

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 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.



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.

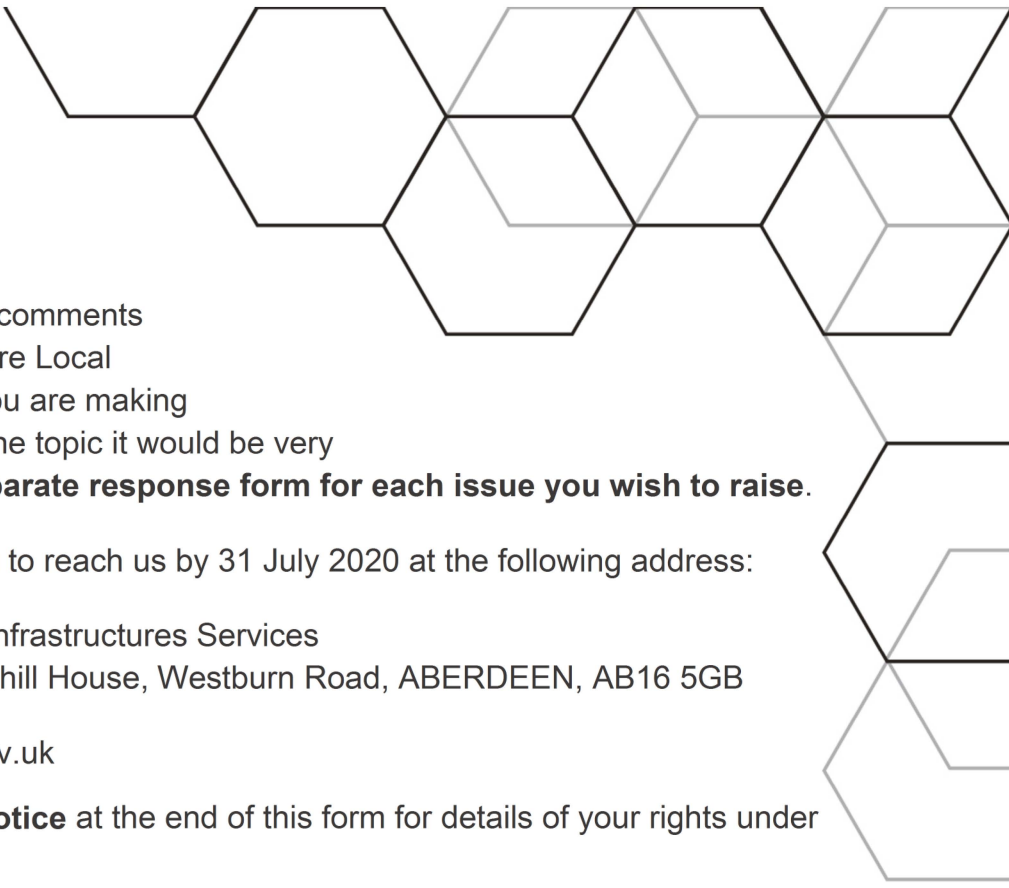
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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

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

Tel: 01467 536230
Email: ldp@aberdeenshire.gov.uk
Web: www.aberdeenshire.gov.uk/ldp
Follow us on Twitter @ShireLDP

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.



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

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:	Thomson
Date:	30 July 2020
Postal Address:	CHAP Group (Aberdeen) Ltd, [REDACTED] [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):

Modification of Appendix 7D, Settlement Statements, Garioch, Kemnay (pages 578 to 582):-
Reallocation of Site BUS 2 from business use to a site suitable for up to 65 houses.

Reason for change:

1.0 Introduction

This representation has been prepared on behalf of CHAP Group (Aberdeen) Ltd in response to the proposed Aberdeenshire Local Development Plan to respectfully request that the site currently identified as BUS 2 (safeguarded business use) in the Proposed Aberdeenshire Local Development Plan 2020 (Proposed Plan) is reallocated for housing.

It is essential that this representation is read in the context of the related Development Bid submitted at "Call for Sites" stage and the subsequent representation submitted in response to the Main Issues Report (MIR) both submitted on behalf of CHAP Group in respect of the bid referenced GR134. For ease of reference, these documents have been attached as appendices to this submission.

2.0 Development Proposals & Bid History

Through the initial bid and subsequent response to the MIR, it was demonstrated how the site could be developed in a sympathetic and respectful manner to deliver around 65 homes. These would comprise a mix of one, two, three and four bedroom homes with 25% to be delivered as affordable housing.

Given that the site neighbours a recent residential development a development for housing would be the most compatible with surrounding land uses. There would be opportunities to provide footpath linkages between the site and the adjacent housing development to ensure that the proposed development has strong connectivity with Kemnay and would offer a route from the site to Kemnay Academy which is shorter than the houses to the southern and western ends of the town, including Kemnay's sole housing allocation in the Proposed Plan at West of Milton Meadows (Site OP1).

The Bid has not been supported with the preference of maintaining the business use allocation. Council Officers have suggested issues relating to flood risk, topography and landscape impact as reasons why housing development would be inappropriate for this site. Within our response to the MIR it was clearly explained why these perceived constraints are either unmerited or have viable solutions. Notwithstanding our strong opinion that there are no genuine development constraints affecting the site, the suggested constraints would still apply to a business use development. In fact, a housing development would be better suited to deal with some of constraints suggested such as topography and landscape impact.

Despite the well-reasoned case made demonstrating that there are no justifiable development constraints to disregard the site for a housing allocation, it was disappointing that the reasoning and position of the Council Officers had been maintained in the MIR Issues and Actions Papers.

3.0 Housing Strategy

3.1 Kemnay

Within the Proposed Strategic Development Plan 2018, Kemnay lies close to, but outside, the Aberdeen to Huntly Strategic Growth Area. As such, Kemnay is identified as being within a Local Growth and Diversification Area. In these areas *“the scale and level of opportunities for new growth will vary from place to place, with larger towns such as Fraserburgh, Alford, Turriff, Banchory and Westhill being the main focus for new investment. Levels of growth in individual settlements should relate to local needs, with different places having different potential”*. To reiterate a point made in our previous MIR response, this statement directs that development in Kemnay should be in line with local needs. Since the site was allocated as a business development opportunity in 2006, there has been no interest in the site for that use during this 14 year period. This undoubtedly shows that there is very little, if any demand, for business development land in Kemnay. Accordingly, we consider that the provision of a range of housing, where there is demonstrable continued demand for, would be more suitable in meeting the local needs of Kemnay.

In the second paragraph of the “Vision” section of the Kemnay Settlement Statement of the Proposed Plan it is stated that *“development at an appropriate scale, including smaller and affordable homes, including bungalows will help to meet local housing need, sustain and enhance services within the community”*. It is very difficult to ascertain how the local housing need will be met through the Proposed Plan within which there is a single housing allocation for up to 20 homes at West of Milton Meadows. It is suggested in the 2019 Housing Land Audit (HLA) that all 20 houses will be delivered by 2021. **There will therefore essentially be no effective housing land supply in Kemnay during the Proposed Plan period.** Not only is this contrary to the objectives set out by the proposed SDP and Proposed Plan, this will severely constrain the supply of housing in Kemnay. This will put greater pressure on the existing housing stock and will have an adverse impact on the affordability of housing in Kemnay.

The 2019 HLA indicates that between 2014 and 2018 there were 102 homes completed suggesting an average delivery rate of c.20 homes per year. This is ignoring the 2016 anomaly during which only one house was delivered. The reason for this outlier is understood to be due to supply issues resulting from time lag between one development completing and another commencing. Adjusting for this would suggest an increased delivery rate of more than 25 homes per year. **These delivery rates demonstrate that there has been consistent demand for new homes in Kemnay and there will be an insufficient housing land supply during the Proposed Plan period to meet this demand. This can only be addressed through the allocation of additional housing sites.**

The need for new housing allocation(s) in Kemnay was acknowledged in the MIR through the allocation of Birley Bush (bid reference GR147) for up to 49 homes. This site was less suited to a housing allocation than either Sites GR134 or GR135 at Kirkstyle, the reasons for which were presented in our response to the MIR. The Birley Bush site has since been reallocated for the expansion of Kemnay Community Garden and employment land. Ignoring the fact that the proposed housing allocation at Birley Bush would be insufficient in meeting local housing needs, there is now a further housing land shortfall of a similar scale to what can be delivered at Site GR134 if it was reallocated for housing.

3.2 Aberdeen Housing Market Area

In addition to the evident need for additional housing allocations in Kemnay, there is also a wider need for additional housing land in the Aberdeen Housing Market Area (AHMA). The reasons for this have been detailed in a separate response to Appendix 6 of the Proposed Plan prepared on behalf of CHAP Group and by another response, also in respect of Appendix 6, prepared by Homes for Scotland, which has been prepared on behalf of its Members. **These responses should be considered alongside this response.** To summarise the key points raised by these responses, there is an insufficient allocation of new housing land in the AHMA with a continued reliance of large “strategic” housing allocations. This issue was highlighted in the Aberdeenshire Council’s Monitoring Statement 2017-2018 where it is noted that *“the small number of large allocations in the area has contributed to the lack of housing supply”*. The overreliance of strategic sites to meet housing need is addressed in paragraph 4.15 of the proposed SDP in which it is directed that additional housing allocations are proposed over the period 2020 to 2032 (the Proposed Plan period) in order to ensure that housing land supply is maintained should any of the strategic sites fail to come forward for development or under deliver the anticipated housing numbers.

There has been a severe lack of new housing allocations in the Proposed Plan to address housing supply issues with the Council seemingly preferring to artificially increase the capacities of existing housing allocations rather than allocating new housing land in order to meet housing supply targets. This approach is unrealistic and does not meet the objectives of the proposed SDP or Proposed Plan and should be reconsidered.

We would raise further concerns over the extent of constrained sites that would contribute to the total housing land supply. Appendix 6 of the Proposed Plan indicates a surplus of only 80 allocated homes over the proposed SDP allowance in the AHMA. It is noted that the surplus cited in the Proposed Plan is lower than the surplus allowed in the MIR. This follows the removal of a number of housing sites (totalling at least 360 homes) during the preparation of the Proposed Plan with no replacement allocations made to mitigate the lost housing numbers. The AHMA has been most affected of the two housing market areas by the loss of housing allocations, illustrated by the negligible surplus in the Proposed Plan. No clarification has been given why a lower surplus is now considered acceptable by the Council.

