure/layouts/designs etc, to suit renewed market conditions.

More recently, consideration of the continued implementation of the development on site has resulted in positive discussions with regard to the potential to deliver an affordable housing scheme on the site. This has included correspondence with the Council's Housing Strategy Team over a potential development of 12-15 affordable homes on the site and what the resultant Developer Obligations would be should a planning application be lodged for that development. Whilst the Housing Service were supportive of a proposal to deliver the site for a 100% affordable housing scheme, they intimated that under current Planning Policy, the Planning Service could not support such an application, as it would effectively fall within the Rural Countryside and associated policy stipulations contained within extant Policy RD2: Housing and employment elsewhere in the Countryside.

The Housing Team had also highlighted that interest in the site had been expressed by a Housing Association, who wished to explore the opportunity further. Positive discussions have subsequently taken place and are ongoing between Drumrossie and a number of active Housing Associations regarding the potential to deliver the site for affordable housing as a joint venture. Drumrossie recognise there is an acute demand for sites of this nature across Aberdeenshire to meet current affordable housing need, which is far outstripping supply.

In light of the feedback provided to Housing by the Planning Service, Drumrossie wish to pursue the site through the formal channels by way of a response to the LDP Review Process. As requested above, an extension to the existing settlement boundary to encompass the land associated with the extant planning

permission for the site would provide additional flexibility to accommodate an alternative delivery option / housing tenure for the site. This would allow for a future application proposing an affordable housing development to come forward and be addressed under LDP Policies on 'infill development' within established settlements, rather than more restrictive rural housing policy. Alternatively, the Council may wish to take this one step further and specifically allocate the site for a modest affordable housing development of 9 units within the next LDP. This would require the Proposed LDP to include the same modification to the settlement boundary as requested above, albeit with the benefit of an 'OP' allocation for 9 affordable housing units. Should such an allocation, or indeed inclusion of the site within the settlement boundary of Whiteford be secured within the next LDP, this would provide Drumrossie and an affordable housing partner the comfort to proceed with a formal planning application for the affordable housing development.

Development of affordable homes on site would respond directly to the matters identified within Main Issue 11 of the MIR, which acknowledges the chronic shortage of affordable housing across Aberdeenshire. The Proposed Strategic Development Plan 2018 suggests that Aberdeenshire Council have a requirement to deliver over 6000 affordable homes in the period 2020 to 2032, which equates to 35% of the overall housing land requirement. Current LDP Affordable Housing Policy requires that 25% of all housing sites should be affordable, with a preference being for on-site delivery of the affordable units. The Housing Needs and Demand Assessment (HNDA) highlights that 48% of all housing need is for affordable housing, with a general view that the development industry should be "*encouraged*" to deliver more than 25% of their sites as affordable, and this flows directly into the wording of the preferred option contained within Main Issue 11.

In reality however, this is not an easy task, as evidenced by the apparent lack of sites coming forward which propose more than 25% affordable housing provision. Therefore, this proposal to deliver the proposed site at Whiteford Road as an entirely affordable housing development of approximately 9 units should be embraced. The LDP Review provides Aberdeenshire Council the opportunity to "*encourage*" this site to come forward within the lifetime of the next LDP, through an appropriate allocation and related extension to the settlement boundary at Whiteford. The principle of development of the site for housing has already been established through the extant and partially implement permission for 3 standard market housing units. As such, there should be no concern over the provision of flexibility within the next LDP to accommodate a slightly higher density affordable scheme, which is clearly welcomed by the Council's Housing Service and could be delivered in the short term, given the positive discussions with Housing Associations. An indicative layout has been provided at Appendix 3, illustrating how the 9 units could easily be accommodated on site, with appropriate amenity and open space provision.

