

PRIVACY NOTICE

LOCAL DEVELOPMENT PLAN

PUBLIC COMMENT

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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

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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.

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Not applicable.

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- to request access to your personal data;
- to data portability, where the legal basis specified above is:
 - Consent; or
 - Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

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 refer to Aberdeenshire Council's Privacy Notice at the end of this form for details of your rights under the Data Protection Act.

Your Details

Date:	28.7.2020
Name:	HALLIDAY FRASER MUNRO
Telephone Number:	[REDACTED]
Email address:	[REDACTED]
Postal Address:	[REDACTED]
Postcode:	[REDACTED]

Are you happy to receive future correspondence only by email? Yes

Are you responding on behalf of another person? Yes

If yes who are you representing? **W. Maitland & Sons**

Would you like to subscribe to the Aberdeenshire LDP eNewsletter: Yes

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



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS

Your Comments (no more than 2000 words)

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

Appendix 7d Settlement Statements – Garioch

Modification Sought:

- i) Lethenty should be allocated as a settlement and the site shown as Phase 2 on the indicative bid plan identified for up to 7 homes.

Reason for change:

PLEASE SEE SUPPORTING STATEMENT



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS

**ABERDEENSHIRE LOCAL DEVELOPMENT PLAN
RESPONSE TO PROPOSED LOCAL DEVELOPMENT PLAN
LAND AT LETHENTY, INVERURIE
GR081**

JULY 2020

On Behalf of W. Maitland & Sons

GR081 – Lethenty, Inverurie – Proposed Local Development Plan Response

Modifications you wish to see – Lethenty should be allocated as a settlement and the site shown as Phase 2 on the indicative bid plan identified for up to 7 homes.

Housing in the Countryside policies (Policy R2) should be relaxed. The Plan should identify more settlements, including Lethenty, where either allocated or organic growth could occur. It should also extend the cluster growth policies across a wider area and provide a criteria based policy that identifies where such growth could be considered appropriate.

Reasons for Change – See Below

1. Introduction

An LDP bid for the above site was lodged during the call for sites stage early in 2018 and a Main Issues MIR response fully countering criticisms of this site (see supporting document **LT1**) in 2019. This site, bid reference GR081, offers an opportunity for new sustainable semi-rural lifestyles that are generally not available to the wider public under the current proposed policy stance on housing. Smaller rural settlements are central to Aberdeenshire's character and a small extension to an existing settlement will help support and cement that character. A proposed new cycle route direct to Inverurie and the existence of multiple commercial businesses in Lethenty support its role as a rural settlement but also suggest that it should be formally identified as a settlement that can support continued limited growth.

On a more general note the housing strategy adopted in the MIR has significant limitations. Not enough housing land has been allocated on a range of locations or scales. Small scale extensions to settlements such as Lethenty will help to maintain the region's rural population as it ages and help maintain a mix of working age families as well as retired and older, usually smaller households.

2. Lethenty

2.1 Services and Facilities

Lethenty is a long-established rural settlement based around Lethenty Mill. The Mill is used for commercial purposes and houses a number of small local businesses. Lethenty also houses a long-established vehicle repair and tuning garage. Between these two locations the village supports a proportionately higher level of economic activity and jobs than its size would suggest. As a settlement it combines housing and employment uses. A new segregated cycle/walking route is planned (in partnership with Aberdeenshire Council) to link the village directly with Inverurie. That link will significantly increase accessibility to services.

Lethenty sits close to Inverurie and benefits from good access to services as a result whilst maintaining a more traditional rural lifestyle typical of most of Aberdeenshire. In Aberdeenshire the scale of accessible rural areas is significantly greater than the Scottish average at 35% compared to 11.2%. Aberdeenshire therefore has a unique character on mainland Scotland with small towns and accessible rural areas set around a single large City that provides the main employment, service and civic centre for the region.

The area provides good access to services on a wide-ranging basis supporting the locational case for further housing at Lethenty. This is demonstrated in Table 1 below which indicates travel times to service and employment centres:



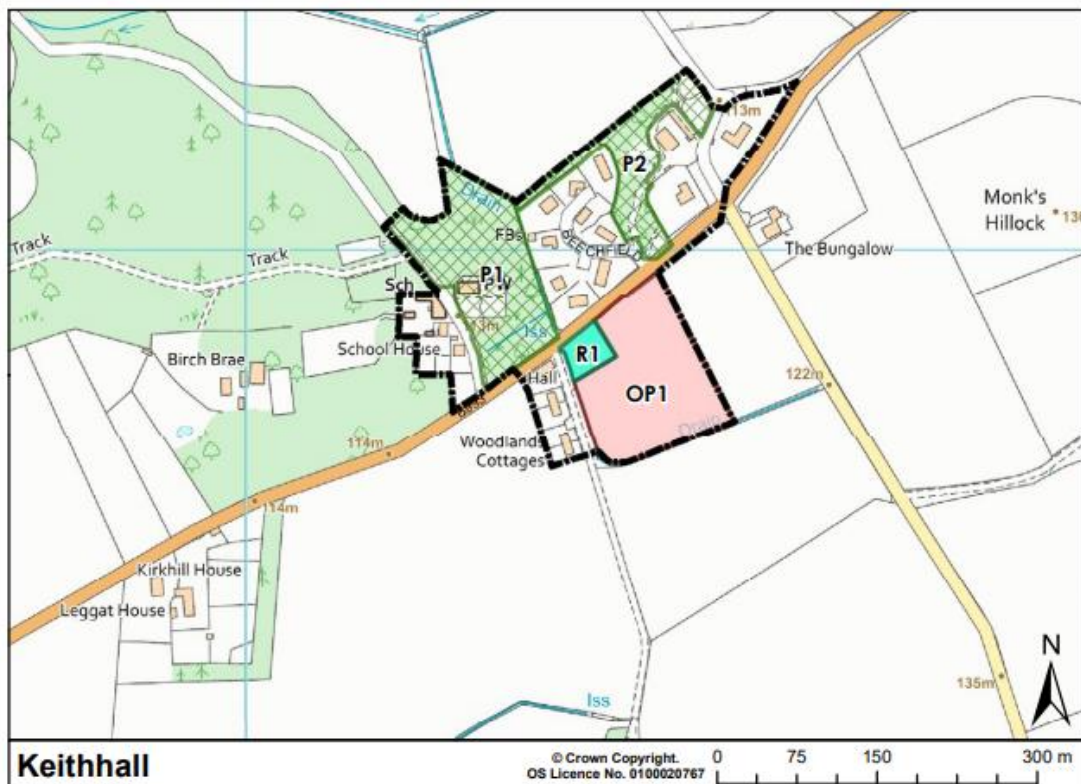
Destination	Travel time by car (minutes)	Travel time by bicycle (minutes)
Inverurie Rail Station	7	13
Inverurie Town Centre	6	12
Primary School	5	9
Inverurie Academy	7	13

