

Appendix 1b Garioch Settlements

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Issue 95 Auchleven

1. List of Respondents

MIR Ref	Respondents
318	Ms June Cameron
506	Scottish Natural Heritage
725	Mr & Mrs John & Jacqueline Curtis
805	SEPA
966	Bennachie Community Council
1036	Mr & Mrs Tom & Sarah Robinson

2. Issues

General

Respondents highlighted that problems associated with flooding could be exacerbated through permitting further residential development (966, 1036), as well as the need to consider the effects of climate change (318). The village is surrounded by prime agricultural land and development is further constrained by lack of primary school capacity (966, 1036). Auchleven lacks services and infrastructure to support growth of the settlement and suffers from very poor public transport links (1036). Further expansion of Auchleven would significantly alter the character of the village (966).

Services and Infrastructure

SEPA has noted that there is no reference to waste water drainage in the Draft Proposed Local Development Plan (LDP) for Auchleven and have requested that this be confirmed with Scottish Water to ensure sufficient capacity can be provided within the sewage treatment works (805).

Bid GR004

Respondents have agreed with Officers' recommendation ("not preferred") for bid GR004 (966, 1036).

Bid GR051

Respondents have agreed with Officers' recommendation ("not preferred") for bid GR051 (318, 966, 1036).

Bid GR072

Respondents have agreed with Officers' recommendation ("not preferred") for bid GR072 (318, 966, 1036). Development should avoid loss of woodland and integrate existing green infrastructure (506). This site is at risk of flooding from the Gadie Burn on the south side (1036).

Other Sites

Land at Auchleven Croft should not be included in the Proposed LDP due to flood risk arising from the effects of climate change (318) and lack of adequate waste water treatment works (725).

Land adjacent to Premnay School should not be included in the Proposed LDP due to flood risk arising from the effects of climate change (318).

3. Actions

Comments from SEPA with respect to waste water drainage are noted. Text should be added under 'Strategic drainage and water supply' to reflect the current position.

Support for Officers' assessment of bids in Auchleven is welcomed.

To ensure consistency with the Housing Land Audit it is considered appropriate to identify in the Proposed LDP windfall sites where delivery is projected during the Plan period. In Auchleven this includes sites at Auchleven Croft and adjacent to Premnay School. Technical matters raised by respondents in respect of these sites would have been addressed through the determination of relevant planning applications.

In accordance with the Aberdeen City and Shire Strategic Development Plan sufficient additional housing land allocations are identified in the Rural Housing Market Area. It is considered that Auchleven has an appropriate amount of land identified for housing to meet local housing needs during the Plan period.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. These are captured in the recommendations below.

4. Recommendations

1. Amend the Vision to reflect community concerns regarding flooding raised during pre-Main Issues Report consultation.
2. Amend the text of sites P1 and P2 to improve accuracy.
3. Add text under 'Strategic drainage and water supply' to reflect the current position with regard to waste water drainage.
4. Allocate land at Auchleven Croft and land adjacent to Premnay School for 5 and 9 homes respectively as opportunity sites in the Proposed LDP.

Issue 96 Blackburn

1. List of Respondents

MIR Ref	Respondents
17	Wood E&I Solutions UK Ltd on behalf of National Grid
173	Ryden LLP on behalf of Marshall Farms Ltd
174	Ryden LLP on behalf of Marshall Farms Ltd
314	Ms Lucy Thomson
506	Scottish Natural Heritage
546	Suller & Clark Planning on behalf of RAM Tubulars
805	SEPA
817	John Wink Design on behalf of Mrs Elizabeth Willis
818	John Wink Design on behalf of Mrs Elizabeth Willis
876	Woodland Trust Scotland
932	Norr on behalf of Stewart Milne Homes
933	Norr on behalf of Stewart Milne Homes
1009	Historic Environment Scotland
1024	Burness Paull LLP on behalf of Neal Still, South Fonet Estates Ltd
1025	Burness Paul LLP on behalf of Neal Still, South Fonet Estates Ltd
1066	Strutt & Parker on behalf of CHAP Homes

2. Issues

Vision

A respondent has expressed support for the revised Vision statement that acknowledges demand for housing in Blackburn due to its proximity to Aberdeen City (173). It was noted that no employment land has been allocated in Blackburn (1024).

There were differing views on the most logical expansion of the settlement with one respondent suggesting that directing development towards the west of the settlement provides a more natural extension than to the east (932). However, it was also noted that the presence of pipelines constrains development to the west and that there may also be greater landscape impact arising from development; and that development to the north would elongate the settlement (173).

Protected Land

Respondents agreed that it is appropriate to remove the existing P5 designation (173, 314).

Flood Risk

SEPA has requested that the text, “Blackburn lies within an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required” should be added to the Settlement Statement (805).

Oil and Gas Pipelines

It was noted that bids GR005, GR023, GR033 and GR085 cross or are located in close proximity to gas pipelines and that statutory safety clearances between overhead lines, the ground, and built structures must not be infringed (17).

Services and Infrastructure

SEPA has noted that the Draft Proposed Local Development Plan (LDP) uses the text “Capital Maintenance project has been triggered to deliver growth”. SEPA has highlighted that a growth project is currently under construction at Inverurie and required that it be confirmed with Scottish Water that this will have capacity for all sites proposed in the LDP. Otherwise future long-term capacity issues will need to be highlighted in the Proposed LDP (805).

Bid GR005

One respondent agreed with Officers’ recommendation (“not preferred”) for bid GR005 (314). Both Historic Environment Scotland (HES) and Scottish Natural Heritage (SNH) raised concern regarding the proximity of bid GR005 to Kinellar House, a category B-listed building (506, 1009). HES has suggested that the design and layout of any development should consider potential impact to this and its designed landscape setting. The cumulative impact of bid GR005 with GR033 should also be considered (1009).

Bid GR023 and GR024

A respondent has suggested that Glasgoforest should be identified as a settlement as it was in the Local Plan 2006 (1025), whereas another disagreed with this (818). A respondent has suggested that these bids should have been assessed in the context of its location in proximity to “Forest Farm” (1024).

Differing views were received in respect to bids GR023 and GR024. Two respondents suggested that these sites do not flood; there is limited prime agricultural land; pedestrian access could be achieved via the existing flyover; and that the presence of pipelines should not be a constraint on development (1024, 1025). These points are challenged by other respondents, who have agreed with the Officers’ recommendation (“not preferred”) for these bids (314, 817, 818).

SNH has recommended that a site brief would be required for bid GR023 to identify how woodland would be protected and enhanced and to integrate active travel links (506).

Bid GR033

A respondent has agreed with Officers' recommendation ("not preferred") for bid GR033, however the respondent also indicated that support could be given to a smaller development on part of this site as an alternative to GR087 (314). Another respondent has requested that the site should be allocated for 300 homes with a revised site area to exclude the area to the west (933). SNH has indicated that should bid GR033 be taken forward, development should be limited to the eastern part of the site, on the lower slopes where it relates to the existing settlement. SNH also request that a site brief would be required to protect and enhance woodland and to integrate active travel with existing core paths (506).

HES has suggested that the design and layout should consider potential impact on Kinellar House, a category B-listed building and its designed landscape setting and that the cumulative impact of bid GR033 with GR005 should be considered (1009).

Bid GR085

One respondent has agreed with Officers' recommendation ("not preferred") for bid GR085 (314), whereas another suggested the bid should be allocated in the Proposed LDP (1066).

Bid GR087

One respondent has agreed with Officers' recommendation ("preferred") for bid GR087, including the proposed increased capacity to 268 homes (173), whereas others have objected to this bid suggesting the site is constrained (314, 932, 1066).

A respondent has welcomed the suggestion in the Main Issues Report that the site boundary should be amended to exclude an area of ancient woodland and recommends the addition of a buffer area (876). SNH has recommended that a site brief should be required to include identification of how the core path could be retained so as to enhance woodland connectivity and active travel connections between the wider settlement and the forest (506).

SEPA has indicated that a Flood Risk Assessment (FRA) may be required. They note that the Black Burn is currently downgraded to "Moderate" status due to its physical condition. Enhancement of the Burn through re-naturalisation and removal of any redundant features would require to be investigated (805).

Bid GR088

One respondent has agreed with Officers' recommendation ("reserved") for bid GR088 (174), whereas others have objected to this bid (314, 1066).

SNH has recommended that a site brief be required to identify constraints, including ancient woodland of how core paths could be retained, to enhance woodland connectivity and active travel connections between the wider settlement and the forest (506).

SEPA has indicated that an FRA would be required for any development below 75m AOD. A buffer to the Black Burn would also be required and should be integrated positively into the development. The Black Burn is currently downgraded to “Moderate” status due to its physical condition. Enhancement of the Burn through re-naturalisation and removal of any redundant features will require to be investigated (805).

New Site

A respondent proposes a new site should be allocated at Kinellar (near Ellismoss Farm and RAM Tubulars) for employment uses (Class 6). It was suggested that development would allow for expansion of an existing adjacent business (546).

3. Actions

Vision

It is recognised that no new employment land opportunities have been identified in Blackburn. This is due in a large part to no suitable sites proposing employment uses coming through the call for sites undertaken in early 2018. This is discussed in more detail below for those bids promoting employment. Additionally, employment opportunities exist within the existing BUS site in Blackburn, along with major employment opportunities being available in close proximity such as Kintore and Dyce.

Protected Land

Support for the removal of existing P5 site is welcomed.

Flood Risk

The request made by SEPA for additional text to be added to the Settlement Statement is considered appropriate and should be included in the Proposed Local Development Plan (LDP).

Oil and Gas Pipelines

Comment highlighting the presence of pipelines is noted.

Services and Infrastructure

Information received from Scottish Water notes that waste water is pumped to Inverurie Waste Water Treatment Works and that a Drainage Impact Assessment (DIA) would be required for the preferred bid GR087. The Settlement Statement text should be updated to reflect the current position, with the requirement for a DIA for bid GR087 added to the allocation summary.

Bid GR005

Given the concern raised by both HES and SNH it is considered appropriate not to allocate bid GR005 in the Proposed LDP. This aligns with the Officers' recommendation in the MIR.

Bid GR023, GR024 and New Site

It is noted that bids GR023 and GR024 fall outwith the settlement boundary of Blackburn. However, despite it being listed in the Aberdeenshire Local Plan 2006, Glasgoforest is not deemed to be classed as a “settlement” in terms of the LDP on the basis that it lacks urban characteristics such as street lighting and a reduced speed limit.

It is noted that full planning permission was granted on land submitted as a late bid on 2 July 2019 (APP/2019/0767). It is considered that circumstances have overtaken preparation of the LDP 2021 and there is no need to allocate the site in the Proposed LDP.

Bid GR033

Revisions made to the bid are welcomed as a means to attempt to make the site more acceptable. It is considered that there are still a number of constraints associated with the site that require to be overcome before the site could be taken forward as an Officers’ preference.

At this time, the focus of future expansion should be towards the east of the settlement. Sensitive development to the west of Blackburn should only be reconsidered when there is a need for further major development sites to be allocated in the settlement.

Bid GR085

Comments made both in support and against bid GR085 are noted. As stated above, the preference at this time is to focus new residential development towards the east of the settlement, followed by development to the west. Development to the north is the least preferred option at this time on the basis that development would elongate the settlement away from the services and facilities available within the settlement core.

Bid GR087/ Existing Site – OP1/ P5

Comments made both in support and against bid GR087 are noted. We remain convinced that the existing OP1/P5 site remains the most appropriate location for expansion of Blackburn in the short term. Support for amending the site boundary to exclude an area of ancient woodland to the north of the site is welcomed. This area should form part of the open space requirements for the site with the ancient woodland being protected through a protected land designation and enhanced as far as possible through development. By amending the settlement boundary, this reduces the developable area of the site. As such it is now considered that 240 homes could be accommodated on the site. This is an acceptable level of growth for the settlement given its location within a Strategic Growth Area and its anticipated impact on local infrastructure and services. It is acknowledged that this site is not without constraint and significant effort will be required during the early part of the Plan period to bring this site forward.

Comments received from SNH and SEPA are considered appropriate and should be added to the allocation summary for the site.

Bid GR088

Bid GR088 was identified as a reserved option in the MIR as a possible future opportunity site (FOP). On the basis that the LDP 2021 is no longer expected to show FOPs on the Settlement Statement maps, there is no need to reserve this site for future development. It should however be noted in the allocation summary for OP1/GR087 that there is potential for expanding development to the north west of the site through the allocation of land subject to bid GR088 in future LDPs.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. With the exception of identification of a possible future opportunity site (bid GR088), these are captured in the recommendations below.

4. Recommendations

1. Amend the Vision to reflect that a replacement primary school has been delivered.
2. Remove existing P5 site as no longer required.
3. Identify the area of ancient woodland to the north of GR087 as protected land.
4. Reallocate existing R1 as protected land.
5. Add the following text to the Settlement Statement, "Blackburn lies within an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required".
6. Text should be amended under 'Strategic drainage and water supply' to reflect the current position with regard to waste water drainage.
7. Allocate bid GR087 for 240 homes adding text to the allocation summary to reflect comments from SNH, SEPA and Scottish Water. Text should also be added to recognise that development should consider the potential for impact on listed buildings situated to the north of the site. Provision for possible future expansion to the north west should be incorporated into the layout, siting and design of the site.

Issue 97 Chapel of Garioch

1. List of Respondents

MIR Ref	Respondents
506	Scottish Natural Heritage
805	SEPA
966	Bennachie Community Council

2. Issues

Vision

Respondents expressed support for the settlement objective that seeks to create a path linking both sections of the settlement and provide a safe route to school (506, 966).

Services and Infrastructure

SEPA has noted that the Draft Proposed Local Development Plan (LDP) states that no waste water treatment is available. SEPA has indicated that development where no public waste water infrastructure is available is unlikely to contribute to long-term sustainability and therefore would pose concerns for SEPA in the absence of First Time Sewerage provision. SEPA suggested that in bringing the site forward, early engagement with SEPA should be sought to ascertain if a private system is viable (805).

Existing Site – OP1

One respondent supported retention of the existing OP1 allocation on the basis that it is in close proximity to the primary school (966).

Bid GR130

One respondent agreed with Officers' recommendation ("not preferred") for bid GR130. Two-thirds of the site is prime agricultural land. The site is far away from the school with no safe route available. Chapel of Garioch lacks services and infrastructure to support growth of the village and suffers from very poor public transport links (966).

3. Actions

Support for the aspiration to create a path linking both sections of the settlement is noted. It is acknowledged that delivering this is not without its challenges.

Comments received from SEPA in respect of waste water drainage are noted. Text should be added under "Strategic drainage and water supply" to reflect the need for early engagement be taken with SEPA.

Support for Officers' assessment of GR130 is welcomed. It is considered that the existing site OP2 (bid GR130) should be removed from the LDP due to a lack of a safe route to the school and potential for underdevelopment of the land as outlined in the Main Issues Report.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. These are captured in the recommendations below.

4. Recommendations

1. Include within the Vision, a statement recognising that creating a safe route to school is an aspiration of the community but that ways to deliver this are currently limited.
2. Add text under 'Strategic drainage and water supply' to reflect the need for early engagement be undertaken with SEPA.
3. Remove existing site OP2 (bid GR130) and amend the settlement boundary accordingly.

