

# 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 31 July 2020\*.

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

*\*UPDATE 16 June 2020: Consultation period was extended from 17 July 2020 for a further two-week period.*



## 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

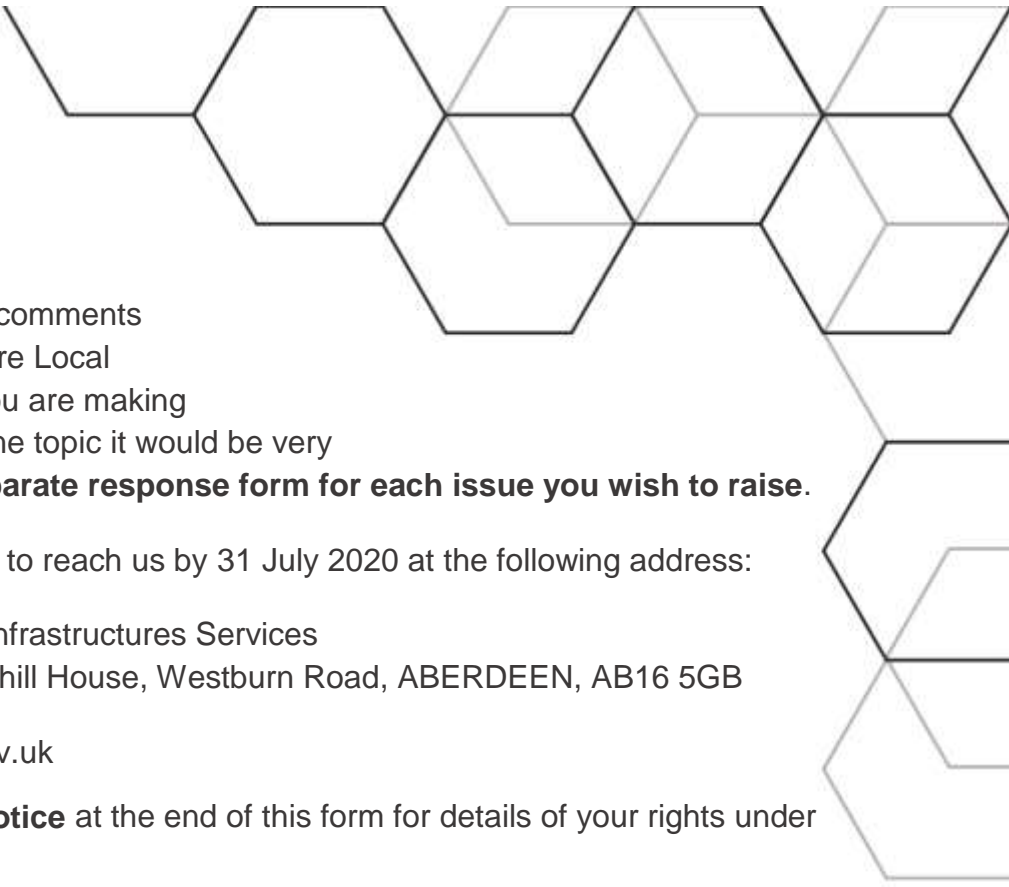
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If you wish to contact one of the area planning offices, please call 01467 534333 and ask for the relevant planning office or email [planning@aberdeenshire.gov.uk](mailto:planning@aberdeenshire.gov.uk).



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 31 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:	31/7/20
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?

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):

Please refer to attached Paper Apart.

**Reason for change:**

Please refer to attached Paper Apart.

# 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:

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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:

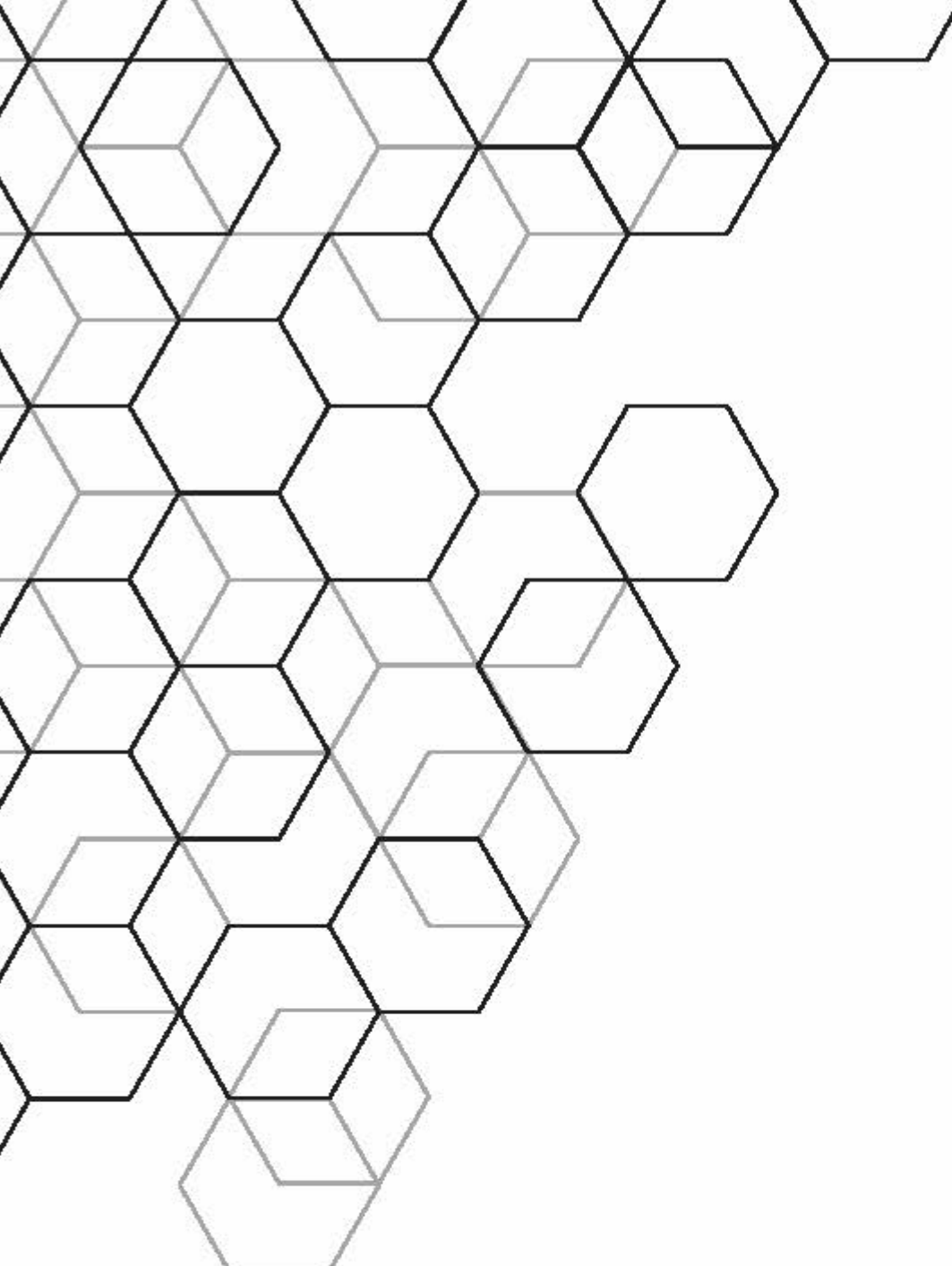
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue 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);
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- 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.



# Ryden



**Proposed Aberdeenshire Local Development Plan 2020**

**Representation on behalf of Barratt North Scotland**

**Paper Apart**

July 2020

## **PAPER APART**

# **Representations to the Proposed Aberdeenshire Local Development Plan 2020 on behalf of Barratt North Scotland**

### **Introduction**

Barratt North Scotland (Barratt) welcome the fact that Aberdeenshire Council have published their Proposed Local Development Plan (PLDP) 2020 with a view to it being progressed toward adoption in late 2021, following Examination in Public.

Barratt have reviewed the PLDP and acknowledge that the Spatial Strategy and Housing Allocations are derived from the Strategic Development Plan (SDP). However, along with a large portion of the development industry, Barratt maintain concerns over the status of the Housing land Supply across Aberdeenshire and the continued reliance on what is perceived to be the 'effective' supply of housing land to deliver the Housing Land Requirement set out within the SDP. Whilst it is acknowledged that some efforts have been made to 'augment' the existing supply through a number of new allocations, Barratt believes that additional new allocations must be made to further increase the supply of new homes. This is particularly crucial in moving to a 10 year LDP cycle, whereby ensuring a 5 year housing land supply at all times, as required by Scottish Planning Policy (SPP) could prove more difficult.

