

# PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

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

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

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

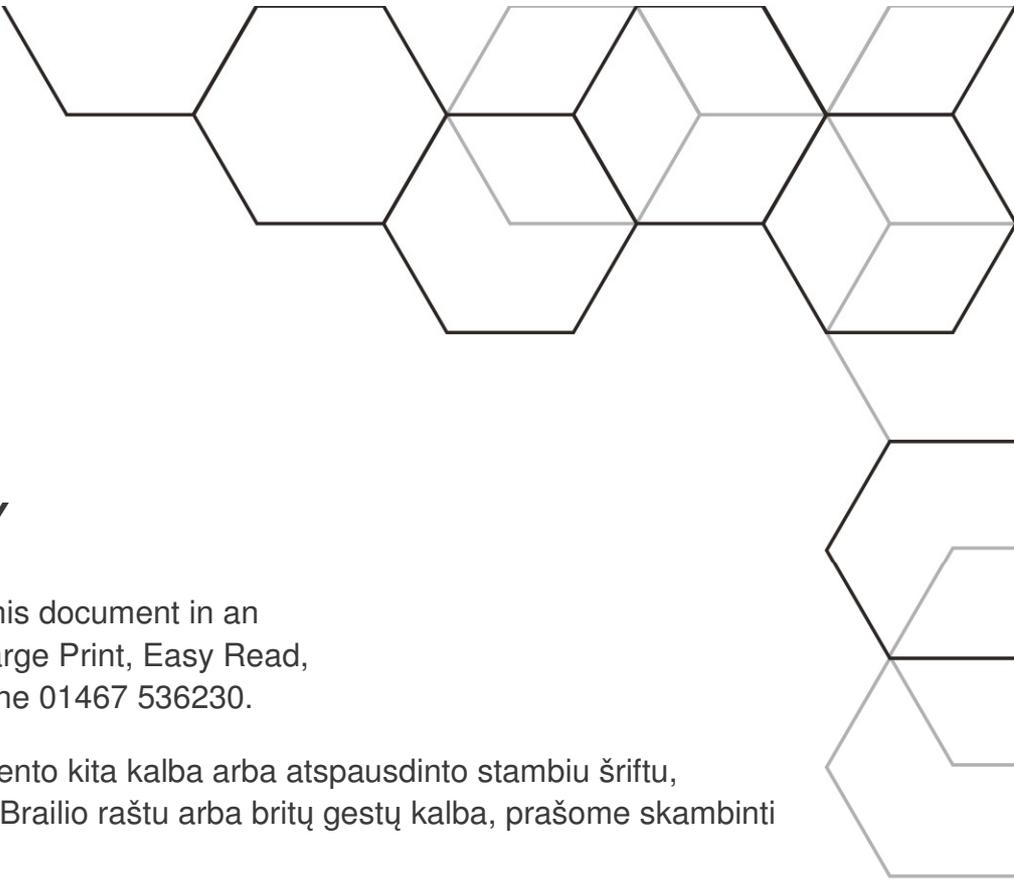
When writing a response to the Proposed Plan it is important to specifically state the modification(s) that you would wish to see to the Plan.

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

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

Please email comments to [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk) or send this form to reach us by 31 July 2020.

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



## 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.

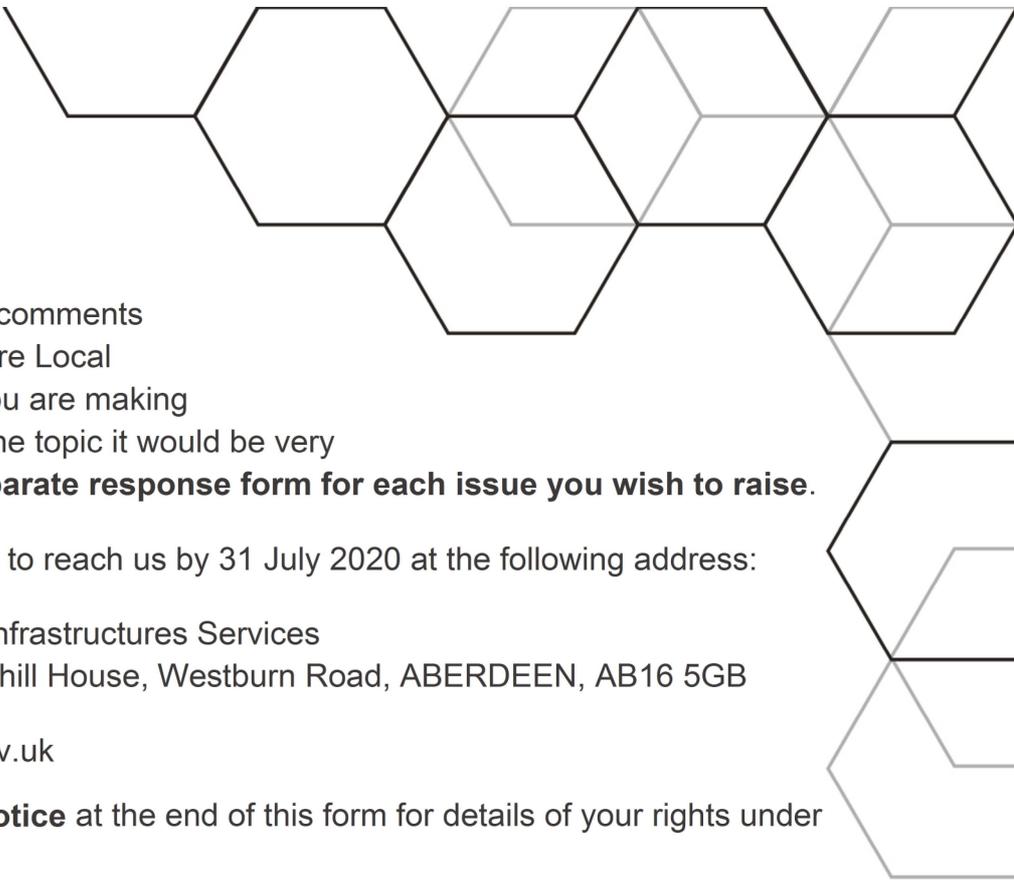
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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](mailto:ldp@aberdeenshire.gov.uk)  
Web: [www.aberdeenshire.gov.uk/ldp](http://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](mailto:planning@aberdeenshire.gov.uk).