Homes for Scotland, in their response to the Proposed Plan, calculate that 23% of the sites identified to meet the required housing allowances appear to be wholly or in part sites identified as constrained in the 2019 HLA (paragraph 37). Any site identified as being constrained should not be included as part of the effective land supply to meet the required housing allowances set out by the Proposed SDP. Aberdeenshire Council concur with this viewpoint in paragraph 5.4 of the Proposed Plan, however, this has not been followed through given the allocation of constrained sites in the Proposed Plan. Homes for Scotland reviewed the new allocations proposed and removed those that are considered to be non-effective. **Their analysis suggests a total shortfall of -1,680 homes in Aberdeenshire with -432 homes of the shortfall in the AHMA** (summarised in Table 1 and analysis shown in Appendix 1 of their response to the Proposed Plan).

Furthermore, Homes for Scotland did not factor the continued inability of large strategic sites to deliver housing completion numbers anticipated in HLAs in their analysis. In the aforementioned response prepared by HFM, the actual deliver rates against expect delivery rates of four large housing allocations at Blackdog, Kintore, Chapleton and Crichtie (Section 3.3) were analysed. Using the actual homes delivered from 2017 to 2019 and extrapolating the anticipated delivery rates of these sites to 2027 (based on the 2019 HLA) HFM estimated a potential shortfall of 2,249 homes from the 10 year period following the adoption of the extant Local Development Plan. These larger sites have a part to play in the delivery of new housing in Aberdeenshire; however, the overreliance on these sites to deliver expected housing numbers is unsustainable and will inevitably lead to the under-delivery of housing. More realistic delivery rates for larger strategic sites should be adopted with a range of further housing allocations made to address the inevitable delivery shortfall.

The proposed SDP states that “*Local Development Plans must identify allocations for the period 2020 and 2032 which are deliverable within the timeframe of the period*”. We contend that the lack of new housing allocations, the reliance on existing allocated strategic sites and constrained sites coming forward for development means the Proposed Plan does not adhere to the principles set out by the proposed SDP with regard new housing allocations. There is therefore a need for appropriately located additional housing allocations, in established and popular locations within the AHMA, such as Kemnay, to meet the proposed SDP’s housing requirement. If no further allocations are made, there is a high risk the LDP will not be able to maintain a rolling five-year supply of effective housing land supply, which would be contrary to Scottish Planning Policy.

4.0 Conclusion

If reallocated for housing, Site BUS2/GR134 could contribute to the effective housing land supply in Kemnay and AHMA. The site would deliver much needed new housing during the Proposed Plan period with a “technical start” having already taken place through the partial formation of an access and SUDS pond. We consider that a well-reasoned argument has been made, through the initial Development Bid and subsequent MIR response, that there has and will be little interest in the site for business use. We would therefore question the logic to maintain the business use allocation, when there is no demand, rather than reallocating the site for housing when there is an apparent and demonstrable need for new land allocations in Kemnay to meet the local housing need.

In light of the foregoing, we would again respectfully request that Site BUS 2 is reallocated for housing in the 2021 Aberdeenshire LDP. If allocated, CHAP would be committed to the delivery of housing on the site during the Proposed Plan period and we are confident that contribute positively to the village of Kemnay.

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

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:

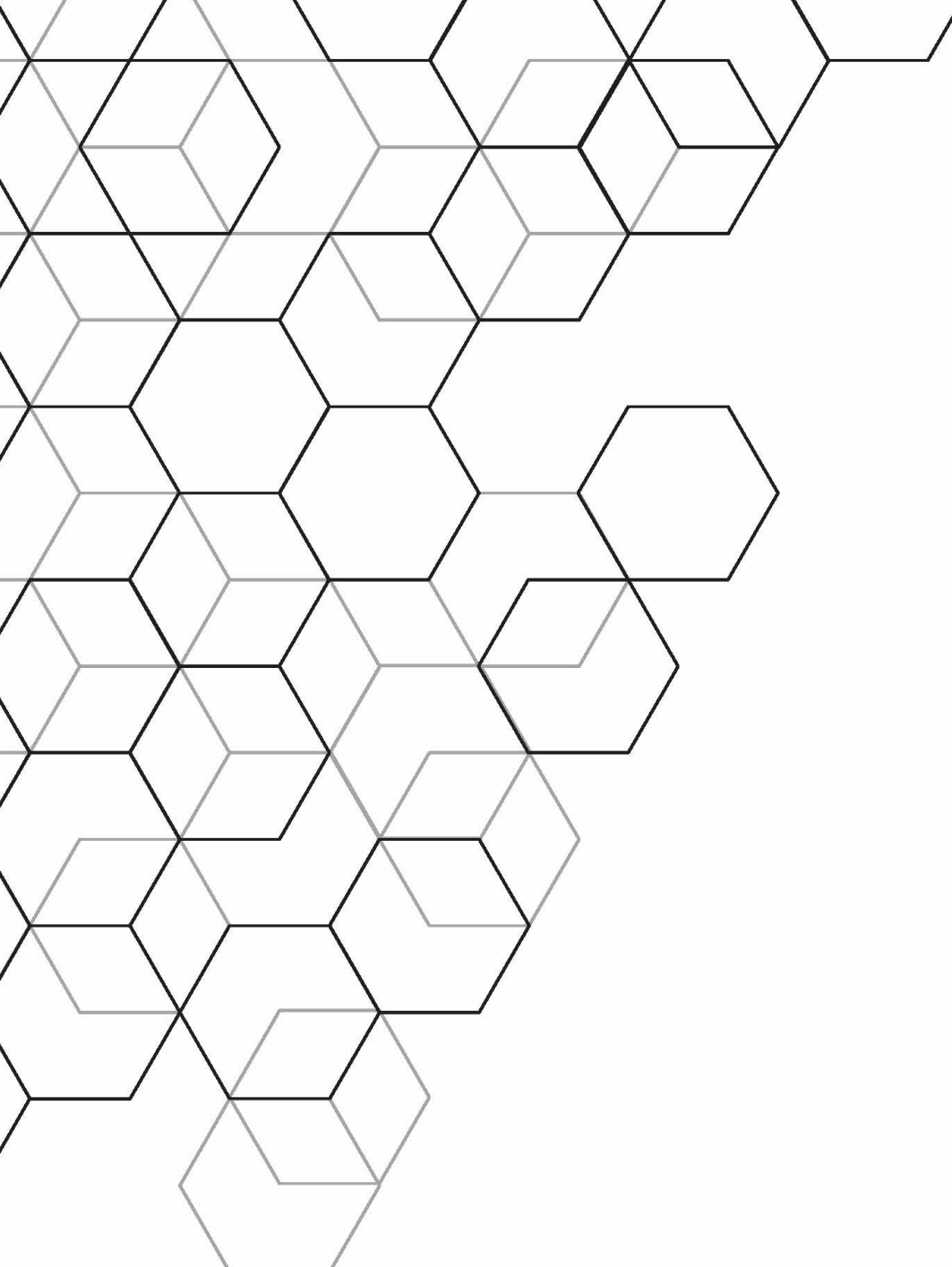
Not applicable.

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
Site BUS 2, Kemnay – Development Bid

Appendix 2
Site BUS 2, Kemnay – MIR Response



Local Development Plan 2021

Call for Sites Response Form



Aberdeenshire Council would like to invite you to use this form to submit a site for consideration within the next Local Development Plan (LDP 2021) for the period 2021 to 2031. A separate form should be completed for each site you wish to submit.

This is not a speculative plan. It is a fresh ‘call for sites’, so please re-submit any sites that do not or are not expected to have planning permission by 2021.

In order for the bids to be fully assessed, it is crucial that the questions in the bid form are answered fully and concisely with clear evidence of deliverability. The submission of a supporting statement, often known as a paper apart, should be avoided, and only assessments, such as a Flood Risk Assessment that has already been undertaken, should be submitted in support of your proposed site.

Completed forms and Ordnance Survey “Landline” site maps should be returned by email to: ldp@aberdeenshire.gov.uk

Alternatively, you can return the form and Ordnance Survey map by post to:
 Planning Policy, Infrastructure Services, Woodhill House, Westburn Road, Aberdeen AB16 5GB

All forms must be submitted by 31 March 2018.

1. Your Details

Name	[REDACTED]
Organisation (if applicable)	NORR
Address	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Do you wish to subscribe to our newsletter?	Yes

2. If you are acting as an agent on behalf of a third party, please give their details

Name	[REDACTED]
Organisation (if applicable)	CHAP Group (Aberdeen) Ltd
Address	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]

3. Other Owners

Please give name, organisation, address, email details of other owner(s) where appropriate:	[REDACTED]
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Do these owners know this is being proposed for development?	Yes
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For data protection purposes, please complete the rest of this form on a new page

4. Site Details

Name of the site (Please use the LDP name if the site is already allocated)	Kirkstyle Farm (North) – Option I
Site address	
OS grid reference (if available)	NJ740164
Site area / size	3.7 Ha
Current land use	Agricultural
Brownfield / greenfield	Greenfield
Please include an Ordnance Survey map (1:1250 or 1:2500 base for larger sites, e.g. over 2ha) showing the location and extent of the site, points of access, means of drainage etc.	

5. Ownership / Market Interest

Ownership (Please list the owners in question 3 above)	The land is under option from private landowners as disclosed in question 3.
Is the site under option to a developer?	Yes
	If yes, please give details CHAP Group (Aberdeen) Ltd
Is the site being marketed?	No
	If yes, please give details

6. Legal Issues

Are there any legal provisions in the title deeds that may prevent or restrict development? (e.g. way leave for utility providers, restriction on use of land, right of way etc.)	No
	If yes, please give details
Are there any other legal factors that might prevent or restrict development? (e.g. ransom strips / issues with accessing the site etc.)	No
	If yes, please give details

7. Planning History

Have you had any formal/ informal pre-application discussions with the Planning Service and what was the response?	No
	If yes, please give details
Previous planning applications	Please provide application reference number(s), description(s) of the development, and whether planning permission was approved or refused: APP/2003/1626 approved as a part of a mixed use residential and business development.
Previous 'Call for sites' history. See Main Issues Report 2013 at www.aberdeenshire.gov.uk/ldp	Please provide Previous 'Call for sites' / 'Bid' reference number: Current allocation in the Local Development Plan, BUS2.
Local Development Plan status www.aberdeenshire.gov.uk/ldp	Is the site currently allocated for any specific use in the existing LDP?