In that respect, Barratt, have pursued robust arguments to the Review of the SDP seeking a more ambitious Housing Supply Target, which would allow for additional allocations to be encompassed within the next LDP. Arguments were also made for a review of the Spatial Strategy, seeking inclusion of Westhill within a Strategic Growth Area, thereby allowing for substantial growth of the settlement in recognition of its success as a settlement and the contribution it makes to the regional economy. Separate, site / settlement specific representations have been lodged in respect of Barratt's land interest at Westhill, in addition to a number of relevant settlement statements contained within Appendix 7 of the PLDP.

Additionally, Barratt wish to comment a number of specific Policy matters. The following representations highlight the areas of concern, as well as the associated recommendations and changes which should be factored into the preparation of the Proposed LDP.



## Foreword

### Modification Proposed

Paragraph 4 of the Foreword suggests that, *“Only in exceptional circumstances, and with overriding material considerations, will we make decisions that do not follow the policies and land allocations in this Plan.”*

*This should be modified to read “**Planning decisions will be made in accordance with this Plan, unless material considerations indicate otherwise**”.*

### Reason for Modification

The reference to ‘exceptional circumstances’ is ambiguous, misleading and is not derived from policy or current legislation. Section 25 (1) of the Town and Country Planning (Scotland) Act 1997 (as amended) states

“Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination is, unless material considerations indicate otherwise – (a) to be made in accordance with that plan”

The proposed amended wording outlined above would bring the foreword in line with the provisions contained within the Act.

## Section 4 – The Purpose of the Local Development Plan and its Outcomes

### Modification Proposed

Paragraph 4.2 *‘To promote sustainable mixed communities with the highest standards of design’* should be updated to include a statement recognising the importance that the housebuilding industry makes to the creation of sustainable mixed communities, through the provision of new housing across Aberdeenshire.

### Reason for Modification

The housebuilding industry is at the forefront of creating sustainable mixed communities, through the provision of high quality new housing, creating new, as well as expanding existing communities through appropriate placemaking principles. Barratt is no exception, with both a national and local track record of delivering developments of the highest standards of design, creating great places to live that serve to enhance local communities for years to come. The purpose of the LDP must therefore recognise the importance the housebuilding industry makes to our economy and people’s lives. Barratt fully support the promotion of sustainable mixed communities as one of the key purposes of the Plan and its associated outcomes, however the explanatory paragraph must emphasise the role housing plays within the land use planning system, to achieve these aspirations.

Furthermore, construction jobs account for 8% of jobs in Aberdeenshire, some 8,000 jobs, the joint 4<sup>th</sup> highest share of any local authority in Scotland<sup>1</sup>. It is the joint 5<sup>th</sup> largest industry in the Aberdeenshire by employees<sup>2</sup>. Not all of these jobs are in homebuilding, but it is an important component. It is vital that the PLDP does not limit opportunities for the retention of and growth of jobs in the sector.

## **Section 5 – the Spatial Strategy**

### Modification Proposed

Table\_1 of Appendix 6 of the PLDP sets out the land supply which the Council has identified to address the SDP allowances. It claims a modest surplus of 80 dwellings in the Aberdeen Housing Market Area (AHMA) and a larger surplus of 577 dwellings in the Rural Housing Market Area (RHMA), giving an overall claimed surplus of 657 in Aberdeenshire. Barratt do not consider this is an accurate summary of the Council's land supply situation and consider that shortfalls exist in both HMA's and across Aberdeenshire.

Appendix 6 and 7 of the Proposed LDP should be revised to omit completed units (Built by Jan 2019) from all LDP 2021 allocations to provide a more accurate picture of allocations made from 2021 onwards. It is evident that this approach to double-counting completed units is inconsistent throughout the various settlements. The completed units omitted from the 'LDP 2021 allocations' as a result of this exercise should be re-allocated to sites(s) within their associated settlements as new allocations.

In the interests of maintaining a 5 year land supply at all times, as required by Scottish planning Policy (SPP), Barratt request a substantial review of the Council's Housing Land Supply position and request that additional sites are allocated which are effective and can be delivered over the lifecycle of the next Plan.

### Reason for Modification

Barratt do not consider that the PLDP and its supporting documents focus sufficiently on ensuring that new allocations are effective and will be deliverable over the PLDP period. Homes for Scotland (HfS) have undertaken an extensive review of the identified new housing land supply. This is included at Appendix 1. Their analysis shows that many of the new allocations identified as contributing to the SDP allowances are either sites which are constrained in the Housing Land Audit (HLA) or they comprise density increases to existing allocations, which in reality cannot become effective until such time as the existing allocations are built out.

As evidenced within Appendix 1, of the sites identified to meet the allowances across Aberdeenshire, 23% of these (measured by indicative capacity) appear to be wholly or in part sites identified as constrained in the 2019 HLA. This figure is 43% in the RHMA. Barratt do not consider that constrained sites should be counted towards the allowances. They cannot be relied upon to deliver new homes and

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<sup>1</sup> Nomis Labour Market Profile (2018 Data).  
<https://www.nomisweb.co.uk/reports/lmp/la/1946157406/report.aspx>

<sup>2</sup> ibid

were excluded from the land supply by the Reporter during the recent examination of the Proposed SDP.

When adjustments are made to remove non-effective sites there is a shortfall in allocations across Aberdeenshire and both HMAs. In HfS's analysis (Appendix 1) sites identified as constrained in the 2019 HLA have been removed, which have not been demonstrated to be effective and additional new/enlarged allocations which we do not consider to be capable of becoming effective. The impact of this upon the land supply situation is summarised in Table 1 below. The shortfalls are very concerning and can only be remedied through the allocation of additional, deliverable sites.

*Table 1 Summary of Land Supply Position (Courtesy of HfS)*

	SDP Allowance	Aberdeenshire Claimed New Supply	Aberdeenshire Surplus / Shortfall	HFS Supply	HFS Surplus/Shortfall
Aberdeenshire	5107	5764	657	3427	-1680
Rural HMA	2042	2619	577	794	-1248
Aberdeen HMA	3065	3145	80	2633	-432

Appendix 6 of the PLDP includes a column for units "Built by Jan 2019". For some of the allocated sites these completed units are included within the overall "LDP 2021 allocations" column, giving an inaccurate reflection of the scale of new development proposed. Additionally, this double-counting is not a consistent approach. Two examples of this contrasting and misleading approach are provided below:

- Within the Garioch Area (page 170) Inverurie site OP7 records 315 no. units being 'Built by Jan 2019', with 366 no. remaining effective – yet the "LDP 2021 Allocation" is for 681 no. units. This is misleading as there are only 366 units remaining.
- Conversely the OP2 allocation within Newmachar the "LDP 2021 Allocation" column reflects only the 95 no. effective units and does not include the 70 no. completed units recorded in the "Built by Jan 2019" column.

For clarity, the approach applied at Newmachar OP2 is correct and provides an accurate account of the scale of development proposed for the area from the proposed date of adoption (2021) onwards. Barratt believe that only the remaining effective/ constrained units should be reflected within the "LDP 2021 Allocation" column and a full review of Appendix 6 should be undertaken to correct LDP 2020 allocations which include units that are already complete.

## Section 5 - The Spatial Strategy- Aberdeen to Huntly SGA

### Modification Proposed

Paragraph 5.12 should be updated to provide clarity on where the previous strategic allocations at Huntly, which have been removed from the PLDP are to be reallocated. These should be redistributed to settlements identified for strategic growth or which demonstrate a significant demand for new housing, such as Westhill, rather than within the wider Rural Housing Market Area where demand is more limited.

Objection is also taken to the lack of a future growth direction for Inverurie and resultant ambiguity within the Proposed Plan, based upon concerns over the new A96 dualling route as a result of the following proposed wording, *“even once a preferred route is identified it would not be wise to promote development in this area until there is a confirmed completion date for the works to be undertaken. Currently we do not know when this is likely to be, either at Inverurie or Huntly, and this restricts opportunity for further development in this area. Development of existing opportunity sites and, where available, brownfield land remains the best solution to meet housing demand”*.

It is requested that Paragraph 5.12 is modified to read, *“Within the Aberdeen Housing Market Area the area identified for future strategic development options by the Strategic Development Plan, there is **uncertainty in the Aberdeen/Inverurie/Huntly Strategic Growth Areas regarding the proposed dualling of the A96. Whilst** currently we do not know when this is likely to be, either at Inverurie or Huntly, development of existing **and expanded** opportunity sites and, where available, brownfield land remains the best solution to meet housing demand **in the short term with longer term opportunities created when the dualling has completed. Where development proposals come forward in advance of the identification of a preferred route, they should safeguard the line of any proposed route.**”*

It is requested at the very least that future allocations are identified for the settlement, which could be unlocked subject to an interim review of the LDP and once progress has been made in selected a preferred dualling route.