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

Please email or send the form to reach us by 31 July 2020 at the following address:

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

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

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

## YOUR DETAILS

Title:	Mr
First Name:	Michael
Surname:	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) to allocate land at Kirkstyle Farm (site reference GR135 in the Main Issues Report) for housing.

## 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 2020 (Proposed Plan) to respectfully request that the site identified as GR135 Main Issues Report (MIR) is allocated 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 MIR both submitted on behalf of CHAP Group. 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 has been demonstrated how the site could be developed to deliver around 90 homes. These would comprise a mix of one, two, three and four bedroom homes with 25% to be delivered as affordable housing. The mix of homes would ensure that a range of types and tenures are offered to meet different demands and needs.

The Bid has not been supported by Council Officers who have raised issues relating to topography, landscape impact and lack of coalescence 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" against the proposed residential use at the site are either unmerited or have viable solutions. The proposed development would be thoughtfully and sensitively designed to minimise any landscape impact. There would be opportunities to incorporate new drystone walls, green corridors, formal green areas, woodland and areas of planting as part of the design to enhance the habitat value of the site. Further, it is proposed that the site would be brought forward as a strategic reserve site and would come forward after the development of the site to the north (referenced Site GR134 in the MIR). This would balance development on the northern side of Victoria Terrace by mirroring the opposite residential land uses at Site GR134 and Fyfe Park.

Despite the well-reasoned case made demonstrating that there are no justifiable constraints to disregard the site for a housing allocation, it was disappointing that the Council Officers had maintained their position not to allocate the site in the MIR Issues and Actions Papers, with no reasoned justification as to why the arguments made in our MIR response had been disregarded.

Flooding and drainage were added to the reasons not to allocate the site for housing in the Issues and Actions Papers, despite neither of these being raised as concerns when the MIR was initially published. Whilst a very small part of the site has been identified at risk of flooding, through the incorporation of a combination of suitably designed SuDS, there would be no risk of flooding on the site nor will there be an increased risk of flooding in surrounding areas. Accordingly, we do not consider flooding to be a justifiable reason against a housing allocation as there is a viable solution to mitigate this.

### **3.0 Housing Strategy**

#### **3.1 Kemnay**

Kemnay is a popular and attractive town providing a range of services and amenities, and benefitting from strong public transport links. The X20 and 420 bus routes pass the frontage of Site GR135. These services connect Kemnay to Alford and Aberdeen City, providing a frequent daily service for both commuters and leisure travellers getting to Aberdeen. The town is also well positioned to take advantage of Inverurie train station and the new station at Kintore, when completed.

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”*. This statement directs that development in Kemnay should be in line with local needs.

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 built 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 a 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 have been insufficient in meeting local housing needs, there is now a further housing land shortfall as a result of its reallocation. It is evident that additional housing allocations are necessary in Kemnay to meet its housing needs during the Proposed Plan period and given the housing delivery rates in Kemnay, Sites GR134 and GR135 would greatly assist in meeting that need if allocated for residential use.

In contrast, the take up for business land in Kemnay has been very subdued. 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. It is more appropriate to allocate business land in these locations. Any demand there is for business land in Kemnay can easily be met through the existing allocations at BUS1 and BUS3, which are more appropriately located to the north of Kemnay, and the new allocation at Birley Bush.

### **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 Crichie (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 allocated for housing, Site GR135 would positively contribute to the effective housing land supply in Kemnay and AHMA. As evidenced, there is a clear and identifiable need for new housing allocations in order to adequately meet local housing demand and to help support existing services. This need is demonstrated by the 2019 HLA which has no programmed house completions past 2021. Sites GR135 and GR134 are logical locations for new housing land allocations and could create an attractive planned residential gateway into Kemnay.

In light of the foregoing, we would again respectfully request that Site GR135 is allocated 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](mailto:dataprotection@aberdeenshire.gov.uk)

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

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

### Your information is:

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

Personal Data	
Legal Obligations	X

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

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

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

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

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

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

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

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

Not applicable.