Table 1 – Example Travel times from Lethenty

Inverurie has grown significantly over recent plan periods and now offers a full range of local services and facilities within reasonable travel distances as well as greater opportunities to access public transport (bus and train) to head north or south. Lethenty then, although a rural village, does have very good access to services and facilities.

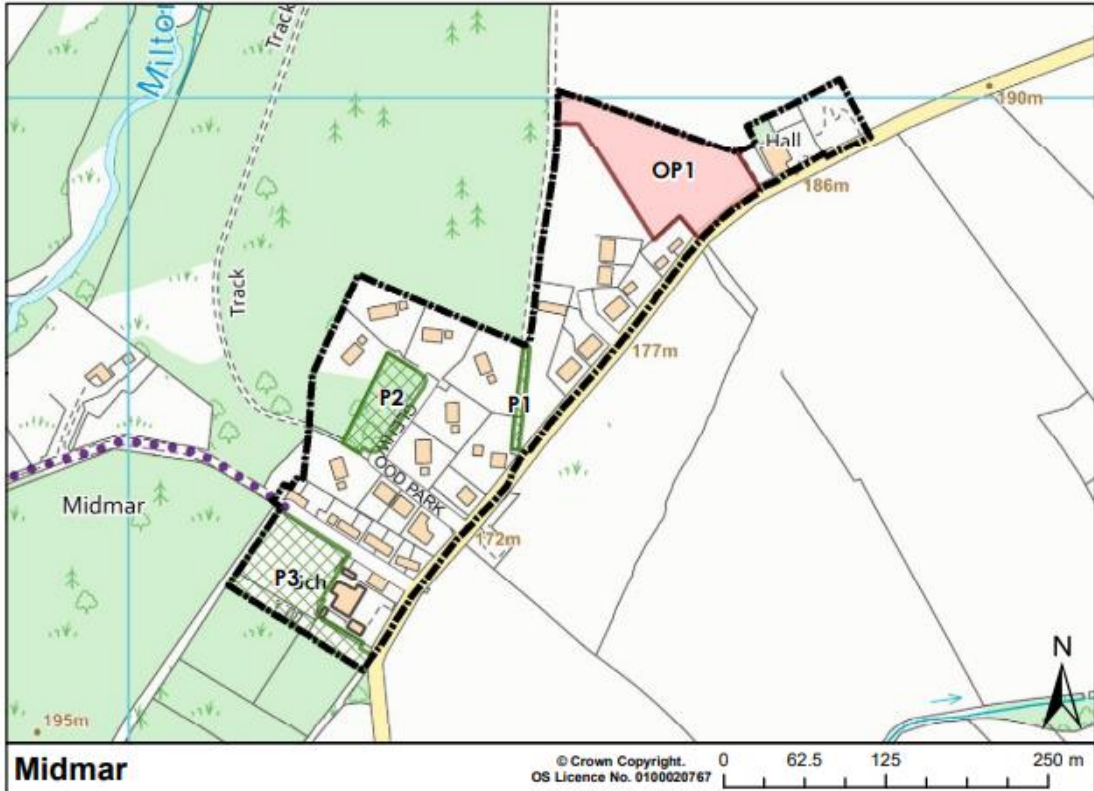
The Proposed LDP however seems to be inconsistent in its approach to these small settlements as it also includes allocations that adopt a far more positive approach to small rural settlements elsewhere in Aberdeenshire that also have reasonable access to larger neighbouring settlements. These include examples such as:

- **Keithhall** – 36 homes supported – in order to support the local primary school and recognising the site can be delivered without significant constraint.