### Reason for Modification

A number of allocated housing sites located within the settlement of Huntly, have consistently failed to deliver any housing over a number of consecutive LDPs. This has now been recognised, with officers proposing their removal from the PLDP (existing sites OP1 – OP5), which equates to a total of 671 homes. Factoring in the Proposed Plan allocations of 102 homes to Huntly, this would result in 569 homes being removed from the settlement. It is argued that these homes should be reallocated to the Strategic Growth Area [and settlements such as Westhill, where there is identified demand for housing. Instead it appears that the units have been reallocated to the wider Rural Housing Market Area, where there is more limited demand for housing.

Whilst it is accepted that there remains uncertainty over the future location and delivery of the proposed A96 bypass, given the strategic importance of Inverurie and demand for growth, it appears somewhat short-sighted to place an embargo on any substantial new sites coming forward within the next LDP. Considering the LDP will cover a period of 10 years from adoption in 2021, the apparent lack of direction for future growth in Inverurie is concerning, both for the development industry and the local community. It should be stressed that a number of public consultation events on the proposed Route Options Plan for the A96 dualling were presented towards the end of 2018. It is highly likely that a route will be selected and delivery programme outlined prior to the adoption of the next LDP. Options for future growth should have been identified as part of the MIR and contained within the Proposed LDP.

Additionally, the proposed LDP 2021 allocates only 259 new homes to Inverurie for the period 2020-2032, but includes 340 units which were complete prior to 2019, giving a false impression of the scale of proposed development. These 340 units should be re-allocated within the settlement to ensure there is a ready supply of housing for the key settlement in the SGA.

## **Section 5 – The Spatial Strategy - Aberdeen to Laurencekirk SGA**

### Modification Proposed

The following sentence at Paragraph 5.13 should be modified, *“The rate of growth in Chapelton has been unexpectedly slow and the local aspiration for a model town here is likely to be constrained unless significant new development land elsewhere in the corridor is restricted”*.

This should instead read, *“The rate of growth in Chapelton has been unexpectedly slow, **therefore substantial new allocations should be made to augment the supply of effective housing land within the corridor**”*.

### Reason for Modification

Whilst Barratt homes welcomes the fact that the Council recognise the rate of delivery of new homes at Chapelton have been slow, this should in no way be perceived as a barrier to the allocation of additional land either within that corridor, or other marketable locations where there is significant demand for housing, that is capable of being delivered through the next LDP. As encouraged by SPP, LDPs should identify a range of housing sites which are capable of becoming effective over the course of the Plan and emphasis a “sharp focus” on the deliverability of sites. Clearly Chapelton has failed to deliver anywhere near the anticipated numbers that were envisaged following its adoption within the 2012 LDP.

In that respect, 4,045 homes were allocated to Chapelton in the 2012 LDP, split over two plan periods. An initial allocation of 1,845 homes were allocated up to 2016, with the remaining 2,200 to be delivered by 2023. As confirmed by the 2019 HLA, 164 units have been delivered at an average of 40 units per annum since construction work began in 2015. Looking ahead over the next LDP plan period, even in a best case scenario delivering between 60 – 80 units per annum, the HLA predicts that the settlement

will have delivered around 1,184 units by 2032. That means that some 2,861 homes are not, and cannot be expected to become effective during the lifetime of the next plan. It is therefore maintained that this conflicts with the purpose of the LDP in delivering the housing allowances set within the SDP, as well as Paragraph 110 of Scottish Planning Policy (SPP), which requires a “**sharp focus on the delivery of allocated sites**”. This evident shortfall must be met through the allocation of additional sites, within marketable locations, that will deliver homes over the lifespan of the Plan.

Whilst the draft 2020 HLA does demonstrate an improvement in completions for 2019, some 106 units, in reality the bulk of these completions will be attributed to the one-off ‘Brio Retirement Living’ development, comprising 94 no. 1 bed and 2 bed apartments and cottages. This is unrepresentative of the wider development and as projected within the draft HLA, projected completions for 2020 and beyond drop significantly again to 60 units. It is also highly unlikely that level will have been achieved this year given lockdown restrictions due to Covid-19.

In view of the foregoing, Chapelton has benefited from restricted supply in this growth corridor for 8 years, thereby providing more than sufficient time to establish. It should therefore be accepted that the level of output from Chapelton has reached a point which reflects the delivery strategy for that development and has reached a level where further restrictions within the corridor through the next LDP will only serve to unnecessarily limit the range and locational choice of new homes in that area. Indeed, the SDP states that a range of sites need to be provided and it’s therefore completely unreasonable to present Chapelton as the only option to homebuyers looking for a new home. In reality the location will not appeal to or satisfy all household needs.

The most recent Housing Needs and Demand Assessment (HNDA) estimated that affordable housing need across Aberdeen and Aberdeenshire is likely to be in excess of 48% of all need. This was also noted in the Main Issues Report (MIR). The Council’s strategy places a heavy reliance on an average 25% of housing being delivered on allocated sites to be affordable. The largest allocation within the Aberdeen to Laurencekirk SGA at Chapelton is only providing a total of 13% affordable housing across the approved site area. Furthermore, under the terms of the planning consent no, affordable housing is required within phase 1 of development, and only 10% is to be delivered in phase 2.

Additional housing sites should therefore be allocated within the SGA to address these shortfalls and the evident lack of affordable housing delivery in the short term. A strategic reserve housing land allocation, with a draw-down mechanism would offer a suitable mechanism to address instances where there is evidence of under-delivery. Officers supported the inclusions of strategic reserve (Future Opportunity (FOP)) sites at MIR stage. Barratt maintain these allocations should be reintroduced into the next Plan. Further details in respect of FOP sites are provided under Section 8 below.

## Section 5 - The Spatial Strategy- Other Locations in Aberdeenshire

### Modification Proposed

Paragraph 5.15 of the Proposed LDP, *“Development in Westhill remains stalled until transport assessments are undertaken over the next few years and the Regional Transport Strategy identifies the nature of a solution that may be required to allow further development to take place in the town”*, should be amended.

This should instead read, ***“Further Development in Westhill shall be considered as part of a review of the Spatial Strategy within the first 5 years of the plan, per the commitment set out within the Strategic Development Plan. Accordingly, transport assessments shall undertaken to inform the Regional Transport Strategy and identify the nature of a solution that may be required to allow further substantial development to take place in the town following an interim review of the Plan”***

### Reason for Modification

Barratt, along with the wider development industry, provided robust arguments to the preparation of the PSDP that Westhill should be afforded Strategic Growth Area (SGA) status. This was in recognition of the contribution the settlement makes to the regional economy, its thriving business and employment sector, continued demand for growth through new housing and its proximity to excellent transport links, including the recently opened AWPR. Disappointingly, due to perceived concerns over the capacity of the existing transport network to absorb strategic levels of growth, neither the PSDP nor the more recently published Examination Report from the Reporter have elected to provide Westhill with the Strategic Growth status it deserves. Instead, it continues to remain within an area designated for 'local growth and diversification.

Paragraph 8.7 of the PSDP commits to undertake a review of the Spatial Strategy and consideration as to the potential for changes to be made to the existing SGAs, with specific reference made to the corridor west of Aberdeen. It specifies a range of studies will be undertaken over the first five years of the Plan, including assessments of the impact of the AWPR to inform a review of the SGAs. Indeed, the Reporter acknowledged the Council's commitment to this review within their Examination Report for the PSDP. This commitment is welcomed by Barratt, however it is requested that this undertaking is reflected more strongly within the Proposed LDP. The present wording in Paragraph 5.15 (page 19) of the Proposed LDP only makes a sweeping reference to this, *“Development in Westhill remains stalled until transport assessments are undertaken over the next few years and the Regional Transport Strategy identifies the nature of a solution that may be required to allow further development to take place in the town”*. It is hereby requested that this is reinforced, to reflect the strong commitment as stipulated within the PSDP, thereby allowing for further growth of the settlement following an interim review of the LDP.

Barratt have submitted a separate, related representations to the Westhill Settlement Statement in respect of their substantial land interests at Westhill West.

## **Section 8 – Shaping Homes and Housing – Policy H1 Housing Land**

### Modification Proposed

Policy H1 should be modified to include further provision at 'H1.4' for the identification of Strategic Reserve housing allocations, thereby allowing for the reintroduction of Future Opportunity 'FOP' Sites into the next Plan, as were originally planned for at Main Issued Report (MIR) stage. The policy wording should highlight the identification of future allocations within Appendix 6 – Housing Land Allocations and Appendix 7 Settlement Statements for the post 2032 Plan Period. It should allow for an early draw down mechanism should there be any identified shortfall in the 5 year housing land supply or other circumstances, such as further stalling of allocated sites and subject to an interim review of the LDP.