The retention period for the data is:

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

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

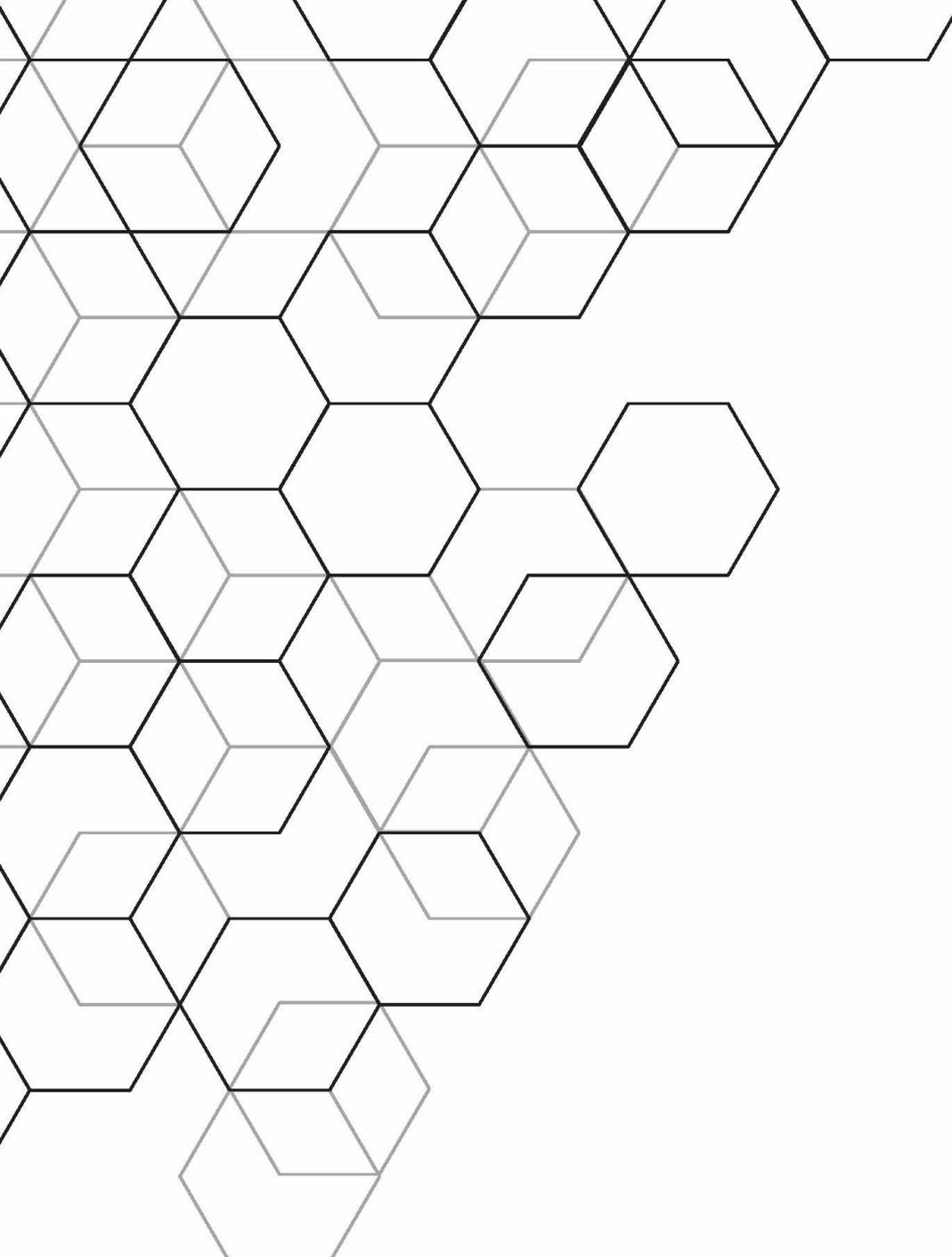
Not applicable.

Please note that you have the following rights:

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

Appendix 1  
Site FR135 – Development Bid

Appendix 2  
Site FR135 – 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](mailto: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 (South) – Option 2
Site address	
OS grid reference (if available)	NJ740162
Site area / size	6.7 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 The land is under option to 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:  None
Previous 'Call for sites' history. See Main Issues Report 2013 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>	Please provide Previous 'Call for sites' / 'Bid' reference number:  None

Local Development Plan status <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>	Is the site currently allocated for any specific use in the existing LDP?
	No
	If yes, do you wish to change the site description and or allocation?
	N/A

## 8. Proposed Use

Proposed use		Housing
Housing	Approx. no of units	111
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> <li>• Detached: 35%</li> <li>• Semi-detached: 30%</li> <li>• Flats: 5%</li> <li>• Terrace: 30%</li> <li>• Other (e.g. Bungalows):</li> </ul> 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.
		Number of: <ul style="list-style-type: none"> <li>• 1 bedroom homes: 8</li> <li>• 2 bedroom homes: 11</li> <li>• 3 bedroom homes: 53</li> <li>• 4 or more bedroom homes: 39</li> </ul> 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.
	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 <sup>2</sup>
	General industrial	Indicative floor space: 0m <sup>2</sup>
	Storage and distribution	Indicative floor space: 0m <sup>2</sup>
	Do you have a specific occupier for the site?	N/A

Other	Proposed use (please specify) and floor space	0m <sup>2</sup>
	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	90
	6-10 years	21
	+ 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"> <li>• <a href="https://www.environment.gov.scot/">https://www.environment.gov.scot/</a></li> <li>• EU priority habitats at <a href="http://gateway.snh.gov.uk/sitelink/index.jsp">http://gateway.snh.gov.uk/sitelink/index.jsp</a></li> <li>• UK or Local priority habitats at <a href="http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/">http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/</a></li> <li>• Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a></li> </ul>	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:	
<b>Biodiversity enhancement</b>		
<p>Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy, <a href="http://www.gov.scot/Resource/0045/00453827.pdf">http://www.gov.scot/Resource/0045/00453827.pdf</a>) by ticking all that apply. Please provide details.</p> <p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: <a href="http://www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf">www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</a></p> <p>Advice is also available from Scottish Natural Heritage at: <a href="https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers">https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers</a> and <a href="http://www.nesbiodiversity.org.uk/">http://www.nesbiodiversity.org.uk/</a>.</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):	
	<p>If yes, please provide details:</p> <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"> <li>• <a href="http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d">http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d</a></li> <li>• <a href="http://portal.historicenvironment.scot/">http://portal.historicenvironment.scot/</a></li> <li>• <a href="https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire">https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire</a></li> </ul>	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	