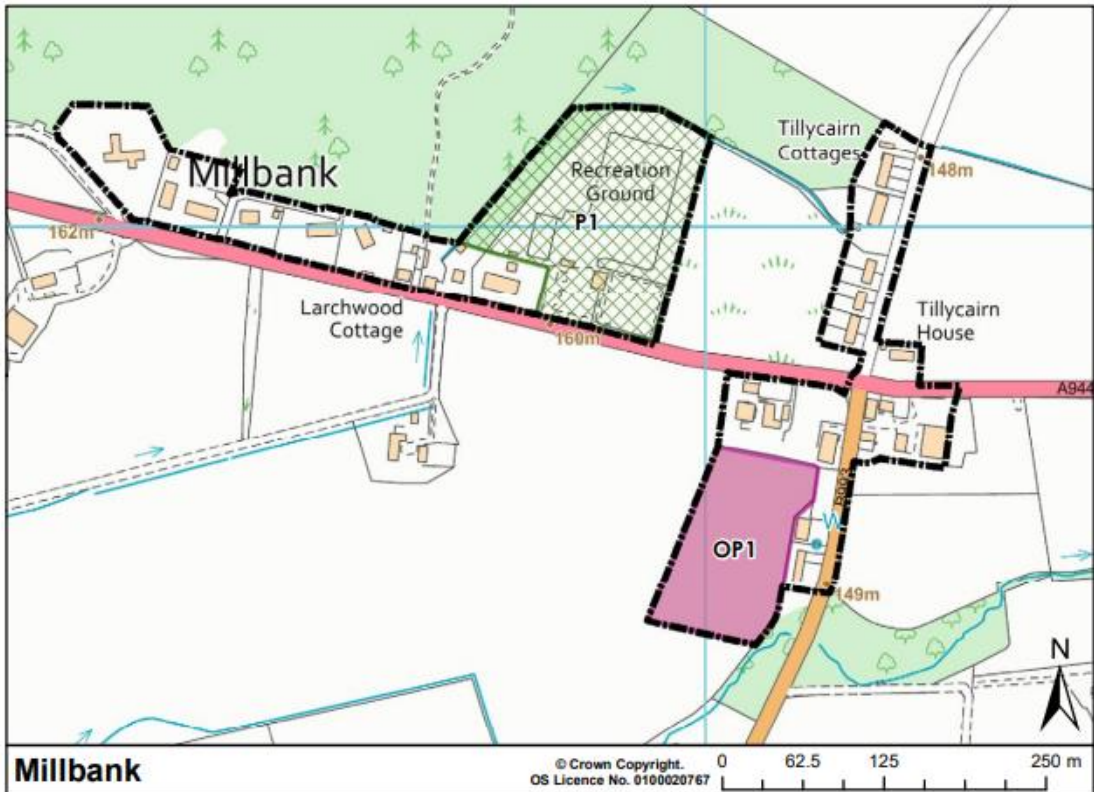




- **Midmar** – 12 homes supported despite being protected land for public open space and supporting the local primary school.



- **Millbank** – 30 homes supported but the site area reduced as the original bid was too low density.



In each of these the settlement has been formally identified as a small rural settlement and an extension for new housing has been considered acceptable, often despite constraints. The sites are of a scale suitable to the existing settlement. We can see no significant difference in context between the above examples and Lethenty. The sites at Lethenty have few and certainly no insurmountable development constraints and are of a scale that would allow infrastructure upgrades to be limited or on-site. A consistent approach should be reflected in the identification of Lethenty as a settlement alongside and allocation for limited housing.

Lethenty is currently dealt with as a *Landward Site* in the 2017 LDP allowing some organic growth, however we consider it should be formally identified as a settlement. There are smaller, more remote places across Aberdeenshire classified as settlements in the LDP. Lethenty's position between the towns of Inverurie and Oldmeldrum means it is well placed to accommodate residential development which there is a strong market demand for given its proximity to Inverurie. The 2000 Draft Aberdeenshire Local Plan identified Lethenty as a settlement with an associated housing allocation. It has since increased in size and should more appropriately be identified as a settlement in its own right in the LDP.

2.2 Scale of proposed development

The land at Lethenty offers an opportunity to deliver a small number of new homes as part of an existing well-connected rural community in Aberdeenshire. The bid sites were carefully selected in respect of landscape and visual impact and the natural pattern of growth of the existing settlement.

The indicative layout contained in the bid, shown over, suggests two phases and accommodating approximately 15 homes in a range of sizes and mix of tenures. The MIR response then **altered the bid to focus on Phase 2 which forms the northern portion of the bid and treat the previously named Phase 1 to the south as a future strategic reserve. That revised approach continues to be promoted through this PLDP response** and is considered to be a sensible, measured approach to future housing allocations.

The total site area of Phase 2 amounts to 2.5 acres and a single access to the site will be taken off the Daviot Road to help deliver approximately seven houses. We consider that seven houses is an appropriate scale of development. The proposal has been designed in a linear pattern that follows the natural growth pattern and is in keeping with the settlement pattern and the existing housing to north acting as a 'bookend' to development.

Although the site does include some prime agricultural land this is not considered a reasonable justification for discounting the bid. The proposed site is so small that its land take will not have any significant impact on Aberdeenshire's overall supply of such land. In any event, given Aberdeenshire's coverage of prime agricultural land, most additional allocations are likely to have some impact on prime land. That is the case with other allocated sites and should not rule out sites for development that would otherwise be acceptable.