Issue 98 Cluny and Sauchen

1. List of Respondents

MIR Ref	Respondents
99	Mr Phil Cropper
100	Ms Janina Kutscha
114	Ms Marjon van der Pol
115	Mr Matthew Brettle
129	Cluny, Midmar, and Monymusk Community Council
506	Scottish Natural Heritage
543	Stewart Milne Homes
545	Stewart Milne Homes
805	SEPA
819	John Wink Design on behalf of Mr & Mrs Howie and Mr & Mrs Brownie
889	Holder Planning on behalf of Hallam Land
1080	Sir/Madam A Simmers

2. Issues

Vision

Respondents have emphasised that Sauchen has doubled in size in the last 20 years and therefore is not suitable for further expansion. It was considered that no further housing development should be considered until the impacts of recent development at Cluny Meadows has been fully assessed (99, 100, 114, 115, 129, 819, 1080).

Settlement Features

The area along Cluny Burn provides crucial natural habitat for wildlife and should be protected (99, 100, 114, 115, 129, 1080).

Flood Risk

The flood risk in Sauchen has been grossly underestimated in assessing all bids (99, 100, 114, 115, 129, 1080). Another respondent suggested that development to the north of the settlement would increase flood risk (99, 100, 114, 115, 129, 819, 1080).

Services and Infrastructure

Respondents have suggested that education capacity is a constraint on development, both at Cluny Primary and Alford Academy. It is noted that Cluny Primary school lacks facilities including a gym hall (99, 100, 114, 115, 129, 1080).

SEPA has noted that the Draft Proposed Local Development Plan (LDP) uses former text, "there is limited capacity but Scottish Water will initiate a growth project if required." For any future development, it should be confirmed with Scottish Water that the proposed population growth is within the current design criteria for the sewage

treatment works, however, if not, an upgrade may be required and should be highlighted in the Proposed LDP (805).

Existing Site – OP1

It was considered that site OP1 would have a detrimental impact on the settlement in terms of road safety, reliance on private car and the sense of place (99, 100, 114, 115, 129, 1080).

Bid GR017

A number of respondents have objected to bid GR017 on the basis that there has been no change in circumstances since the bid was considered in preparing the Local Development Plan 2017 and that the current bid proposal lacked detail. Reasons to reject the site included flood risk, waste water drainage constraints, development would lead to car reliance and the site is good agricultural land that should be preserved (99, 100, 114, 115, 129, 1080). Another respondent raised concern at the proposed doubling of the site capacity and suggests this would have an adverse landscape impact. In addition, it was noted that there are no community benefits arising from this bid (543). Concerns regarding flood risk were shared by SEPA in stating that a Flood Risk Assessment may be required. SEPA also indicated that a buffer strip would be required adjacent to the Cluny Burn which should be integrated positively into the development. The buffer strip would need to allow sufficient space for restoration of the straightened watercourse and that enhancement and removal of any redundant features would require to be investigated (805).

Scottish Natural Heritage (SNH) suggested that the site boundary should be amended to exclude the burn and woodland area from the site. They also recommended integration of existing and proposed green infrastructure and delivery of active travel links with the settlement and school (506).

Bid GR020 and GR021

Respondents have agreed with Officers' recommendation ("not preferred") for bid GR020. It was however noted that GR021 would provide all the facilities that are currently missing from the settlement, however drainage, access and education would need to be addressed. It was also believed that the Cluny Burn was unlikely to be able to cope with the scale of development proposed (99, 100, 114, 115, 129, 1080).

One respondent has disagreed with Officers' recommendation for bid GR020 and requested that the bid be allocated in the Proposed LDP. Bid GR021 forms part of a wider Masterplan for how Sauchen could expand in the future. Development would provide a sustainable mixed community, with a varied mix of house types, employment opportunities and community hub. Vehicular access could be taken directly from the A944, rather than an unclassified road as proposed by bid GR017. The site can integrate well with the existing community through provision of open space, footpath linkages and reflect the character of the surrounding area. The respondent notes that no opportunity for further development avoids prime agricultural land (819).

Bid GR030

A number of respondents have expressed support for bid GR030 as providing limited enhancement to the village as community hub/retail facility. Respondents agreed that the site would not be suitable for residential development. Drainage and sewage would need to be given careful attention, as it is a remote location from the existing water treatment plant. Road access off the A944 will also need to be assessed (99, 100, 114, 115, 129, 1080). SEPA indicated that an FRA may be required (805).

One respondent questioned the deliverability of this bid. It was suggested that the bid would be unviable unless it came forward as part of a wider development proposal (889).

Bid GR056

This bid would be a loss of good agricultural land, and a rather disjointed expansion of the community (99, 100, 114, 115, 129, 1080).

Bid GR096 and GR097

A number of respondents have agreed with Officers' recommendation ("not preferred") for bid GR096 and GR097. This site would add to drainage problems and increase flood risk (99, 100, 114, 115, 129, 1080). A new sewage treatment works would be required to accommodate the proposed development.

One respondent has disagreed with Officers' recommendation for bids GR096 and GR097 and requested that these bids be allocated in the Proposed LDP. The proposal forms a logical extension to the settlement and is in close proximity to existing services. The respondent disagrees with the MIR assessment with regard to flood risk and confirmed that a Flooding and Drainage Study has been undertaken and does not identify any constraint that would preclude development. Perceived landscape impact is also disputed and the respondent requests that this is reconsidered (889).

Bid GR115

A number of respondents have agreed with Officers' recommendation ("not preferred") for bid GR115. This site would add to drainage problems, increase flood risk and development would destroy good quality agricultural land (99, 100, 114, 115, 129, 1080).

One respondent disagreed with the assessment of GR115 requesting that 50 homes be allocated in the Proposed LDP for immediate delivery, with the remainder identified as strategic reserve. The Masterplan submitted with the bid takes full account of flood risk and proposed that over 50% of the site becomes a community parkland. GR115 provides community benefit in way of land for a hall and discussion on this element have been held with Cluny, Midmar and Monymusk Community Council. It was considered that provision of community hall overrides the presence of prime agricultural land in this case. Development is not likely to have an impact on the Cluny Castle Gardens and Designed Landscape (545).

3. Actions

Vision

Comments in relation to the scale of development that should be promoted in Cluny and Sauchen during the Plan period are noted. In agreeing with respondents it is not proposed that any major new developments should be allocated in the Proposed LDP.

Settlement Features

We agree that the Cluny Burn is an important habitat. However, in promoting a consistent approach across Aberdeenshire we think it would be appropriate to recognise the Cluny Burn as forming part of the green/blue network and this should be shown on the settlement map.

Services and Infrastructure

Information received from Scottish Water confirms that there is no treatment capacity required. Text should be updated to reflect the current position.

Flood Risk

Concerns regarding flood risk are noted. No additional information has been received from SEPA that requires to be reflected in the Proposed LDP, nor is it understood that development options are entirely restricted in the settlement due to flood risk.

Existing Site – OP1

Site OP1 is an effective site in the Housing Land Audit that is partially developed. As such it is appropriate to retain the site in the Proposed LDP. Information received from Scottish Water confirms that a Drainage Impact Assessment would be required.

Bid GR020, GR021, GR056, GR096, GR097 and GR115

Comments made both in support, and opposing bids GR020, GR021, GR056, GR096, GR097 and GR115 are noted. None of these bids were identified as a preferred option in the MIR. They provide no reasons to allocate these bids in the Proposed LDP. In addition, sufficient housing land is available through existing sites to meet the requirements of the Aberdeen City and Shire Strategic Development Plan. It is considered that there is not a need for major additional housing land within Cluny and Sauchen.

Bid GR017

Objections received to bid GR017 are noted. Although constraints associated with the site could be overcome as part of the planning application process, sufficient housing land is available through existing sites to meet the requirements of the Aberdeen City and Shire Strategic Development Plan. As such it is considered that there is no need to allocate bid GR017 in the Proposed LDP.

Bid GR030

Bid GR030 was identified as a preferred option in the MIR as a possible solution to the community's aspiration for a community hub to be established in the settlement. Since publication of the MIR, this matter has progressed and an alternative site has been identified by the community within the existing P2 site, which is now preferred. Given a more suitable location has been identified land subject to bid GR030 is no longer required for this use. As such, the bid should not be allocated in the Proposed LDP. Instead, P2 should be reserved for development of a community hub.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. With the exception of identification of bids GR017 and GR030 as opportunity sites and reserved land for junction improvements at the A944, these are captured in the recommendations below.

4. Recommendations

1. Include within the "Vision" recognition that the presence of prime agricultural land and flood risk constrains future development opportunities and that the lack of community facilities or a meeting space within Sauchen is an issue for the local community.
2. Amend text under 'Strategic drainage and water supply' to reflect the current position.
3. Reallocate the existing P2 designation to be reserved land for development of a community hub. Until this is developed the site should be maintained as open space.
4. Protect the Cluny Burn as forming part of the green/blue network in the Settlement Statement map.
5. Amend site boundary of OP1 to exclude the area now built out and add wording to the allocation summary to require a Drainage Impact Assessment to be undertaken.
6. Remove site OP2 as now built out.

Issue 99 Dunecht

1. List of Respondents

MIR Ref	Respondents
392	Echt & Skene Community Council
479	Ryden LLP on behalf of Cabardunn Development Company Limited and Dunecht Estates
506	Scottish Natural Heritage
805	SEPA
1009	Historic Environment Scotland

2. Issues

Flood Risk

SEPA has requested that the text, “Dunecht lies within an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required” should be added to the Settlement Statement (805).

Services and Infrastructure

SEPA has noted that no reference to waste water drainage is made in the Draft Proposed Local Development Plan (LDP) for Dunecht. SEPA has recommended that it should be confirmed with Scottish Water that the proposed population growth is within the design criteria for the current sewage treatment works, and if not, an upgrade may be required and this should be highlighted in the Proposed LDP (805).

Existing Site – OP1

SEPA has indicated that should the extant permission expire an updated Flood Risk Assessment (FRA) may be required. A buffer to the Kinnernie Burn would also be required and should be integrated positively into the development. The Kinnernie Burn is currently downgraded to “Bad” status due to its physical condition. Enhancement of the Burn through re-naturalisation and removal of any redundant features would require to be investigated (805).

Bid GR094

Historic Environment Scotland has objected to bid GR094 on the basis that development would have significant adverse impact on the setting of a Scheduled Monument (SM6075 – Upper Corskie) (1009). Scottish Natural Heritage (SNH) suggested that the site is physically and visually divorced from the main settlement and would erode its strong linear character and distinctive historical vernacular (506), whereas another respondent believed the site relates well to the village with minimal visual impact (479). There is concern that the scale of development possible on the site would be very difficult to consolidate within the village (392).

One respondent believed bid GR094 should be allocated in the Proposed LDP. It was suggested that constraints associated with flooding and the presence of pipelines could be readily addressed (479).

SNH has recommended that a development brief would be required for the site to safeguard and integrate new and existing green infrastructure. This should also include integrating SUDs required by the Pollution Prevention Plan into green infrastructure provision (506).

SEPA has indicated that an FRA may be required. A buffer to the Kinnernie Burn would also be required and should be integrated positively into the development. The Kinnernie Burn is currently downgraded to “Bad” status due to its physical condition. Enhancement of the Burn through re-naturalisation and removal of any redundant features will require to be investigated (805).

3. Actions

Flood Risk

The request made by SEPA for additional text to be added to the Settlement Statement is considered appropriate and should be included in the Proposed LDP.

Services and Infrastructure

Waste water drainage capacity has not been raised as an issue in Dunecht. As such, it is not considered that any change is required in this regard.

Existing Site – OP1

OP1 is subject to an extant planning permission and is currently under construction. It is not considered necessary at this point to amend the allocation summary for the site given delivery is ongoing and expected to be complete by 2021.

Bid GR094

Whilst comments from the respondent in support of bid GR094 are acknowledged, on reflection arguments against allocating this bid at this time outweigh those in favour. Bid GR094 was identified as a reserved option in the MIR as a possible future opportunity site (FOP). On the basis that the LDP 2021 is no longer expected to show FOPs on the Settlement Statement maps, and given comments from key stakeholders, there is no need to reserve this site for future development. In addition, it is considered that there are currently sufficient existing development allocations within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the Strategic Development Plan requirements. On this basis, there is not a strategic need to allocate further development opportunities, in addition to the existing OP1 in Dunecht at this time.

Site requirements recommended by SNH and SEPA are noted. In such circumstance that the bid did come forward as an allocation, these requirements should be stated in the allocation summary for the site.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. With the exception of identification of a possible future opportunity site (bid GR094), these are captured in the recommendations below.

4. Recommendations

1. Add the following text to the Settlement Statement: “Dunecht lies within an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required”.
2. Retain existing OP1 with increased capacity from 24 to 33 homes to reflect planning permission subject to APP/2018/2430. The allocation summary should recognise that the site is under construction.

Issue 100 Durno

1. List of Respondents

MIR Ref	Respondents
13	Mr Stephen McMinn
176	Mrs Lesley Wilson
249	Lippe Architects + Planners on behalf of Forestdale Homes
805	SEPA
966	Bennachie Community Council

2. Issues

Services and Infrastructure

SEPA has noted that there is no public waste water infrastructure in Durno (805).

Bid GR048

Three respondents have agreed with Officers' recommendation ("not preferred") for bid GR048 (13, 176, 966), whereas another believed that the site should be allocated in the Proposed Local Development Plan (LDP) (249).

One respondent has highlighted that the settlement is surrounded by prime agricultural land (966). Two respondents have suggested that development would be contrary to planning objective to protect the character and amenity of the settlement (13, 966). Respondents have suggested that development would be severely constrained by the absence of public sewerage provision (13, 176, 966) and the lack of services and infrastructure to support growth (13, 966). It is noted that the site is at risk of flooding (13, 176, 966). The settlement suffers from poor public transport connectivity (13, 966) and road safety is a concern (176). There is little demand for housing development as this would distort the market to the detriment of existing homeowners (176). There are existing sites with planning permission that remain undeveloped (13).

One respondent has supported bid GR048 on the basis that development acts as infill and would support the local primary school. The respondent has argued that the lack of sewage infrastructure has not resulted in permission not being granted for other developments, adding that private systems have successfully been developed.

Development would also have no landscape implications. The respondent has argued that the merits of the site have not been fully considered (249).

3. Actions

Bid GR048

Whilst the comments in support of bid GR048 are acknowledged, including those promoting the merits associated with the site, it is maintained that Durno lacks services and has limited public transport connectivity such that it is not an appropriate location for further development.

In accordance with the Aberdeen City and Shire Strategic Development Plan sufficient additional housing land allocations are identified in the Rural Housing Market Area without the need to allocate land in Durno.

The Draft Proposed Local Development Plan

A change to the settlement boundary was proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. These are captured in the recommendations below.

4. Recommendations

1. Minor amendments should be made to the settlement Vision to improve readability.
2. Amend the settlement boundary to exclude 3 homes (Woodlands, Craighead and Birchfield) to the south west on the basis that these properties are unrelated and detached from the settlement core.