## 12. Landscape Impact

Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> )	No. 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:
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"> <li>• SNH: Landscape Character Assessments <a href="https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment">https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment</a></li> <li>• SNH (1996) Cairngorms landscape assessment <a href="http://www.snh.org.uk/pdfs/publications/review/075.pdf">http://www.snh.org.uk/pdfs/publications/review/075.pdf</a></li> <li>• SNH (1997) National programme of landscape character assessment: Banff</li> </ul>	<b>If your site is not within an SLA</b> , 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:  Landscape impact is considered within the supporting statement at section 5.3.

<p>and Buchan  <a href="http://www.snh.org.uk/pdfs/publications/review/037.pdf">http://www.snh.org.uk/pdfs/publications/review/037.pdf</a></p> <ul style="list-style-type: none"> <li>• SNH (1998) South and Central Aberdeenshire landscape character assessment  <a href="http://www.snh.org.uk/pdfs/publications/review/102.pdf">http://www.snh.org.uk/pdfs/publications/review/102.pdf</a></li> </ul>	
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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 <a href="http://map.sepa.org.uk/floodmap/map.htm">http://map.sepa.org.uk/floodmap/map.htm</a>)</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 <a href="http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search">http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search</a>)?</p>	Water	TBC
	Waste water	TBC
<p>Has contact been made with Scottish Water?</p>	<p>No</p> <p>If yes, please give details of outcome:</p>	
<p>Will your SUDS scheme include rain gardens? <a href="http://www.centralscotlandgreennetwork.org/campaigns/greener-gardens">http://www.centralscotlandgreennetwork.org/campaigns/greener-gardens</a></p>	<p>See below. Please specify:</p> <p>To be fully considered through future landscaping strategy.</p>	

#### b. Education – housing proposals only

<p>Education capacity / constraints  <a href="https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/">https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/</a></p>	<p>Please provide details of any known education constraints. Is additional capacity needed to serve the development?</p> <p>The education constraints and benefits of development have been described within the Supporting Statement.</p>
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Has contact been made with the Local Authority's Education Department?	No If yes, please give details of outcome:
<b>c. Transport</b>	
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 <a href="mailto:transportation.consultation@aberdeenshire.gov.uk">transportation.consultation@aberdeenshire.gov.uk</a>	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 site benefits from a good provision of and access to public transport due to its location within and at the edge of Kemnay. The distances to the bus stops are shown under Section 16 of this form. Further details of public transport 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 a short walking distance of a range of services and facilities that are provided within Kemnay. The distance of local services are shown under Section 16 of this form. Further details of connections are contained within the supporting statement at Section 5.5.
<b>d. Gas / Electricity / Heat / Broadband</b>	
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 site's location on the edge of the settlement and with the recent development to the north-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>There will be renewable technologies incorporated within the development, but due to the timescales until the adoption of a new Local Development Plan, potential changes to Building Standards requirements and advances in technology this cannot be defined at this stage.</p>
<p><b>e. Public open space</b></p>	
<p>Will the site provide the opportunity to <b>enhance the green network?</b> (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: The proposals provide an opportunity to enhance the green links surrounding the site and supplement the existing landscaping in the surrounding area. There are footpaths nearby the site, including a 'secret den'.</p>
<p>Will the site meet the open space standards, as set out in Appendix 2 in the <b>Aberdeenshire Parks and Open Spaces Strategy?</b> <a href="https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf">https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf</a></p>	<p>Yes Please specify: The indicative layout prepared shows that a minimum of 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>

Will the site deliver any of the shortfalls identified in the <b>Open Space Audit</b> for specific settlements? <a href="https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/">https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/</a>	Not applicable Please specify:  The development will contribute towards the strategic aims of the Open Space Strategy in 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.
<b>f. Resource use</b>	
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 <a href="https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf">https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf</a>	No
Carbon-rich soils and peatland <a href="http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/">http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/</a>	No
Coastal Zone <a href="https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf">https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf</a>	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 <a href="https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/">https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/</a> and advice at <a href="http://www.hse.gov.uk/landuseplanning/developers.htm">http://www.hse.gov.uk/landuseplanning/developers.htm</a> )	No
Minerals – safeguarded or area of search <a href="https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf">https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf</a>	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. <a href="http://map.environment.gov.scot/Soil_maps/?layer=6">http://map.environment.gov.scot/Soil_maps/?layer=6</a>	No

'Protected' open space in the LDP (i.e. P sites) <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> and choose from Appendix 8a to 8f	No
Rights of way / core paths / recreation uses	No
Topography (e.g. steep slopes)	Yes
Other	No (please specify)
<p>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.</p> <p>The site does rise up from the road, but with roads and building lines following the contours a successful development can be achieved with appropriate gradients and minimal alterations to the existing topography.</p>	

### 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:
	<p>If not yet, please detail how you will do so in the future:</p> <p>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</p>