### Reason for Modification

Future Opportunity ('FOP') sites had been identified at MIR stage, clearly setting out where Officers determined to be the future growth direction of settlements. This was generally welcomed by the development industry, a position that was shared and fully supported by Barratt. A draft version of the Proposed Plan, published at MIR stage contained settlement maps which identified the future opportunity sites as 'FOP' sites. These were described within the Draft Glossary as, *"Future opportunity site "FOP": Land identified as a possible future development land allocation. Land subject to this designation are not available for immediate development and will be reassessed at such time as the Local Development Plan is reviewed"*.

In the intervening period between publishing the MIR and approval of the proposed Plan for consultation, Officers have chosen to remove the sites which had been identified for future growth/strategic reserve. Within the published MIR Issues and Actions Paper, under Issue 8 – Shaping Homes and Housing, Officers highlight that they envisaged strategic reserve housing sites would be afforded a 'protected' status, safeguarded for residential use, but with a clear distinction that they could not be brought forward before an interim review of the LDP. This would have generally accorded with Paragraph 4.15 of the Proposed Strategic Development Plan, which allows for the identification of Strategic Reserve housing land. Officers however argue that this is not mandatory and there is a 'fear' that Strategic Reserve sites could be *"drawn down prematurely"*.

Barratt hereby object in principle to the removal of the Strategic Reserve / FOP sites and argue that this introduces a degree of ambiguity to the Proposed Plan, both for the development industry and local communities as to the future growth direction for settlements. Identification of the longer term growth strategy for settlements is deemed to be even more crucial as the next LDP will be adopted for a period of 10 years, as opposed to the previous 5 year period subject to the extant and former plans. Ensuring a 5 year land supply at all times could therefore prove more difficult within a 10 year cycle, particularly



in the latter stages of the lifetime of the Plan. FOP sites would provide the local authority the flexibility to review the delivery of allocations and overall housing land supply position, with the option to draw down on strategic reserve sites following an interim review of the Plan, should there be an undersupply identified. Fears that sites could be drawn down early are overstated, when in reality, any application lodged prematurely would be contrary to the Plan. Accordingly, in the interests of transparency and to ensure consistency with the SDP, it is argued that this approach should be carried forward into the adopted LDP.

## **Section 8 – Shaping Homes and Housing – Policy H2 Affordable Housing**

### Modification Proposed

The first sentence of paragraph H2.2 should be amended to:

- a) Remove the term “**must include**” as the wording does not strictly reflect Scottish Planning Policy. The word “**only**” should be removed from the penultimate sentence. It places unnecessary emphasis on the requirement to justify less than the 25% benchmark.
- b) Remove the term “**25% of the serviced plots**” and replace with “**25% of the total number of houses**”, to align with SPP.

Footnote 3 is an advisory note aimed at the development industry in respect of Affordable Housing filters applied within the Housing Need and Demand Assessment. It serves no policy purpose and should be removed.

### Reason for Modification

The PLDP should be more proactive in the delivery of affordable housing. Greater emphasis should be given to the allocation of specific sites for affordable housing and in particular, surplus Local Authority owned land or buildings should be identified for affordable housing as advocated by Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits.

The finer details of the delivery mechanisms and circumstances whereby a lower contribution will be accepted should form part of the adopted LDP e.g. within an associated Appendix, as opposed to non-statutory Planning Advice.

Barratt generally agree with PLDP approach, which carries forward Policy H2 from the extant 2017 LDP and seeks a benchmark 25% affordable housing requirement from sites of 4 units or more; this remains broadly in line with SPP. The wording of Policy H2 should however be amended to provide sufficient flexibility for a reduction in exceptional circumstances. It is noted that further Planning Advice will be forthcoming setting out the detail of the forms affordable housing can take and the circumstances whereby a lower contribution or alternatives to on-site can be made. It is disappointing that this is not yet available for comment, given the extant LDP contains such information as adopted Supplementary Guidance to the Plan.

The provision of affordable housing continues to rely too heavily on the delivery of mainstream housing from the development industry, with the onus placed on landowners to make land available for development. If an unacceptable burden is placed on land values there is likely to be a reluctance on the part of landowners to release land for development. It can also create funding concerns and uncertainty for RSLs, which often restricts their ability to progress affordable housing delivery. As such, there requires to be greater flexibility in approach to delivery, which should be clearly articulated within the LDP.

Off-site provision should be viewed as acceptable as onsite provision. In many instances, it is simply not viable to provide affordable housing on-site. For example, the factoring costs for shared amenities and open space provision are often not capable of being met by RSLs or the occupiers of affordable housing. Sufficient flexibility and support for delivery across all mechanisms, whether on-site, off-site or commuted payments, should be provided depending on the circumstance. The key is the delivery of affordable housing in areas of need. Off-site provision and Commuted sums can therefore play a vital role in the delivery of affordable housing, acting as a catalyst for delivery on specific sites. Accordingly, there should be a wider acceptance of the benefit of all forms of affordable housing delivery mechanisms, not the current overreliance on developers to meet 25% delivery on-site.

With regard to other measures the Council could consider to assist with the delivery of Affordable Housing, the LDP should seek to be more pro-active in terms of identifying and allocating specific sites for affordable housing. Planning Advice Note 2/2010 promotes four additional or alternative means of delivering affordable housing, which could be considered by Planning Authorities. These include:

1. *Allocating new sites in Local Development Plans specifically for affordable housing.*
2. *Identifying plots for self-build dwellings.*
3. *Using Compulsory Purchase powers to support the delivery of a new supply and regeneration.*
4. *Making appropriate surplus Local Authority land or buildings available for affordable housing.*

Given the mechanisms available to Aberdeenshire Council as set out above, this should be reflected through the Local Development Plan, as an alternative to the current blanket 25% approach across all sites and could serve to enhance the levels of affordable housing being delivered across Aberdeenshire. In that regard, specific sites should be identified for the provision of affordable housing along with the preferred method by which they will be delivered. The alternatives also clearly support the principle of off-site provision, which should be better reflected in the Policy of the next LDP. In that respect, footnote 3 should be removed and replaced with tangible policy mechanisms placing greater emphasis on the local authority to proactively increase supply.

Any review of the existing commuted sums figures and the low cost home ownership benchmark should be undertaken in consultation with the development industry and the appropriate forum for that is through the Development Plan process, not through the publication of non-statutory planning advice at a later date. It must be emphasised that any figure used should be for the duration of the Plan and not be subject to further increases, without a full and informed consultation with the housebuilding industry.

Barratt also feels that the existing benchmark figures need to be reviewed to reflect a continuing surge in build costs, infrastructure contributions and developer obligations.

## **Section 9 – Shaping Places – Policy P1: Layout, Siting and Design**

### Modification Sought

Paragraph P1.1 which stipulates that all residential proposals that fall within the category of a major development will be required to participate in a 'Design Review Process', lacks clarity, is unjustified, will create unnecessary delays and should therefore be removed from the PLDP.

Paragraph P1.2 should be amended to increase the number of homes from more than 50 to '**more than 200**' before it would merit the provision of a formal Masterplan. It should also remove the phrase "*deemed appropriate*".

In line with the modifications sought under Paragraph P1.2, for increasing the thresholds for the requirement to prepare a masterplan from 50 units to 200 units, should any Design Review Process be introduced as a policy requirement, it would be more appropriate to tie it into the masterplanning process itself, rather than a separate process / requirement.

The wording contained within the footnote on page 47 doesn't appear to make any sense and should therefore be omitted. Assuming that "or" is a typo and the footnote is meant to read "*for sites requiring a Development Framework or Masterplan, they must be subject to public consultation which has been agreed by the Local Area Committee in advance of determining a planning application.*" Committee agreement of public consultation is unnecessary, would add undue bureaucracy and delay, yet no value to the process.

### Reason for Modification

Suggestion that all new major residential development applications will be required to participate in a Design Review Process is too onerous and places an undue burden on the housebuilding industry. It will undoubtedly lead to further delays in the processing of planning applications and will lead to consultation fatigue, given the existing requirements for statutory public consultation, major pre-application meetings and detailed master planning of major development proposals.

The policy contains a distinct lack of detail or guidance on how this process would operate. Barratt would note that a Design Review Panel previously operated across both the City and Shire, however this was on an ad-hoc basis and Barratt understand that the Panel no longer functions due to lack of interest / demand. It therefore seems odd to introduce new policy provision within the next LDP in respect of a previously tried and failed process.