	Yes, current allocation in the Local Development Plan, BUS2.
	<p>If yes, do you wish to change the site description and or allocation?</p> <p>It is requested that the allocation for business use is changed to an allocation for housing. The reasons and justification in support of this request are contained within a supporting statement.</p>

8. Proposed Use

Proposed use		Housing
Housing	Approx. no of units	65
	Proposed mix of house types	<p>Number of:</p> <ul style="list-style-type: none"> • Detached: 35% • Semi-detached: 30% • Flats: 5% • Terrace: 30% • Other (e.g. Bungalows): <p>The above mix is indicative and the exact mix will be determined at the point of application which will be dependent on market requirements and information contained within the Council's Housing Need and Demand Assessment.</p>
		<p>Number of:</p> <ul style="list-style-type: none"> • 1 bedroom homes: 4 • 2 bedroom homes: 8 • 3 bedroom homes: 27 • 4 or more bedroom homes: 28 <p>The above mix is indicative and the exact mix will be determined at the point of application which will be dependent on market requirements and information contained within the Council's Housing Need and Demand Assessment.</p>
	Tenure (Delete as appropriate)	It is proposed that the development would be a mix of private housing for sale and affordable housing to be provided to RSL's or made available for purchase as part of an LCHO scheme. Depending on the needs at the time there may be other affordable tenures introduced within the development.
	Affordable housing proportion	25% or in accordance with the prevailing Aberdeenshire Council policy.
Employment	Business and offices	Indicative floor space: 0m ²
	General industrial	Indicative floor space: 0m ²
	Storage and distribution	Indicative floor space: 0m ²
	Do you have a specific occupier for the site?	N/A

Other	Proposed use (please specify) and floor space	0m ²
	Do you have a specific occupier for the site?	N/A
Is the area of each proposed use noted in the OS site plan?		Not applicable (NA)

9. Delivery Timescales

We expect to adopt the new LDP in 2021. How many years after this date would you expect development to begin? (please tick)	0-5 years	✓
	6-10 years	
	10+ years	
When would you expect the development to be finished? (please tick)	0-5 years	65
	6-10 years	
	+ 10years	
Have discussions taken place with financiers? Will funding be in place to cover all the costs of development within these timescales	Yes	
	<p>If yes, please give details (e.g. bank facility, grant funding, secured loan etc.)</p> <p>The proposed development would be taken forward by CHAP Group (Aberdeen) Ltd indicating the seriousness and commitment to deliver the project. CHAP has been building homes for more than 20 years within the Aberdeenshire market and has existing finance arrangements to ensure that this development can be delivered within the timescales indicated above.</p> <p>CHAP have experience in viability analysis and development and a track record that provides confidence that the parties will have the ability to raise the necessary finance.</p>	
Are there any other risk or threats (other than finance) to you delivering your proposed development	No	
	If yes, please give details and indicate how you might overcome them:	

10. Natural Heritage

<p>Is the site located in or within 500m of a nature conservation site, or affect a protected species?</p> <p>Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> • https://www.environment.gov.scot/ • EU priority habitats at http://gateway.snh.gov.uk/sitelink/index.jsp • UK or Local priority habitats at http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/ • Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at www.aberdeenshire.gov.uk/ldp 	RAMSAR site:	No
	Special Area of Conservation	No
	Special Protection Area	No
	Priority habitat (Annex I)	No
	European Protected Species	No
	Other protected species	No
	Site of Special Scientific Interest	No
	National Nature Reserve	No
	Ancient Woodland	No
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	No
	Priority habitat (UK or Local Biodiversity Action Plan)	No
	Local Nature Conservation Site	No
	Local Nature Reserve	No
	If yes, please give details of how you plan to mitigate the impact of the proposed development:	
Biodiversity enhancement		
<p>Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy, http://www.gov.scot/Resource/0045/00453827.pdf) by ticking all that apply. Please provide details.</p> <p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</p> <p>Advice is also available from Scottish Natural Heritage at: https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers and http://www.nesbiodiversity.org.uk/.</p>	Restoration of habitats	No
	Habitat creation in public open space	Yes
	Avoids fragmentation or isolation of habitats	Yes
	Provides bird/bat/insect boxes/Swift bricks (internal or external)	Yes
	Native tree planting	Yes
	Drystone wall	Yes
	Living roofs	No
	Ponds and soakaways	Yes
	Habitat walls/fences	Yes
	Wildflowers in verges	Yes
	Use of nectar rich plant species	Yes
	Buffer strips along watercourses	No
	Show home demonstration area	Yes
	Other (please state):	
	If yes, please provide details:	
	<p>Open space and landscaping will be incorporated within the development. An indicative layout has been prepared and the development can be achieved and still provide 40% open space.</p> <p>There will be opportunities to incorporate new drystone walls as features within the development reflecting the local context. In combination with green corridors these can enhance the habitat value of the site.</p>	

	Within open spaces and amenity land there will be a mixture of formal green areas, woodland, formal planting and less formal areas for wildflower planting.
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11. Historic environment

Historic environment enhancement		
Please state if there will be benefits for the historic environment.	No If yes, please give details:	
Does the site contain/ is within/ can affect any of the following historic environment assets? Please tick any that apply and provide details. You can find details of these designations at: <ul style="list-style-type: none"> http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d http://portal.historicenvironment.scot/ https://online.aberdeenshire.gov.uk/smrp/ub/master/default.aspx?Authority=Aberdeenshire 	Scheduled Monument or their setting	No
	Locally important archaeological site held on the Sites and Monuments Record	No
	Listed Building and/or their setting	No
	Conservation Area (e.g. will it result in the demolition of any buildings)	No
	Inventory Gardens and Designed Landscapes	No
	Inventory Historic Battlefields	No
	If yes, please give details of how you plan to mitigate the impact of the proposed development On the site itself is a record of a finding of a stone ball with 6 projecting knobs found in the area measuring 76mm in diameter.	

12. Landscape Impact

Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at www.aberdeenshire.gov.uk/ldp)	Yes. If yes , please state which SLA your site is located within and provide details of how you plan to mitigate the impact of the proposed development: The Site is located within the Bennachie SLA. The site is identified for development in the Local Development Plan and there will be no detrimental effect resulting from development.
SLAs include the consideration of landscape character elements/features. The characteristics of landscapes are defined in the Landscape Character Assessments produced by Scottish Natural Heritage (see below) or have been identified as Special Landscape Areas of local importance. <ul style="list-style-type: none"> SNH: Landscape Character Assessments https://www.snh.scot/professional-advice/landscape-change/landscape- 	If your site is not within an SLA , please use this space to describe the effects of the site's scale, location or design on key natural landscape elements/features, historic features or the composition or quality of the landscape character:

<p>character-assessment</p> <ul style="list-style-type: none"> • SNH (1996) Cairngorms landscape assessment http://www.snh.org.uk/pdfs/publications/review/075.pdf • SNH (1997) National programme of landscape character assessment: Banff and Buchan http://www.snh.org.uk/pdfs/publications/review/037.pdf • SNH (1998) South and Central Aberdeenshire landscape character assessment http://www.snh.org.uk/pdfs/publications/review/102.pdf 	
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13. Flood Risk

<p>Is any part of the site identified as being at risk of river or surface water flooding within SEPA flood maps, and/or has any part of the site previously flooded?</p> <p>(You can view the SEPA flood maps at http://map.sepa.org.uk/floodmap/map.htm)</p>	<p>No</p> <p>If yes, please specify and explain how you intend to mitigate this risk:</p>
<p>Could development on the site result in additional flood risk elsewhere?</p>	<p>No</p> <p>If yes, please specify and explain how you intend to mitigate or avoid this risk:</p>
<p>Could development of the site help alleviate any existing flooding problems in the area?</p>	<p>No</p>

14. Infrastructure

a. Water / Drainage

<p>Is there water / waste water capacity for the proposed development (based on Scottish Water asset capacity search tool http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search)?</p>	<p>Water</p> <p>TBC</p>	<p>TBC</p>
<p>Has contact been made with Scottish Water?</p>	<p>No</p> <p>If yes, please give details of outcome:</p>	<p>TBC</p>
<p>Will your SUDS scheme include rain gardens? http://www.centralscotlandgreennetwork.org/campaigns/greener-gardens</p>	<p>TBC</p> <p>Please specify:</p> <p>At this stage the drainage solution for the site is not fixed. Should this option provide an appropriate solution for treating and attenuating of surface water then it will be</p>	

	investigated.
b. Education – housing proposals only	
Education capacity / constraints https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/	Please provide details of any known education constraints. Is additional capacity needed to serve the development? The education constraints and benefits of development have been described within the Supporting Statement.
Has contact been made with the Local Authority's Education Department?	No If yes, please give details of outcome:
c. Transport	
If direct access is required onto a Trunk Road (A90 and A96), or the proposal will impact on traffic on a Trunk Road, has contact been made with Transport Scotland?	N/A If yes, please give details of outcome:
Has contact been made with the Local Authority's Transportation Service? They can be contacted at transportation.consultation@aberdeenshire.gov.uk	No If yes, please give details of outcome:
Public transport	Please provide details of how the site is or could be served by public transport: The location of the proposed development within the settlement of Kemnay benefits from access to public transport. Details of connections are contained within the supporting statement at section 5.5.
Active travel (i.e. internal connectivity and links externally)	Please provide details of how the site can or could be accessed by walking and cycling: The site location is in walking distance of services and facilities within Kemnay. Details of connections are contained within the supporting statement at section 5.5.
d. Gas / Electricity / Heat / Broadband	
Has contact been made with the relevant utilities providers?	Gas: No If yes, please give details of outcome(s):
	Electricity: No If yes, please give details of outcome(s):
	Heat: No If yes, please give details of outcome(s):
	Broadband: No If yes, please give details of outcome(s):