### 18. Residual value and deliverability

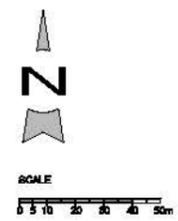
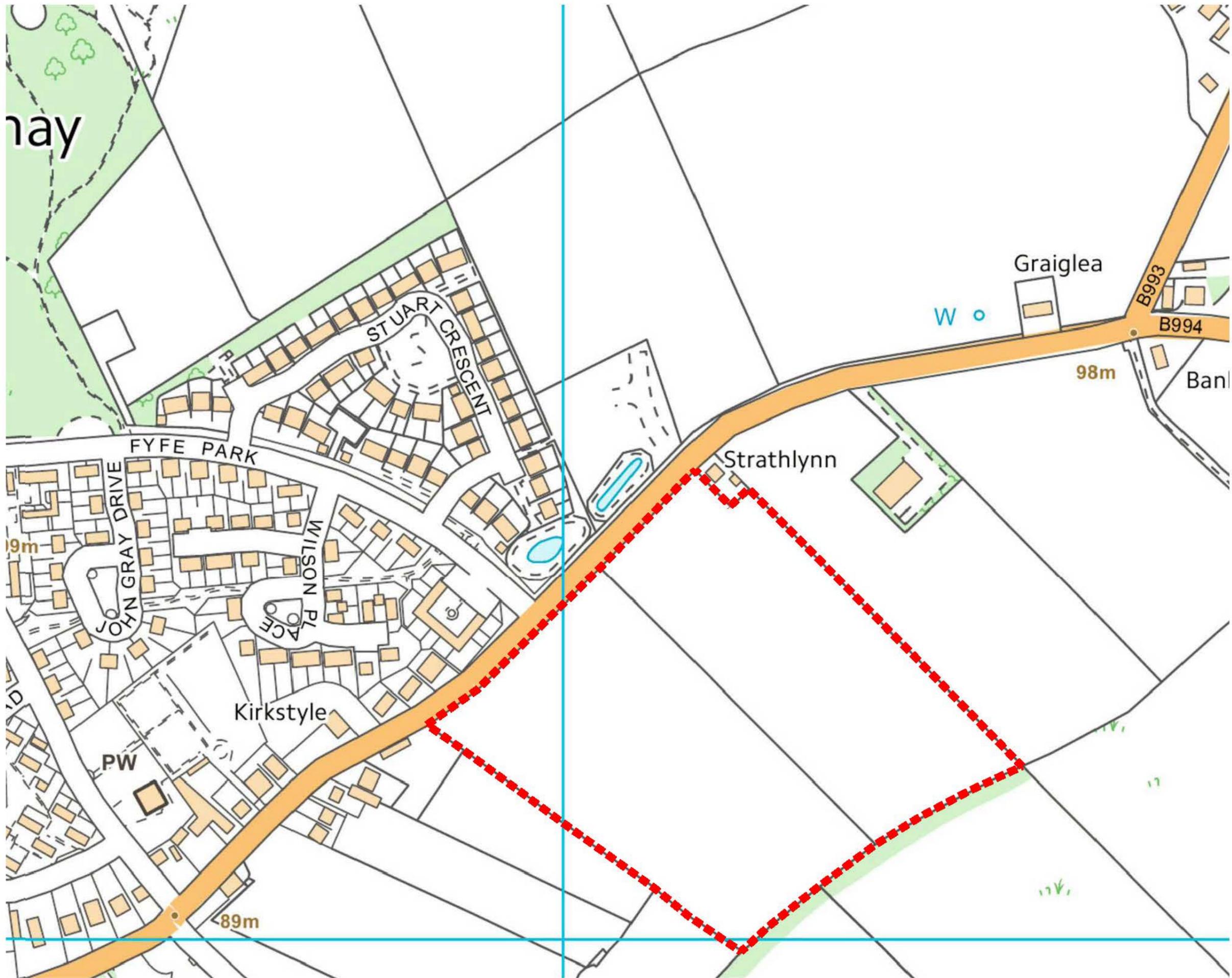
Please confirm that you have considered the 'residual value' of your site and you are confident that the site is viable when infrastructure and all other costs, such as constraints and mitigation are taken into account.	I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable:  Please tick: <input checked="" type="checkbox"/>
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 forecasted 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 and popularity of the settlement that there will continue to be a demand for new housing in Kemnay.  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:  <b>Supporting Statement:</b> 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.  <b>Indicative Site Layout:</b> 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.  <b>Please Note</b> 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.
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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.



INFORMATION	
Project/Client:	Project No:
Chap Homes	180024
Residential Development at	Draw No:
Kirkstyle Farm	A10-00-11
Kemnay	Rev:
Drawing:	Scale:
Location Plan	1:2500 @A3
Option 2	Drawn By:
	Date:
	Checked By:
	Date:



Our drawings are not valid unless signed, stamped and dated by a registered professional engineer or architect.



# Kirkstyle Farm, Kemnay

Local Development Plan Bid 2018

Option 2

**NORR**

# Kirkstyle Farm, Kemnay

## Option 2

### 1. Introduction

This statement has been prepared on behalf of CHAP Group (Aberdeen) Ltd in support of a bid for the allocation in the next Aberdeenshire Local Development Plan in respect of a site to the east of the settlement of Kemnay for housing. The site lies immediately east of the town's current settlement boundary and abuts Victoria Terrace/B993, which runs along the site's northern boundary.