Barratt maintain that the planning system in Scotland already places a significant emphasis on the creation of high-quality places through a design-led approach. This strong emphasis is enshrined in national policy, including SPP, Creating Places and Designing Streets, all of which filter into

placemaking policies and guidance at a local level. Officers within the Council and relevant consultees should have the skills set and knowledge to assess major residential applications against these policies, without reliance on third party assessment as part of any Design Review Panel. Such provision may be reserved for particularly sensitive sites, or developments of a strategic nature, which are likely to have wider cross-boundary implications, however introducing a blanket policy which requires such reviews for all major residential developments should be resisted.

Barratt also object to the policy on masterplanning. In practice the masterplanning regime in Aberdeenshire creates a two-step consent process which has no basis in legislation and is inconsistent with creating a streamlined planning system. It requires applicants to first secure approval at committee for a site masterplan and then proceed with pre-application consultation followed by a planning application. This is unnecessary and is not an optimal use of officers' or the applicants' time. For most sites design can be fully addressed through a combination of statutory pre-application consultation, a Design and Access Statement (DAS) and the scrutiny given to proposed developments at application stage.

There may be a benefit in this approach in some limited circumstances but the proposed policy would apply this two-step consent process to all major applications. This represents clear mission creep for a practice which was brought in specifically to deal with large strategic allocations in the 2012 Plan. Whilst the masterplanning process may have continued benefits in setting a framework for large sites which will be delivered over multiple phases or by multiple owners. Outside of these circumstances the masterplanning process is a time consuming (for all parties) duplication of what is already necessary as part of the statutory pre-application process and application documentation (e.g. the DAS).

Often Area Committees when considering masterplans have an increasing tendency to seek more detail and comfort on other aspects of proposals, far beyond the high level design work one would expect in a masterplan. This is unnecessary and time consuming, there is no justification in legislation for widespread use of this preliminary quasi planning consent on all major developments and is not in the best interests of a streamlined planning system that creates the optimum conditions for housing delivery. Additionally, despite these ever-increasing requirements, there is no right of appeal should an Area Committee decline to approve a Masterplan.

The phrase 'deemed appropriate by the Planning Authority' is an unreasonable catch all which creates unnecessary uncertainty. The PLDP is the opportunity to set out clearly what it deems to be appropriate. It is not in the interests of a plan led approach to withhold this information to a later date and potentially surprise applicants.

## Section 9 – Shaping Places – Policy P2: Layout, Siting and Design

### Modification Sought

Paragraph P2.2 should be amended to remove specific reference to 40%, as a general requirement for all major development. Instead it should require a **'sufficient degree'** of public open space and go on as currently worded to highlighted that, *"in each case the actual proportion will take account of the location, function and characteristics of the development proposal and site; the function of the open space proposed; and, where appropriate, the function and characteristics of existing open space in the area"*.

Similarly, the same ethos should be applied at Paragraph P2.3, thereby removing specific reference to "at least 120m<sup>2</sup>" in respect of allocated or windfall sites of less than 50 homes.

### Reason for Modification

Aberdeenshire is primarily a rural area, where residents have relatively easy access to vast areas of coast, countryside and woodlands. For this reason, a **"one size fits all"** approach is inappropriate and the Policy should be more targeted towards those communities where there is an identified shortfall or they lack access to areas of countryside for public enjoyment. Each site and settlement is different in nature and whilst the Policy wording recognises this to an extent, specifying strict amounts on the basis of a 40% requirement for sites in excess of 50 units and 120m<sup>2</sup> for those below contradicts a more flexible approach. It also fails to take account of the commercial basis of land and property development. The burden placed on landowners and developers is compounded when the requirements for affordable housing and developer obligations are factored in. These burdens will have an inevitable impact on the delivery of both mainstream and affordable housing. In addition to the provision of public open space land will also be lost to accommodate distributor roads, community facilities etc., which factored together, could render sites unviable.

The requirements also conflict with other Planning Policy aims, such as the efficient use of land and the creation of sustainable mixed communities, where a mix of house types and affordable housing are to be provided. The requirement could also prejudice the Strategic Development Plan target for a density of 30 dwellings per hectare in Strategic Growth Areas, or indeed Aberdeenshire Council's drive to achieve circa 25 units per hectare on other sites. A more reasonable approach would be for Masterplans, Design and Access Statements and Design Statements to inform the final open space requirements across housing sites, rather than a rigid figure.

Barratt notes the approach proposed by the Council to increase densities across allocated and new sites from an average of 22 units to 25 units per hectare. Whilst this may be appropriate as an upper limit for settlements within close proximity to Aberdeen and in the AHMA, a blanket application of this density across Aberdeenshire is unrealistic and could present conflicts with the unique characteristics of certain settlements and specific sites. As outlined above, similar to the overall provision of open space, final site densities should be left to Masterplans, Design and Access Statements or Design Statements to dictate the final layout and densities of housing sites.

## Section 13 – Climate Change – Policy C1 Using Resources in Buildings

### Modification Sought

Policy C1 should be substantially re-written to focus only on those matters which can be directly influenced or delivered by the planning system. Specifically, the silver and gold standards for emissions and water should be removed from policy and left to the building standards regulatory framework, which is set to be updated over the next year.

### Reason for Modification

Barratt recognise the importance of addressing climate change, however, the requirements set out in Policy C1 – Using Resources in Buildings are too onerous, are not directly reflected within SPP and should, therefore, be more appropriately addressed through stringent Building Regulations rather than through the policies of the Local Development Plan, which should instead focus on directing the appropriate management of the use of land. The requirements for carbon reduction and the calculation of those reductions are a complex requirement and meeting these requirements at pre-planning stage is not necessary. The Policy is in effect stipulating similar measures as implemented through building warrant regulations which results in a duplication of work and relates to information that Planners are not appropriately qualified to assess

The requirement to install low and zero carbon generating technologies in new residential developments does not flow directly from SPP. Instead, SPP encourages Local Development Plans to take a more holistic view through, for example, heat mapping to identify the potential for co-location of developments with a high heat demand with sources of heat supply. It advises that heat demand sites for particular consideration include high density developments, communities off the gas grid, fuel poor areas and anchor developments, such as hospitals, schools, leisure centres and heat intensive industry. The onus is, therefore, on the planning authority through their Local Development Plans to be more proactive in terms of identifying opportunities for co-location of development

Barratt maintains that a **“fabric first”** approach should be adopted ahead of the requirement to install low and zero carbon generating technologies. Such technologies are often unproven and add significantly to the cost of development, when other, more efficient methods can deliver the required carbon reduction. This can further exacerbate viability issues for sites which already experience substantial development costs. Furthermore, the development industry is at the forefront of delivering sustainable and energy efficient new homes. The Council should instead focus of measures to implement schemes to improve older housing stock across Aberdeenshire, which are much less energy efficient.

Similarly, and in regard to water efficiency measures are more appropriately controlled through Building Regulations rather than through the Local Development Plan, which essentially controls the use of land.

The Scottish Building Regulations are due to be updated in 2021, therefore the requirements sought through the references to 'silver' and 'gold' levels in the proposed policy will become outdated almost immediately. Conversely, the PLDP references only '*current Scottish building regulations*' and as such, it is unreasonable to require an industry to achieve levels which are yet to be determined by the relevant authority.

## **Section 12 – Protecting Resources - Policy PR1 Protecting Important Resources**

### Modification Sought

Policy PR1 as worded is overly restrictive, it should be reworded as per the following, to allow the Planning Service to undertake a balanced assessment of a development,

*“Developments that have a negative effect on important environmental resources associated with air quality, the water environment, important mineral deposits, prime agricultural land, peat and other carbon rich soils, open space, and important trees and woodland, will only be permitted when public economic or social benefits outweigh any negative effects on the protected resource or it has been demonstrated that appropriate mitigation can be put in place to address any impacts.”*

### Reason for Modification

The policy as currently worded is too restrictive and suggests that any development that presents a detrimental impact on this listed environmental resources will be refused. In reality, developments of any scale has the potential to have an impact on said resources. However, the planning application process offers the applicant the opportunity to demonstrate that these impacts can be suitably mitigated against or that wider material considerations, such as economic and social benefits can often outweigh such impacts. The wording should be amended as per the above to provide clarity and remove the negative wording as per the suggested wording in the PLDP.

## **Section 14 – The Responsibilities of Developers – Policy RD1 Providing Suitable Services**

### Modification Sought

Paragraph RD1.1 should be updated to read, *“We will only allow development that provides adequate road connections, waste management collections, water supply or wastewater connections and treatment as appropriate. **Consideration should also be given to the provision of vehicle charging points (including hydrogen fuel stations where appropriate)**”*.