<p>Have any feasibility studies been undertaken to understand and inform capacity issues?</p>	<p>Given the location on the edge of the settlement and with the recent development to the west of the site service connections will be available. We are seeking an allocation in the Local Development Plan from 2021 and it is too early to have meaningful discussions with the service providers at this stage. However, should the site be identified as a preferred location for development within the Main Issues Report the developers will contact the service providers to begin discussions to ensure that there is no delay to the delivery of the development.</p>
<p>Is there capacity within the existing network(s) and a viable connection to the network(s)?</p>	<p>Please refer to response to previous question.</p>
<p>Will renewable energy be installed and used on the site? For example, heat pump (air, ground or water), biomass, hydro, solar (photovoltaic (electricity) or thermal), or a wind turbine (freestanding / integrated into the building)</p>	<p>Yes If yes, please specify the type of renewable energy technology(s), if it is to provide electricity and/or heating (i.e. space heating and/or hot water), and the scale of provision (To supplement off-site connection all the way to 100% energy provision (off-grid)):</p> <p>At this stage the detailed design of the housing has not been developed. There will be renewable technologies incorporated within the development, but due to the timescales until the adoption of a new Local Development Plan the Building Standards requirements and advances in technology cannot be defined.</p>
<p>e. Public open space</p>	
<p>Will the site provide the opportunity to enhance the green network? (These are the linked areas of open space in settlements, which can be enhanced through amalgamating existing green networks or providing onsite green infrastructure)</p> <p>You can find the boundary of existing green networks in the settlement profiles in the LDP</p>	<p>Yes Please specify:</p>
<p>Will the site meet the open space standards, as set out in Appendix 2 in the Aberdeenshire Parks and Open Spaces Strategy? https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf</p>	<p>Yes Please specify: It is anticipated that 40% of the proposed development would be utilised as open space. This is in line Aberdeenshire Council's current open space standards for new development.</p>
<p>Will the site deliver any of the shortfalls identified in the Open Space Audit for specific settlements? https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-</p>	<p>Not applicable Please specify: The development will contribute towards the strategic aims of the Open Space Strategy in</p>

space-strategy-audit/	providing a network of green spaces within the site and strong connections to existing areas of open space and recreation. Good design, planting and landscaping within these areas will help to improve the visual appearance of the area and also promote increased biodiversity.
f. Resource use	
Will the site re-use existing structure(s) or recycle or recover existing on-site materials / resources?	Yes. If yes, please specify: The site generally comprises open farmland, however, the existing topsoil and sub-soils will be re-used as appropriate within the site.
Will the site have a direct impact on the water environment and result in the need for watercourse crossings, large scale abstraction and/or culverting of a watercourse?	No If yes, please provide details:

15. Other potential constraints

Please identify whether the site is affected by any of the following potential constraints:

Aberdeen Green Belt https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf	No
Carbon-rich soils and peatland http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/	No
Coastal Zone https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf	No
Contaminated land	No
Ground instability	No
Hazardous site / HSE exclusion zone (You can find the boundary of these zones in Planning Advice 1/2017 Pipeline and Hazardous Development Consultation Zones at https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/ and advice at http://www.hse.gov.uk/landuseplanning/developers.htm)	No
Minerals – safeguarded or area of search https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf	No
Overhead lines or underground cables	No
Physical access into the site due to topography or geography	No
Prime agricultural land (grades 1, 2 and 3.1) on all or part of the site. http://map.environment.gov.scot/Soil_maps/?layer=6	No
'Protected' open space in the LDP (i.e. P sites) www.aberdeenshire.gov.uk/ldp and choose from Appendix 8a to 8f	No
Rights of way / core paths / recreation uses	No

Topography (e.g. steep slopes)	No
Other	No (please specify)
If you have identified any of the potential constraints above, please use this space to identify how you will mitigate this in order to achieve a viable development.	

16. Proximity to facilities

How close is the site to a range of facilities?	Local shops	400m-1km
	Community facilities (e.g. school, public hall)	400m-1km
	Sports facilities (e.g. playing fields)	400m-1km
	Employment areas	400m-1km
	Residential areas	400m
	Bus stop or bus route	400m
	Train station	>1km
	Other, e.g. dentist, pub (please specify)	400m-1km
Refer to Section 5.5 of the supporting statement for a plan identifying facilities within walking distance. Kemnay Town Centre is located within a short walking distance of the site.		

17. Community engagement

Has the local community been given the opportunity to influence/partake in the design and specification of the development proposal?	Not yet
	If yes, please specify the way it was carried out and how it influenced your proposals:
	If not yet, please detail how you will do so in the future: As part of the Local Development Plan process the applicant and their design team will engage with the local community which is anticipated to commence during the consultation on the Main Issues Report. We would be happy to work with the Council on any engagement exercises that they are carrying out.

18. Residual value and deliverability

Please confirm that you have considered the 'residual value' of your site and you are confident that the site is viable when infrastructure and all other costs, such as constraints and mitigation are taken into account.	I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable: Please tick: <input checked="" type="checkbox"/>
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If you have any further information to help demonstrate the deliverability of your proposal, please provide details.

There is a continued robust demand for housing within Kemnay. This is demonstrated by the previous housing completions and the forecast housing completions up to 2020 following which completions will be constrained by a lack of available allocated housing land. It is anticipated that due to the size of the settlement that there will continue to be a demand for new housing in Kemnay.

The site has the benefit of an existing vehicular access and the infrastructure requirements are not in excess of that which can reasonably be financed by the development. It is anticipated that there will be a requirement to make contributions to mitigate any effects on local services within Kemnay such as schooling. These have been considered when assessing the viability of the development proposal and the applicant is confident that the proposal is deliverable.

19. Other information

Please provide any other information that you would like us to consider in support of your proposed development (please include details of any up-to-date supporting studies that have been undertaken and attach copies e.g. Transport Appraisal, Flood Risk Assessment, Drainage Impact Assessment, Peat / Soil Survey, Habitat / Biodiversity Assessment etc.).

The following documents have been submitted in support of the proposed development:

Supporting Statement: Prepared by NORR, provides further information in response to the questions asked by Aberdeenshire Council in this form. This statement sets out the reasons why we believe that there is a need for additional housing allocations to be made within Kemnay and the implications of rezoning the site from Business to Housing.

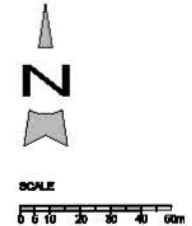
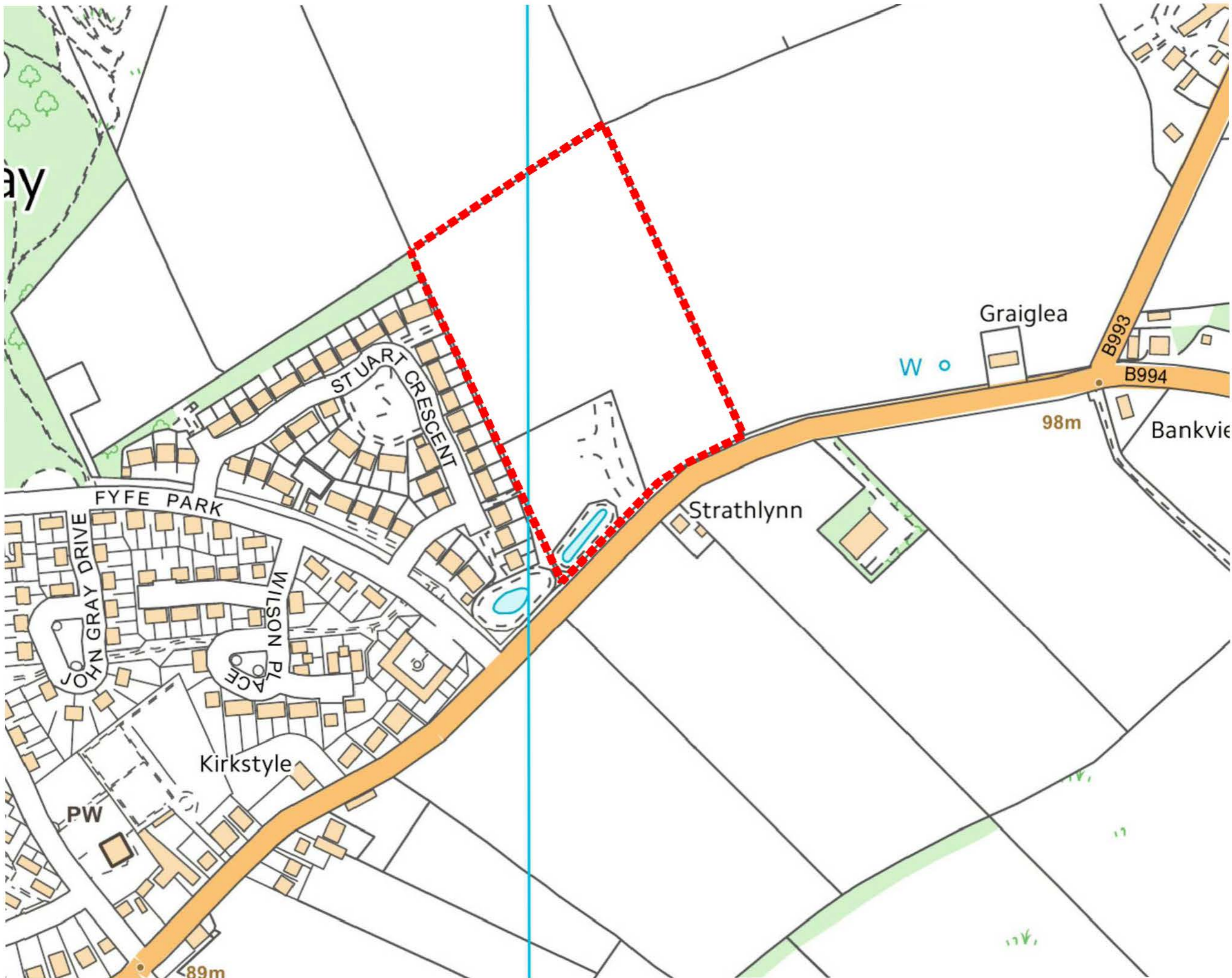
Indicative Site Layout: Prepared by NORR illustrating the proposed residential development has been prepared to demonstrate how the development would be laid out to ensure that the Council's expectations of open space and appropriate access will be achieved.

Please Note that there are three options that relate to the land in this area being promoted by CHAP Group (Aberdeen) Ltd. All supporting statements have been submitted with each bid and should be assessed as a whole. The supporting statements provide further information in response to the questions asked by Aberdeenshire Council in this form. This statement sets out the reasons why we believe that there is a need for additional housing allocations to be made within Kemnay and the implications of rezoning the site from Business to Housing.