In support of this bid a layout has been provided to demonstrate how the development could be designed to reflect the site's setting and the surrounding character. It should be noted that a total of three options have been submitted for development around Kirkstyle Farm adjacent to Victoria Terrace/B993 and the application bid form and Supporting Statement for each bid should be reviewed in conjunction with each other.

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

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

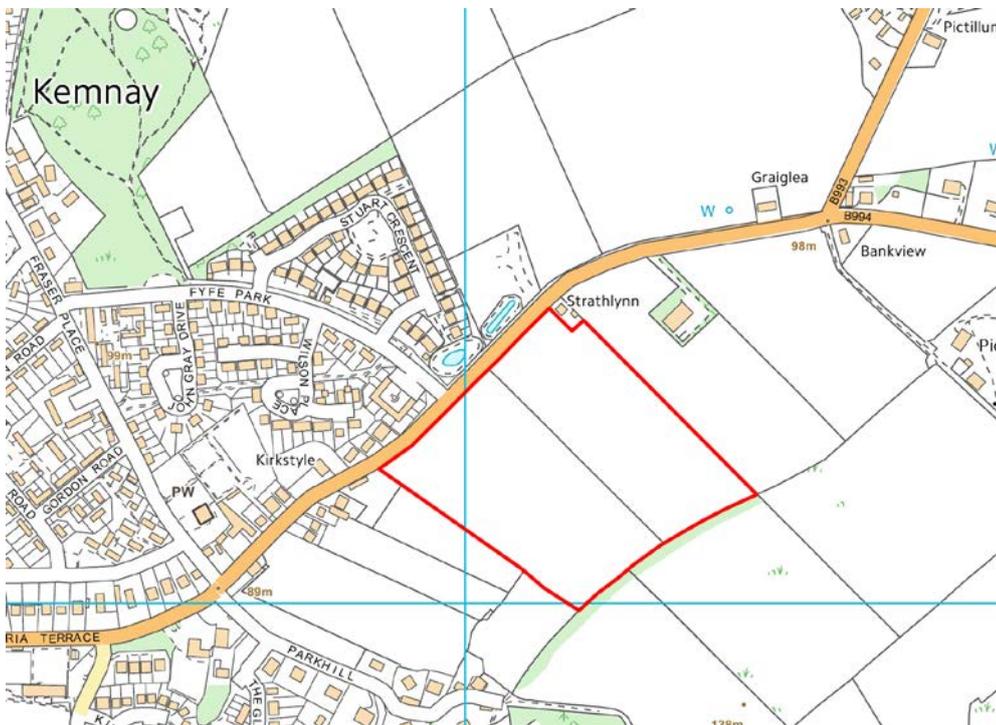


Figure 1: Site Location

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 extends to an area of approximately 6.7ha and is located immediately east of Kemnay and the site fronts onto Victoria Terrace/B993, which serves as the town's main eastern entrance and leads westwards from the site to the town centre. The land to the south of Victoria Terrace and immediately east of Kemnay's current settlement boundary is predominantly agricultural in nature. There are however, a series of commercial and residential properties that run eastwards from the site along the south side of Victoria Terrace, which provides a continuous visual connection from the site to the eastern settlement boundary.

There is no planning or development bid history relevant to this site.

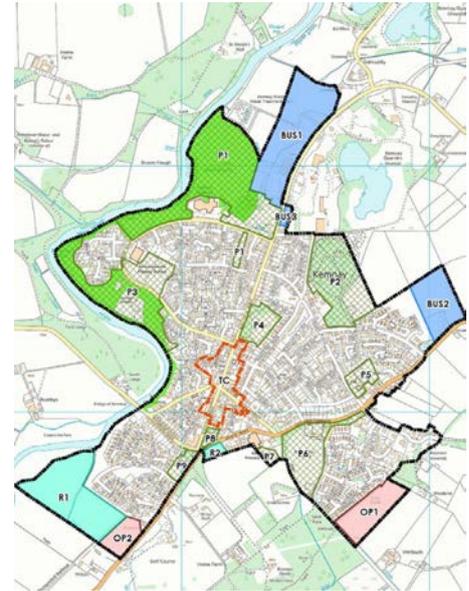


Figure 2: ALDP Proposals Map

## 2. Proposed Development

This bid proposes a new housing allocation at the site which has the ability to accommodate around 111no. 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.

An indicative layout has been prepared to illustrate how the development could be designed on the site with the houses and roads following the contours.

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.

## 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 SDPs 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 Strategic Development Plan, 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.

#### 4. Benefit of Residential Development

Kemnay has an estimated population of 3,918 people and falls within the second tier of larger settlements that have a population of between 3,000 and 4,000 people. The SDP 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 an 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 111 homes (including 25% affordable housing) will assist in meeting the local growth requirements of Kemnay and if allocated would 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. With robust demand for housing in Kemnay this site is well placed to deliver much needed housing with the plan period and would ensure that there is a continued supply of land for new housing within Kemnay.

#### 5. Assessment of Development Proposal

##### 5.1 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.

## 5.2 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.

## 5.3 Landscape

The site is located to the south of the B993 and is situated outwith the designated Bennachie Special Landscape Area. The land rises towards the south as shown in Figure 3. There is a row of trees that follow the southern boundary and it is the intention of the applicant to retain these trees. The land continues to rise beyond the extent of the site boundary and the land can be seen rising beyond the site. Figure 4 shows that there is a context for development on the south side of the B993 with the residential properties at Parkhill visible towards the western boundary



Figure 3: Photograph of Site from Land to the North



*Figure 4: Photograph of Site From Land to North Looking Towards Parkhill*

The proposed housing use will have minimal impact on the wider landscape setting of the surrounding area. Any impact will be minimised through the careful and considered use of strategic landscaping and public open space throughout the site, particularly in and around the site boundaries and higher ground levels. There is of course existing housing development on the north side of Victoria Terrace and development at the site will essentially balance out the built form by mirroring the opposite residential land use. Further, the land opposite the site, to the east of the aforementioned housing development is allocated in the current LDP for business use.