The site is free from infrastructure constraints and was previously identified as part of a larger allocation for the future expansion of Whiteford as part of a previous Local Plan. Additionally, delivery of these units would provide a significant opportunity to bolster the School Roll Forecasts for Logie Durno Primary School. The

School is currently operating well below its capacity at 60%, which is predicated to rise to around 69% by 2023, therefore more than sufficient capacity exists to accommodate the proposed development and support the continued provision of this rural Primary School service to the surrounding community. Whilst the MIR Settlement Statement for Whiteford suggests that a lack of primary school capacity is a constraint to future growth of the village, this is clearly not the case, particularly for a modest development of 9 affordable homes. The School Roll Forecasts indicate the operational capacity of the school to be 45 pupils, whilst presently there are only 26 pupils programmed into the 2019 Roll, leaving capacity for a further 18 pupils.

Similarly, the MIR Settlement Statement states flood risk as a further constraint for the village, however that would not be applicable for the proposed site. As has been highlighted, permission exists for the development of the site for 3 units, with no flood risk identified as part of the associated planning application process for that consent. Increasing the capacity of the site to accommodate 9 affordable units would have no increased risk of flooding as it would be developed within the approved boundary associated with the extant permission. As the Settlement Statement highlights, flood issues relate to the area to the south of the village, associated with the River Urie floodplain. The proposed site lies a considerable distance from this.

In summary, the proposed site at Whiteford Road should be included as part of the identified settlement boundary for Whiteford for the delivery of 9 affordable homes within the next LDP. This would require a slight extension to the current settlement boundary encompass to the land associated with implemented consent APP/2013/2710. The site sits immediately adjacent to the existing defined settlement boundary, has no associated constraints as confirmed through previous consented and partially implemented residential development. The site can be delivered in the short term and could accommodate an entirely affordable scheme, thereby meeting the wider aspirations contained within the MIR aimed at encouraging sites to deliver more than 25% affordable housing. In view of my client's aspirations to deliver the site as a development of 9 affordable homes, it is respectfully requested that a formal allocation be afforded to the site to reflect this within the next LDP.

**APPENDIX 1**



Berberis Darwinii.  
Berberis Gagnepanii.  
Brachyglottia Sunshine.  
Chamaeloma Japonica.  
Chiosya Ternata.  
Cotoneaster Lacteus.  
Rosa Rugosa.  
Rosa Rubrifolia.  
Olearia Haastii.  
Osmanthus Heterophyllus.  
Prunus Lusitanica.  
Viburnum Tibum.

11. As directed the landscape contractor shall be responsible for the maintenance of the planted and seeded areas during the 12 months defect liability period.

An area of 1.0m. dia. at the base of the tree shall be kept clear of all weeds and grass either mechanically or by using an approved herbicide.

Trees are to be inspected 3 times per year ( autumn, spring and winter ) to ensure stakes and guards are effective. Repair as necessary.

All trees which have been removed or found to be dying, diseased or damaged will be replaced by trees of a similar size and species to those originally planted. These are to be replaced as soon as seasonal weather conditions allow.

TREE PROTECTION  
FENCE DETAIL

- Existing foul sewer

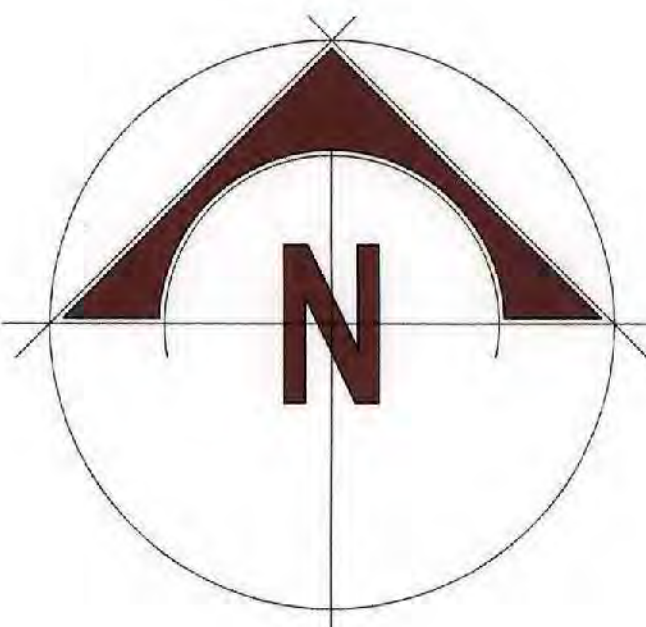
Note:  
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and must not be reproduced without the written consent of same.