Issue 101 Echt

1. List of Respondents

MIR Ref	Respondents
21	Ms Gail Assiter
179	Mrs Helen May
392	Echt & Skene Community Council
484	Ryden LLP on behalf of Cabardunn Development Company Limited and Dunecht Estates
488	Ryden LLP on behalf of Cabardunn Development Company Limited and Dunecht Estates
805	SEPA
1065	Mr & Mrs John & Paula Houston

2. Issues

Services and Infrastructure

SEPA has noted that the Draft Proposed Local Development Plan (LDP) uses former text “a growth project has been initiated”. SEPA understands that the sewage treatment works have been upgraded with an increased treatment capacity. However, it should be confirmed with Scottish Water that the proposed population growth is within the current design criteria for the sewage treatment works, however, if not, an upgrade may be required and this should be highlighted in the Proposed LDP (805).

Bid GR092

Respondents have objected to bid GR093 on the basis of flood risk and encroachment on open space and core paths. It was considered that development would go against the planning objective of preserving the character of the settlement (21, 1065).

Other respondents have indicated that bid GR092 would be preferred over GR093 as the site would be well related to the recent housing development in the village and site OP1. Bid GR092 is on the same side of the B9119 as the shop and Post Office, and the existing zebra crossing near the school allows for pedestrian access to other services (179, 392).

One respondent has requested that bid GR092 be allocated in the Proposed LDP. It was considered that development would sustain services and facilities in the settlement. A landscape buffer would be created to the east and north and a Flood Risk Assessment (FRA) would address concerns regarding flood risk. It was considered that Echt has capacity to accommodate further growth and the primary school could be extended to accommodate growth (484).

Bid GR093

Respondents have objected to bid GR093 on the basis of flood risk, encroachment on open space and core paths. It was considered that development would go against the planning objective of preserving the character of the settlement (21, 179, 1065).

One respondent has supported the Officers' recommendation for bid GR093 with increased capacity to 42 homes. Development would round off the settlement providing a defensible boundary. It was argued that Echt School could be extended into the recreation ground (488).

It was recognised that car parking is a concern for the local community, but believed that development of parking on site GR093 was unlikely to resolve the problem. Parking provision within bid GR093 would be distant from the village centre and it would be preferable to identify a site closer to the village centre. Significant improvement could be achieved and additional parking provided from rationalisation of access to the recreation ground from this site (488).

SEPA has indicated that an FRA would be required for bid GR093 to establish the source and extent of flood risk at the site. A buffer strip would also be required adjacent to the watercourse on the southern boundary which should be integrated positively into the development (805).

3. Actions

Services and Infrastructure

Information received from Scottish Water indicates that a growth project would be triggered once development meets Scottish Water's criteria. Text should be amended under "Strategic drainage and water supply" to reflect the current position with regard to waste water drainage.

Bid GR092 and GR093

Comments both in support and objection to bid sites in Echt are noted. As identified in the Main Issues Report there is little to separate the merits of the bid proposals, but in order to avoid overdevelopment and to ensure that an opportunity to consolidate growth is provided, it is considered appropriate to allocate one bid site in Echt in the Proposed LDP. Having considered comments from respondents it is now recommended that bid GR092 should be taken forward as opposed to bid GR093. To account for flood risk the site area should be reduced to that required to accommodate 25 homes as sought through the bid, and an area of protected land introduced on that area which is at risk from flooding with a specific note in the Settlement Statement that it should form open space for this modest development.

The Draft Proposed Local Development Plan

Changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. With the exception of the identification of bid GR093 as an opportunity site, these are captured in the recommendations below.

4. Recommendations

1. Include statement within the Vision to reflect community aspiration for additional car parking provision to be provided within the settlement.
2. Text should be amended under 'Strategic drainage and water supply' to reflect the current position with regard to waste water drainage.
3. Remove site OP1 as now built out.
4. Allocate part of bid GR092 for 25 homes.
5. Designate part of bid GR092 at risk from flooding as protected land. This area should form part of the open space and biodiversity contribution from wider development of the GR092 site, and form part of the green network.

Issue 102 Hatton of Fintray

1. List of Respondents

MIR Ref	Respondents
50	Mr & Mrs Wayne Gault
108	Dr Richard Taylor
378	Mr Nicholas Beeson
424	Mr & Mrs Simon & Vicki Glazier
425	Fintray Community Council
491	Ms M A Roberts
506	Scottish Natural Heritage
639	Mr Jim Emslie
656	Ms Jacqueline Turner
805	SEPA
992	Ms Colette Robertson
1009	Historic Environment Scotland

2. Issues

Services and Infrastructure

A respondent has suggested that further development should only take place once improvements to the local road infrastructure have been made and pedestrian/cycle route connections to Blackburn and Dyce are provided. The respondent also indicated that rail links should be reinstated with the reopening of a railway station at Kinaldie (378).

A respondent has indicated that further development would only increase problems in accessing health care and impact on capacity at Hatton of Fintray Primary School (50).

SEPA has noted that no reference to waste water drainage is made in the Draft Proposed Local Development Plan (LDP) for Hatton of Fintray. SEPA recommend that it should be confirmed with Scottish Water that the proposed population growth is within the current design criteria for the sewage treatment works, and if not, an upgrade may be required and this should be highlighted in the Plan (805).

Bid GR013

Respondents have agreed with Officers' recommendation for bid GR013 ("not preferred") (378, 424, 425, 491, 656, 992, 1009). Historic Environment Scotland (HES) has suggested that the cumulative impact of this bid alongside bid GR107 would potentially have significant adverse effects on a Donald's Hillock cairn (SM12346) (1009).

One respondent has raised no objection to bid GR013 on the basis that development is proportionate and sympathetic to the wider settlement. The respondent has recommended that a reduced site capacity of 20 homes rather than 40 homes would be appropriate on the site (50).

Bid GR044/ Existing Site – OP1

Respondents have agreed that bid GR044 is the most suitable location for development within the settlement (50, 424, 425, 992), however respondents have requested that the site area (378) or capacity is reduced (108, 639) from 32 to either 16 homes (424, 425, 656), or 12 homes (50, 491), or removed entirely (108). Respondents raised concerns that the increase proposed in the Main Issues Report would be disproportionate to the size of the settlement and the settlement lacks services to support development of the scale proposed (108, 378, 424, 425, 491, 992). One respondent was concerned that development would have a detrimental visual impact due to the topography of the site (108, 656).

There were requests that access should be taken directly from the B977 and not taken from Hatton Court. Provision should also be made for pedestrian and cycle routes around the site, linking with the settlement (50, 491, 656). In a similar vein Scottish Natural Heritage (SNH) has recommended that new green infrastructure is integrated with existing woodland areas and to identify locations for active travel routes to school and the settlement (506).

SEPA has indicated that a Flood Risk Assessment (FRA) may be required. A buffer strip would also be required adjacent to the watercourse on the western boundary which should be integrated positively into the development. The buffer strip will need to allow sufficient space for restoration of the straightened watercourse. Enhancement of these through re-naturalisation and removal of any redundant features will be required to be investigated (805).

Bid GR107

Respondents have agreed with Officers' recommendation for bid GR107 ("not preferred") (378, 424, 425, 491, 992, 1009). HES has suggested that the cumulative impact of this bid alongside bid GR013 would potentially have significant adverse effects on a Donald's Hillock cairn (SM12346).

One respondent has raised no objection to bid GR013 on the basis that development is proportionate and sympathetic to the wider settlement. Provision for pedestrian and cycle access would be required (50). Another respondent has suggested that the only part suitable for development is the northern portion that could accommodate a row of housing along the B977 between the school and cemetery (656).

Bid GR108

Respondents have agreed with Officers' recommendation for bid GR108 ("not preferred") (50, 378, 424, 425, 491, 656, 992).

HES has advised that consideration needs to be given to the impact on the setting of Mote Hill Scheduled Monument (SM12440). It may however be possible that impacts are not likely to be significant due to topography and trees (1009). SNH has suggest that in the case that bid GR108 is allocated that the boundary should be amended to avoid woodland loss. SNH has also recommended that a development brief would be required to integrate new green infrastructure with existing woodland and to create active travel links to settlement facilities and out to open countryside (506).

3. Actions

Services and Infrastructure

The desire to reinstate rail connections or introduce new active travel routes from Hatton of Fintray to surrounding settlements was not raised as an aspiration of the community during pre-Main Issues Report engagement with stakeholders. There is also significant dubiety regarding delivery of reinstated rail links to this settlement. It would be inappropriate to amend the Vision or Services and Infrastructure section to include such an aspiration at this time.

Any contributions required to mitigate against the impact to health and education provision from development would be considered in bringing the development in the settlement forward.

Information received from Scottish Water indicates that there is limited capacity available at Hatton of Fintray septic tank and that a growth project may be required. Text should be added to the Proposed LDP to reflect the current position.

Bid GR044/ Existing Site – OP1

Bid GR044 sought to retain an existing opportunity site (OP1). Acknowledgement that this site is the most appropriate location to direct development in the settlement is welcomed but concerns raised regarding the site capacity are also noted. As such it is recommended that the site area be reduced to that required to accommodate 16 homes and the settlement boundary amended accordingly. The revised site capacity should be reflective of the density of 25 homes per hectare being promoted in the Aberdeen Housing Market Area. Reduction to the site area and capacity should consequently reduce the impact of traffic on Hatton Court should direct access from the B977 not be possible. Whilst it is expected that developments will promote active travel, specific wording could be added to the allocation summary for the site to emphasise the need for new green infrastructure to be integrated with existing woodland areas and to identify locations for active travel routes to the primary school and more widely within settlement.

Requests made by SEPA in respect to FRA and the need for a buffer strip are considered acceptable and should be reflected in the development brief for the site.

Bid GR013, GR107 and GR108

Support for Officers' assessment of bids GR013, GR107 and GR108 in Hatton of Fintray is welcomed.

It is considered that there are currently sufficient existing development allocations within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the Strategic Development Plan requirements. On this basis, there is not a strategic need to allocate further development opportunities, in addition to the existing OP1 (bid GR044) in Hatton of Fintray at this time.

The Draft Proposed Local Development Plan

Changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. These are captured in the recommendations below.

4. Recommendations

1. Minor changes should be made to the settlement Vision to reflect community comments raised during pre-Main Issues Report consultation and correct inaccuracies.
2. Add text under 'Strategic drainage and water supply' to state that there is limited capacity at Hatton of Fintray septic tank. A growth project will be initiated once development meets Scottish Water's criteria.
3. The southern portion of the existing OP1 (bid GR044) allocation should be retained within the Proposed Local Development Plan for 16 homes and amend the settlement boundary accordingly.
4. Text should be added to the development brief for OP1 to emphasise the need for new green infrastructure to be integrated with existing woodland areas and to identify locations for active travel routes to the primary school and more widely within settlement. An FRA may be required. A buffer strip will be required adjacent to the watercourse on the western boundary which should be integrated positively into the development. The buffer strip will need to allow sufficient space for restoration of the straightened watercourse. Enhancement of these through re-naturalisation and removal of any redundant features will be required to be investigated.

Issue 103 Insch

1. List of Respondents

MIR Ref	Respondents
15	Suller & Clark Planning on behalf of Ian Stuart
19	Nestrans
34	Dr Katherine Smith
157	Mr Allan Cooper
167	Suller & Clark Planning on behalf of Ian Stuart
176	Mrs Lesley Wilson
185	Mrs Julie McDonough
186	Mr Tony McDonough
211	Mr William Leask
212	Ms Fiona Leask
215	Mr Duncan Reid
273	Mr & Mrs Collam
323	Mr Tom Cochrane
346	Ms Elaine Lopez
365	Mr Graham Myers
506	Scottish Natural Heritage
607	Shepherd & Wedderburn LLP on behalf of Mr & Mrs Dix
798	Ryden LLP on behalf of Scotia Homes Limited and Drumrossie Homes Limited
805	SEPA
960	Mr Nigel Badiozzaman
966	Bennachie Community Council
989	Ms Janet Hoper
1029	Ms Janet Rennie
1034	Ms Jane Bellamy
1036	Mr & Mrs Tom & Sarah Robinson
1044	Ms Lesley Ovington
1045	Ms Patience Schell
1053	Mr Stuart Rennie
1062	Ms Lorna Robinson

2. Issues

Vision

It was noted that Insch has grown considerably in recent years (1062). Sites in Inverurie, Kintore (1036), and Huntly (365, 1036), should be prioritised and any future development informed by the route of the new A96. There is no requirement for

additional housing allocations to be made in Inch (966). A respondent disagreed, suggesting that by restricting development in Huntly and Inverurie means that demand for housing in Inch would not be met (798). Another believed small-scale development could be supported (34, 176) in order to maintain the sense of place within the settlement (34).

It was suggested that the wording in the Vision regarding Inch needing time to consolidate recent development was confusing and should be revised (989). Another respondent objected to the principle of this statement suggesting that there was little justification for this position, and that other than primary education constraints, there were no infrastructure issues that would curtail development (798).

Respondents agreed with statement in the Draft Proposed Local Development Plan (LDP) acknowledging that there is little in the way of off-street parking within the centre of the village (346, 1062).

It was noted that the primary school is at capacity and the medical centre appears to be at capacity (365, 1029, 1044, 1053, 1062).

One respondent indicated a need for a new police station in Inch (365) whereas another requested that continued development should provide a new primary school (346).

A respondent has indicated that they would wish to see encouragement of shopping opportunities for an increased range and size of shops (346).

It was requested that the statement that a new Household Waste and Recycling Centre (HWRC) is required in Inch should be retained in the Settlement Statement Vision. The existing facility is inappropriate in terms of access and impact on health and a new location for this facility should continue to be sought as identified by the Reporter in examining the current LDP. There has been no substantive change since the Plan was adopted (607).

Flood Risk

SEPA has requested that the text, "Inch lies within an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required" should be added to the Settlement Statement (805).

Services and Infrastructure

SEPA has noted that there is no reference to waste water drainage in the Draft Proposed LDP for Inch. They request that this is confirmed with Scottish Water to ensure that the proposed population growth is within the current design criteria for the sewage treatment works, and if not, an upgrade may be required and this should be highlighted in the LDP (805).

Existing Site – OP1

A respondent has raised concern regarding flood risk associated with existing OP1 site (1053). SEPA support this view indicating that OP1 has been identified as being at a much greater flood risk than was concluded from the Flood Risk Assessment (FRA) to support the current planning permission. SEPA has stated they would object to development on the site should permission lapse due to new flood risk information being provided by the Council's Flood Study for Insch. The fluvial flood risk would require to be carefully managed (805). It was also noted that this site is prime agricultural land and would have negative landscape impacts (1053). One respondent has expressed support for the retention of this site (346).

Existing Site – OP2, OP3 and OP4

Support was expressed for the retention of existing site OP2, OP3 and OP4 (346). SEPA indicate that an FRA may be required and that a buffer strip would be required adjacent to the watercourse on the western boundary of site OP4 which should be integrated positively into the development (805).