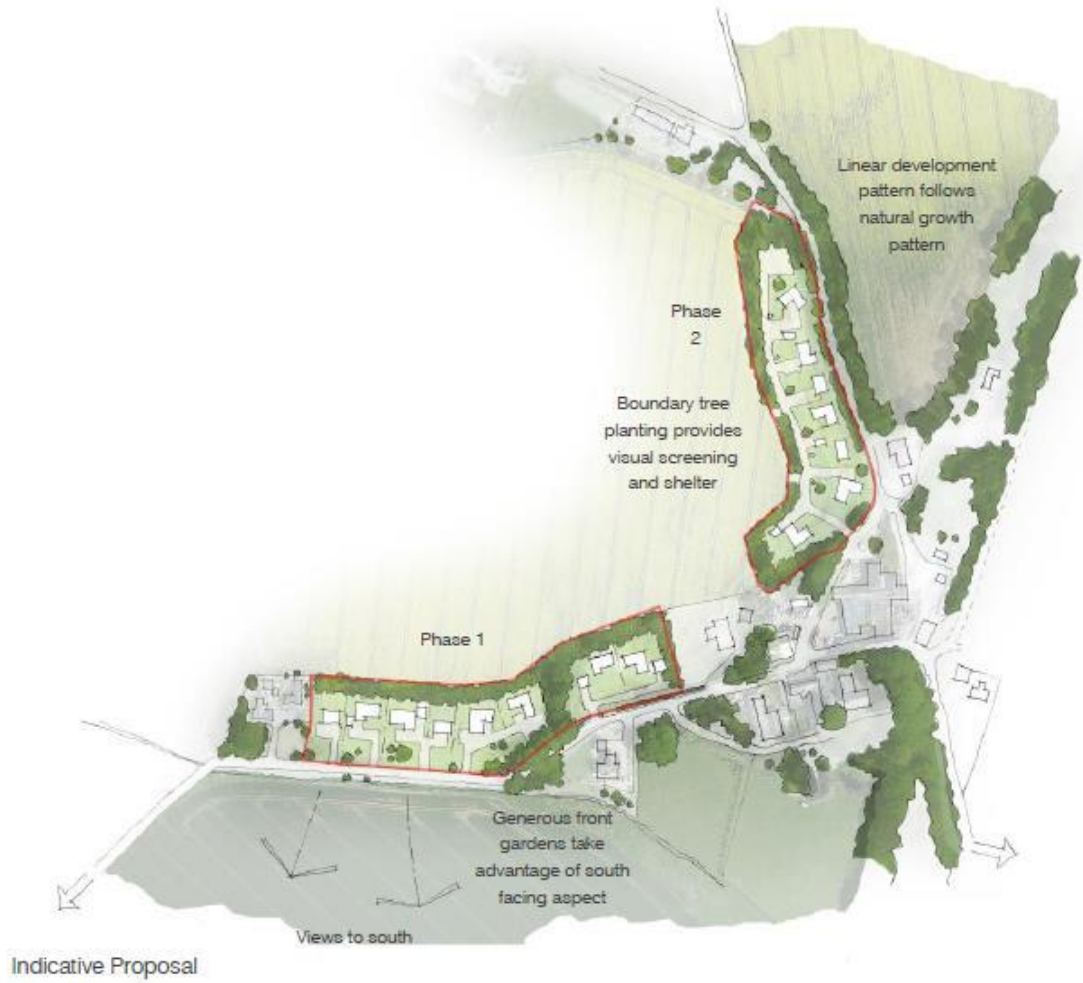


Figure 2 – Indicative Proposal from LDP Bid Supporting Document

SEPA's Floodmap (see over) shows that the bid site is not affected by flooding. Drainage provision is a technical design issue for sites of this nature and scale. Private treatment would be possible and viable.

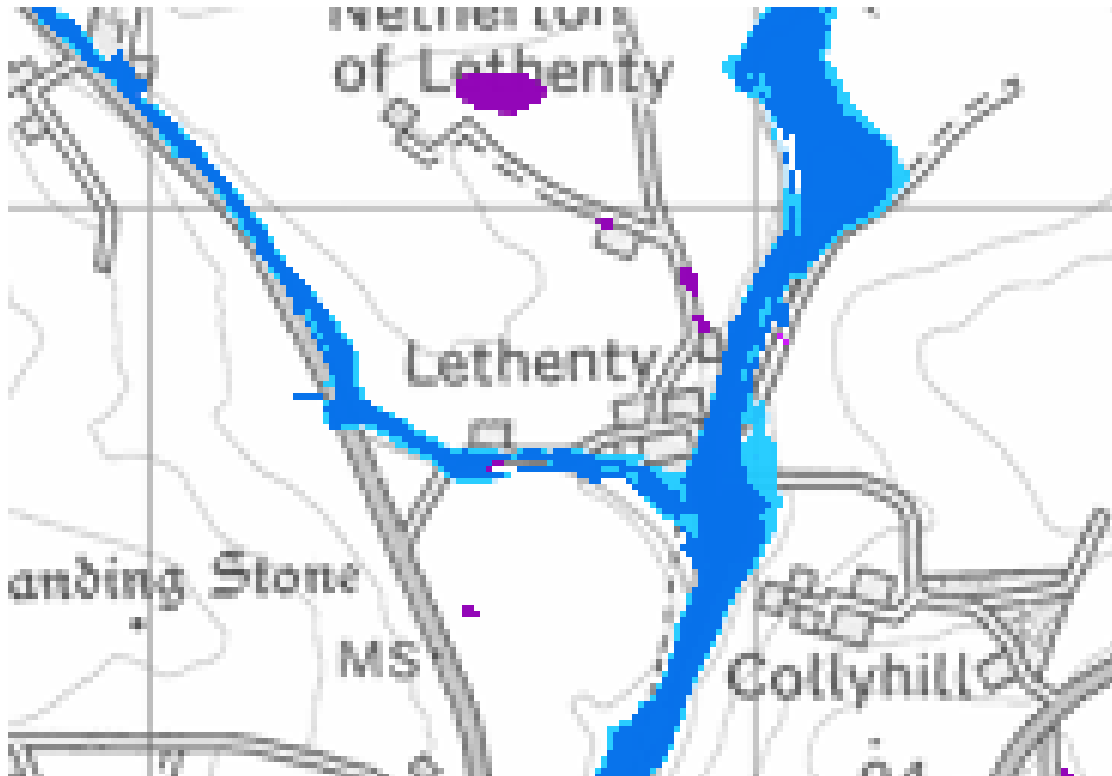


Figure 3 – Extract from SEPA Floodmap – showing that none of the site is affected by flooding (*All intellectual property rights for Flood Maps are owned by SEPA or its licensors and are shown for information purposes only*)

The MIR mentions pipeline consultation zones but these are just consultation zones. They don't necessarily restrict development. In this case we have completed a search of the HSE online reporting facility which shows that the site to the west of Lethenty is within an Outer Consultation Zone (the least onerous) and only a small proportion of the site to the north falls within that same zone. Housing up to 30 dwellings is considered Level 2 Sensitivity by the HSE and as can be seen from the extract from HSE planning guidance below, that development here would be considered acceptable (DAA – Do not Advise Against).

Level of Sensitivity	Development in Inner Zone	Development in Middle Zone	Development in Outer Zone
1	DAA	DAA	DAA
2	AA	DAA	DAA
3	AA	AA	DAA
4	AA	AA	AA

DAA = Don't Advise Against development

AA = Advise Against development

Many developments have been allocated in similar situations across Aberdeenshire including areas around Westhill and Stonehaven where development has been kept to outer consultation zones. **Phase 2 as proposed in Figure 1 is for the most part not affected at all.**

3. PLDP Housing Strategy Response

On a macro scale the strategy adopted by the MIR for the scale and location of housing allocations does not reflect the facts or the character of the region. We understand why larger allocations are located closer to services and better public transport but a general removal of allocated opportunities for limited housing around existing rural settlements is not supported. The justification for the lack of allocated small sites seems to be based on two elements – sustainability and a lack of requirement to allocate additional sites.

Sustainability - On sustainability the PLDP strategy is simplistic. It relates sustainability to location and the need to travel to access services. Historically that approach may have had some credence but as the need to travel to access services becomes less important (with the advent of online services – banking, telephone and online medical consultations, viable tele-conferencing over the internet, high speed broadband and flexible working) the locational need is less important. Historically too the locational aspect of sustainability related to the use of the private car and substantially on its contribution to environmental pollution and congestion. Automotive technology has also moved on and with the advent of electric and hybrid cars short journeys can be supported on a non-polluting basis.

Location then is less of a concern where the opportunity for this more sustainable lifestyle is available. In areas closer to large settlements such as Lethenty that have good connections to services, the Proposed Plan should rethink its strategy on these accessible rural areas and support housing allocations in or adjacent to settlements where the scale of the allocation is appropriate.