**General Notes:**  
All information is to be checked on site prior to the commencement of any work and the ordering or fabrication of any components.

Any variation or decision required is to be referred back to this office for further consideration and the issuing of revised instructions.

This drawing is to be read in conjunction with all other information produced for this development including all information produced by the project Engineer.

Do not scale from from drawings. Where possible, large scale drawings take precedent over smaller scale drawings. If in doubt, please contact this office.



Dotted line indicates line — of tree protection fencing to be erected prior to the commencement of the works. See detail above for protection fence details.

The field is 1-1.5m below the trees growing along road verge

# S I T E L A Y O U T P L A N

10.01.14	<b>AMENDMENT</b>	DRAINAGE DETAILS ADD
----------	------------------	----------------------

**Supersedes plan dated**

14 JAN 2014

Project  
Residential Development at  
Whiteford Road, Whiteford,  
Inverurie by the Drumrossie  
Land Development Co.

Site Layout Plan.

Scale Date Drwg. No. Rev.  
1:500 Mar. 2014 FBD.360/500B

Alan G.W. Forbes M.C.I.A.T. I.C.I.O.B.  
CHARTERED ARCHITECTURAL TECHNOLOGIST



UKP SCANNED



**APPENDIX 2**

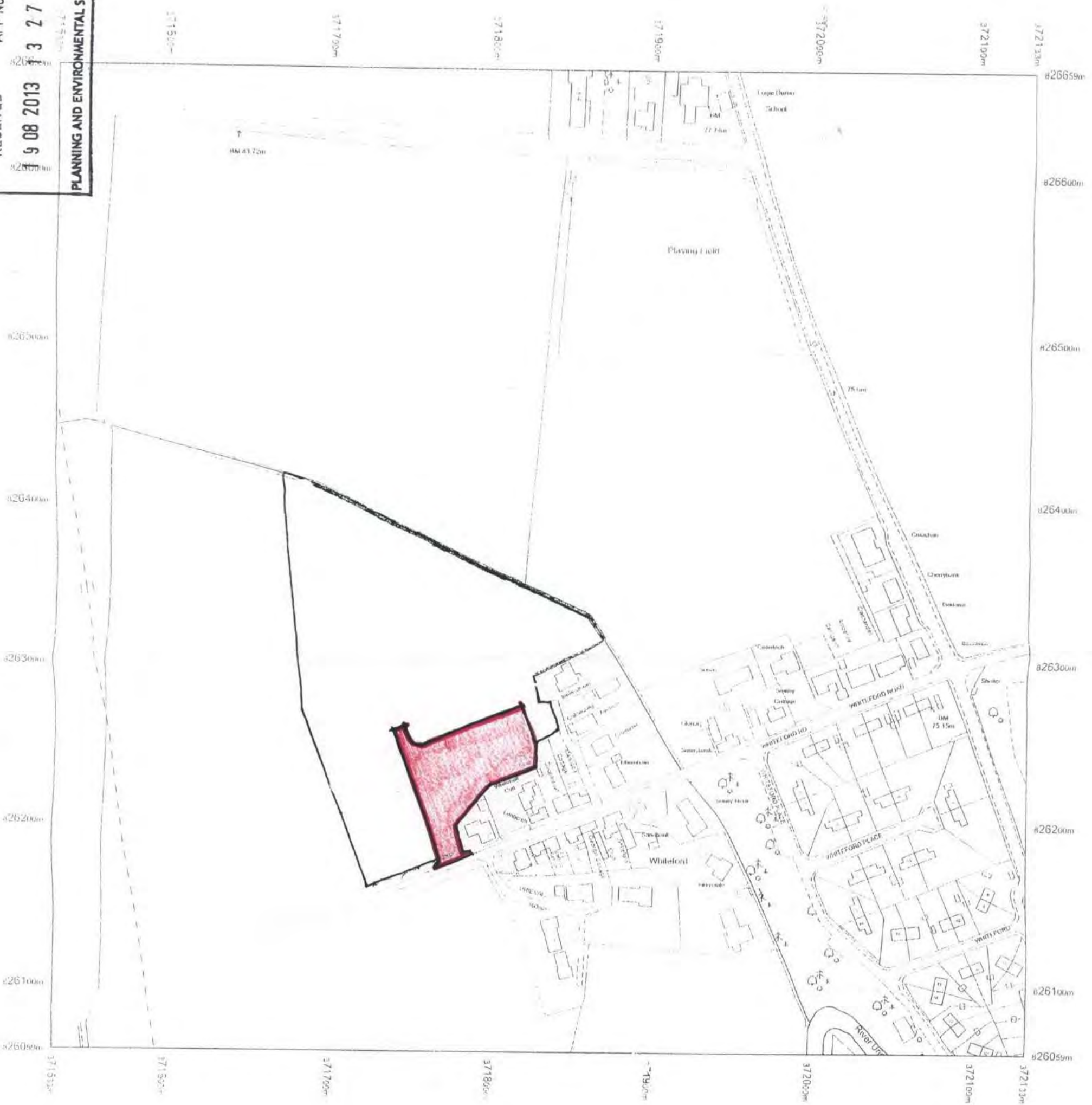
UNKIP SCANNED



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The representation of features as lines is no evidence of a property boundary



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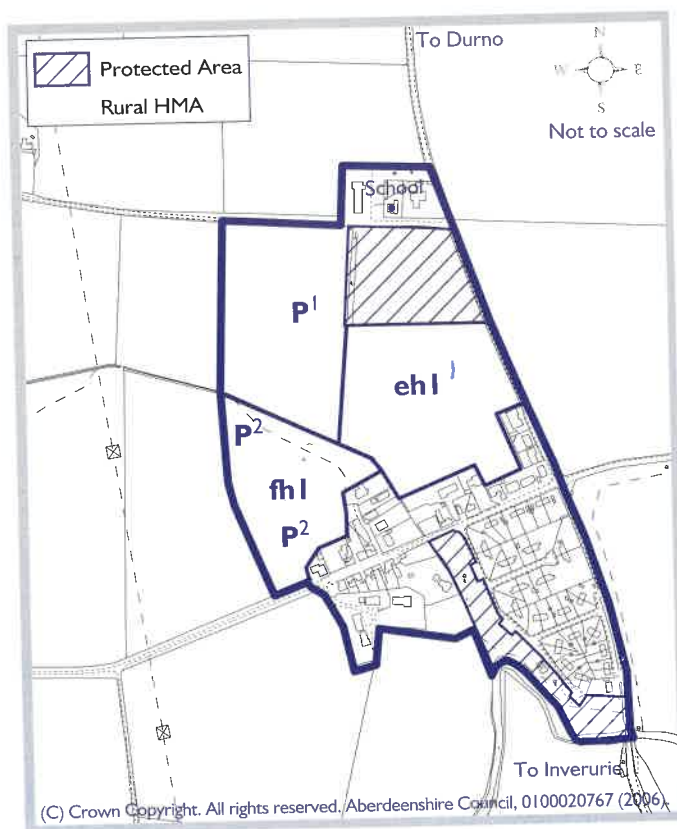
**APPENDIX 3**



Development Summary		
Houses		
3 or 4-bed affordable units	9	
<i>(Mix of unit sizes to be agreed in line with housing requirements)</i>		
Parking		
2 allocated spaces per dwelling		

Feasibility Site Layout - NTS

**APPENDIX 2**  
**2006 Local Plan Extract**



In Whiteford there is one main opportunity for new development.

- **Site eh1** is suitable for around 74 houses.

Three project areas are shown as **Site P1** (site for new school) & **Sites P2 & P3** (strategic landscaping).

Future housing land is shown as **Site fh1** (15).