Please tick to confirm your agreement to the following statement:



By completing this form I agree that Aberdeenshire Council can use the information provided in this form for the purposes of identifying possible land for allocation in the next Local Development Plan. I also agree that the information provided, other than contact details and information that is deemed commercially sensitive (questions 1 to 3), can be made available to the public.



Rev	Date	Drawn	Checked
INFORMATION			
Project/Client:		Project No:	
Chap Homes		180024	
Residential Development at		Dwg No:	
Kirkstyle Farm		A10-00-10	
Kennay		Rev:	
Drawing:		Scale:	
Location Plan		1:2500 @A3	
Option 1		Drawn By: _____ Date: _____	
		Checked By: _____ Date: _____	



Kirkstyle Farm, Kemnay

Local Development Plan Bid 2018

Option 1

NORR

Kirkstyle Farm, Kemnay

Option 1

1. Introduction

This statement has been prepared on behalf of CHAP Group (Aberdeen) Ltd in support of a bid for a rezoning of a site located within the settlement boundary on Victoria Terrace (B993), Kemnay, for a residential development. In support of this bid a layout has been provided to demonstrate how the development would be designed to respond to the site context. It should be noted that three options have been submitted for development around Kirkstyle Farm on the B993 and these should be reviewed in connection with each other.

The following documents have been attached as appendices for ease of reference:

- Indicative Layout (Appendix 1)
- Option 2 Supporting Statement (Appendix 2)
- Option 3 Supporting Statement (Appendix 3)

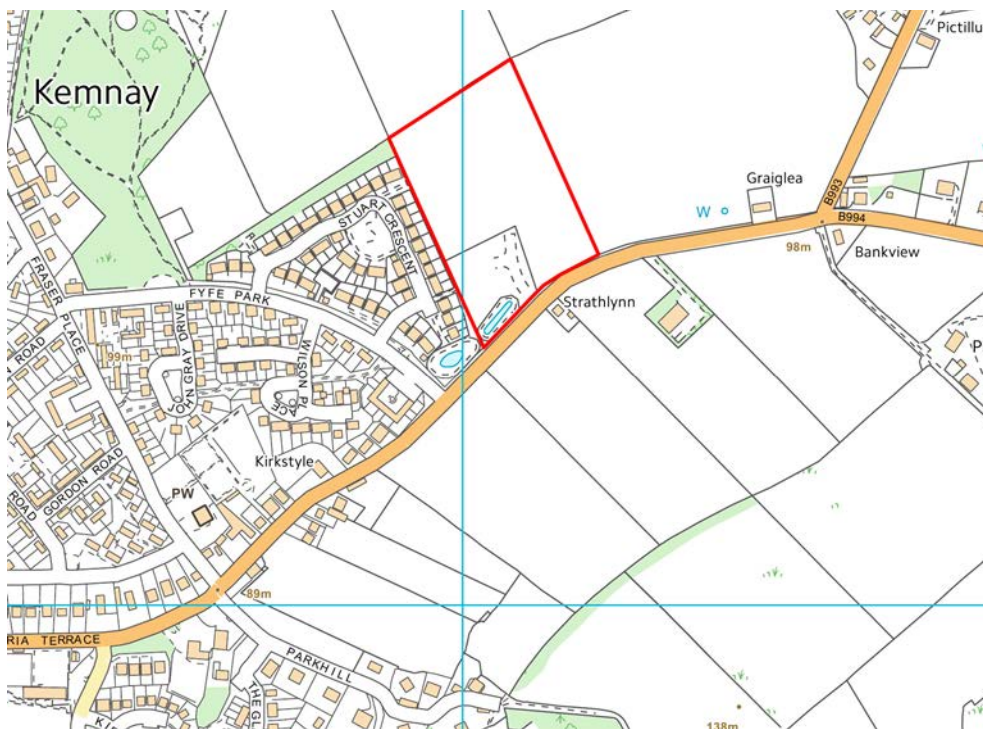


Figure 1: Site Location

This site is located within the settlement boundary of Kemnay to the north of Victoria Terrace.

Kemnay is a popular and attractive town in the Garioch area of Aberdeenshire. The town has an estimated population of 3,918 (2016 NRS estimate). Kemnay benefits from a range of services and amenities which are generally found in and around the town centre. Kemnay also provides two primary schools and an academy. As well as serving Kemnay, the academy also serves the wider rural area and the nearby settlements of Kintore and Blackburn. Kemnay does have areas of local employment, which

are largely focussed in the town centre and to the north of the settlement where Kemnay Quarry is also located.

The site is approximately 3.8ha and is located to the east of the town adjacent to a recent residential development of 54 homes, and fronting the B993, the main road into the town centre from the east. To the south of Victoria Terrace is agricultural land. The site is currently allocated as BUS2 and this is to be safeguarded for business uses.

The site was originally identified as future development opportunity within the Aberdeenshire Local Plan 2006. Planning permission was granted for the land to the west (APP/2003/1626) for a combined residential and commercial development. A new separate consent was issued for the residential element (APP/2007/2474) and a subsequent application for the approved combined development proposing the partial purification of the conditions to create an access and provide surface water drainage on this site was approved and implemented (APP/2010/2772).

2. Proposed Development

The proposal is for the reallocation of the site for residential use to accommodate around 65 homes. The proposals are indicative at this stage, but it is envisaged that the development would comprise a mix of one, two, three and four bedroom homes and provide a mix of terraced, semi-detached and detached properties to meet a range of local market demands and needs. In accordance with Aberdeenshire Council policy the development will include affordable housing (25%) and open space will be incorporated within the proposals, 40% of the total site area.

The development will have a vehicular access onto the B993 and pedestrian connections to the west to the existing residential development. Three areas of open space are shown indicatively that would provide areas for recreation that are accessible to the residents and benefit from natural surveillance.

The site is within private ownership with an option agreement with CHAP for the purchase subject to planning permission. A residential development can be delivered on this site within the early years of the next Local Development Plan period should the site be allocated.



Figure 2: Photo of Existing Access

3. Strategic Development Plan

The Aberdeen City and Shire Strategic Development Plan (2014) (SDP) set a clear direction for the future development of the North East, which recognised the importance of improving links and connections, adding to the already enviable quality of life and providing the opportunities for high-quality sustainable growth. The delivery of employment and jobs forms an important part of the SDP's vision and it seeks to make sure the area has enough people, homes and jobs to support the level of services and facilities needed to maintain and improve the quality of life. The spatial strategy for development in the region is based on Strategic Growth Areas (SGAs) and the strategy is to focus development in places where there are clear opportunities to encourage people to use public transport.

Kemnay is located outwith the SGAs and forms part of the local growth and diversification area. Within these locations *"the level of growth in individual settlements should relate to local needs."*

Housing allowances are made for local growth within the SDP, but employment land is just to be made available to meet local needs.

The SDP acknowledges that there is demand for housing in the countryside, but seeks to ensure that new housing is focussed on existing settlements, particularly those that are well served by public transport.

The Strategic Development Plan focuses new employment land developments within the SGAs and only makes strategic allowances and targets for these locations.

The SDP identifies employment allowances for the Huntly to Blackburn corridor of 42Ha to be identified up to 2026 and 28Ha of Strategic Reserve employment land from 2027 to 2035. Settlements along this corridor include Blackburn, Kintore, Inverurie and Huntly which are established business and employment locations. The considerable availability of allocated employment land along the Huntly to Blackburn corridor will have a significant bearing on the demand for employment land in Kemnay. The SDP Main Issues Report (2018) does not seek to change the approach to the growth corridors and maintains the Aberdeen to Huntly corridor approach. The SDP Main Issues Report also recognises that there is a very generous supply of employment land and only suggests further deferring the release of 'strategic reserve' land.

4. Prospects of the Site Being Developed for Employment Uses and Strategic employment land requirement

In the development of this site, ALDP Policy B1 requires that the development does not prejudice the strategic employment land supply. Kemnay does not form part of the SGAs and employment land within the settlement does not contribute towards the strategic supply of land. The expectation is that housing and employment allocations are made in relation to local needs. It is therefore essential that it is ascertained what the local demand for employment land is likely to be in Kemnay.

Aberdeen City and Aberdeenshire undertake an audit of employment land, which identifies the amount of land that is available within the area for future employment uses. The figures from the Employment Land Audit are used by the Council as the basis for calculating the need for additional employment supply. Table 1 identifies the allocations and existing business locations within Kemnay and the available land between the Employment Land Audit in 2012 and 2017. This shows that there has been no take up of employment land within Kemnay over a five year period despite there being no overarching development constraints.

Table 1 Kemnay Employment Land Audit Information

Site	ALDP Allocation	Marketable Supply					
		2017	2016	2015	2014	2013	2012
Quithie Road / Dalmadilly	BUS1	4.3	4.3	4.3	4.3	2.43	2.4
Fyfe Park / Kemnay East	BUS2	2.8	2.8	2.8	2.8	2.8	2.8

Source: All figures taken from Aberdeen City and Aberdeenshire Employment Land Audits

Planning applications for business developments in Kemnay since 2000 include:

- Extension to car showroom (within BUS1) – Submitted in 2012
- Change of use from car sales room to light industrial use (BUS3) – Submitted in 2015
- Fetternear Estate mixed use application (refused) – Submitted in 2008
- Application that covered this proposed site – Submitted in 2003

The above evidence strongly suggests that there is very little demand for business land in Kemnay and that there is already an adequate provision of business/employment accommodation. It is therefore clear that there is an overprovision of allocated employment land in Kemnay.

Kemnay is a settlement of a reasonable size. Whilst it is close to the A96 corridor, as a location for employment and business development it does not provide any competition to the land that is available in Blackburn, Kintore and Inverurie that have far greater connections and benefit from the existing market for employment and business in these locations. This is what the Strategic Development Plan seeks to achieve as these are the locations that are most likely to be able to attract investment and business to the area and are in the most sustainable locations.

Within the Huntly to Blackburn Strategic Growth Area (SGA) there is to be an allowance for 42Ha of gross employment land and the Council is to ensure that there is 60ha of marketable land available in the SGAs in Aberdeenshire. Appendix 4 of the 2017 Employment Land Audit identifies the employment land supply within the Strategic Growth Areas and demonstrates that within the Huntly to Blackburn SGA there is 71.25Ha of established employment land, significantly in excess of the 42ha requirement. This also identifies that there is a total of 218.39ha of marketable land within the SGAs in Aberdeenshire. This was previously higher, but there has been a 17% increase in the constrained land supply, but the Employment Land Audit notes that these sites are likely to come forward in the medium term once infrastructure constraints have been resolved. The 2016 Employment Land Audit identifies that there has been on average a development rate of 8ha per annum over the last 10 years. At this rate of development the Council would retain 60ha of employment land for the next 19 years up to 2036 extending well beyond the life of the next plan period. This evidence validates the proposal in the SDP Main Issues Report to further delay the release of 'strategic reserve' sites.