#### 5.4 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 1<sup>st</sup> 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.

### 5.5 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 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 are excellent bus services operating in Kemnay and along Victoria Terrace.

## 5.6 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.



Figure 5: Photograph of Site

## 5.7 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 remains a good supply of new housing to ensure that demand does not further exacerbate affordability constraints, and development with a proportion of affordable housing in line with policy 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.

## 6. Conclusion

This bid has been submitted to the Council with a request that the land proposed is identified within the next Local Development Plan for a residential development of approximately 110 homes.

An indicative layout for the development of the site has been prepared to demonstrate how the development of 110 homes and the appropriate standards of open space can be achieved on this site and how it would fit within the landscape.

There is an identified need for additional residential development and the supply of residential land within Kemnay is forecast to have run out by 2020. There will continue to be a need and demand for residential development within Kemnay and additional allocations will be necessary over the next plan period.

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

# Appendix 1: Indicative Residential Layout

## Appendix 2: Option 1 Supporting Statement

# Appendix 3: Option 3 Supporting Statement



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**ABERDEENSHIRE LOCAL DEVELOPMENT PLAN  
RESPONSE TO THE MAIN ISSUES REPORT  
GR135, KIRKSTYLE, KEMNAY**

**APRIL 2019**

On behalf of  
CHAP Group (Aberdeen) Ltd



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS



**HALLIDAY FRASER MUNRO**

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# HALLIDAY FRASER MUNRO

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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. Bid GR135 was submitted for land at Kirkstyle Farm (South) for proposed residential use for 111 homes at the 'Call for Sites' stage.
- 1.3. The bid has not been supported in the Main Issues Report. The reasons given for not supporting the site are:
  - The proposed site is situated adjacent to the settlement boundary but would appear isolated in relation to the existing pattern of development with little or no coalescence to existing development to the north or west;
  - The proposed site would be visually prominent given the topography of the site and possible impacts on the Bennachie Special Landscape Area.

## 2. Bid Summary

- 2.1. The proposed development of circa 90 homes comprising a mix of detached, semi-detached, cottage flats and terraced properties, as shown in indicative layout below, offers a choice to meet different needs and market demand. Included in the proposed development would be affordable housing comprising 25% of the properties.



Figure 1: Indicative Site Layout



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- 2.2. The development would be taken forward by CHAP Group (Aberdeen) Ltd. CHAP has been building homes for more than 20 years in the Aberdeenshire market. They have proven delivery of high quality and popular developments and would be committed to delivering the same at this site.
- 2.3. It was proposed in the bid that the development could include biodiversity enhancements. There would be opportunity to incorporate new drystone walls as features within the development reflecting the local context and that these could be combined with green corridors to enhance the habitat value of the site. The open spaces within the development were proposed to be a mixture of formal green areas, woodland, formal planting and areas for wildflower planting.
- 2.4. The submitted bid confirmed that the site does not currently provide a valuable habitat for wildlife and there are no environmental designations of either natural or built heritage on or near to the site. There are no areas identified to be at risk of flooding and suitable SUDS will ensure there will be no increase in the risk of flooding at the site or in surrounding areas as a result of the development.
- 2.5. 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 have helped to address this. In addition, education was not raised as a reason for officers not supporting the bid.

### **3. Planning Context**

- 3.1. The Aberdeen City and Shire Strategic Development Plan (2014) sets out the vision of the two Councils and a clear direction for the future development of the North East.
- 3.2. Part of the SDPs strategy is to focus development in areas where there are clear opportunities to encourage people to use public transport. Kemnay has good public transport links to surrounding towns and Aberdeen City.
- 3.3. In the SDP Kemnay is classified as a Local Growth and Diversification Area. In these areas levels of growth should relate to local needs and will vary from place to place. An aim for these areas is to provide a mix of housing opportunities for everyone but with a focus on providing smaller homes to buy or rent, something that can be provided by this proposed development.
- 3.4. The SDP recognises that there will continue to be pressure for housing in the countryside which is not connected to existing settlements and requires that LDPs in line with Scottish Planning Policy, should approach this by focusing new housing in existing settlements, particularly those well served by public transport. The SDP notes that this will help to create and maintain successful places and enhance sustainability. Kemnay is well placed to accommodate an extension given its proximity to the trunk road network, frequent public



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transport service and its range of services and amenities including primary and secondary school provision. Future housing in Kemnay would help to reduce pressure for housing in the countryside.

- 3.5. Population growth is one of the themes included in the SDP, this is informed by the Housing Needs and Demand Assessment from 2011 which estimated that the population would grow by 35,000 up to 2035, this coupled with the average number of people in each household falling means 54,000 new homes are required. In the period 2017-2026 in the Aberdeen Housing Market Area, in which Kemnay is included, the housing requirement is 15,017. To meet this the SDP requires both planning authorities to make land available for homes through local development plans.
- 3.6. The 2017 Housing Needs and Demand Assessment demonstrates that population growth has been significantly higher in Aberdeenshire than in Aberdeen City, but the Aberdeen Housing Market Area (HMA) population has increased by more than the Rural HMA. From this it can be concluded that population growth and accordingly housing demand in Aberdeenshire has been strongest in areas close to the city. At 16 miles from Aberdeen City Centre and close to Inverurie, Kintore and Blackburn, we consider Kemnay a sensible location for new residential development where there is proven demand for housing.