**APPENDIX 3**

**School Roll Extract**

## Appendix 1 - 2019 Based School Roll Forecast

School	Area	Capacity	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	Current % Capacity	% Capacity 2024
<b>Meldrum Academy</b>	Formartine	980	990	<b>989</b>	993	1052	1062	1084	1071	1042	1021	956	101%	109%
Barthol Chapel	Formartine	50	33	<b>35</b>	27	24	21	20	20	19	15	16	70%	39%
Cultercullen	Formartine	75	52	<b>52</b>	56	64	67	73	76	73	73	69	69%	101%
Daviot	Formartine	120	104	<b>111</b>	104	97	97	96	93	93	91	86	93%	77%
Logie Durno	Garioch	45	26	<b>30</b>	31	30	34	35	36	37	38	37	67%	79%
Meldrum PS	Formartine	459	368	<b>393</b>	405	393	405	404	404	382	354	332	86%	88%
Methlick	Formartine	120	114	<b>103</b>	110	105	112	113	108	110	105	98	86%	90%
Old Rayne	Garioch	75	58	<b>59</b>	51	50	53	51	50	49	46	48	79%	67%
Pitmedden	Formartine	242	156	<b>146</b>	165	155	169	179	181	179	173	162	60%	75%
Rayne North	Garioch	74	66	<b>62</b>	60	58	58	51	53	54	50	49	84%	72%
Rothienorman	Formartine	150	137	<b>140</b>	148	132	138	140	133	136	130	122	93%	89%
Tarves	Formartine	217	129	<b>132</b>	143	153	149	169	168	160	150	138	61%	77%
Udny Green	Formartine	75	47	<b>55</b>	51	46	50	43	42	44	38	37	73%	56%
<b>Mintlaw Academy</b>	Buchan	900	796	<b>786</b>	807	837	868	867	846	833	795	759	87%	94%
Auchnagatt	Buchan	75	49	<b>53</b>	55	59	64	70	66	71	67	64	71%	88%
Fetterangus	Buchan	75	36	<b>41</b>	38	45	42	39	43	42	40	41	55%	58%
Kininmonth	Buchan	50	32	<b>31</b>	31	25	23	20	16	14	15	12	62%	31%
Longside	Buchan	217	155	<b>154</b>	155	143	148	155	158	158	155	147	71%	73%
Maud	Buchan	125	100	<b>96</b>	102	100	104	111	115	118	122	114	77%	92%
Mintlaw PS	Buchan	217	168	<b>170</b>	171	169	175	181	183	185	190	189	78%	84%
New Deer	Buchan	180	99	<b>104</b>	103	97	98	99	98	95	88	85	58%	54%
New Pitsligo & St John's	Buchan	155	120	<b>123</b>	110	102	98	99	94	87	80	76	79%	61%
Pitfour	Buchan	180	133	<b>124</b>	116	115	118	123	129	136	141	148	69%	71%
Strichen	Buchan	150	109	<b>116</b>	116	120	124	126	130	131	132	128	77%	87%
Stuartfield	Buchan	150	122	<b>123</b>	127	132	134	138	148	143	137	130	82%	99%
<b>Peterhead Academy</b>	Buchan	1700	1113	<b>1142</b>	1168	1230	1260	1298	1307	1292	1250	1186	67%	77%
Boddam	Buchan	217	135	<b>126</b>	123	126	120	124	116	109	106	105	58%	54%
Buchanhaven	Buchan	523	493	<b>468</b>	442	427	413	414	409	395	392	393	89%	78%
Burnhaven	Buchan	100	71	<b>58</b>	60	58	45	46	43	39	36	30	58%	43%
Clerkhill	Buchan	484	459	<b>468</b>	480	460	445	428	421	413	396	378	97%	87%
Dales Park	Buchan	317	205	<b>228</b>	265	304	359	382	404	407	406	392	72%	127%
Longhaven	Buchan	50	0	<b>0</b>	2	3	5	6	8	9	10	10	0%	16%
Meethill	Buchan	279	188	<b>190</b>	209	205	222	225	219	228	219	207	68%	78%
Peterhead Central	Buchan	300	182	<b>168</b>	176	181	183	184	188	193	193	185	56%	63%
Port Erroll	Buchan	242	120	<b>119</b>	122	124	141	149	151	147	147	148	49%	62%
St Fergus	Buchan	120	107	<b>113</b>	110	111	104	95	98	96	87	82	94%	82%

**APPENDIX 4**  
**SEPA Flood Map**