Strategic Growth Area	Established	Constrained	Marketable Total	Immediately Available	Under Construction
Ellon-Blackdog	33.83	8.5	24.33	6.73	0.11
Peterhead-Hatton	70.45	15.81	54.64	4.95	0.93
Total	103.28	24.31	78.97	11.68	1.04
Huntly-Pitcaple	19.74	2.2	17.54	3.01	0.24
Inverurie- Blackburn	52.01	30.5	21.51	3.81	5.2
Total	71.75	32.7	39.05	6.82	5.44
Portlethn-Stonehaven	137.26	37	100.26	18	0
Sth of Drumlithie-Laurencekirk	11.11	11	0.11	0.11	0
Total	148.37	48	100.37	18.11	0
Aberdeen HMA Local Growth	37.6	15.38	22.22	10.56	0
Rural HMA Local Growth	189.46	132.07	57.39	17.34	1.99
Total	227.06	147.45	79.61	28	1.99
Report Total	550.46	252.46	298	64.61	8.47

Figure 3: Extract from Aberdeen City and Aberdeenshire 2017 Employment Land Audit

It has been clearly demonstrated that there has been very limited development activity for business employment uses in Kemnay. This is in large part due to the availability of allocated employment land in major employment hubs along the A96 corridor, which has already been established as one of the Council's preferred locations for new business development as shown by this area being allocated as an SGA. The settlements within the SGA are established commercial locations where there is higher demand for employment accommodation from business occupiers. Kemnay lies within a short distance of a number of these settlements where employment development is most appropriate due to their superior transport connections and accessibility.

5. Preferred Location for Employment Land in Kemnay

It is clear that demand for employment land in Kemnay continues to be subdued. Notwithstanding this there are other existing business land allocations at the northern edge of Kemnay at BUS3 and BUS1 as identified in figure 4. These sites are adjacent to the Kemnay Quarry and existing employment developments. When considering the land uses that already exist to the north of Kemnay, it is clear that the most appropriate location for business development is around the town's northern boundary. This will ensure that development occurs in the most suitable locations which are compatible with the surrounding area. Based on the trends of the development of employment land in Kemnay, there is a more than adequate provision of allocated business land to the north of Kemnay, which is more than sufficient to meet any local demand that may arise. However, the lack of employment/business development activity in Kemnay in previous years strongly indicates that there would still be an overprovision of business land to meet future demand during the Local Development Plan period, which would still provide sufficient flexibility in the availability of business land.

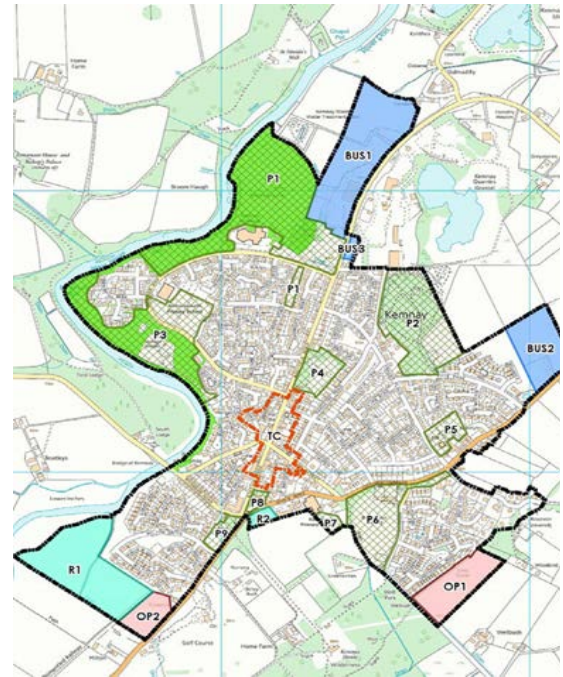


Figure 4: Local Development Plan Extract

6. Benefit of Residential Development

Kemnay has an estimated population of 3,981 people and falls within the second tier of larger settlements that have a population of between 3,000 and 4,000 people. The Strategic Development Plan seeks to identify housing allocations for settlements not situated in a strategic growth area, such as Kemnay, to ensure that the local growth needs are met. Kemnay is a popular location benefitting from a range of local services and amenities including primary and secondary schooling. It is essential that there is an adequate supply of allocated housing land in Kemnay to meet demand and to help maintain and enhance the existing service provision in the town.

Previous housing land audits demonstrate that housing completions in Kemnay have remained steady between 2012 and 2017. 2016 is the only exception to this trend, however, this was due to a delay between the completion of [REDACTED] development to the north of Fyfe Park and the commencement of [REDACTED] development to the east of Greystone Road. The 2017 and draft 2018 Housing Land Audits indicate that Kemnay will have in excess of 30 housing completions in 2017 and 2018, which will then reduce to 10 housing completions in 2019 and 2020. There are no housing completions anticipated after 2020 which is solely due to a lack of allocated housing land in Kemnay despite it being clear that there is continued demand for housing in the town. Without an adequate supply of housing land in Kemnay, demand for the existing houses will increase which could force people out of the area due to a lack of suitable housing stock and possibly lead to pressure on the affordability of housing in the town.

The proposed development of 65 homes (including 25% affordable housing) will assist in meeting the local growth requirements of Kemnay and if allocated will provide a supply consistent with previous housing completions in the settlement.

The 2018 Strategic Development Plan Main Issues Report is seeking to identify smaller sites that have no overarching development constraints so that housing can be delivered timeously within the plan period. The proposed development fits these criteria and is the logical location for new housing in Kemnay. The site benefits from a recently constructed access and SUDS pond, and the principle of development already accepted. The site is therefore well placed to deliver much needed housing within the plan period and would ensure that there is a continued supply of land for new housing within Kemnay.

7. Assessment of Development Proposals

7.1 Design and Amenity

Policy B1 of the current Local Development Plan requires that any alternative development respects the character of the area and is compatible with nearby uses. The neighbouring site is residential and agricultural land surrounds the site to the north and east. Consequently, the proposed residential development would not have any conflict with the surrounding land uses and will respect the character of the area.

7.2 Natural and Historic Environment

The site does not currently provide a valuable wildlife habitat. Further, there are no environmental designations either of a natural heritage or built heritage nature on the site or within close proximity to the site. The site is already allocated for development and as such the principle of development in this area has been firmly established.

7.3 Flooding and Drainage

There are no areas identified to be at risk of flooding on the site. The development will incorporate a sufficient SUDS scheme to ensure that there will be no increase in the risk of flooding at the site or surrounding areas as a result of the development.

7.4 Landscape

The majority of the settlement of Kemnay is located within the Bennachie Special Landscape Area. This is centred on Bennachie, but the area boundary does extend out just to cover the B993 and this site lies within the boundary. The extent of the designation is in response to the views over the surrounding lowlands from Bennachie. Bennachie can be seen in the background to Kemnay, but development on the edge of the settlement will not alter the character of the views from Bennachie in any way. This is a site which is already allocated for employment development and the principle of development in this area is therefore firmly established.

The site is well contained within the existing urban environment and is located at the entrance to the town from the B993. It is important that any development at the site is well designed with a sympathetic landscaping scheme to create an attractive gateway to the settlement. A residential development is more suitable to achieve this given the character of Kemnay, in comparison to a commercial development for Class 4, 5 or 6 uses.

7.5 Education

The site is within the zone for Alehousewells Primary School and Kemnay Academy. The 2017 school roll forecasts estimate that there is to be a falling roll in the primary school and at 2022 the capacity is anticipated to be at 71%. Within a report to Education and Children's Services Committee on 1st February 2017 a revised capacity for the school was agreed, increasing the capacity by 47 pupils. The development will support this school and the school roll forecasts confirm that there is sufficient capacity to accommodate further housing development. Kemnay Academy is currently noted as over capacity within the School Roll Forecasts. However, additional capacity is currently available through the use of 'non-linked classrooms' and has a working capacity of 1,000 pupils.

The A96 corridor, including Blackburn, Kintore, and Inverurie, surrounding rural areas and Kemnay are served by Inverurie Academy and Kemnay Academy. Works are now programmed to commence in April 2018 on a new Inverurie Academy Campus for completion March 2020. This will provide an increased capacity of 1,227 pupils and will support the ongoing expansion of the area. This capacity will be taken up by the projected growth in the forecast for the catchment based on current plans. This will not provide capacity for the growth planned for Kintore, which is zoned to Kemnay Academy.

The current Action Programme for the delivery of the Local Development Plan identifies that there is a school estate review being considered within Garioch. A report to the Garioch Area Committee in January 2018 advised that an options appraisal for the capacity constraints at Kemnay Academy is being undertaken. This will be essential to ensure that this corridor can meet the strategic targets for growth. Kintore has a large planned settlement expansion which includes a site identified for a new secondary school. The delivery of a new secondary school will add further capacity in the area and will ease the pressure on existing secondary schools such as Kemnay Academy.

As a settlement with dedicated primary and secondary schools, Kemnay is a logical location for additional residential development. There are already major allocations in Kintore and Inverurie, and there are uncertainties surrounding any further new housing allocations in Inverurie until the strategic road network has been upgraded by the dualling of the A96 and other potential road improvements still to be designed. Kemnay, whilst not providing housing to meet the strategic targets can assist in part to the provision of the strategic infrastructure that this area requires to grow, namely a new secondary school.

7.6 Transportation

Kemnay is a town that benefits from a range of local shops, services and facilities and it is clear to see why this is a desirable location. The image below shows the distances from the centre point of the site to the surrounding area highlighting how well connected this site is and the opportunity to encourage sustainable modes of travel. There are operating bus services from Kemnay to the nearby settlements of Inverurie, Blackburn and Kintore as well as a direct bus service from Kemnay to Aberdeen. Rail services are presently available at nearby Inverurie and rail services will be enhanced following the completion of a new station at Kintore.