Paragraph RD1.4 should be amended to read, *“Development must be close to existing public transport services (if available) or deliver proportionate improvements to public transport services, in scale with the development. Where there is no or limited services, the developer may be required to contribute proportionately to service extensions or improvements to the closest public transport hub”*

The opening sentence of RD1.5 should be amended to, “*all developments must include formal lit footway connections on land within their control, up to the boundary with adjacent development...*”

RD1.6 should be modified to increase the number of homes which be accessed via private road from 6 to 12.

#### Reason for Modification

Barratt wish to highlight their concern in respect of the opening wording of the policy in Paragraph RD1.1, which appears to conflict with the subsequent wording of Paragraph RD1.2. The present wording would suggest that development will only be allowed if it provides electric vehicle charging infrastructure. This would place a significant financial burden on the housebuilding industry in addition to concerns in relation to the capacity of the existing network to accommodate an unknown and potentially significant increase in new demand. However, when reading on to Paragraph RD1.2 dealing specifically with Vehicle Charging Points, it highlights that new home designs should consider including at least one charging point. Crucially it acknowledges that this may not always be appropriate to the design of the property and therefore remains ‘discretionary’.

Barratt supports this discretionary approach, to ensure housing and other development sites are adaptable to allow the fitting of renewable technologies where appropriate and where there is a demand, rather than a blanket policy approach requiring all new housing developments to include such technology, which at present is expensive and will likely become outdated as technologies continue to advance rapidly. This would provide greater flexibility to consider existing capacity and timescales for necessary grid upgrading and advancements in technology, ensuring that the LDP remains adaptable to change and avoid any potential duplication or conflict with regulations coming through under new Building Standards Accordingly, a slight modification is proposed to the opening paragraph that would better align with the intended policy approach.

The development industry should not be expected to ‘fund’ major improvements to pre-existing infrastructure deficits. The current wording of the policy could be deemed contrary to Circular 3/2012. Instead, where public transport provision is not available in close proximity to a development site, then it would be more appropriate to seek proportionate contributions from developers toward identified improvements.

An increase in the number of properties which can access to a private road from 6 to 12 homes, would provide additional flexibility within housing layouts. As well as supporting smaller scale housebuilders, it would also benefit larger sites, whereby there are often small development pockets that would benefit from an easing of such restrictions, rather than more onerous roads adoption requirements.



## Section 14 – The Responsibilities of Developers – Policy RD2 Developer Obligations

### Modification Sought

Given the intended removal of Supplementary Guidance from the next LDP, the exact methodologies for calculating the specific Developer Contributions should be included within the Plan. This should form a detailed Appendix titled ‘Developer Obligations’ which would form part of the adopted LDP.

Paragraphs RD2.7 – RD2.16 should be modified to provide consistent wording, replacing “we will need contributions” with “***we may need contributions***”.

### Reason for Modification

Barratt would maintain concern over the lack of detail provided on the methodologies to be used by the Council in calculating developer obligations in relation to proposed housing development. At present under the extant LDP, these methodologies are to an extent outlined within associated Supplementary Guidance (SG) which forms part of the Development Plan. Whilst Barratt do not object to the general principle of removing Supplementary Guidance from the Plan, in accordance with the provisions of the new Planning (Scotland) Act 2019, replacing the current Developer Obligations SG with non-statutory ‘Planning Advice’ is unacceptable. Planning Advice does not form part of the adopted Plan, therefore its materiality as a basis for calculating financial mitigation requirements to fund infrastructure improvements could be seriously questioned.

Considering the ever growing list of services and infrastructure which developers are expected to contribute to, which ultimately impacts on the viability of development projects and often results in long and protracted negotiations and significant and unnecessary delays through the preparation of associated S75 Agreements, greater transparency is required in relation to the methodologies used for calculating the cost of providing community infrastructure. It is imperative that this is enshrined within the LDP, hence the suggestion that it forms an appropriate Appendix to the Policy, rather than separate, unadopted Planning Advice. The methodologies have not therefore been subject to sufficient scrutiny through the preparation of the Proposed Plan and Barratt would maintain their objection to this.

Furthermore, the existing wording prescribed under each individual infrastructure heading within paragraphs RD2.7 through RD2.16 require to be updated to ensure consistency of the language used. The present wording in relation to a number of the specific areas of infrastructure suggests that all development will be required to contribute. For example RD2.7, “*We will need contributions to make transportation improvements...*” However, in reality this will not apply to all development and only in those circumstances where there is an identified need and the contribution required, relates in scale and in kind to the proposed development in line with Circular 3/2012. Accordingly, it is suggested that the wording utilised at RD2.14, 2.15 and 2.16 is more appropriate as the wording here instead suggests that contributions ‘***may***’ be required. It is therefore requested that this is applied throughout the provisions of the policy.

Appendix 1: Homes for Scotland Land Supply Analysis

Table 1 - Summary

	SDP Allowance	Aberdeenshire Claimed New Sup	Aberdeenshire Surpl	HFS Supply	HFS Suplus/Shortfall
Aberdeenshire	5107	5764	657	3427	-1680
Rural HMA	2042	2619	577	794	-1248
Aberdeen HMA	3065	3145	80	2633	-432

Table 2 - Summary of HFS Allowances Review

Aberdeen HMA	Allocations
Formartine Supply (Council)	1315
Garioch Supply (Council)	1096
Kincardine and Mearns Supply (Council)	557
Marr Supply (Council)	177
<b>Aberdeenshire Total New Land Supply Allowance</b>	<b>3145</b>
<b>Aberdeenshire Surplus / Shortfall</b>	<b>80</b>
Total Dwellings HFS Considers Constrained / Not Effective*	512
<b>HFS Total New Land Supply*</b>	<b>2633</b>
<b>HFS Surplus / Shortfall*</b>	<b>-432</b>

Rural HMA	Allocations
Banff and Buchan Supply (Council)	906
Buchan Supply (Council)	400
Formartine Supply (Council)	691
Garioch Supply (Council)	22
Kincardine and Mearns Supply (Council)	283
Marr Supply (Council)	317
<b>Aberdeenshire Total New Land Supply Allowance</b>	<b>2042</b>
<b>Aberdeenshire Surplus / Shortfall</b>	<b>577</b>
Total Dwellings HFS Considers Constrained / Not Effective*	1825
<b>HFS Total New Land Supply*</b>	<b>794</b>
<b>HFS Surplus / Shortfall*</b>	<b>-1248</b>

\*We have raised further queries on additional sites where inadequate information is provided. Subject to receipt of further information this total may change. We view the shortfall totals identified as minimum figures as we have questions on a number of other sites where for the purpose of this calculation we have used the Council's figures provisionally.

Table 3 Detailed Review of Land Supply

Key	
	Further information necessary. Council programming provisionally used
	Partial change in capacity made
	Not considered effective / likely to become effective