Bid GR015

A number of respondents have objected to bid GR015. Reasons to discount the bid included that it lies on prime agricultural land, flood risk, impact on the landscape setting and there would be significant traffic impact arising from development (157, 185, 186, 211, 212, 215, 323, 960, 966, 989, 1029, 1036, 1044, 1045, 1053). Two respondents objected to the inclusion of allotments on this site (185, 186).

Support was also expressed for bid GR015 (15, 19, 167, 346). It was requested that the bid be brought forward and allocated in the Proposed LDP (15, 167).

There was agreement with the need for disabled access to be provided at the railway station (19, 1044), however promoting further housing development should not be required to meet this aspiration (1044). Other respondents have raised concern that there is no guarantee that access would be delivered (185, 1029). One respondent believed that platform to platform access would be the only acceptable solution (966).

SNH has recommend that a development brief would be required for the site to allow for identification and promotion of active travel routes to the railway station and from the settlement to surrounding woodland and enhanced woodland connectivity (506).

Bid GR029

A number of respondents have objected to the parts of the bid area identified in the Main Issues Report (MIR) as being potentially suitable for development, or to the full extent of bid GR029. Reasons to discount the bid included that it lies on prime agricultural land, would have an adverse impact on the landscape setting of the settlement, and there would be significant traffic impact arising from development (34, 157, 273, 323, 966, 989, 1029, 1034, 1036, 1045, 1053). Two respondents have expressed support for the site, indicating that the areas identified as "reserved" in the

MIR should be allocated in the Proposed LDP, with the remaining area allocated at such time as the next LDP is reviewed (346, 798).

It is proposed that bid GR029 would help facilitate delivery of a new primary school. It was also argued that the loss of prime agricultural land could be justified as development on the site would be essential to meet the Spatial Strategy of the LDP, and landscape impact could be mitigated (798).

SNH has recommend that a development brief should be required to mitigate for potential loss of woodland and the tree belt, and to integrate green infrastructure including planting and active travel routes to existing core paths, as parts of the site are some distance from the settlement core (506).

3. Actions

Vision

Differing views regarding the need for further housing land to be allocated in Inch are noted. Given its location within a Strategic Growth Area, Inch is considered to be a sustainable location where development could be promoted. However, given the level of growth experienced within the settlement, we still believe that it is appropriate to not allocate any major new land allocations at this time to allow the extent of recent growth to be consolidated. Additionally, in accordance with the Aberdeen City and Shire Strategic Development Plan (SDP) sufficient additional housing land allocations are identified in the Rural Housing Market Area, without the need to allocate any further housing land in Inch at this time.

Constraints associated with parking provision, school capacity and health provision are noted.

No bid, or representation has been received that proposes a new police station in Inch. It is considered that there would be sufficient infill opportunities available to accommodate such a development should a proposal come forward during the Plan period. There is no need to identify a specific site within the Proposed LDP for this use. Significant new residential development would need to be allocated in Inch before a new primary school could be provided in the village. This would be counter to the communities' aspiration that no additional housing allocations should be made in Inch at this time as indicated to Planning Officers' during pre-MIR consultation.

The text in the existing Vision related to identifying a site for a new HWRC is outdated and no longer required following a review of all HWRCs. The Council's Waste Strategy initially proposed to close the site in Inch and not replace it, however, during the public consultation on the Strategy, the final Strategy retained the Inch site at reduced opening hours. The Waste Strategy was approved by the Infrastructure Services Committee in January 2019. Inch is well served by HWRCs in nearby towns such as Inverurie and Huntly whose sites are open 7 days a week.

Flood Risk

The request made by SEPA for additional text to be added to the Settlement Statement is considered appropriate and should be included in the Proposed LDP.

Existing Site – OP1

Site OP1 is subject to an extant planning permission for 48 homes (APP/2015/0634). A Proposal of Application Notice has recently been received which seeks to amend the existing permission. As an effective site in the Housing Land Audit it is appropriate to retain the allocation in the Proposed LDP. Significant concerns by SEPA regarding flood risk are recognised and is a matter that would need to be carefully considered in determining any future planning applications on the site.

Existing Site – OP2, OP3 and OP4

Support expressed for existing opportunity sites is noted. It is recommended that the existing OP2 site is removed from the Proposed LDP. The site is currently operating as a business. Should a proposal for housing come forward on the site during the Plan period, it would be considered to be infill development and would be determined against relevant policies. There is no need to retain an allocation in this case.

The existing LDP states that an FRA may be required. This text should be retained with the requirement for a buffer strip to be added to the allocation summary.

Bid GR015

Comments received both in support and objecting to bid GR015 are noted. We are not aware of any progress that has been made with regard to identifying a solution to providing access to the southern platform of the railway station. As such it is not clear whether the solution included as part of bid GR015 would be taken forward. Until such time as this matter is resolved it is not considered appropriate to allocate the bid in the Proposed LDP.

Bid GR029

Whilst support for bid GR029 is noted, it is also acknowledged that a number of objections were also received. Part of bid GR029 was identified as a reserved option in the MIR as a possible future opportunity site (FOP). On the basis that the LDP 2021 is no longer expected to show FOPs on the Settlement Statement maps, there is no need to reserve any part of this site for future development. In addition, in accordance with the SDP sufficient additional housing land allocations are identified in the Rural Housing Market Area. As such it is not necessary to allocate any part of bid GR029 in the Proposed LDP.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. With the exception of identification of possible future opportunity sites (bids GR015 and GR029), these are captured in the recommendations below.

4. Recommendations

1. Amend the Vision to state that, "Given the recent, substantial development that has taken place in Inch, and in order to allow the village to consolidate and respond to the greater demands on its services and infrastructure, no new land allocations for development have been made in this Plan period." Minor amendments should also be made to reflect community comments raised during pre-Main Issues Report consultation.
2. Remove text from the Vision regarding identifying a site for a new HWRC in Inch.
3. Add the following text to Settlement Statement "Inch lies within an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required".
4. Remove existing OP2 site.
5. Add text to the allocation summary for existing OP4 site to require a buffer strip to the watercourse on the western boundary of the site.

Issue 104 Inverurie and Port Elphinstone

1. List of Respondents

MIR Ref	Respondents
17	Wood E&I Solutions UK Ltd on behalf of National Grid
88	Suller & Clark Planning on behalf of Malcolm Allan Housebuilders Ltd
213	Mr & Mrs Innes & Sarah Simpson
260	Lippe Architects + Planners on behalf of RCM & RD Maitland
261	Lippe Architects + Planners on behalf of Mr Patrick Stephen
262	Lippe Architects + Planners on behalf of Mr Patrick Stephen
263	Lippe Architects + Planners on behalf of Mr Patrick Stephen
265	Lippe Architects + Planners on behalf of F & J Whyte Farms
276	Lippe Architects + Planners on behalf of Inverurie Business Association
302	Halliday Fraser Munro on behalf of Barratt North Scotland
318	Ms June Cameron
383	Ryden LLP on behalf of A Rhind And S Wilson
386	Ryden LLP on behalf of A Rhind & S Wilson
401	Halliday Fraser Munro on behalf of ANM Group Ltd
447	Halliday Fraser Munro on behalf of ANM Group Ltd
463	John Wink Design on behalf of Mr James Innes
506	Scottish Natural Heritage
512	Halliday Fraser Munro on behalf of ANM Group Ltd
533	Wardrop Strategic Planning Limited on behalf of Taylor Wimpey (East Scotland) Ltd
550	Norr on behalf of Stewart Milne Homes
572	Bancon Homes Ltd
575	Bancon Homes Ltd
576	Bancon Homes Ltd
598	Lippe Architects + Planners on behalf of Mr Patrick Stephen
599	Lippe Architects + Planners on behalf of Mr Patrick Stephen
805	SEPA
843	Kintore and District Community Council
865	Inverurie Community Council
876	Woodland Trust Scotland
980	Mr Paul Davison
1009	Historic Environment Scotland

2. Issues

Spatial Strategy for Inverurie and Port Elphinstone

It was believed that development of Inverurie and Port Elphinstone has lacked the proper planning that is necessary to create sustainable places. It is essential that the Local Development Plan (LDP) meet demand for housing, employment land, local facilities and infrastructure to support growth (865). Expansion of the town in recent decades has placed increasing strain on to core infrastructure (865) and the town centre (213).

It was considered that more needs to be done to ensure there is an adequate range and choice of deliverable sites in Inverurie that are not just focussed on large allocations (260, 261, 262, 263, 276, 383, 598, 599). It was also suggested that there was a need for additional business land allocations and mixed use developments within the town centre (865). One respondent believed there was no need for further housing development in the town (213).

A number of respondents have objected or raised concern as to the lack of preferred sites identified in the Main Issues Report (MIR) for Inverurie and Port Elphinstone (260, 261, 262, 263, 265, 276, 302, 383, 386, 575, 576), whereas another respondent was concerned that further development may be permitted despite existing land for development having not been built out (213). It was also highlighted that many of the bids submitted could be delivered without reliance on the A96 dualling project, nor would they affect any of the proposed routes (88, 260, 261, 262, 263, 265, 276, 302, 383, 386, 401, 463, 533, 550, 572, 865).

A respondent has raised concern that there appears to have been an inconsistent approach to assessing bids in Inverurie and Port Elphinstone (302). Scottish Natural Heritage (SNH) has noted that ancient woodland has not been referenced for all relevant “non-preferred” sites (506).

Vision/ Planning Objectives

A respondent has expressed support for the objectives for Inverurie set out in the MIR (401). SNH has expressed support for the aspiration to increase community growing spaces and recommended that there be a focus on integrating and linking open space throughout the town, particularly along the Don and Ury which could form significant green networks (506). This was echoed by another respondent who emphasised that the maintenance of green and blue networks through the town required to be addressed (865).

It was noted that the Vision should address the need for improved footpath and cycle connectivity and an integrated public transport system. There is a need for suitable accommodation for clubs and community activities. There is demand for allotments, self-build homes, live-work proposals and opportunities for small start-up businesses (865).

Affordable and accessible housing is a priority for the town, a wider range of housing types and tenures will be required to meet demand, particularly for one-bedroom flats, bungalows and one-off or self-build homes. There is demand for increased garden sizes, reduced build-to-plot ratios and creative solutions to reduce the burden of costs for factor maintenance of public spaces (865).

Protected Land

The Uryside Riverside Park should be updated from reserved to protected land (865).

Flood Risk

SEPA has requested that the text, "Parts of Inverurie and Port Elphinstone are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required" should be added to the Settlement Statement (805).

It was suggested that the area subject to the Inverurie South Development Framework (OP5, OP10, OP11, SR1, BUS8 and BUS9) was increasingly at risk of flooding (318). However, SEPA has confirmed that no FRA is required for existing sites SR1, OP1 and OP2. SEPA has also confirmed that an FRA would be required for existing sites OP3 and OP9 should planning permission lapse. Any future development should take account of the latest Council Flood Study for Inverurie (805).

Services and Infrastructure

There is a lack of evidence on the impacts (including cumulative impacts) of development on local infrastructure (865).

The provision of health and wellbeing opportunities needs greater emphasis in the LDP, in particular walking and cycling routes (865).

SEPA has noted that the Draft Proposed LDP uses the former text, "Capital Maintenance project has been triggered to deliver growth". However, a growth project is currently under construction at Inverurie. They request that this is confirmed with Scottish Water and that this will have capacity for all sites proposed in the LDP. Otherwise long-term capacity issues would need to be highlighted in the Proposed LDP (805).

Existing Site – OP4 and OP11

A respondent has objected to retention of site OP4 and OP11 on the basis of transportation and access issues (980). It was suggested that consultation was required to be undertaken by the developer with the community (843). It was also noted however that the site description is out of date as permissions are now extant and development commenced in late 2018, with landscaping also having been agreed and confirmation that a grade separated interchange is no longer required. A revised site description was provided by the respondent (447).

Existing Site – OP12

Respondents have agreed with Officers' recommendation that site OP12 should be removed from the Local Development Plan (843, 865, 980). One respondent has requested that the site be retained in the Proposed LDP (512).

Existing Site – OP14

Respondents have objected to retention of site OP14 on the basis of potential impact on roads (843, 980).

Existing Site – OP16

Respondents have objected to retention of site OP16 on the basis of potential flood risk (843, 980).

Existing Site – BUS5, BUS6, BUS7, BUS8, BUS9 and BUS10

Respondents have objected to retention of site BUS5 and BUS6 on the basis of potential impact on roads (843, 980).

A respondent has objected to retention of site BUS7 (843) given the proximity to pipelines (980).

Support is expressed for retention of site BUS8 (980) but issues associated with impact on the Thainstone roundabout and pedestrian access need to be addressed (843).

It was noted that BUS9 appears to be fully developed (843).

Respondent has objected to retention of BUS10 (980) on the basis that it is unsuitable for more developments (BUS10).

Bid GR009, GR010 and GR138

A respondent has requested that bid GR009 be allocated in the Proposed LDP (88). Another respondent has requested that bid GR138 (incorporating the site area of bids GR009 and GR010) be allocated in the Proposed LDP (261). It was felt that GR138 had potential to meet a community aspiration in providing community growth space (865).

Bid GR027, GR028 GR046

A respondent has agreed with Officers' recommendation ("not preferred") for bid GR027 (865). Another respondent has requested that bid GR027 be allocated in the Proposed LDP (383), for 100 homes, with the southern proportion of the site identified as a future opportunity site for 260 homes (386). It was noted that part of GR027 is located within the P15 site to enable the relocation for St Andrews Special School if required. Clarity is required as to whether this is still a requirement. If not, the site could still be retained for community uses (386).

SNH has noted that GR027 would extend development beyond and over the broad summit of Backhill of Davah which forms the natural landscape setting to Inverurie to

the west. Any development at this locale should be strictly contained to the eastern extent of the site. SNH also noted that the Davah Hill core footpath extends through the southern part of bid GR027. It was suggested that this should be retained and new links provided (506).

A respondent has agreed with Officers' recommendation ("not preferred") for bid GR028 (865), whereas another respondent has requested that bid GR028 be allocated in the Proposed LDP for 100 homes as a logical extension to the settlement (383).

SNH has noted that a core path runs along the northern boundary of bid GR046 to Dillys Hill Cairn; and should be retained and provide new linkages (506).

Bid GR037 and GR038

A respondent has agreed with Officers' recommendation ("not preferred") for bid GR037 and GR038 (865). SNH has indicated that the core path should be retained, and new linkages promoted (506). For bid GR037, SNH has recommended that a development brief be required to protect/enhance woodland and integrate green infrastructure with existing habitats and paths.

Bid GR057, GR058, GR059 and GR137

A respondent has agreed with Officers' recommendation ("not preferred") for bids GR057, GR058 and GR059 (865). Another respondent has requested that bids GR057, GR058 and GR059 be allocated in the Proposed LDP as a natural extension to the settlement and a site identified as an "F" future site in the Aberdeenshire Local Plan 2006. It is considered that the site can provide excellent pedestrian and cycle connections, enable a new secondary school as well as provide improvements to the local road network. Landscape impacts could be mitigated (572).

Historic Environment Scotland (HES) has advised that the cumulative impacts of bids GR057, GR058 and GR059 on the inventory battlefield should be considered. Whilst the potential for archaeological remains may be low, this should be considered and assessed. There is potential for impact on the understanding and appreciation of the battlefield landscape and character (1009).