Strategic Requirement – the Strategic Development Plan Examination report 2020 found that Aberdeenshire requires an increased housing land supply (939 homes). This site could contribute to that requirement.

4. Housing in the Countryside Policies

Page 27 suggests that Aberdeenshire Council “... *want to create a welcoming approach to development in the countryside that meets local needs, and encourages prosperous, sustainable communities and businesses* ...”. By not identifying new allocations in settlement such as Lethenty this welcoming approach is left to housing in the countryside policies. Unfortunately, these too are overly restrictive. Policy R1 is the most restrictive and relates to Special Rural Areas. Policy R2 deals with accessible rural areas but only allows development (R2.2) that would be acceptable under Policy R1 (so, very restrictive). Organic growth of settlements is included under R2.11 to 2.14. This only applies to “identified Settlements” and where a particular need has been identified by the Planning Authority.

Extensions to clusters/housing groups (r2.16/2.17) allows for clusters to grow but only in “remote rural areas”. This rules out large areas of rural Aberdeenshire where extensions to small villages could actually be appropriate. We believe these policies are far too restrictive. The Plan should identify more settlements, including Lethenty, where either allocated or organic growth could occur. It should also extend the cluster growth policies across a wider area and provide a criteria based policy that identifies where such growth could be considered appropriate.

5. Conclusion

Failing to provide small scale residential allocations in rural Aberdeenshire does not encourage sustainability. Rather it puts rural communities at risk. Bid site GR081 offers a real opportunity to provide measured housing development in Lethenty that will help to sustain the settlement and the services it contains. Lethenty currently provides a mix of housing and employment uses and should be allocated as a settlement. The site shown as Phase 2 on the indicative bid plan should be identified as an immediate opportunity site for up to 7 homes.

The area previously indicated as Phase 1 could, if required, be included as future housing land although that is considered a secondary request in this PLDP response.



Housing in the Countryside policies (Policy R2) should be relaxed. The Plan should identify more settlements, including Lethenty, where either allocated or organic growth could occur. It should also extend the cluster growth policies across a wider area and provide a criteria based policy that identifies where such growth could be considered appropriate.



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CHARTERED ARCHITECTS & PLANNING CONSULTANTS

Supporting Document

LT1 – MIR Response



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS

**ABERDEENSHIRE LOCAL DEVELOPMENT PLAN
RESPONSE TO MAIN ISSUES REPORT
GR081 LAND NORTH AND WEST OF LETHENTY, INVERURIE**

April 2019

On behalf of
W. Maitland & Sons



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- 4. Conclusion**

GR081 – Lethenty, Inverurie - MIR Response

Two alternative sites, approximately 7 houses each- 1 Allocation, 1 Strategic Reserve

1.Introduction

The site owner lodged a Local Development Plan bid for the above site during the call for sites stage early in 2018. During the review process Aberdeenshire Council officers have suggested that the site should not be preferred on the following basis:

- Absence of key services and facilities;
- Scale of proposed development;
- Loss of prime agricultural land;
- Flood risk;
- Inadequate drainage provision; and
- HSE Pipeline consultation zone.

Having reviewed all of these and amended the bid as described later in this response, we don't believe that any of these are valid reasons for discounting these sites. GR081 offers an opportunity for new sustainable semi-rural lifestyles that are generally not available to the wider public under the current proposed policy stance on housing. Smaller rural settlements are central to Aberdeenshire's character and a small extension to an existing settlement will help support and cement that character rather than detract from it as suggested. A proposed new cycle route direct to Inverurie and the existence of multiple commercial businesses in Lethenty support its role as a rural settlement but also suggest that it should be formally identified as a settlement that can support growth.

On a more general note the housing strategy adopted in the MIR has significant limitations. In effect not enough housing land has been identified to meet the area's housing needs, it doesn't include enough choice of location for new homes and is inconsistent in approach. Rural Aberdeenshire supports multiple small-scale settlements. These are central to the area's character and context and a key reason why people choose to live in the area. Small scale extensions to these settlements will help to maintain the region's rural population as it ages and help maintain a mix of working age families as well as retired and older, usually smaller households. Maintaining that mix will be important for the future of the region.

Each of the issues are considered in the following response.

2. MIR Response – GR081

2.1 Absence of key services and facilities

Lethenty is a long-established rural settlement based around Lethenty Mill. The Mill is used for commercial purposes and houses a number of small local businesses. Lethenty also houses a long-established vehicle repair and tuning garage. Between these two locations the village supports a proportionately higher level of jobs than its size would suggest. As a settlement it combines housing and employment uses. It does therefore have some services and facilities within the village. A new segregated cycle/walking route is planned (in partnership with Aberdeenshire Council) to link the village directly with Inverurie. That link will significantly increase accessibility to services.

The MIR also proposes to adopt the Scottish Government’s 6-fold Urban Rural Classification. That classification essentially categorises all areas of Scotland depending on their location and accessibility. The maps in Figure 1 show the 6-fold classification and a more detailed 8-fold classification. Both indicate quite clearly that most of Aberdeenshire Council’s area is included within the Accessible Rural classification. Accessible areas are those within a 30-minute drive time from the centre of a settlement with a population of more than 10,000. Lethenty sits very close to Inverurie and benefits from good access to services as a result.