Aberdeen HMA					
Ref	Settlement	Site Name	Size of Allocation Contributing to Allowances	Notes	HFS View On Contribution
OP1	Formartine	Land at Balmedie South	80		80
OP1	Formartine	Barthol Chapel	5		5
OP1	Formartine	Belhelvie	4		4
OP2	Formartine	Land at Cairntack (East)	41	Understand this site was only promoted for 25 dwellings. Difference needs to be explained along with Council justification on deliverability.	25
OP3	Formartine	Land to the East of Cairn View	49		49
OP3	Foveran	South of Turin Way	36	More information necessary to demonstrate effectiveness / confidence it'll become effective.	36
OP4	Foveran	Site 2, Land at Blairthan Terrace	20	Newly Allocated. Consortium Ownership. Bid (FR066) only for 5 dwellings. Clarity needed on why capacity has been increased. Question site marketability. What work has the Council undertaken to ascertain that this site is deliverable?	5
OP5	Foveran	Land adjacent to former A90, North of Westfield Road	14	Understand this site may have been previously informally marketed unsuccessfully.	14
OP1	Methlick	Coltonhillock	20	Newly Allocated. No apparent Homebuilder Involvement. Question marketability of this site. What work has the Council undertaken to ascertain that this site is deliverable? Understand this site may have been previously informally marketed unsuccessfully.	0
OP2	Methlick	West of Black Craigs	3	Constrained in 2019 HLA. BID(034) appears to suggest site not being marketed.	0
OP3	Methlick	Land at Sunnybrae Croft, Methlick	12	New Allocation. Bid (FR040) only for 7 homes. No apparent homebuilder involvement.	7
OP4	Methlick	Site adjacent to Belmuir Lodge, Methlick	63	New Allocation. Appears to consist of 2 BIDS (046&47). But these only appear to promote 13 homes between them. No Apparent Homebuilder involvement. Question whether a development of this size is marketable in such a rural area. What work has the Council undertaken to ascertain that this site is deliverable?	13
OP3	Newburgh	Land North of School Road, Mill of Newburgh	160		160
OP1	Oldmeldrum	Land North of Distillery Road	38		38
OP2	Oldmeldrum	Coutens	35		35
OP4	Oldmeldrum	Land at Chapelark	33	Understand an AMSC application is in for 62 dwellings. Capacity should be amended accordingly.	27
OP5	Oldmeldrum	Newbarns	146		146
OP2	Pitmedden	Land Southwest of Pitmedden	219		219
OP3	Pitmedden	Mill of Allathan	68	No apparent homebuilder involvement. BID (FR108) for just 30 dwellings. What work has the Council undertaken to ascertain that additional homes on this site are deliverable?	30
OP4	Pitmedden	Land at Cloisterseat	10	New allocation for housing previously business. BID (FR015) Only for 7 dwellings. Why has the site capacity been increased?	7
OP1	Potterton	Land north of Denview Road	172		172
OP2	Potterton	Land north West of Denview Road	61		61
OP1	Rashierieve	Land West of Rashierieve Cottages	8		8
OP1	Tarves	The Grange	13		13
OP1	Ythanbank	Braklay Park	5	Constrained in 2019 HLA. Capacity increased by 5 but no BID apparent.	0
<b>Garioch</b>					
OP1	Blackburn	Caskieben	190	Expanded allocation. BID is only for 150 (087) not the 240 in allocation. Understand the site has been in plans since 1989 and not progressed and may be constrained by lack of 2 points of access.	0
OP1	Dunecht	Land to the West of Tillybrig	9		9
OP1	Echt	North of Forbes Park	25		25
OP1	Hatton of Fintray	North of B977	16	Site Constrained in 2019HLA. Capacity increased by 8. No BID Apparent.	0
OP3	Inverurie	Land at Harlaw Park	50	Previous Allocation. - part of OP2. Now being promoted for 50 flats (084). Site was previously constrained by multiple ownerships. Now understand from BID this site is in single ownership and intention is to develop independently. More information needed on how this will be delivered.	50
OP11	Inverurie	Pineshaw, Port Elphinstone	29	Previous Allocation with increased housing, now 54, previously 54. No BID evident. What work has the Council undertaken to ascertain that this site is deliverable?	0
OP15	Inverurie	Land West of Bennachie View Care Home	130		130
OP16	Inverurie	Land West of Conglass Cottages	50	New allocation. No homebuilder involvement. BID (142) doesn't appear to provide a capacity. How has Council arrived at proposed capacity?	50
OP1	Keithhall	South of Inverurie Road	36	Constrained in 2019 HLA. What work has the Council undertaken to ascertain that this site is now deliverable?	0
OP1	Kintore East (Residential)		400		400
OP6	Kintore	Land Adjacent to Woodside Croft	24	Previously reserved land. Promoted for AH. BID126. No apparent homebuilder involvement. What work has Council undertaken to understand whether this site is deliverable?	24
OP7	Kintore	South of Northern Road-A96	32	Previous allocated for business use. Promoted for residential BID 053. No apparent Homebuilder involvement. What work has Council undertaken to understand whether this site is deliverable?	32
OP1	Midmar	Roadside of Corsindae	12	Previously protected land. BID074 only for 10 homes not 12. No apparent Homebuilder involvement. What work has Council undertaken to understand whether this site is deliverable? What is reason for increased capacity.	10
OP1	Millbank	Land at Millbank Crossroads	30	Previously constrained in 2019 HLA. Capacity reduced by 5. Not apparent that infrastructure constraint identified in the 2019 HLA has been resolved.	0
OP3	Westhill	Land at Former Blockworks Site	63	Previously business designation. Appendix 7D refers to promotion for 100% AH but BID125 mentions 25% AH. Not clear where capacity of 63 is from. Council needs to explain why this allocation is deliverable. Is there funding in place for the affordable housing? How the capacity has been arrived at?	63
<b>Kincardine and Mearns</b>					
OP1	Findon	Land South of Earnsheugh Terrace	11		11
OP1	Marywell	Land East of Old Stonehaven Road	52	New housing. Previously business. Appendix 7E mentions that "The positioning of new housing in this area must not constrain developments within the BUS2 site by way of noise/amenity issues.". What work has the Council done to confirm the site is deliverable and compatible with adjacent business uses?	52
OP1	Newtonhill	Park Place	51		51
OP1	Park	Land to the West of Park Village Hall	7	No apparent BID. Effective in 2019 HLA for 6 units. Unclear why capacity has been increased.	0
OP1	Portlethen	Schoolhill	176		176

OP2	Stonehaven	Ury House, East Lodge	33		33
OP3	Stonehaven	Ury House, Blue Lodge	48		48
OP4	Stonehaven	Land Adjacent to Kirktown of Fetteresso	1	Not clear why 1 counted towards allowances. This is a previous allocation and undersand developer is on site with a number of completed homes to date.	0
OP5	Stonehaven	Land at East Lodge	60	Promoted for 40-50 unclear where capacity of 60 is from. Council needs to explain why it considers additional dwellings are deliverable.	60
OP6	Stonehaven	Mackie Village Ury Estate	91	Council to explain how this allowance has be worked out given that part of the site was previously allocated.	91
OP1	Woodlands of Durris	Land Northwest of Clune Gardens	27		27
	<b>Marr</b>				
OP1	Banchory	East Banchory/Eco village	2		2
OP2	Banchory	Lochside of Leys	5		5
OP6	Banchory	Land at former Glen O'Dee Hospital	40	Constrained in 2019 HLA. Do not consider site to be deliverable.	0
OP2	Inchmarlo	Land Southeast of Glencommon Wood	120		120
OP3	Inchmarlo	Land at East Mains and Auldeer Wood	10	Not clear who has promoted this. No BID evident. Council to advise.	10
	<b>Total</b>		<b>3145</b>		<b>2633</b>