A respondent has noted that GR137 lies within the flood plain and requested that this be given reserved status as a future extension to the Ury Riverside Park. The respondent has suggested that there may be scope for a small-scale development within the central part of the bid site on an enabling development basis to allow for footpaths and cycle connectivity to be made between the riverside park and development sites at OP3 and BUS1 (865). Another respondent has requested that the bid be allocated in the Proposed LDP. It was argued by the respondent that the presence of prime agricultural land is not a reason to disregard the site. Development would deliver an extension to the Riverside Park. It was considered that infrastructure solutions could be delivered without reliance on the A96 dualling project (260).

Bid GR061, GR062 and GR114

Respondents have agreed with Officers' recommendation ("not preferred") for bids GR061 (865), GR062 (865, 876) and GR114 (865).

A respondent has requested that sites GR061, GR062 and GR114 be allocated in the Proposed LDP. It was considered that infrastructure solutions could be delivered without reliance on the A96 dualling project and it was also noted that none of the routes considered for the A96 would directly impact on the bid sites. It was suggested that strategic landscaping could mitigate any landscape impact arising from development. In relation to bids GR061 and GR062 it was argued that flood risk should not be seen as a constraint to development and that the area at risk of flooding could contribute towards meeting the open space requirement for the site. It was noted that bid GR114 is bound by the exiting settlement boundary and acts as a natural extension to the settlement. Pedestrian access could be provided via an existing footpath (575).

SNH has advised that considerable earthworks may be required to accommodate bid GR062 and that this could have landscape impacts. SNH has also indicated the ancient woodland should be retained and extended to enhance connectivity and that there should be links to the riverbank to allow for continuation of informal access. Should GR061 or GR062 be allocated in the Proposed LDP, SNH has recommended that a development brief be required to integrate new green infrastructure with existing paths and protection and enhancement of woodland (506).

Bid GR084

A respondent has raised no objection to bid GR084 on the basis that the proposed use is compatible with the town centre and would add to the housing mix (865). SEPA has noted that bid GR084 is adjacent to activities which are regulated by SEPA under a Waste Management License, Pollution Prevention and Control (PPC) Permit or Controlled Activities (CAR) License. There may be co-location issues and Environmental Health would need to advise on the compatibility of these sites with existing adjacent regulated activities. SEPA has confirmed that an FRA would not be required (805).

Bid GR089, GR090 and GR091

HES has advised that bids GR089, GR090 and GR091 have potential for significant impacts on the Keith Hall Inventory Garden and Designed Landscape and that there is a need to preserve the integrity of the designed landscape. The cumulative impacts of bids GR050 and GR060 in Keithhall also needed to be considered (1009). SNH has noted that the bids could significantly compromise and impact on the wider setting of these important local resources, including mature policy woodland and the distinctive mosaic of open to enclosed space (506). Another respondent has indicated any impact could be mitigated through woodland planting (533).

A respondent has requested that bid GR091 be allocated in the Proposed LDP with bid GR089 identified as an extension to the riverside park. It is noted that the site was a site identified as an “F” future site in the Aberdeenshire Local Plan 2006. The site is in close proximity to the town centre. Development could resolve education constraints associated with the town through development of a new primary school. The bid proposer has indicated commitment to delivering 35% affordable homes. It was not anticipated that the site would be affected by the A96 dualling. An updated Flood Risk Assessment has identified the developable area and an updated Ecology Report and Otter Survey identifies that development could take place without adverse impact on ecology (533).

Bid GR117

Respondents, including HES have agreed with the Officers’ recommendation (“not preferred”) for GR117 (865, 1009). SNH has indicated that should the site come forward that a development brief would be required to mitigate for any tree loss and to integrate green infrastructure proposals with existing woodland. Provision of active travel routes through the site to settlement facilities and to the countryside would be required (506).

A respondent has requested the bid GR117 be allocated in the Proposed LDP as an extension to existing development. The bid area is mentioned in the Uryside Development Framework and the Imagine Inverurie and Kintore Study which support this area for development. It is considered that flood risk is minimal and could be addressed through sustainable flood management and drainage infrastructure on the site. Potential tree loss could be mitigated through robust and high-quality open space and landscaping. Likewise, any impact on category A-listed Bourtie House could be addressed through careful design and landscaping to reduce any visual impact (302).

Bid GR131

Respondents have agreed with Officers’ recommendation (“not preferred”) for bid GR131 (843, 865, 980), whereas one respondent requested the site be allocated as an extension to employment uses at Thainstone Business Park (401). It was noted that development is unlikely to be affected by the A96 dualling project and the presence of pipelines should not be seen as a constraint on development (401). SNH has identified that any proposal on the site would require a Landscape and Visual Impact Assessment (506). This was accepted by the bid proposer (401). HES has highlighted that development would have potential impacts on the setting of Bruce’s Camp, a Scheduled Monument, including views to and from if trees are felled in this area (1009).

Bid GR139, GR140, GR141, GR142 and GR145

It was requested that one or a combination of bids GR139, GR140, GR141, GR142 and GR145 be allocated in the Proposed LDP. It was noted that there are few constraints associated with these sites and that none of the routes considered for the A96 would directly impact on the bid sites (262, 263, 265, 598, 599, 865).

SNH has indicated that a development brief would be required for sites GR141 and GR145 to integrate and connect existing woodland and to promote active travel links to schools and community facilities in the town centre (506). It was noted that bid GR145 crosses or is in close proximity to gas pipelines. The statutory safety clearances between overhead lines, the ground, and build structures must not be infringed (17).

3. Actions

Spatial Strategy for Inverurie and Port Elphinstone

Inverurie and Port Elphinstone is situated within the Aberdeen to Huntly Strategic Growth Area (SGA). The Spatial Strategy for this SGA is discussed under “Issue 6 The Spatial Strategy”. As outlined in the MIR and the Issues and Action Paper for Issue 6, it is maintained that in accordance with the Aberdeen City and Shire SDP sufficient housing land allocations have been identified across Aberdeenshire, and within this SGA. Likewise, there is no need to allocate further strategic employment land in Inverurie and Port Elphinstone in the Proposed LDP.

However, additional sites that promote relatively small-scale developments in relation to the size of the settlement and existing opportunity sites could be taken forward to the Proposed LDP to further augment the existing land supply. As such, we have identified additional bid sites that could be considered to be an “Officers’ preference” and as such could be allocated in the Proposed LDP, where they are located in the right place, are without constraint and have been supported by respondents to the MIR. These sites are identified below. It is not considered that identification of these additional preferred sites drastically effects the Spatial Strategy for Inverurie and Port Elphinstone, or its position within the SGA. Neither do these sites affect the anticipated delivery of other allocations in the settlement. It is expected that these sites will add an element of choice and address respondents concerns that there is a lack of preferred sites in Inverurie.

We accept that several of the bids received associated with Inverurie and Port Elphinstone could be delivered without affecting the proposed routes of the A96 dualling, that have emerged since publication for the MIR, however we continue to believe that to account for continuing uncertainty associated with the project that a precautionary approach is an appropriate course of action at this time. Significant additional traffic is likely to make access into and out of the town more difficult at peak times and it is very likely that developers would wait for the A96 dualling project to resolve these matters for them. In order to support comments made regarding an apparent “lack of proper planning” we think it advisable to take no action at this time to enable us to fully assess and mitigate possible future traffic issues.

Concerns from SNH regarding consistency are noted. However, the presence of ancient woodland was a factor considered for all bid sites received. A lack of reference in the MIR does not necessarily mean that impact on ancient woodland was not assessed.

Vision/ Planning Objectives

Comments received in relation to the Vision and Planning Objectives are noted. Review of the Vision statement to be included within the Proposed LDP is ongoing and should account for comments received and wider recommendations made through the Issues and Actions for Inverurie and Port Elphinstone.

Protected Land

We agree that the Uryside Riverside Park designation should be changed from being reserved land to protected land.

Flood Risk

The request made by SEPA for additional text to be added to the Settlement Statement is considered appropriate and should be included in the Proposed LDP.

Text should also be added to reflect that an FRA would be required for existing sites OP3 and OP9 should planning permission subject to these sites lapse.

Services and Infrastructure

Wording should be added to the Vision to recognise that Inverurie and Port Elphinstone is defined as an Integrated Travel Town by the Local Transport Strategy and that an active cycle route is being provided between Aberdeen and Inverurie.

Information received from Scottish Water confirms that there is available capacity to treat predicted waste water. Wording should be amended to reflect the current position.

Existing Sites

Sites OP4 and OP11 are subject to Planning Permission in Principle (APP/2013/0267) granted in December 2018. It is therefore appropriate to retain these sites within the Proposed LDP. We agree that the allocation summary should be updated to reflect the current position.

Support for removing existing site OP12 from the Proposed LDP is welcomed. We acknowledge that the site is referenced in the Inverurie South Development Framework approved in February 2013, however no progress has been made in delivering this site and Full Planning Permission (APP/2012/3648) subject to the site lapsed some time ago. It is not considered that removal of the site would prejudice the delivery of other allocated sites referenced in the Development Framework, nor the wider Spatial Strategy for the settlement. There are sufficient employment land allocations elsewhere within the settlement that provide opportunities for employment. It continues to be our preferred option to remove site OP12 from the Proposed LDP.

Whilst objections to existing OP14 site are noted, the site forms part of the effective housing supply. The site was allocated by the Reporter in examining the current LDP 2017. It is considered appropriate to retain the site in the Proposed LDP to allow sufficient opportunity for the site to come forward. Should the site fail to come forward

by the mid-term review of the LDP 2021, it may be appropriate at that time to remove it from the LDP. In addition, based on a 25 house per hectare being applied to undeveloped housing sites in the Aberdeen Housing Market Area it is considered that the site is capable of accommodating 54 homes. The site allocation should be amended accordingly to reflect this standard density.

Existing site OP16 forms part of a redevelopment opportunity associated with the former paper mill. As a significant brownfield opportunity that is also subject to Planning Permission in Principle (APP/2017/1398) it is considered appropriate to retain the site within the Proposed LDP. The allocation summary already recognises the need for an FRA to be undertaken.

BUS sites are safeguarded for businesses uses. As such it is considered appropriate to retain these sites within the Proposed LDP.

Bid GR009, GR010 and GR138

No specific comments were received in relation to bid GR010. However, support for bid GR138 which incorporates bids GR009 and GR010, and the comment received specifically in relation to GR009 is noted. The MIR acknowledged that there were few constraints associated with any of these bids. We feel that to allocate these sites would be premature, and there would be a greater case for allocating GR009 or GR138 during a future review of the LDP. At this time we maintain these bid sites should not be allocated in the Proposed LDP.

Bid GR027, GR028 and GR046

For reasons set out in the MIR, and having given consideration to comments received from SNH, we maintain that bids GR027 and GR046 should not be allocated in the Proposed LDP.

It is noted that part of bid GR027 lies on land protected to enable the relocation of St Andrews Special School, if required (P15). The Draft Proposed LDP indicates that this site should be removed from the settlement as this site is no longer required for that use. The settlement boundary should be amended accordingly.

For bid GR028, whilst the MIR acknowledges that there are few constraints associated with the site, based on a 25 per hectare calculation, the site could accommodate 158 homes. We consider that there is not a strategic need to allocate a bid site of this scale in the Proposed LDP. Additionally, with the removal of P15, the site is considered that the bid area is not well related to the existing urban form and would represent a significant additional incursion of development into the countryside.

Bid GR037 and GR038

No support was expressed for allocating these bid sites in the Proposed LDP. As per the Officers' recommendation neither of these bid sites should be allocated in the Proposed LDP.

Bid GR057, GR058, GR059 GR061, GR062, GR114 and GR137

For reasons set out in the MIR, and having given consideration to comments received from HES (bids GR057, GR058, GR059 and GR137) and SNH (GR061, GR062 and GR114), we maintain that none of these bids should be allocated in the Proposed LDP. We consider that there is not a strategic need to allocate further development opportunities at the scale that could be accommodated by these bids at this time.

Bid GR084

No objection to identifying bid GR084 as an Officers' preference was received in response to the MIR. As such it is considered appropriate to allocate the bid as an opportunity site in the Proposed LDP. Comments received from SEPA are noted and should be reflected in the allocation summary for the site. In allocating this bid, it is considered appropriate to revise the existing OP2 allocation to reflect the current position with regard to completed development and remaining opportunities.

Bid GR089, GR090, GR091 and GR117

For reasons set out in the MIR, and having given consideration to comments received from HES and SNH, we maintain that none of these bids should be allocated in the Proposed LDP. We consider that there is not a strategic need to allocate further development opportunities at the scale that could be accommodated by these bids (based on 25 homes per hectare), at this time.

Bid GR131

Support for the Officers' recommendation is welcomed. For reasons set out in the MIR, and having given consideration to comments received we maintain that bid GR131 should not be allocated in the Proposed LDP. Sufficient employment land is available through existing sites to meet the requirements of the Aberdeen City and Shire Strategic Development Plan. It is considered that there is not a particular need for additional employment land within Inverurie and Port Elphinstone and existing sites are available without constraint. In light of this it is not proposed to allocate any additional employment land in Inverurie and Port Elphinstone at this time.

Bid GR139, GR140, GR141, GR142 and GR145

Support expressed for bids GR139, GR140, GR141, GR142 and GR145 is noted. Several of these sites were subject to support from the Community Council. The MIR acknowledged that there were few constraints associated with any of these bids and indeed, GR139 forms part of an existing opportunity site. We consider that bids GR139 and GR140 should be allocated as a single opportunity site for 130 homes, and bid GR142 should be allocated for 50 homes and 2 hectares of employment land. In allocating bids GR139 and GR140 it is expected that a landscape buffer would be provided along the western boundary. This should be stated in the allocation summary. We are aware that there are areas of woodland and mature trees within the GR142 bid area, particularly at the north-western side of the site. As such trees along the boundary of the site and to the north-west of the site should be given protected land status to protect the landscape buffer and contribute towards amenity. It should be stated within the allocation summary that woodland, and in particular any mature trees

within the developable area should be retained as far as possible and incorporated positively into the development, forming part of the open space requirements from the site. Given the relative scale of development associated with bids GR141 and GR145 for which there is not a strategic need for at this time, it is considered appropriate not to allocate these sites in the Proposed LDP.

Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. These are captured in the recommendations below.

To ensure consistency with the Housing Land Audit it is considered appropriate to identify in the Proposed LDP windfall sites where delivery is projected during the Plan period. This includes development of the Former Hatchery for 64 homes.

4. Recommendations

1. Review the Vision statement to account for comments received to the MIR and to reflect further engagement undertaken with the Inverurie Community Council.
2. Add text to the Vision to recognise that Inverurie and Port Elphinstone is defined as an Integrated Travel Town by the Local Transport Strategy and that an active cycle route has been provided between Aberdeen and Inverurie.
3. Remove area of protected land known as P15 as this land no longer required and amend settlement boundary accordingly.
4. Remove area of reserved land known as R1 as use has been delivered.
5. Amend reserved land status of the Uryside Riverside Park (R2) to protected land.
6. Add the following text to Settlement Statement "Parts of Inverurie and Port Elphinstone are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required".
7. Add text to require an FRA for existing sites OP3 and OP9 should planning permission subject to these sites lapse.
8. Amended text under 'Strategic drainage and water supply' to reflect the current position with regard to waste water drainage.
9. Remove site OP5 as now built out.
10. Remove site OP12 from the LDP on the basis of non-delivery and amend the settlement boundary accordingly.