Map 2.3: Scottish Government 6-fold Urban Rural Classification 2016

Map 2.4: Scottish Government 8-fold Urban Rural Classification 2016

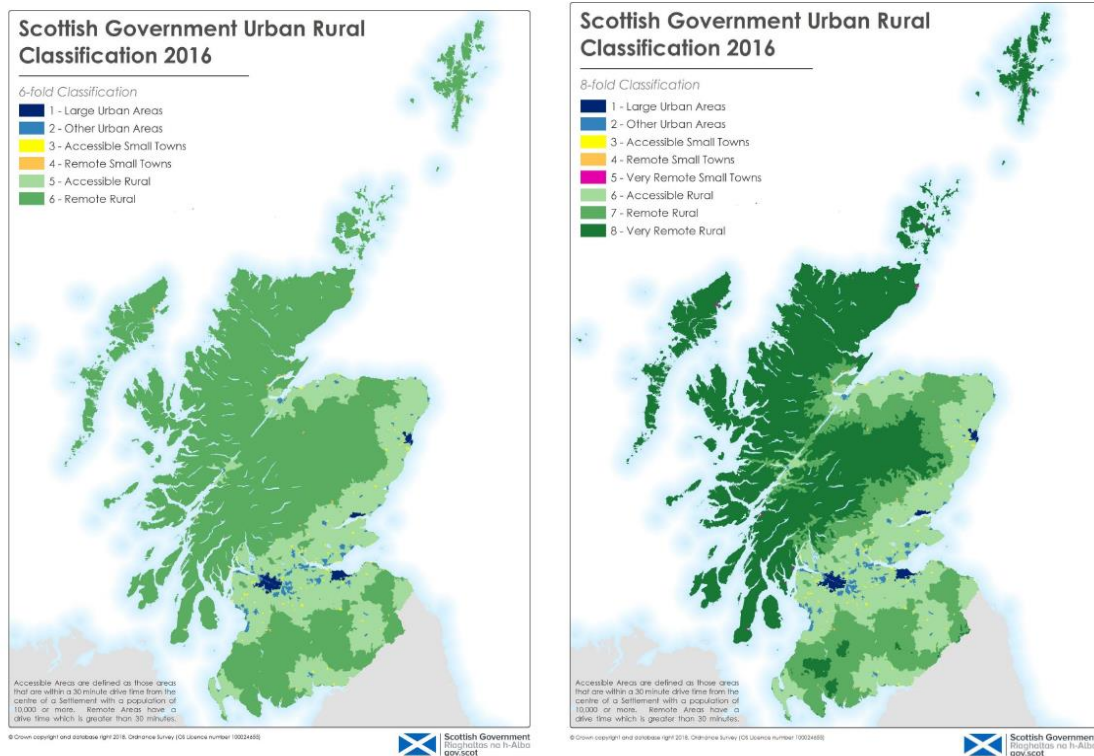


Figure 1 – Maps 2.3 & 2.4 Scottish Government 6-fold Urban Rural Classification

In Aberdeenshire the scale of accessible rural areas is significantly greater than the Scottish average at 35% compared to 11.2%. Aberdeenshire’s scale of accessible rural areas is only comparable with island authorities of Nan Eilean Siar, Orkney Islands and Shetland Islands. Aberdeenshire therefore has a unique character on mainland Scotland with small towns and accessible rural areas set around a single large City that provides the main employment, service and civic centre for the region. The area provides good access to services on a wide-ranging basis supporting the locational case for further housing at Lethenty. This is demonstrated in Table 1 below which indicates travel times to service and employment centres:

Destination	Travel time by car (minutes)	Travel time by bicycle (minutes)
Inverurie Rail Station	7	13
Inverurie Town Centre	6	12
Primary School	5	9
Inverurie Academy	7	13

Table 1 – Example Travel times from Lethenty

Inverurie has grown significantly over recent plan periods and now offers local services and facilities within reasonable travel distances as well as greater opportunities to access public transport (bus and train) to head north or south. Therefore, although a rural village, it does have good access to services and facilities.

The MIR however seems to be inconsistent in its approach as it also includes allocations that adopt a more positive approach to small rural settlements elsewhere in Aberdeenshire that have reasonable access to larger neighbouring settlements. These include:

- Keithhall – 32 homes supported and 36 reserved – in order to support the local primary school and recognising the site can be delivered without significant constraint.
- Midmar – 20 homes supported despite being protected land for public open space and supporting the local primary school.
- Millbank – 30 homes supported but the site area reduced as the original bid was too low density.
- Kirkton of Rayne – 8 homes supported as a logical extension of the village with no significant impact on landscape setting or sense of place. That site is constrained (waste water) but is considered surmountable due to the scale of development. Loss of prime agricultural land is considered acceptable to support the community and provide housing choice in a rural location.

In each of these the extension of a small rural settlement has been seen to be acceptable, often despite constraints. The sites at Lethenty have few and certainly no insurmountable development constraints and development is of a scale that would allow infrastructure upgrades to be limited or on-site. A consistent approach should be reflected in the identification of Lethenty as a settlement alongside an allocation for limited housing.

Lethenty is currently dealt with as a *Landward Site* however we consider it should be formally identified as a settlement. There are smaller, more remote places across Aberdeenshire classified as settlements in the LDP. Lethenty's position between the towns of Inverurie and Oldmeldrum means it is well placed to accommodate residential development which there is a strong market demand for given its proximity to Inverurie. In the 2000 Draft Aberdeenshire Local Plan Lethenty was identified as a settlement with a housing allocation, at that time it was viewed as appropriate and since then Lethenty has increased in size with individual dwellinghouses being consented making a strong case for it being identified as a settlement in the 2021 LDP in line with the strategy for other similar places.

2.2 Scale of proposed development

The land at Lethenty offers an opportunity to deliver a small number of new homes as part of an existing well-connected rural community in Aberdeenshire. The bid sites were carefully selected in respect of landscape and visual impact and the natural pattern of growth of the existing settlement.

The indicative layout contained in the bid, shown below, showed GR081 being delivered in two phases and accommodating approximately 15 homes in a range of sizes and mix of tenures. Since the bid was submitted the decision has been taken to focus on Phase 2 which forms the northern portion of the bid and treat Phase 1 to the south as a future strategic reserve. This is considered to be a sensible, measured approach to future housing allocations. The total gross site area of Phase 2 amounts to 2.50 acres and a single access to the site will be taken off the Daviot Road. It is proposed to deliver approximately seven houses. The MIR claims that 'The scale of development would be out of keeping with the character of this housing group'. By reducing the scale of the bid it is considered that this has addressed this issue. We consider that seven houses is an appropriate scale of development. The proposal has been designed in a linear pattern that follows the natural growth pattern and is in keeping with the settlement pattern and the existing housing to north acting as a 'bookend' to development.



Figure 2 – Indicative Proposal from LDP Bid Supporting Document

2.2 Flood Risk

In this instance SEPA's Floodmap shows that none of the bid sites are affected by flooding. This bid can manage surface water on-site if that is an issue but surface water drainage is a technical issue and not a strategic reason to discount the site. The fact that SEPA's floodmaps indicate that flooding is not an issue on these specific sites reinforces that case.