Figure 5: Walking Distances

Figure 5 shows the services and facilities that are available within walking distance of the site. This plan demonstrates that the site is well connected to existing services in Kemnay thus reducing the need to travel by car. In addition, there excellent bus services operating in Kemnay and along Victoria Terrace.

7.7 Open Space

Kemnay benefits from a range of different types of open space including formal sports areas and informal recreation, including a number of walking routes around Fetternear Estate and The Place of Origin. The development would enhance the existing provision of local open space and a minimum of 40% of the development will be retained as public open space in line with the Council's prevailing policy.

7.8 Affordable Housing

The Housing Need and Demand Assessment identified housing need across all towns and villages in Aberdeenshire. The SDP Main Issues Report recognises that to meet the levels of need there will be a need for fully affordable development sites in Aberdeenshire. Within the Strategic Housing Investment Plan Kemnay is identified as a medium priority settlement (second level after the high priority settlements). Therefore, it will be important that there does remain a supply of housing to ensure that demand does not further exacerbate affordability constraints and development with a proportion of affordable housing can assist in meeting backlog housing needs. The development will assist in the provision of new affordable housing in Kemnay with affordable housing making up 25% of the overall housing proposed.

8. Conclusion

This bid has been submitted to the Council with a request that the site is reallocated in the next Local Development Plan from business use to residential use.

The Strategic Development Plan seeks to ensure that there is an adequate supply of employment land to meet local needs in settlements located outwith the SGAs, such as Kemnay. Taking cognisance of the historic development of employment and business land in Kemnay, it has been demonstrated that demand is and has been subdued. Demand for employment land is greater along the A96 strategic growth area at the established commercial estates in Kintore, Blackburn and Inverurie. It is therefore more appropriate if business land is allocated in these settlements rather than towns such as Kemnay where there is evident lack of demand with any business/employment development at the site almost certainly being commercially unviable. Notwithstanding this, there remains 4.3ha of allocated business land to the north of Kemnay at BUS1 and BUS3, which is the most appropriate location for business/employment development in the town and is more than large enough to meet future demand during the local development plan period.

In contrast to the subdued demand for employment land, there is an identifiable need for future housing in Kemnay. This is evidenced by the steady number of housing completions which has only been limited due to constraints in land supply and delays to housing development. The supply of housing land in Kemnay is due to run out by 2020 which will lead to a shortfall in supply unless new housing allocations are identified. There will continue to be a need and demand for new housing in Kemnay and additional allocations will be necessary over the next plan period to ensure that this need is met.

The site is allocated in the current Local Development Plan for development and it is not considered that there are any environmental or any other overarching development constraints that will inhibit the delivery of the proposed development. The applicant is committed to the delivery of housing at the site and is confident that it would provide an opportunity to enhance the entrance to the settlement from the east along the B993.

It is requested that the Council provide support to this proposal to ensure a continued supply of housing within Kemnay is maintained over next Local Development Plan period.

Appendix 1: Indicative Layout

Appendix 2: Option 2 Supporting Statement

Appendix 3: Option 3 Supporting Statement



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**ABERDEENSHIRE LOCAL DEVELOPMENT PLAN
RESPONSE TO MAIN ISSUES REPORT
GR134, KIRKSTYLE, KEMNAY**

APRIL 2019

On behalf of
CHAP Group (Aberdeen) Ltd



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



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1. Introduction

- 1.1. This report has been prepared by Halliday Fraser Munro, Chartered Architects and Town Planning Consultants, on behalf of CHAP Group (Aberdeen) Ltd. It is written in response to the Aberdeenshire Local Development Plan Main Issues Report.
- 1.2. At the 'Call for Sites' stage CHAP Group (Aberdeen) Ltd submitted a bid for land in Kemnay that is currently allocated for business use (BUS2) to be reallocated as a site suitable for up to 65 houses. This bid has not been supported in the MIR as an 'officer's preference'.
- 1.3. The site was first allocated as a future development opportunity in the 2006 plan as BUS2 however there has been no interest in the site as a business/commercial opportunity over the past 13 years. There has only been one Planning Application (APP/2003/1626) submitted for the site since 2000. This was in 2003 for a residential and commercial development which was approved but not developed.
- 1.4. Ultimately there has been little development on other BUS sites in Kemnay. On BUS3 there was an application (APP/2015/0572) to change the use of a car sales show room and forecourt to light industrial. On BUS1 there has been a change of use application (APP/2018/1840) to industrial fabrication workshop and ancillary storage. This points to a low demand for employment in Kemnay and strong grounds for the reallocation of BUS2 for alternative appropriate use, such as housing.

2. Bid Summary

- 2.1. Bid GR134 was submitted for the reallocation of the site from business use to residential. There is a 'technical start' on the site as an access has been formed. The site could accommodate around 65 homes in a mix of one, two, three and four bedroom homes provided across terraced, semi-detached and detached properties, as shown in indicative layout plan below. This would provide a range of properties meeting market needs and demands in a popular part of Kemnay.



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Indicative Layout Plan

- 2.2. The Bid was not supported, the reasons given for this are;
 - the site is currently “safeguarded for business uses” and;
 - Council Officers have identified constraints associated with the site including flood risk, topography and landscape impact which would mean housing development would be inappropriate.
- 2.3. We do not consider any of the constraints highlighted by the Officer as being valid as they either do not exist as constraints or they have viable solutions. Notwithstanding our view that these are not genuine development constraints, they would exist whether the site was to be used under its current allocation of business use, or if the allocation was changed to residential. Focussing specifically on the baseless topography constraint, housing would be better suited and equipped to deal with challenging levels more easily due to the smaller size of a house plot giving it greater flexibility. Nevertheless, we would reiterate that we do not agree with Officer’s comments identifying topography as a constraint associated with the site.
- 2.4. In terms of the perceived flooding risk constraint, the SEPA Flood Maps do suggest that there is a risk of surface water on the site. It is, however, imperative to note that we have been advised that this is related to an infrastructure issue that can be resolved rather than a natural constraint and therefore does not present an issue in developing the site. This matter is therefore not a constraint that would prevent the site from the proposed change in allocation to residential.
- 2.5. The development would take vehicular access from the B993, using the existing access formed with pedestrian connections being to the west through the adjacent residential development.



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- 2.6. There has been no developer interest for the site under its current allocation. This is expanded in more detail below and evidenced by a letter provided by J&E Shepherd independent professional property agents. CHAP are an established developer who have successfully developed across Aberdeenshire, should the site be allocated for residential use CHAP will be able to deliver 65 homes.

3. Planning Context

3.1. Strategic Development Plan

- The purpose of the Aberdeen City and Shire Strategic Development Plan 2014 is to set a clear direction for the future of development in the North East.
- The SDP sets out that new housing will be focused in or as an extension to existing settlements and that settlements that are well served by public transport will be a particular focus. Residential development at Site GR134 would be a suitable extension to the settlement of Kemnay which has good public transport links to the surrounding area and Aberdeen City.
- Kemnay is located outwith the Aberdeen to Huntly Strategic Growth Area. The SDP notes that “Significant development will take place in the 31-mile road and rail corridor stretching from Huntly to Blackburn”. SGAs are the main focus for development, designed as such to capitalise on public transport routes. Blackburn, Kintore and Inverurie are included in the SGA and are well established business and employment locations. These towns have better connections to the trunk road network than Kemnay which is connected to the A96 by B-class roads only. Given this, as a location for business and employment it does not offer the same opportunity as Blackburn, Kintore, Inverurie and other towns within the SGA.
- A sensible approach to development in Kemnay would be to provide land for a measured supply of housing.

3.2. Proposed Strategic Development Plan

- In the Proposed Strategic Development Plan 2018 it is stated that in Local Growth and Diversification Areas “the scale and level of opportunities for new growth will vary from place to place, with larger towns such as Fraserburgh, Alford, Turriff, Banchory and Westhill being the main focus for new investment. Levels of growth in individual settlements should relate to local needs, with different places having different potential”. This sets out that development in Kemnay should be in line with local needs and that the village is not a main focus for new investment. We consider that providing a range of housing across a mix of tenures does more to meet the local needs of Kemnay than business land allocations for which there is little proven demand for.
- The proposed SDP also deals with the Delivery of New Homes. It states that “Local Development Plans must identify allocations for the period 2020 to 2032 which are deliverable within the timeframe of the period”. Should site GR134 be allocated for residential use CHAP Group (Aberdeen) Ltd are confident that new homes would be delivered in this period. The proposed



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SDP accepts that “some new development will need to take place on greenfield sites in order to deliver our Vision and future strategy for growth”. The greenfield nature of this site has already been altered as there has been partial construction of an access road and SUDS pond. This sets the site apart from other greenfield sites that have not experienced any development.

3.3. Aberdeenshire Local Development Plan 2017

- Of relevance to bid GR134 is Policy B1: Employment and Business Land of the ALDP requires existing land allocated for business use to be retained, unless there is a constraint on the site “whereby there is no reasonable prospect of it ever becoming marketable for business development or it is poorly located for employment use”.
- We consider that as the site has been allocated since the 2006 plan for business use and has never been developed this demonstrates there is no reasonable prospect of development. Policy B1 also states that alternative uses must “benefit the local community”, providing houses on this site would help to sustain the services in Kemnay and support local businesses in the village. Policy B1 requires a change of use to “respect the character of the area and be compatible with nearby uses”, it would be possible to explore this through a planning application, however we consider it would be appropriate to alter the zoning through the LDP preparation process. A residential development would be designed to a high standard in keeping with local character. The site is bordered to the west by residential uses, to the south by the B993 and to the north and east by open fields, we therefore consider that it would be compatible with nearby uses. The ALDP explains that proposals for change of use from business “will not normally be permitted if it removes all business land opportunities within the settlement”. Should site GR134 be reallocated from business use to residential a further two business allocations would remain, sufficient to meet any business demand in Kemnay through the period of the next LDP. As evidenced by the supporting letter from J&E Shepherd, there is not high demand for business land in Kemnay and there has been no interest in this site as a commercial development despite targeted marketing to three parties and marketing to all commercial areas in the Aberdeen market area.

3.4. Allocated and Preferred Sites

- OP1 is allocated for 66 houses. A planning application (APP/2015/1107) was submitted in 2015 and approved in August 2016. The site is under construction and is expected to be completed later this year (2019).
- OP2 was originally allocated in the 2012 LDP, to date there has been no development on the site and there have been no planning applications submitted. The MIR accordingly proposes to remove the site from the Plan.
- There is one preferred site, GR147, in the Main Issues Report. There is uncertainty around when and if this site will come forward as it is reliant on the Council depot being relocated to an alternate site. Development at GR147 will also result in the loss of trees.