11. Increase the capacity of site OP14 to 54 homes.
12. Rationalise existing opportunity sites to reflect the current position (e.g. align site allocations and boundaries with relevant planning permissions) and consolidate sites where appropriate.
13. Allocate the Former Hatchery as an opportunity site for 64 homes
14. Allocate bid GR084 as an opportunity site for 50 homes (supported accommodation). The allocation summary should highlight that the site lies adjacent to activities that are regulated by SEPA under a Waste Management License, Pollution Prevention and Control (PPC) Permit or Controlled Activities (CAR) License and there may be co-location issues that may need to be taken into account. Early discussions should take place with Environmental Health to ensure compatibility.
15. Allocate bids GR139 and GR140 as a single opportunity site for 130 homes. Requirement for a landscape buffer along the western boundary should be stated in the allocation summary.
16. Allocate bid GR142 as an opportunity site for 50 homes and 2 hectares of employment land. The allocation summary for the site should include a statement emphasising that woodland, and in particular any mature trees within the developable area should be retained as far as possible and incorporated positively into the development, forming part of the open space requirements from the site.
17. Trees along the boundary of bid GR142 should be identified as protected land.

Issue 105 Keithhall

1. List of Respondents

MIR Ref	Respondents
213	Mr & Mrs Innes & Sarah Simpson
259	Lippe Architects + Planners on behalf of Bancon Developments
506	Scottish Natural Heritage
576	Bancon Homes Ltd
805	SEPA
865	Inverurie Community Council
876	Woodland Trust Scotland
1009	Historic Environment Scotland

2. Issues

Vision

Keithhall is a suitable location for low density housing development, particularly where it can deliver a community need. The opportunity to support or secure the future of the primary school is not in itself a good enough reason to support development in unsustainable locations (865). Another respondent has suggested that Keithhall is an appropriate option for delivering the housing requirement for Inverurie, and the Strategic Growth Area as a whole (576).

The reference to Capability Brown should be removed from the Vision as this is factually incorrect (865).

One respondent is concerned about the lack of delivery of the existing development opportunity (OP1) (213).

Flood Risk

SEPA has requested that the text "Parts of Keithhall are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required" should be added to the Settlement Statement (805).

Services and Infrastructure

SEPA has noted that the Draft Proposed Local Development Plan uses former text "Capital Maintenance project has been triggered to deliver growth". The progress of the growth project should be verified with Scottish Water. It should be ensured that the proposed population growth is within the design criteria for the sewage treatment works (805).

Bid GR050

Two respondents, including Scottish Natural Heritage (SNH) have objected to bid GR050 on the basis of potential impact on ancient woodland (506, 876), whereas another has suggested that any loss of trees on ancient woodland could be addressed through compensatory planting (259).

SNH and SEPA have highlighted that bid GR050 is within the Keith Hall Inventory Designed Landscape (506,1009) with SEPA emphasising the need to preserve integrity of the designed landscape and consider cumulative impacts including bid sites in Inverurie, namely GR089, GR090 and GR091 (1009). SNH has agreed with recommendations in the Main Issues Report that bid GR049, GR128 and GR129 are more suitable alternatives for development (506). Another respondent has commented that the bid is on the periphery of the designed landscape (259).

One respondent has requested that GR050 be allocated in the Proposed Local Development Plan on the basis that the site relates well to the settlement and is on the same side of the road as the primary school (259). A respondent agreed with this suggesting that a low density development would integrate into the settlement, and more closely align with the Vision for the settlement, than larger scale bid proposals (865).

SEPA has confirmed that no Flood Risk Assessment (FRA) is required (805).

Bid GR060

Two respondents, including SNH have objected to bid GR060 on the basis of potential impact on ancient woodland (506, 876). SNH and SEPA have highlighted that bid GR050 is within the Keith Hall Inventory Designed Landscape (506,1009) with SEPA emphasising the need to preserve integrity of the designed landscape and consider cumulative impacts including with bid sites in Inverurie, namely GR089, GR090 and GR091 (1009). SNH has agreed with recommendations in the Main Issues Report that bid GR049, GR128 and GR129 are more suitable alternatives for development (506).

One respondent has requested that GR060 be allocated in the Proposed Local Development Plan. The respondent also believed that the site should have been considered in the context of Inverurie and Port Elphinstone rather than Keithhall. The respondent has considered that it is inappropriate for the Local Development Plan not to identify land for development until a preferred route for the A96 dualling is selected. It is highlighted that none of the proposed routes would directly impact on the bid and this should not be seen as a constraint on development (576).

Bid GR128 and GR129

Respondents have raised concern regarding the proposed density of bids GR128 and GR129 suggesting the proposed density would not be in keeping with adjacent properties (259, 865). One respondent questioned whether open space and infrastructure could be accommodated within the density proposed (259). One respondent has suggested that 15 homes would be more appropriate (865).

SEPA has indicated that an FRA may be required for bid GR129 and GR128. SEPA suggest that a buffer strip would be required adjacent to the watercourse on the southern boundary which should be integrated positively into the development. Re-meandering would not be appropriate (805).

3. Actions

Vision

Comments in relation to the settlement Vision are noted. It is intended that housing development in Keithhall will provide an element of choice in the Aberdeen Housing Market Area in proximity to Inverurie and support other facilities in addition to the primary school. Keithhall is not within a Strategic Growth Area and as such development is intended to meet local needs. It is not considered that the Vision statement needs to be amended in this regard.

Confirmation has been received from the Council's Environment Team in respect of the history of the designed landscape. As such the reference to Capability Brown should be removed from the Vision statement.

Flood Risk

The request made by SEPA for additional text to be added to the Settlement Statement is considered appropriate and should be included in the Proposed Local Development Plan.

Services and Infrastructure

Information received from Scottish Water confirms that there is no capacity at Anvil Terrace septic tank and a Growth Project would be required. Text should be amended under 'Strategic drainage and water supply' to reflect the current position with regard to waste water drainage.

Bid GR049

No comments were received in relation to bid GR049. This bid was identified as a reserved option in the MIR as a possible future opportunity site (FOP). On the basis that the LDP 2021 is no longer expected to show FOPs on the Settlement Statement maps, there is no need to reserve this site for future development.

Bid GR050 and GR060

Whilst the comments in support of bids GR050 and GR060 are acknowledged, it is maintained that constraints associated with the location of these bids within the designed landscape and loss of ancient woodland do not override any benefits associated with development of these sites. In addition, it is considered that there are currently sufficient existing development allocations within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the Strategic Development Plan requirements. On this basis, there is not a strategic need to allocate further development opportunities, in addition to those identified in Keithhall at this time.

Bid GR128 and GR129

Concern regarding the proposed density of bid GR128 and GR129 is noted. Site densities are consistent with the conclusions of Issue 8 Shaping Homes and Housing. In order to address concerns regarding the scale of development that could take place in Keithhall during the Plan period, bid GR128 should not be taken forward to the Proposed Local Development Plan. The existing OP1 (bid GR129) should be retained for an increased capacity of 36 homes (based on 25 homes per hectare). The settlement allocation for OP1 (bid GR129) should state that the layout of the site should allow for longer term expansion of the settlement to the west in a future Plan period. Text should be added reflecting SEPA's comments regarding the likelihood for an FRA to be required and the need for a buffer strip to be included.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. With the exception of identification of a possible future opportunity site (bid GR049), these are captured in the recommendations below.

4. Recommendations

1. Remove from the Vision the text, "whilst the grounds of Keithhall Estate were landscaped by Capability Brown in the 18th Century".
2. Add the following text to the Settlement Statement "Parts of Keithhall are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required".
3. Amend text under 'Strategic drainage and water supply' to state that the septic tank is at capacity and that a growth project will be initiated once development meets Scottish Water's criteria.
4. Retain existing OP1 allocation with increased site capacity of 36 homes. Text should be added to the allocation summary to state that the layout of the site should allow for longer term expansion of the settlement to the east of the allocation in a future Plan period. An FRA may be required and a buffer strip will be required adjacent to the watercourse on the southern boundary.

Issue 106 Kemnay

1. List of Respondents

MIR Ref	Respondents
7	Mr David Noakes
40	Kemnay Community Council
68	Suller & Clark Planning on behalf of Malcolm Allan Housebuilders Ltd
284	Kemnay Community Council
299	Mr Terry Reeve
437	Mr David Evans
506	Scottish Natural Heritage
509	Greener Kemnay
551	NHS Grampian
556	Ms Anne Reid
630	Mr Peter Gedge
658	Ms Irene Ferguson
672	Ms Caroline Susan Wainman
690	Ms Irene Ferguson
797	Halliday Fraser Munro on behalf of CHAP Group (Aberdeen) Ltd
805	SEPA
810	Halliday Fraser Munro on behalf of CHAP Group (Aberdeen) Ltd
873	Ms Lorna Forsyth
1017	Mr & Mrs Louise & James Tough
	Pilot Youth Engagement Project – Kemnay Academy

2. Issues

Vision

It was highlighted that Kemnay has a small, congested centre with limited shops, local amenities, and employment opportunities, and that given the recent flooding, there should be no large scale housing development allocated in the next Local Development Plan (LDP) (437, 690). Another respondent however, argued that Kemnay was well served in terms of services and facilities (797).

It was suggested that any expansion to the village should focus on providing an environment and facilities that ensures the safety of people and property and to enhance the quality of life of residents (658, 690). Respondents indicated that there was a need for bungalows in the settlement (7, 658, 690).

Respondents have requested that the Vision reflect a community aspiration for a new Scout/Guide hut in the Kemnay area (284, 658). A number of respondents have noted that there is a shortage of garden and allotment space in the settlement (509, 658).

Electric charging points should be made available (658, 672). Road safety is an issue on Station Road and the primary school on Victoria Terrace (658, 690).

Scottish Natural Heritage (SNH) has expressed support towards the aspiration highlighted in the Main Issues Report for the provision of safe active travel routes to Inverurie, Kintore and surrounding settlements (506).

Flood Risk

A number of respondents raised considerable concern regarding flood risk associated with the settlement (40, 299, 437, 556, 658, 690).

The Scottish Environment Protection Agency (SEPA) has requested that the text, "Parts of Kemnay are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required" should be added to the Settlement Statement (805).

SEPA has requested that the status of the waste water infrastructure be confirmed with Scottish Water, and the Proposed LDP text altered accordingly (805).

Settlement Features

Respondents requested that site P1 be retained (40, 672, 873). Kemnay Academy believed site P1 should be extended to the north to the road.

Kemnay Academy suggested that site P2 should be protected and extended to include the cairn and path network to the north east of the current protected area.

Kemnay Academy noted that Kemnay Granite needs to be protected therefore the area of Kemnay Quarries should be protected.

Kemnay Academy suggested that the area north of McCombie Crescent should be protected with the facilities improved.

A respondent has requested that site R1 should be safeguarded for a possible Flood Risk Management Scheme/Conservation Area (658). Kemnay Academy suggested that site R1 would be good for 3G pitches for the local community as well as for the local football club.

Existing Site – OP1

Several positive comments were received from Kemnay Academy in relation to this site including that it is a good location for housing. The site is close to services and open space including a play park. It was commented that the site would allow new houses in Kemnay which would bring more people into the area to support local businesses.

Comments were also received in terms of the fact that the housing should make best use of the whole site. It was noted that the houses that are on the site are too tightly

packed and have increased the noise within the area. Concerns were raised with the distance of travelling to school (Kemnay Academy).

Existing Site – OP2

A respondent has requested that this site be retained as an effective site and noted that a planning application is pending, with two permissions already in place. It was argued that physical constraints can be overcome and the site acts as a logical infill site that could offer good connectivity to the settlement (68).

It has been noted that OP2 was allocated in 2012 and has not yet come forward for development (797). Concern was raised regarding flood risk (672). Other respondents have requested that OP2, along with R1 should be designated as Protected Land to protect the wildlife and habitat and mitigate flood risk (658, 690).

Kemnay Academy noted that this site would allow new housing to be built in the town, and could potentially allow people to move from other areas. Another positive noted was that it is close to facilities including primary schools, all weather pitch and health centre (if built). The site is also in close proximity to the golf course and woodlands which was noted as a positive for the site.

There were also a number of concerns raised with regard to the site, notably the site being located too far from the school, site being at risk from flooding and that it was located too far out of Kemnay for new housing. A comment was also received noting whether there was demand for the site (Kemnay Academy).

Existing Sites – BUS1, BUS2 and BUS3

Respondent has requested that existing BUS sites are retained (658, 690), whereas another respondent noted that there is low demand for employment land in Kemnay and BUS2 should be reallocated to residential uses (810).

Kemnay Academy supported retention of BUS sites.

Bid GR036

A number of respondents have expressed support for the Officers' recommendation ("not preferred") for bid GR036 (437, 506, 658, 690, Kemnay Academy). SNH has noted that the bid is located outwith the settlement boundary and is separated by an extensive area of woodland and the river. There are landscape issues as it sits within the Fetternear Estate designed landscape (non-designated). SNH has advised that there are other preferred sites which provide more suitable options for development (506). In addition comment was made by SNH that bid GR147 was "physically and visually divorced from the main settlement by the River Don and policy woodlands to Fetternear House, which are an important part of the western setting to Kemnay". We believe that these comments relate to this bid site and were made in error against bid GR147 (506).

Bid GR083

A number of respondents have expressed support for the Officers' recommendation ("preferred") for bid GR083 (40, 551, 658, 690, Kemnay Academy). It was however noted that compensatory planting would be required (658, 690), the site may be contaminated (658) and the pavements accessing the site are narrow (672, 873). It was suggested that bid GR083 be linked to bid GR147 and the existing nursing home (672, 873).

Bid GR134, GR135 and GR136

A number of respondents have expressed support for the Officers' recommendation ("not preferred") for bids GR134, GR135 and GR136. Reasons to disregard the site included the impact of increased traffic in the settlement, school capacity and drainage, landscape impact, topography, flood risk and the lack of coalescence with other residential areas. It was suggested that GR134 should be retained as a BUS site (7, 299, 437). Kemnay Academy suggested that these sites were situated too far away from schools.

Other respondents have requested that bids GR134 and GR135 be allocated in the Proposed LDP. It was considered that development would meet housing demand and that constraints could be overcome (797, 810).

Bid GR147

One respondent expressed support for the Officers' recommendation ("preferred") for bids GR147 (437), whereas others have objected to the site (40, 556, 658, 690, 1017, Kemnay Academy). It was requested that the community garden be retained and that compensatory planting would be required should the site be developed (437, 509, 556, 630, 658, 873, 1017). Other respondents raised concern regarding the delivery of the site and potential for tree loss (810, 797). It was noted that access to Kemnay Primary involves walking on narrow pavements (672). One respondent believed the site should be reserved for a recycling centre (690) and/ or community uses (556, 810, 873).