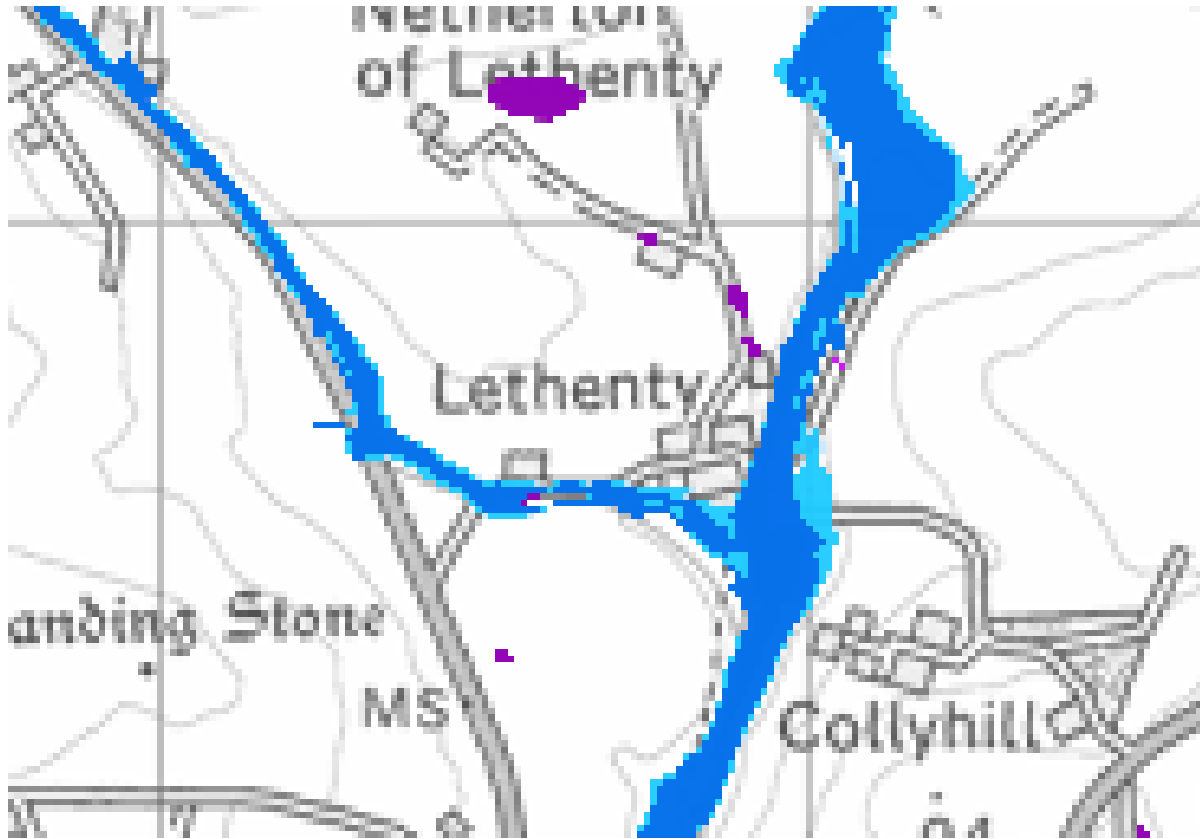


Figure 3 – Extract from SEPA Floodmap – showing that none of the site is affected by flooding (*All intellectual property rights for Flood Maps are owned by SEPA or its licensors and are shown for information purposes only*)

2.3 Loss of Prime Agricultural Land

Loss of prime agricultural land is not considered a reasonable justification for discounting these bids either. The site to the west of the village has only a very limited proportion of prime agricultural land and both sites are so small that their land take will not have any significant impact on Aberdeenshire's overall supply of such land. In any event, given Aberdeenshire's coverage of prime agricultural land, most additional allocations are likely to have some impact on prime land. That is the case with other MIR preferred sites and should not rule out sites for development that would otherwise be acceptable.

2.4 Inadequate Drainage Provision

Again, drainage provision is a technical design issue for sites of this nature and scale. Private treatment would be possible and viable. The intention would be for provision of sustainable drainage infrastructure on the site including rain gardens which will be designed into scheme. However, if further mitigation is required, there are no ownership constraints to consider a wider land area if necessary, as the landowner is in control of a much broader land area around the site. This would

allow for offsite solutions to be found if required to ensure drainage issues could be addressed and mitigated.

2.5 HSE Pipeline Consultation Zone

Pipeline consultation zones are just that, consultation zones. They don't necessarily restrict development. In this case we have completed a search of the HSE online reporting facility which shows that the site to the west of Lethenty is within an Outer Consultation Zone (the least onerous) and only a small proportion of the site to the north falls within that same zone. Housing up to 30 dwellings is considered Level 2 Sensitivity by the HSE and as can be seen from the extract from HSE planning guidance below, that would be considered acceptable (DAA – Do not Advise Against).

Level of Sensitivity	Development in Inner Zone	Development in Middle Zone	Development in Outer Zone
1	DAA	DAA	DAA
2	AA	DAA	DAA
3	AA	AA	DAA
4	AA	AA	AA

DAA = Don't Advise Against development

AA = Advise Against development

Concerns regarding the pipeline consultation zone are therefore unfounded. Any concerns around the site being situated within the Health and Safety Executive's pipeline consultation zone could be addressed at a detailed design stage. Indeed, the Council's own planning advice (1/2017) acknowledges that "While a consultation zone is regarded as a constraint to development, a development proposal may be approved even if it is within a consultation zone, providing that:

1. full account has been taken of the advice provided by the Health and Safety Executive, and the facility's owners and operators; and
2. it is demonstrated that there will be no increased risk to public safety.

3. MIR Housing Strategy Response

On a macro scale the strategy adopted by the MIR for the scale and location of housing allocations does not reflect the facts or the character of the region. We understand why larger allocations are located closer to services and better public transport but a general removal of allocated opportunities for limited housing around existing rural settlements is not supported. The justification for the lack of allocated small sites seems to be based on two elements – sustainability and a lack of requirement to allocate additional sites.