### 3.7. Allocated Sites

- OP1 was 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 allocated in the 2012 LDP, to date there has been no development on the site and there have been no planning applications submitted with the MIR proposing to remove the site from the plan as a result.
- 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. If developed GR147 would be separated from the village due to the agricultural field on the site's eastern boundary creating a sense of remoteness from the rest of Kemnay.
- The delivery of OP1 and removal of OP2 limits the supply of sites for residential development in Kemnay. The remaining allocated site will not be developable until 2021 at the earliest further limiting any potential for new housing to be delivered in Kemnay.

## 4. Kemnay Suitability

- 4.1. Kemnay is a popular and attractive town in the Garioch area of Aberdeenshire. It benefits from a range of services and amenities and a strong village core which provides areas of employment boosted further by employment land in the north of the village around Kemnay Quarry.



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- 4.2. Kemnay is well covered by public transport routes benefiting from direct buses to nearby Blackburn and Kintore and Aberdeen City. Kemnay is also well placed to take advantage of the rail station in Inverurie and will see further benefit following the completion of a new station at Kintore. As well as having effective public transport routes, the village of Kemnay benefits from a range of local shops, services and facilities reducing the need for people to travel outwith the village.
- 4.3. The site is within the zone for Alehousewells Primary School and Kemnay Academy which as discussed in section 2 have capacity to support additional pupils from new residential development.
- 4.4. Kemnays proximity to the A96 is advantageous for residential development. The A96 trunk road provides links south to Aberdeen, Dyce and Westhill and north to Inverurie and Huntly. These towns all provide services and facilities as well as employment opportunities.
- 4.5. The 2017 Aberdeenshire Housing Land Audit shows that there are no housing completions programmed for after 2020. This is due to the lack of allocated land in Kemnay, despite there being continued demand. A constrained supply of housing can increase demand on the existing housing stock which in turn can impact on the affordability of property in the village. The proposed development would provide 90 homes and would include 25% affordable homes, assisting in meeting the local growth requirements of Kemnay. Were the site to be allocated it would provide a new supply of housing post-2020.

### 5. Site Suitability

- 5.1. The site extends to approximately 6.7ha and located immediately east of Kemnay fronting onto Victoria Terrace/B993 which acts as the towns main eastern entrance and travels westwards from the site to the town centre.
- 5.2. One reason given in the Main Issues Report for not supporting the site is that it is adjacent to the settlement boundary and isolated in relation to the existing pattern of development. Site GR135 is being submitted as a strategic reserve site to come forward after development of Site GR134 in the second phase of the LDP. Site GR134 is directly opposite Site GR135 so there would be residential development on the north side of Victoria Terrace, this would balance development on either side of Victoria Terrace by mirroring the opposite residential land use at Site GR134 and Fyfe Park, creating a planned residential gateway into Kemnay. The preferred GR147 would be more isolated than GR135 given that both a field and public park separates GR147 from the village.
- 5.3. The second reason given for not supporting the bid was that the proposed site would be visually prominent and could impact on the Bennachie Special Landscape Area. **The site is situated outwith the SLA** and so we do not consider this a sufficient reason to discount development on this site. The proposed housing would have minimal impact on the wider landscape setting of the surrounding area as demonstrated by the Preliminary Visual Appraisal in Appendix 1. The proposed development would be sensitively designed to minimise any landscape impact. This would include considered use of strategic landscaping and public open space throughout the development.



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- 5.4. The Strategic Environmental Assessment (SEA) reported that the site would have a neutral effect on all elements covered in the SEA apart from landscape which was reported as having a negative/uncertain impact. The explanation given for this was that the nature of land use in the area will be changed and displaced, “the relationship between land forms and land use; field pattern and boundaries as well as buildings and structure will change”. The SEA sets out that a landscape and visual impact assessment may be required, this would be provided were the site to be allocated for residential use. We consider that any landscape impact can be mitigated through a well designed development that considers and takes into account the landscape setting of the surrounding area.

### **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, 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. The bid at the ‘Call for Sites’ stage was for approximately 111 houses to the east of Kemnay on a site immediately east of the villages current settlement boundary. The bid is not considered an Officer’s Preference in the Main Issues Report. The justifications for development put forward in the bid are still relevant, namely that there is high demand for



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housing in Kemnay and that the site would provide a perfectly logical extension to the settlement.

- 7.2. There is an identified need for additional residential development and the 2017 Housing Land Audit demonstrates that there are no programmed housing completions past 2020. We propose that this site should be allocated as a strategic reserve allocation to come forward after Site GR134 in the second phase of the LDP.
- 7.3. We consider the reasons given for not supporting the bid can be overcome through considered design and layout and the site could accommodate an attractive residential development in a popular and sustainable location within the Garioch area.
- 7.4. Having regard to the information set out in this response to the Main Issues Report, we respectfully request that this site, GR135, be supported in the LDP as a residential allocation.



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**APPENDIX 1**

**PRELIMINARY VISUAL APPRAISAL**

**GR135, KIRKSTYLE FARM (SOUTH), KEMNAY**



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