New Sites

Comments were received from Kemnay Academy noting three areas which were thought to be suitable for additional housing within the settlement including land to the south of OP1, land to the south of GR083 and land to the west of South Lodge.

3. Actions

Vision

Kemnay has a defined town centre in the LDP but is not subject to a Town Centre Health Check, nor is it subject to the Town Centre First Principle adopted by the Council. Development in Kemnay would however be expected to comply with policies in the LDP related to town centre developments. Based on observation it is considered that due to its size, Kemnay is relatively well served in terms of town centre uses and services available more widely within the settlement. It would be appropriate to add

further text to the Vision to reflect the need to preserve and where possible enhance the town centre, particularly supporting opportunities for retail uses.

It is considered that sites identified in the LDP would contribute towards the sense of place felt in Kemnay through support for the town centre and employment opportunities identified. Areas of open space will also be reviewed to ensure it is preserved going forward as Protected Land. A desire for development of bungalows within the town should also be included as a community aspiration within the Vision statement.

It is considered appropriate to include within the Vision a statement to reflect the community aspiration for a Scout/Guide Hut to be provided within the settlement. At this time, no site has yet been confirmed for this use, and as such it is not possible to reserve land within the Proposed LDP. A similar position should be adopted with regard to allotments, in that this is a community aspiration, but no site has come forward for this use. There are policies within the Proposed LDP that will address electric charging points. Road safety is a concern widely for the Council. However, it is not considered that the sites identified for inclusion within the Proposed LDP will resolve issues associated with Station Road and Victoria Terrace. Support expressed by SNH in respect to active travel is welcomed.

Flood Risk

Concern raised by respondents in respect to flood risk are noted. The request made by SEPA for additional text to be added to the Settlement Statement is considered appropriate and should be included in the Proposed LDP. Information received from Scottish Water does not suggest that that position with regard to waste water drainage has changed since preparation of the current LDP. As such, it is considered appropriate to retain the existing wording.

Settlement Features

To ensure consistency with other Settlement Statements it is considered appropriate to extend site P1 to include the extent of the secondary school to protect recreation ground.

The request by Kemnay Academy to extend the boundary of the P2 site to include the cairn and path network to the north east of the current protection area is seen as a reasonable request. Therefore, this change should be included within the Proposed LDP.

It is not an action at this time to locate any new facilities within site P3, however, should a new location be sought for facilities mentioned above this would be a location that was assessed along with the other protected areas within the LDP.

We agree that Kemnay Quarries is an important asset within Kemnay, however it is not deemed that including the site within the LDP as a protected site is the most appropriate action to take. As mentioned above, the area outwith the settlement boundary is

classified as countryside which provides some protection for the site to continue to operate.

With regards to the open space north of McCombie Crescent it would seem appropriate to protect this area as an amenity for the village as there is already an established play area for children along an open area of grass.

It is proposed that R1 (sports pitches) is removed from the LDP. As such land subject to this designation will be considered part of the countryside. Additionally, we are not aware of any Flood Prevention Scheme for Kemnay that requires land to be reserved.

Existing Site – OP2

The MIR proposed to remove site OP2 on the basis of non-delivery. A planning application seeking full planning permission for 20 homes has since been received by the Planning Service (APP/2019/0490). This application is currently pending decision. As the site forms part of the effective housing land supply, and it is expected that physical constraints associated with the site can be overcome it is considered appropriate to retain the site in the Proposed LDP.

Existing Sites – BUS1, BUS2 and BUS3

Existing BUS sites form part of the established employment land supply and promotion of these sites is supported by the local community. Ensuring there is sufficient opportunities for employment in Kemnay is important and the existing sites are considered to be the most appropriate locations in which to promote business uses to come forward.

Bid GR036, GR083, GR134, GR135 and GR136

Support for Officers' assessment of bids Bid GR036, GR083, GR134, GR135 and GR136 is noted. Issues raised by respondents in respect to GR083 would be addressed at the planning application stage.

Comments made in support of bids GR134 and GR135 are also acknowledged. However reasons outlined in the MIR to discount the proposed development of these sites is maintained. We continue to be of the opinion that these sites should not be allocated in the Proposed LDP.

Bid GR147

Comments made both in support, and opposing bid GR147 are noted. It is considered appropriate, given the relationship of the Community Garden to the settlement, to protect this asset in the Proposed LDP. We also propose to reserve the area of woodland to the rear of the community garden to allow for further expansion of the community garden. It would be expected that as many trees as possible would be retained and the woodland enhanced as an asset for the community providing recreation opportunities. Given that redevelopment of the depot site could come forward as a brownfield proposal at this time it is considered appropriate to allocate the site as an opportunity site in the Proposed LDP. We are now of the belief that

brownfield element of the bid site should be identified for employment uses, targeted at small-scale and start-up businesses, rather than promoting the site for housing.

Additionally, it is noted that the bid is situated immediately adjacent to the drive towards the A-listed Kemnay House which is part of the landscape around the house visible on the Roy Military Maps of 1747 – 55, forming an important part of its setting. This would need to be a consideration for any future application and should be highlighted in the allocation summary.

New Sites

A number of additional sites were proposed through the exercises undertaken with pupils from Kemnay Academy. It should however, be noted that the sites put forward through the Pilot Youth Engagement Project have not been subject to comment by the wider community nor have they been subject to any bid. It is therefore not proposed to include any of the additional development sites proposed by Kemnay Academy.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. These are captured in the recommendations below.

4. Recommendations

1. Add text to the Vision to reflect the need to preserve and where possible enhance the town centre, particularly supporting opportunities for retail uses and that BUS sites should promote the start-up of small and medium sized enterprises. The Vision should also be amended to reflect a desire for development of bungalows, allotments, cycle routes and aspiration for a Scout/ Guide Hut to be developed. Text should also be added to recognise flood risk as a particular concern for the local community. Some of these issues have already been identified in the settlement vision from the Draft Proposed LDP.
2. Add the following text to the Settlement Statement “Parts of Kemnay are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required”.
3. Remove R1 as this site is no longer required.
4. Extend the P2 site the north east to include the cairn and path network at the Place of Origin.
5. Designate the Kemnay Community Garden as protected land.
6. Introduce a new protected site into the Proposed LDP for the area north of McCombie Crescent as an amenity for the town.
7. Remove OP1 as now built out.

8. Retain site OP2 for 20 homes.
9. Reserve part of bid GR147 for future expansion of the community garden.
10. Identify the extent of the brownfield element of bid GR147 for as a BUS (Safeguarded for Business Uses) site.

Issue 107 Kingseat

1. List of Respondents

MIR Ref	Respondents
506	Scottish Natural Heritage
805	SEPA

2. Issues

Services and Infrastructure

SEPA has noted that there is no reference to waste water drainage in the Draft Proposed Local Development Plan (LDP) for Kingseat. Kingseat is however connected to the Newmachar network which is at capacity and requires a growth project. The Proposed LDP will need to highlight there are waste water capacity issues and a technical solution is still being sought. The growth project cannot be confirmed until a technical solution is found, and SEPA has indicated that they cannot advise on the timescales for this at present. This may limit development in the Plan period (805).

Bid GR011 and GR012

Scottish Natural Heritage (SNH) has recommended that a development brief would be required to safeguard and integrate new and existing green infrastructure (506).

Bid GR034

SNH has noted that the southern boundary of the site overlaps slightly with an area of woodland and carbon rich soils. It was recommended that a development brief would be required to safeguard and integrate new and existing green infrastructure (506).

3. Actions

Comments received from SEPA are noted. Text to reflect SEPA's comments should be included under 'Strategic drainage and water supply' to reflect the current position with regard to waste water drainage.

The requirement for a development brief to be provided for bids GR011, GR012 and GR034 is noted. These bids are not preferred for development as per the Officers' recommendation in the Main Issues Report. In such circumstance that any of these bids did come forward a development brief should be a requirement in delivering the site.

The development priority for Kingseat is to redevelop the remaining derelict buildings of the former Kingseat Hospital. To ensure consistency with the Housing Land Audit it is considered appropriate to identify in the Proposed LDP windfall sites where delivery is projected during the Plan period.

It is considered that there are currently sufficient existing development allocations within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the SDP requirements. On this basis, there is not a strategic need to allocate further development opportunities in Kingseat at this time.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. These are captured in the recommendations below.

No comments were received in respect of recommendations made by Officers in the Main Issues Report to extend the settlement boundary, reinstate a BUS (safeguarded for business uses) designation over the remaining part of Kingseat Business Park and to protect areas of open space within the village. As such, these changes are considered to be acceptable.

4. Recommendations

1. Add text the Vision to state that opportunities for redeveloping the former Kingseat Hospital buildings should be promoted.
2. Introduce a BUS (Safeguarded for Business Uses) designation on the Kingseat Business Park.
3. Add text under 'Strategic drainage and water supply' to reflect the current position with regard to waste water drainage.
4. Allocate the remaining undeveloped parts of the former Kingseat Hospital as an opportunity site for housing.
5. Introduce a protected land designation to land south of King Malcolm Drive to protect the play park.
6. Extend the settlement boundary to the north to include Kingseat Farm, Kingseat Farm Cottages, Wood Cottages and warehouses.

Issue 108 Kinmuck

1. List of Respondents

Number	Respondents
347	Ms Lorraine Hawkins
506	Scottish Natural Heritage
580	Halliday Fraser Munro on behalf of Mr John McIntosh
805	SEPA
865	Inverurie Community Council

2. Issues

Vision

The Vision should not solely reference Keithhall Primary School but refer also to the village hall in Keithhall and other community facilities available nearby in Inverurie (865).

One respondent indicated that there is no need to allocate housing land in Kinmuck at this time, and that any future housing should be allocated to the north of the settlement, to the west of existing OP1 allocation (865).

Services and Infrastructure

SEPA has suggested that the Proposed Local Development Plan (LDP) should highlight that there is no public waste water infrastructure available in Kinmuck (805).

Bid GR045

One respondent has suggested that bid GR045 would not contribute towards sustainable development (865). Scottish Natural Heritage has highlighted that the bid overlaps with a tree belt identified on the Scottish Semi-Natural Woodland Survey and that this woodland should be protected (506).

Bid GR047

One respondent has suggested that bid GR047 is not located in an appropriate nor sustainable location (865).

Bid GR118

Two respondents have agreed with Officers' recommendation for bid GR118 ("not preferred") (347, 865), whereas another believed that the bid should be allocated in the Proposed LDP (580). It is suggested that the bid does not provide any benefits for Kinmuck and that the proposal would severely damage the aspect and amenity of Friends Cottage, a category B-listed building (347). Another respondent suggests that the impact could be addressed through careful design, landscaping and provision of open space to provide visual separation (580). Trees bordering the bid area are subject to a Tree Preservation Order (TPO) (347).

In supporting the site, a respondent believed that the bid provided an opportunity to deliver proportionate expansion of the settlement. It was noted that the Main Issues Report suggested that the site was capable of accommodating 30 homes, however it is unlikely this density would be achieved. It was suggested that 15 homes could be delivered. The respondent suggested that a private drainage solution would be viable and that the presence of pipelines should not be seen as a constraint on development as potential safety impacts could be addressed (580).

3. Actions

Vision

The request for acknowledgement of community facilities in Keithhall beyond the primary school, and those in Inverurie is considered acceptable and appropriate wording should be added to the Vision statement to capture this fact.

No bid was received to the north of the settlement, to the west of OP1.

Services and Infrastructure

The existing LDP notes that there is no public sewerage provision within the settlement. It is not considered that any change is required.

Bid GR045 and GR047

Neither bid GR045 nor bid GR047 is identified as a preferred option in the Main Issues Report as Kinmuck lacks any services capable of supporting such a scale of development. Comments rejecting these sites are noted. In such circumstance that the bid did come forward the developable area should be reduced to exclude the tree belt.

Bid GR118

Historic Environment Scotland has not provided comment on the bid in response to the Main Issues Report, but this does not indicate support for the proposal. For clarity, it is noted that the TPO was revoked in October 2018. Whilst comments from the respondent in support of bid GR094 are acknowledged on reflection arguments against allocating this bid outweigh those in favour. As noted above it is maintained that it would be inappropriate to promote further housing development in Kinmuck during the Plan period. In addition, it is considered that there are currently sufficient existing development allocations within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the Strategic Development Plan requirements. On this basis, there is not a strategic need to allocate further development opportunities in Kinmuck.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. These are captured in the recommendations below.

4. Recommendations

1. Modify the Vision within the Settlement Statement to reflect the aspirations as expressed in early consultation by local stakeholders, including the Community Council.
2. Add text under Strategic drainage and water supply to state that no public waste water infrastructure is available in Kinmuck.
3. Remove site OP1 as now built out. Open space associated with this site should be identified as protected land in the Proposed LDP.

Issue 109 Kintore

1. List of Respondents

MIR Ref	Respondents
240	Lippe Architects + Planners
250	Lippe Architects + Planners on behalf of Mr M McDonald
419	Ryden LLP on behalf of The Kintore Consortium
428	Mr John Brownie
477	John Wink Design on behalf of Mr Kenneth Marshall
506	Scottish Natural Heritage
550	Norr on behalf of Stewart Milne Homes
805	SEPA
843	Kintore and District Community Council
980	Mr Paul Davison
1009	Historic Environment Scotland

2. Issues

Spatial Strategy for Kintore

One respondent has indicated that the rate of delivery in Kintore is unrealistic (550).

It was felt that investment in services and infrastructure provision has not kept pace with the rate of development experienced in Kintore. Facilities would require to be improved before any more housing development could take place (843, 980).

Clarification was sought in respect to the meaning of “reserved” status in the MIR (843, 980).

Vision/ Planning Objectives/ Protected Land

Respondents fully supported the planning objective to preserve and enhance existing open spaces including Tuach Hill, and provide new formal open spaces (843, 980). However, another requested that the text, “Encroachment on Tuach Hill from development and infrastructure is of concern to the local community and should be avoided at all costs to preserve this amenity” should be removed from the Vision (419). A respondent supported the continued presence of protected areas P1 and P6 in the LDP but would welcome reassurance on what measures the Council have to protect these areas from potential developments (843).

It was requested that the surviving sections of the Aberdeenshire Canal, between the Inverurie Bridge and the sluice on the River Don, and land within three metres of the canal bank should be designated as a protected area (843, 980). The land containing the visible stretches of canal bed and wall, between Rosebank Gardens, past Brae Farm and onto Dalwearie, should be also be designated as a protected area (843).

Settlement Boundary

A respondent sought amendment to the settlement boundary to include Hillhead Caravan Storage. It was considered that this area formed part of the settlement boundary and would be a sensible addition being more appropriate in an urban setting rather than in the open countryside (240).

Flood Risk

SEPA has requested that the text, "Parts of Kintore are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required" should be added to the Settlement Statement (805).

Services and Infrastructure

SEPA has indicated that the Draft Proposed LDP uses former text "Capital Maintenance project has been triggered to deliver growth". They note that a growth project is currently under construction at Inverurie and request that confirmation is received from Scottish Water that this will have capacity for all sites proposed in the LDP, not just Inverurie itself. Otherwise future long term capacity issues would need to be highlighted in the Plan (805).