3.1 Sustainability

On sustainability the MIR strategy is simplistic. It relates sustainability to location and the need to travel to access services. Historically that approach may have had some credence but as the need to travel to access services becomes less important (with the advent of online services – banking, telephone and online medical consultations, viable tele-conferencing over the internet, high speed broadband and flexible working) the locational need is less important. Historically too the locational aspect of sustainability related to the use of the private car and substantially on its contribution to environmental pollution and congestion. Automotive technology has also moved on and with the advent of electric and hybrid cars short journeys can be supported on a non-polluting basis. Even petrol and diesel cars are significantly less polluting than in the recent past. Location then is less of a concern where the opportunity for this more sustainable lifestyle is available. In Aberdeenshire the Accessible Rural Areas provide this opportunity as the drive-time distances are less to major centres an access to high-speed broadband is simpler. In areas closer to large settlements such as Lethenty (see Table 1) that have good connections to services, the Proposed Plan should rethink its strategy on these accessible rural areas and support housing allocations in or adjacent to settlements where the scale of the allocation is appropriate.

3.2 Housing Strategy and Allocations

The housing strategy contained within the Aberdeenshire Council Main Issues Report (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 expected Strategic Development Plan (SDP) housing requirement. This do-minimum strategy raises concerns on the range and scale of housing that can be actually be delivered, on the practicality of delivering significantly increased densities as proposed by the MIR and the relationship between that strategy, the SDP in its final form when approved later this year and national policy on delivering more housing more effectively.

The MIR (on Policy H1) indicates that it sets out to comply with Scottish Planning Policy (SPP), “... especially paragraph 110 that requires development plans to identify a generous supply of land across all tenures and to maintain at least a 5-year supply of effective housing land at all times”. More specifically the MIR is very clear that “**a sharp focus on delivery is required**” (p19). Our Client is concerned that the Plan as proposed does not provide that sharp focus and will not improve housing delivery across Aberdeenshire as:

The MIR is based on the 2016 Housing Land Audit (HLA). Figures from the more recent 2018 Aberdeenshire Housing Land Audit show that effective housing land supply, a key component in calculating the extent of housing land allocations, is already lower than the 2016 HLA by some 800 units. Additional sites should at least be allocated to address this shortfall.

A review of housing trends across the last four HLAs in Aberdeenshire identified evidence of:

- Housing delivery on currently allocated sites falling below medium-term HLA predictions;
- Over-optimism on housing delivery that becomes less accurate the further in the future it predicts, especially beyond 5 years; and
- A need, therefore, for a greater supply and range of housing allocations to supplement existing allocated sites and help deliver more housing over the life of the Plan.

Over the period from 2021-2025, this equates to a potential shortfall in housing delivery of 2,765 homes. The MIR strategy of limiting future allocations therefore doesn't reflect historical trends in housing delivery. Evidence from HLAs indicates quite clearly that a realistic approach to deliver SDP housing requirements would need to allocate additional land in a variety of marketable locations.

The blanket approach proposed by the Council to increase densities across allocated and preferred sites is unrealistic and creates an artificially inflated housing land supply. The principle of the development bids was such that those making the bids considered their sites in some detail, considered context and constraints and, in some cases, provided indicative layouts that took all of these into account. The MIR approach of applying a generic increased density across the board in that scenario is unlikely to be achievable and can only suggest, at best, a maximum development capacity which ignores context and site-specific circumstances. This creates a mathematical and theoretical housing capacity that is not based on real development opportunities. The actual development capacity is likely to be significantly less. This, therefore presents an unrealistic housing supply figure which overplays the impact of increasing densities as a policy response.

We estimate that the proposed uplift in site capacity by increasing the site density on bid sites could be in the region of 550 houses. This is an almost 50% increase in housing numbers over that proposed by bidders on the affected sites. Most of those bids were based on indicative site layouts which have taken cognisance of the site conditions, local context and the local market, and layouts have been developed with a view to ensuring deliverable developments. This theoretical uplift in site capacity is considered undeliverable resulting in an artificially inflated housing land supply. In that scenario the MIR housing allocations will not meet the requirement of the Strategic Development Plan.

Between these 3 basic criticisms of the MIR approach there seems to be a potential shortfall of just over 4,000 homes based on:

- Difference in effective housing land supply between 2016 Housing Land Audit and 2018 Housing Land Audit = 800 homes;
- Shortfall in projected actual housing delivery when compared to historic trends in HLA medium-term predictions i.e. a realistic view of what will be achieved = 2,765 homes; and
- Impracticality of delivering the MIR proposed theoretical increase in housing density = 550 homes

Even accepting that there is some leeway in these figures, as they are also estimates, they are clear evidence that the proposed MIR allocations are **very unlikely to provide the sharp focus on delivery** that the MIR sets out to achieve. The area clearly needs other credible development options if the Council is serious about addressing housing delivery shortfalls and meeting housing requirements in the area as required by NPF3, SPP and the Strategic Development Plan. The only solution to that is allocate additional sites across the region, including within the Accessible Rural Areas and Aberdeen's

Housing Market Area. These additional allocations should be small to medium scaled, such as that proposed, and are crucial to providing housing choice and meeting market demand which is strong around Inverurie. We are confident that housing delivered at GR081 will sell.

4. Conclusion

Our Client does not agree with the justification presented in the MIR to reject bid GR081. They see this bid as offering a real opportunity to provide measured housing development in Lethenty that will help to sustain the settlement and the services it contains. Failing to provide small scale residential allocations in rural Aberdeenshire does not encourage sustainability, rather it puts rural communities at risk.

To encourage development a range of small scale and deliverable sites need to be available across Aberdeenshire to provide a range of options to developers, GR081 at Lethenty delivers this.

We consider Site GR081, delivered in two phases, represents a measured and considered approach to growth in Lethenty that is in keeping with the settlement pattern and surrounding landscape features.

All constraints listed in the MIR can be addressed and overcome as per the detail in this response therefore they should not be considered constraints to development.

Having regard to the information set out in this response to the Main Issues Report, we respectfully request that Phase 2 be supported in the LDP as a residential allocation, Phase 1 be supported as a strategic reserve residential allocation and that Lethenty is included as an identified settlement.