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- The delivery of OP1 and removal of OP2 limits the supply of sites for residential development in Kemnay. The remaining preferred site (GR147) will not be developable until at the earliest 2021 further limiting any potential for new housing to be delivered in Kemnay.
- The draft HLA suggests that 26 and 45 homes were completed in 2017 and 2018, respectively, leaving no unconstrained house plots in Kemnay. Based on the delivery rates, there would not be a sufficient housing land supply in Kemnay during the LDP period even if the currently preferred site is allocated. Therefore additional sites are required such as those presented at Kirkstyle GR134 and GR135.

4. Kemnay Suitability

- 4.1. Kemnay has an estimated population of 3918 (2016) and falls within the second tier of settlements that have a population of between 3000 and 4000 people. As Kemnay is not within an SGA it is classified as being within a Local Growth and Diversification Area, accordingly the SDP seeks to identify housing allocations for such settlements to ensure that local growth needs are met. Kemnay is a popular place for people to live and benefits from the range of services and amenities available including primary and secondary school provision.
- 4.2. The 2017 Aberdeenshire Housing Land Audit shows that there will be no housing completions after 2020. This is due to the lack of allocated housing land in Kemnay, despite there being continued demand. A constrained supply of housing will increase demand on the existing housing stock which can in turn impact on the affordability of housing in the village. The proposed development of 65 homes (including 25% affordable) through GR134 would assist in meeting the local growth requirements of Kemnay. Were the site to be allocated it would provide a new supply of housing post-2020 when there are forecast to be no housing completions. An extension to Kemnay Academy and a review of academy provision in the Garioch area will help to address issues of school capacity that has previously been a constraint to development. The site is within the zone for Alehousewells Primary School and Kemnay Academy. The bid set out that the 2017 school roll forecasted that there was to be a falling role in the primary school and at 2022 the capacity is anticipated to be at 71%. This shows that there is capacity to accommodate housing development and that the proposed development would help to sustain the school. There have previously been constraints to development resulting from capacity issues at Kemnay Academy, however, an extension to Kemnay Academy and a review of Academy provision in the wider Garioch area help to address this. In addition, education was not raised as a reason for officers not supporting the bid.
- 4.3. The X20 and 420 bus routes connect Kemnay to Alford and Aberdeen City. These bus routes provide a frequent daily service for both commuters and leisure travellers getting to Aberdeen. The bus passes the frontage of the GR134 bid site.



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5. Site Suitability

- 5.1. We consider that the land should be rezoned from business to residential as the site has been allocated for business for thirteen years but has had no interest. It is clear that there is low demand for employment land in Kemnay. There are established areas of local employment concentrated to the north of the village around the quarry and in the town centre. Taking account of the current land uses to the north of Kemnay, it can be considered that the most appropriate location for business and commercial development is around the northern boundary of the village and elsewhere in the area at Thainstone, Midmill and Inverurie. Business development to the north will ensure that development is compatible with the surrounding land uses.
- 5.2. The lack of business development activity in Kemnay in previous years indicates that retaining BUS1, BUS2 and BUS3 will result in an overprovision of business land through the next Local Development Plan period. Retaining BUS1 and BUS3 in the north of the village would still provide enough flexibility in the availability of business land but would allow BUS2 to be developed for the more appropriate and in-keeping use of housing.
- 5.3. The site's location at the entrance to the town from the B993 offers the opportunity to create a high-quality gateway into the village providing a sense of arrival to Kemnay. A residential development is better suited to providing this than a business development for Class 4, 5 or 6 uses, especially given that the majority of development along the B993 is residential in nature.
- 5.4. The site is within the Bennachie Special Landscape Area (SLA). SLAs are in place to "conserve, enhance and manage landscape change over time to protect against development which might impact on the landscape, sense of place and quality of life". Site GR134 is just within the SLA boundary that covers a large area. Accordingly, it is not anticipated that any development on the site would have a negative impact on the SLA. The SLA designation is in place to protect the views over the surrounding lowlands to and from Bennachie.
- 5.5. Whilst Bennachie can be seen in the background of Kemnay, development on this site at the edge of the settlement will not change the views from Bennachie in any way. Should the site be allocated for residential use the design and layout of the development would take the SLA into consideration, ensuring development would not detract from the special nature of the Bennachie area. It should also be noted that almost all of Kemnay is within the SLA, including the recent housing development immediately west of the site, and as the site is allocated the SLA is not considered a constraint to development. In previous LDP processes the Bennachie SLA has not been considered a constraint demonstrated by the fact that the land is currently allocated as BUS2. Additionally, a business development would have more of an impact than housing as the massing would be greater and therefore development would be more visible compared to a continuation of housing, as proposed here, which would have a similar massing to the adjacent properties.
- 5.6. The SLA seeks to protect views to the north from Kemnay. The land and views north of the site are defined by the 'Place of Origin' and Kemay Quarry rather than views to Bennachie, providing a fixed backdrop and context for housing on GR134.
- 5.7. A Preliminary Visual Appraisal of the site is provided in Appendix 1 to demonstrate that the site fits into the existing landscape and will not have a detrimental landscape impact.



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- 5.8. The site does not currently provide a valuable wildlife habitat. There are no natural or built heritage environmental designations on or in close proximity to the site that would constrain development. As the site has already been allocated for employment development, the principle of development has been long established.
- 5.9. Site GR134 is a good location for housing and is more suitable for this than business use. The site is adjacent to a recent development of houses and is therefore compatible with neighbouring uses.
- 5.10. The site is in close proximity to village services and amenities which can be easily accessed on foot.
- 5.11. The Strategic Environmental Assessment (SEA) for the site reports that the site would have a neutral effect on all elements covered apart from population where the effect would be positive and landscape where the effect would be neutral/uncertain.
- **Population:** it is reported that the mix of house types would result in a range of housing choice for all groups across the population. This would be a positive contribution to the housing supply in Kemnay.
 - **Landscape:** it is reported that nature and land use in the area will be changed and displaced as will the relationship between landforms and land use; field pattern and boundaries as well as buildings and structure will change. This is the nature of development and is not unique to this specific site. The SEA does note that the changing nature of land use is likely to have only medium-term effects as over the longer-term what gets developed becomes part of the landscape. The SEA acknowledges that the site is located within the Bennachie Special Landscape Area and claims that the proposal would have a negative impact on the landscape character with a likely long term effect. As discussed in Point 5.2 the principle of development has already been established so we do not consider landscape impact a justifiable reason to not support residential development on Site GR134.
- 5.12. The 'preferred' Site GR147 currently operating as a council depot and plant nursery will result in significant loss of trees. The bid information submitted states the depot will "hopefully relocate to the new depot at Thainstone before the next Local Development Plan is adopted". The timescale for this move is not guaranteed therefore any delay would result in the site being constrained and not deliverable. Additionally, the community have expressed their wish to see Site GR147 "protected for use as allotments and recycling of green garden waste" as a "continuation of existing use" and satisfying "an established need for such facilities in Kemnay". If allocated, Site GR134 is readily deliverable and able to provide much needed housing in a popular location in Kemnay, we would therefore consider this a more sensible and secure residential allocation than Site GR147.

6. Housing Strategy

- 6.1. According to Aberdeenshire Council's Monitoring Statement 2017-2018 housing completions in Aberdeenshire in 2017 were at their lowest level for almost 30 years. The Statement notes that is unusual for completions to drop below 1000 units in Aberdeenshire, and notes that "the small number of large allocations in the area has contributed to the lack of housing supply".
- 6.2. CHAP Group have submitted a separate response on housing land supply which goes into more detail on this issue, but broadly, CHAP are of the view that due to the lack of delivery on large sites,



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the artificial uplift in housing numbers expected through increased site densities and shortfall identified through the 2018 Housing Land Audit, there is a need for additional housing sites to be allocated in the AHMA part of Aberdeenshire.

- 6.3. The housing strategy contained in the MIR relies heavily on existing allocated sites, a generic densification across sites within the AHMA, and some limited small-scale allocations across the area to meet Strategic Development Plan (SDP) housing requirement.
- 6.4. This approach raises serious concerns on the range and scale of housing that can be delivered on the back of the do-minimum strategy, the practicality of delivering significantly increased density on certain sites, and the relationship between that strategy, the SDP in its final form when approved later in 2019 and national policy on delivering more housing and a range of housing more effectively.
- 6.5. The size of GR135 fits with the proposed SDP which notes that allocations should be small scale in nature.
- 6.6. Additional allocations, in appropriate locations, particularly in established locations within the AHMA such as Westhill are required to deliver the SDP's housing requirement. Bid Site GR135 in Kemnay presents such a deliverable opportunity.

7. Conclusion

- 7.1. Bid GR134 was lodged at the 'Call for sites' stage of the LDP preparation process requesting that BUS2 be reallocated in the next Local Development Plan from business use to residential. This Bid was not 'preferred' by Council Officers. The arguments made at that stage still stand, namely there is low demand for business and employment land in Kemnay and what need there is can be met more appropriately by allocations BUS1 and BUS3 which combined contribute 4.3ha of business land to the area, a considerable amount for Kemnay.
- 7.2. There is greater demand for business and employment land in the Aberdeen to Huntly SGA in the established commercial estates in Inverurie, Kintore, Thainstone and Blackburn. We consider that it is therefore more appropriate to allocate business land in these settlements than in Kemnay where there has proven to be little demand for land for business development as confirmed by the J&E Shepherd letter.
- 7.3. There is an identified need for future housing in Kemnay, however there is no programmed delivery of housing after 2020 due to an absence of allocated sites.
- 7.4. The site is allocated in the current Local Development Plan for development and it is not considered that there are any environmental or any other identified constraints that would prevent the delivery of housing on the site. The applicant is committed to the delivery of housing on Site GR134 and is confident that it would enhance the village of Kemnay.
- 7.5. Having regard to the information set out in this response to the Main Issues Report, we respectfully request that this site be supported in the LDP as a residential allocation.



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APPENDIX 1

PRELIMINARY VISUAL APPRAISAL

GR134, KIRKSTYLE FARM, KEMNAY



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View 1





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View 2