<b>Rural HMA</b>					
<b>Banff and Buchan</b>					
OP1	Banff	Goldenknowes	306	This site is 'Lusylaw Road' (in 2019 HLA) which is the identified as constrained by Marketability in the 2019HLA and has been in the HLA since 2006. No evidence provided to explain this constraint has been overcome.	0
OP2	Banff	Colleonard Road	200	Physical, Marketability, Infrastructure constraints identified in the 2019 HLA. Has been in the HLA since 2004. Site promoted for 200, lower than previous allocation of 295. It is not clear in the Bid or Settlement Statement (Appendix 7a) how previously identified constraints have been resolved.	0
OP1	Cairnbulg/ Inverallochy	South of Allochy Road	85	Identified as constrained by marketability in 2019 HLA.	0
OP2	Cairnbulg/ Inverallochy	Westhaven	6		6
OP3	Cairnbulg/ Inverallochy	Land North of Rathen Road	30		30
OP2	Cornhill	Land to the West of Midtown	63	New allocation, previously safeguarded for a school. However, the site does not appear to have an associated bid. It's therefore not clear there is any intention to develop.	0
OP1	Crudie	Land at Hawthorn Croft	10	This site has been in the HLA since 2003. 8 Dwellings identified as effective in the 2019HLA and therefore cannot be counted as contributing towards allowances. A Further 5 dwellings identified as constrained by marketability and infrastructure. No evidence as been provided to demonstrate the site is no effective and it is unclear why it is considered 10 dwellings from this site can contribute to meeting allowances.	0
OP1	Fordyce	West Church Street	5	Identified as constrained by marketability in 2019 HLA. It has been in the HLA since 2004. Settlement Statement does not explain how this constraint will be overcome.	0
OP4	Fraserburgh	Land at Tyronhill Farm	30	New Allocation. No apparent homebuilder involvement. Unclear how capacity of 30 homes has been decided.	30
OP1	Ladysbridge	Phase 5, Ladysbridge Village	35	Understand this is new site with PPP.	35
OP1	Macduff	Land South of Corskie Drive	22	This was previously allocated for another use in past plans. Now identified for housing but understand owner does not control access to the site. Access appears to be dependent on adjacent site being developed for commercial uses. It has not been developed to date despite being allocated at least in the previous plan. Without a forthcoming solution to the access issue, and no timescales are given, consider the site should be considered constrained.	0
OP1	Memsie	Crossroads	15	Constrained by ownership and marketability in the 2019 HLA. In the HLA Since 2013. No information provided as to how these constraints will be overcome.	0
OP2	Memsie	Land North of Cairn Close	20	New site. No apparent Homebuilder involemnt. JNF Developments own and say they will develop.	20
OP1	Rosehearty	South of Ritchie Road	49	Site constrained in 2019 HLA. Has been in HLA since 2013. No evidence marketability constraint has been overcome.	0
OP1	Whitehills	Knock Street	30	Constrained by marketability in 2019HLA. Has been in the HLA since 2013. No evidence constraint has been overcome.	0
	<b>Buchan</b>				
OP1	Auchnagatt	Land at North of Braemo	16	Site Constrained by marketability. Has been in HLA since 2012. Unclear how this constraint will be overcome.	0
OP1	Boddam	East of Inchmore Gardens	9	Site removed from 2019 HLA and included as a small site. Site was however, in 2018 HLA and identified as constrained by marketability. Unclear how this constraint has been overcome or whether it was subject of a Bid.	0
OP2	Cruden Bay	South of Aulton Road	31	Site constrained by marketability in 2019HLA. Has been in HLA since 2012. Not a new site and no evidence as to how marketability constraint has been overcome.	0
OP2	Fetterangus	Land Adjacent to Playing Fields	27	Constrained by ownership in 2019HLA. Has been in HLA for 2014. Not a new site and no evidence of how constraint has been overcome.	0
OP3	Fetterangus	Land East of Gaval Street	49	New allocation. No apparent homebuilder involvement. What work has the Council done to understand effectiveness?	49
OP1	Longside	Land off Station Terrace	30	New allocation. No apparent homebuilder involvement. What work has the Council done to understand effectiveness?	30
OP3	Maud	Land at Bank Road East	30	This is is previous allocation. However, the allocation is only stated as being for 10 homes in Appendix 7b but is claimed as contributing 30 to allowances in Appendix 6. It is in the 2019HLA with remaining capacity for 3. It does not appear to have been promoted through a Bid. The 3 homes outstanding already contributed to the land supply which informs the SDP allowances and so assuming this site contributes to allowances is double counting and the stated capacity appears inaccurate.	0
OP5	Mintlaw	South of Nether Aden Road	50	Identified as constrained in the 2019 HLA due to marketability. It has been in the HLA since 2006. Not a new site and no evidence as to how constraints have been overcome.	0
OP3	New Deer	Land at Auchreddie Croft	30	Site constrained by marketability in 2019HLA. Has been in HLA since 2014. Not a new site and no evidence as to how marketability constraint has been overcome.	0
OP1	Old Deer	Land at Abbey Street	10	Site constrained by ownership in the 2019 HLA due to agricultural tenancy. It has been in the HLA since 2006. Unclear why it is now considered delierable.	0
OP1	St Combs	Site to North of High Street	30	This is a new allocation for social housing.	30
OP2	St Combs	Site to North of High Street	26		19
OP1	St Fergus	South of Newton Road	13	Site part constrained by ownership in 2019 HLA with 25 dwellings effective, unclear why this has been increased to 38.	0
OP3	Strichen	Land at Brewery Road	49	New allocation. No apparent homebuilder involvement. What work has the Council done to understand effectiveness?	49
	<b>Fortamine</b>				
OP1	Cuminestown	Land to the North/West of Teuchar F	60	New allocation. No apparent homebuilder involvement. What work has the Council done to understand effectiveness?	60
OP1	Fyvie	Land North East of Peterwell Road	30	New allocation. No apparent homebuilder involvement. What work has the Council done to understand effectiveness?	30
OP1	Kirkton of Auchterless	Small Site at Kirkton of Auchterless	5	New allocation. Bid just for 2 homes, why is capacity increased?	5
OP1	Rothienorman	Site to West of Blackford Avenue	12	New allocation for social housing. The Council need to explain how this site will be delivered. It appears access is dependent on OP2 coming forward. It needs to be shown how this will come forward if OP2 does not given that OP2 has been allocated since 2006 with no apparent development to date.	0
OP2	St Katherines	Land North of St Katherines	35	New allocation. No apparent bid. Council to explain why it is considered the site is deliverable.	35
OP1	Turriff	Adjacent to Wood of Delgaty	442	Site identified as constrained in the 2019 HLA save for 8 dwellings. Bid submitted but only appears to relate to part of the site (3.6ha). It is unclear why the Council now considers this site to be deliverable and capable of delivering the full capacity by the end of the LDP period.	0
OP3	Turriff	Adjacent to Bridgend Terrace	40	New allocation. No apparent homebuilder involvement. What work has the Council done to understand effectiveness?	40
OP5	Turriff	South of Colly Stripe, Smiddyseat Rd	27	Not apparent if this has been promoted in a bid. New Allocation. What work has council done to consider it is deliverable and ascertain intent to delivier.	27
OP6	Turriff	Land North of Cornfield Road	40	New allocation. No apparent homebuilder involvement. What work has the Council done to understand effectiveness?	40
	<b>Garioch</b>				
OP1	Meikle Wartle	Land North of Meikle Wartle	12	New allocation.	12
OP1	Old Rayne	Land North of Pitmachie Farm	10	New allocation.	10
	<b>Kincardine and Mearns</b>				
OP1	Fettercairn	Land to the Northwest of Fettercairn	60	Site promoted for 49, unclear why it is now identified for 60. It was identified as constrained in the 2019 HLA. Council needs to explain why it is now considered deliverable.	0
OP1	Gourdon	Land at Braehead	49	New allocation.	49
OP4	Laurencekirk	Land North of Gardenston Street	20	New Allocation. Appears to be a combination of bids. Council to advise if these are compatible and in single ownership.	20
OP5	Laurencekirk	Land South of Gardenston Street	11	New Allocation.	11
OP6	Laurencekirk	Land South of High Street	100	This is not a new site, it is in the 2019HLA and should not count towards meeting of the allowances. The timing of the delivery of necessary offsite A90 Grade Separated Junction infrastructure is not certain at this stage.	0
OP7	Laurencekirk	Land West of Fordoun Road	8	Expansion of existing allocation.	8
OP1	Luthermuir	The Chapel	6	Expansion of existing allocation.	6
OP3	Luthermuir	Land North of Church Road	13	New allocation. Bid not apparent. Council to advise on delivery intent.	13
OP1	Roadside of Kinneff	Land to the West of Roadside of Kin	16	Site constrained by ownership in 2019 HLA. Unclear how this has been resolved.	0
	<b>Marr</b>				
OP2	Aboyne	Tarland Road/ North of Kinord Drive	5	Site increased in size, application reference?	5
OP4	Alford	Land at Kingsford Road	85	2019 HLA refers to ransom strip and marketability constraints. Has been in HLA since 2004. No evidence presented to demonstrate it is now deliverable.	0
OP1	Drumblade	Land to Southwest of Drumblade Pri	5	New allocation	5
OP1	Finzean	Site to East of Finzean Village Hall	8	New allocation	8
OP1	Glenkindie	Land to the West of Glenkindie Bow	1	PP granted for 5 homes, unclear why capacity is now 6 homes	0
OP1	Huntly	Land at Steven Road	50	More information is required on deliverability, particularly funding for 100% AH and access. Previous business allocation.	50
OP2	Huntly	Deveron Road	52	More information is required on deliverability, particularly funding for 100% AH and ownership.	52
OP1	Kennethmont	Land South of B9002	32	2019 HLA shows site constrained by marketability. No evidence presented to demonstrate it is now deliverable.	0
OP3	Kincardine O'Neil	Land at Gallowhill Road	8	Site constrained by ownership in 2019 HLA. It has been in HLA since 2006. No evidence presented to demonstrate it is now deliverable.	0

OP1	Logie Coldstone	Land Adjacent to Diamond Jubilee	10	Constrained by marketability in 2019 HLA. No Bid apparent. Has been in HLA since 2011. No evidence presented to demonstrate it is now deliverable.	0
OP1	Tarland	Land at MacRobert Trust Estate Yard	10	Previous business allocation. Council to clarify whether it is intention of owner to develop for housing, no bid apparent for housing development.	10
OP2	Tarland	Land Adjacent to Alastrean House	10	Constrained by marketability in 2019 HLA. No Bid apparent. Has been in HLA since 2012. No evidence presented to demonstrate it is now deliverable.	0
OP3	Tarland	Village Farm	36	Site has been in HLA since 1996. Constrained by marketing funding in 2019 HLA. No evidence presented to demonstrate that it is now deliverable.	0
OP1	Towie	Land Adjacent to the Hall	5	Site constrained by ownership and amrketability in 2019 HLA. It has been in HLA since 2011. No evidence presented to demonstrate it is now deliverable.	0
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