Existing Site – OP1 / Bid GR078

It was noted that the plans to date show that the neighbourhood centre and open space associated with the development are on land identified as protected land. This is unacceptable, and inconsistent with Council policies. No parts of the OP1 development should involve protected land. A large housing estate on the Midmill site is remote for Kintore town centre and needs to be self-contained with regard to supporting facilities (843).

A respondent has expressed support for the Officers' recommendation for parts a - ("preferred"), b - ("reserved") and c - ("not preferred" but protected as open space) of bid GR078 (419), whereas another has objected to the full extent of the site (980). It was considered that the bid represents an overdevelopment of land that could not be justified. There was also concern that the site is detached from the town centre and services could not sustain the level of development proposed (843). It was suggested that the south east corner of GR078c be protected for future strategic landscaping proposals (419). Historic Environment Scotland (HES) welcomed the Officers' recommendation for part GR078c (1009).

HES has noted that bid GR078 includes four Scheduled Monuments – Midmill (SM3958), Tuach Hill (SM50), Aberdeenshire Canal (SM7674 and SM7675). HES raised concern regarding the potential impact on these monuments and on their settings and noted that any direct impact on these would unlikely get Scheduled Monument Consent. It was considered that direct impacts could be avoided by redrawing the allocation boundary. Specific areas of concern for HES were concerns that GR078a could impact on a Scheduled Monument (Midmill) that would be exacerbated as it is

already surrounded by development; and GR078c in that the area includes Tuach Hill and parts of the former Aberdeenshire Canal (1009).

SNH has recommended a development brief be required to safeguard existing woodland and core paths and integrate new green infrastructure proposals. SNH also state that Tuach Hill should be maintained as open space for informal recreation, something that is supported by other respondents including HES (506, 1009).

SEPA has indicated that should the extant permission lapse any new development may require an updated FRA to be submitted. They requested that any new Masterplan should highlight buffer strips will be required adjacent to the Tuach Burn and the small watercourses through the site and should be integrated positively into the development. The buffer strips will need to allow sufficient space for restoration of the straightened watercourses. Enhancement of these through re-naturalisation and removal of any redundant features will be required to be investigated (805).

Existing Sites – OP2, OP3 and OP4

SEPA has indicated that a Flood Risk Assessment (FRA) may be required for sites OP2, OP3 and OP4. SEPA also state that a buffer strip would be required adjacent to the watercourse on the northern boundary which should be integrated positively into the development (805).

It was noted that no details of the proposed town park facilities have been confirmed. The respondent would not support development of 207 houses without these details being made available, and the benefits to the community (843, 980).

Existing Site – OP5

Support for the retention of existing site OP5 was expressed. However, the statement about a retail supermarket was considered to be confusing and the position regarding a supermarket and petrol station on this site should be clarified (843, 980).

Existing Sites – BUS1, BUS2, BUS3 and BUS4

It was noted that with completion of the railway station, development will be complete on BUS1, BUS2, BUS3 and BUS4 (843).

Bid GR052

A respondent has supported the view given in the assessment that it would be reasonable to include the area subject to bid GR052 within the settlement, even though it was identified as being “not preferred” in the Main Issues Report (250).

It was noted that the bid subject to GR052 sought only to amend the settlement boundary to include existing uses in this area (250).

SNH has indicated that much of bid GR52 overlaps with woodland contained within the Semi-Natural Woodland Inventory, although much of this appears to be arable ground (506).

Bid GR053

SEPA has indicated that an FRA may be required due to the presence of a watercourse. A buffer strip would also be required adjacent to the watercourse on the northern boundary which should be integrated positively into the development (805).

Bid GR076

Respondents have expressed support for the Officers' recommendation ("not preferred") for bid GR076 (843, 980). One respondent has requested that bid GR076 be allocated in the Proposed LDP on the basis that the presence of pipelines was not a reason to dismiss the site and that compensatory planting would be provided on site (428).

Bid GR077

One respondent has objected to bid GR077 (980). SNH has recommended that a development brief be required to integrate green infrastructure with existing core paths and areas of woodland to the north and south. It should also promote active travel routes to school and settlement facilities including the new Kintore railway station (506). SEPA has indicated that should the extant permission lapse any new development may require an FRA. They request that any new Masterplan should highlight buffer strips required adjacent to the Tuach Burn and the small watercourse on the east side of the site boundary and should be integrated positively into the development (805).

Bid GR124

Respondents have expressed support for the Officers' recommendation ("not preferred") for bid GR124 (843, 980), whereas another respondent has requested that the site be allocated in the Proposed LDP as an extension to the development of site GR077. The respondent proposes that the site area could be reduced to provide a more connected area of land for future development. The inclusion of open spaces and strategic tree planting will ensure that the area does not feel overdeveloped (477).

SNH has indicated that much of bid GR124 overlaps with woodland contained within the Semi-Natural Woodland Inventory, although much of this appears to be arable ground (506).

Bid GR126

Respondents have objected to bid GR126 stating that the proposal appears to be unnecessary infill removing valuable open space from the centre of Kintore (843, 980). SEPA has confirmed that no FRA would be required (805).

3. Actions

Spatial Strategy for Kintore

Projected rates of delivery are reported in the Housing Land Audit that is updated on an annual basis following a process of engagement and consultation. Build out rates in the HLA are taken on good faith based on the experience of those providing information that is included within the Audit.

The need for services and infrastructure to keep pace with the rate of new development is noted and is a principle that is supported by the Planning Service.

The Main Issues Report included a description of what “reserved” status meant in terms of assessing the bids. However, since publishing the MIR the decision has been taken not to identify any possible future opportunity sites/reserved bids in the Proposed LDP (Issue 8 Shaping Homes and Housing).

Vision/ Planning Objectives/ Protected Land

Support for areas of Protected Land in the Draft Proposed LDP is welcomed. Preservation of Tuach Hill is of utmost importance as was emphasised during pre-MIR engagement with the Community Council using the Place Standard tool. Rather than remove the statement regarding Tuach Hill from the Vision, it is proposed that clarity is provided to state that, it is recognised that development associated with Kintore East requires that access is taken through site P1, however in developing the road, care should be taken to minimise the impact on Tuach Hill and that access to this amenity should be retained, and enhanced in the community interest.

It is considered appropriate to protect the remaining sections of the Aberdeenshire Canal which ran from Inverurie to Aberdeen.

Settlement Boundary

It is considered that Hillhead Caravan Storage does not contribute toward the built-up area of Kintore and is detached from the existing settlement boundary. No change is required in this respect.

Flood Risk

The request made by SEPA for additional text to be added to the Settlement Statement is considered appropriate and should be included in the Proposed LDP.

Services and Infrastructure

Information received from Scottish Water confirms that waste water is pumped to Inverurie. It is noted that a growth project is currently under construction. As such, text should be updated in the Proposed LDP to reflect the current position.

Bid GR077/ Existing Site – OP1

Bid GR077 seeks to retain part of an existing opportunity site for employment uses. The site is subject to an approved Masterplan and is partially developed. It is considered appropriate to retain the bid area as an opportunity site in the Proposed LDP. Comments from SNH and SEPA are noted and requirements stipulated by these organisations should be included within the allocation summary for the site, where not already mentioned. As per the Draft Proposed LDP, to provide clarity in terms of delivery, it is considered appropriate to allocate GR077 as a standalone opportunity site.

Existing Site – OP1 / Bid GR078

Comments in respect to bid GR078/ OP1 are noted. In assessing the bid, it was considered appropriate to attempt to divide the site to reflect the agreed Development Framework, Masterplan and Planning Permission in Principle (PPP). Concerns raised by respondents in respect of potential for adverse impacts on protected sites and open space are recognised, and those matters would have been considered within the context of the planning history associated with the site. Impact on Tuach Hill is regrettable but is considered to be the only means of access to the site. Mitigation through new planting and landscaping would help to reduce the impact. In order to provide clarity, it is considered appropriate to show indicatively the proposed access road for site OP1 that is provided through Tuach Hill (P1). A Matters Specified in Conditions application is currently pending on the site. The OP1 site boundary should be redrawn to reflect the agreed Development Framework, Masterplan and PPP.

The Draft Proposed LDP sought to identify part of the site as a future opportunity site. However, it is no longer expected that the Proposed LDP will identify such sites. Given the extent of the PPP, and the fact that the existing allocation summary for the site acknowledges that the site is capable of accommodating 1000 homes, it is considered appropriate to amend the allocation for the site to read, "Allocation: 1000 homes". Revision to the text and the associated opportunity sites for employment and commercial and community included within the Draft Proposed LDP should ensure that the current position in respect to all parts of the Kintore East development are reflected. For completeness we also propose to protect an area of land to the east of site OP1 that includes acid grassland, fen and woodland. This area does not lie within the red line for the existing PPP.

Comments from SEPA, HES and SNH are noted and should be incorporated into the allocation summary where relevant.

Existing Sites – OP2, OP3 and OP4

The existing LDP already states that an FRA is required for site OP2, OP3 and OP4. OP3 and OP4 are built out and should be removed from the Proposed LDP. No change is required in respect to flood risk for OP2. Text should however be added to the allocation summary to require a buffer strip to be provided.

It is recognised that delivery of a town park has not been forthcoming. We share frustration with the community at the lack of progress being made in this respect. However, this is in large part due to a need to find a solution for the B994/ B987/ Tumulus Way junction that has involved discussion over a number of years. We are pleased to note that since publishing the MIR that PPP has been granted that addresses the junction improvements required. This should now allow for the project to progress. It is currently projected that a Matters Specified in Conditions application should be submitted during 2019, with the first new homes being delivered in 2021. It is expected that the town park should be delivered prior to the completion of the 50th home, or completion of 25% of the total number of homes to be delivered on the site, whichever is the sooner.

Existing Site – OP5

Support for the retention of site OP5 is welcomed. The site is currently allocated for a mix of uses including offices, community facilities and, subject to the findings of a Retail Impact Assessment, a supermarket. It is noted that a convenience shop has been delivered within the BUS3 site and Full Planning Permission granted for a supermarket as part of the existing OP1 site. Given there continues to be a community aspiration for a petrol station it is considered appropriate to retain the allocation as a mixed use site to allow a range of uses to come forward.

Existing Sites – BUS1, BUS2, BUS3 and BUS4

It is considered appropriate to retain BUS sites in the Proposed LDP as the designation is intended to safeguard land for business uses. BUS2 is discussed in further detail below.

Existing Site – BUS2 / Bid GR053

Comments from SEPA regarding flood risk and the need for a buffer strip are noted. It is considered appropriate to reallocate BUS2 as a mixed-use development.

Bid GR052

It is appropriate to include the area subject to bid GR052 within the settlement boundary as contributing to the built up area. As much of the site is at risk from flooding, a protected land designation should be given to the extent of the undeveloped area and the football pitch. BUS4 should be extended to include the business premises found within the bid area.

Bid GR076

Support for the Officers' recommendation for GR076 are welcomed. It is maintained that the bid site is remote from the town centre and local services. Additionally, based on a 25 house per hectare density, it is considered that 62 homes could be accommodated on the site. This is not a level of development that would be considered suitable on the periphery of the main settlement core.

Bid GR124

Support for the Officers' recommendation for GR124 are welcomed. It is maintained that the bid site would not form a logical extension to the settlement. In addition, sufficient employment land is available through existing sites to meet the requirements of the Aberdeen City and Shire Strategic Development Plan. It is considered that there is not a particular need for additional employment land within Kintore and existing sites are available without constraint.

Bid GR126

It is noted that the Section 75 Plan does not show the area subject to bid GR126 as forming part of the town park. Considering this, along with the potential to develop 100% affordable homes it is considered appropriate to allocate the site for 24 affordable

homes. The allocation summary should state that development should only come forward following delivery of the town park.

4. Recommendations

1. Amend the Vision to recognise the importance of Tuach Hill and ensure that in developing the access road to site OP1, care should be taken to minimise the impact on Tuach Hill and that access to this amenity should be retained, and enhanced in the community interest.
2. Protect part C of bid GR078 to preserve the former Aberdeenshire Canal found at that location and protect the area of land to the east of site OP1 that includes acid grassland, fen and woodland.
3. Add the following text to the Settlement Statement “Parts of Kintore are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required”.
4. Amend text under, 'Strategic drainage and water supply' to reflect the current position with regard to wastewater.
5. Show the possible road associated with site OP1, indicatively on the Settlement Statement map as running through site P1.
6. Amend the allocation for site OP1 to 1000 homes and amend the site boundary for site OP1 to reflect the agreed Development Framework, Masterplan and PPP. For clarity, opportunity site status should be given to the area earmarked for commercial and community uses. Text linking all relevant sites forming part of the Kintore East development should be provided in the allocation summary.
7. Add text to the allocation summary for site OP2 to require a buffer strip to be provided.
8. Remove sites OP3 and OP4 as now built out.
9. Retain site OP5 but remove reference to possible development of a supermarket.
10. Extend the settlement boundary to include the area proposed by bid GR052 and give protected land status to the extent of the undeveloped area and the football pitch and extent BUS4 to include the existing business premises.
11. Reallocate BUS2 as a mixed use opportunity site for employment uses and 32 homes. The allocation summary should state that an FRA may be required and a buffer strip will be required.

12. Allocate GR077 as a standalone opportunity site for employment uses. The allocation summary should state that an FRA may be required and a buffer strip will be required. Active travel routes should also be promoted, particularly to the railway station.
13. Allocate site GR126 for 24 affordable homes to follow completion of a town park.

Issue 110 Kirkton of Skene

1. List of Respondents

MIR Ref	Respondents
39	Mr Colin Harvey
64	Mr Charles Taylor
195	Mr Stewart Wallace
221	Dr R.M. Livingstone
267	Mr Scott Dingwall
392	Echt & Skene Community Council
506	Scottish Natural Heritage
938	Savills (UK) Ltd on behalf of Barratt North Scotland

2. Issues

Vision

Two respondents have agreed with the statement made in the Main Issues Report that Kirkton of Skene is not an appropriate location for further expansion (39, 392). One respondent has suggested that no housing development should take place until the impact on roads and services can be assessed following completion of the Aberdeen Western Periphrial Route (AWPR) and the Kingsford Stadium (195).

Respondents expressed support for the settlement objective that seeks to preserve the character and setting of the village, including the countryside between Kirkton of Skene and Westhill (64).

There is a need to prevent coalescence of Kirkton of Skene and Westhill (39, 195, 267).

Protected Land

A respondent has expressed support for areas of protected land identified as P1, P2 and P3 (64).

Bid GR116

One respondent has requested that bid GR116 be allocated to the Proposed Local Development Plan (LDP) for 45 homes. The respondent has provided a Landscape and Visual Impact Assessment that concluded that development would have no impact on the setting of the countryside or listed buildings. Development of the site would avoid coalescence and preserve and enhance the identity, character and setting of Kirkton of Skene (938).

One respondent has objected to development of GR116 on the basis that utilities serving adjacent properties are found within the bid area (195). Development would

negatively affect the listed church (39, 195) and Kirkton House (39). A respondent has expressed concern that development would place pressure on local services (195).

One respondent has suggested that development would create capacity issues at Skene School and/or other nearby primary schools (195), whereas another has stated that there is ample capacity at Skene Primary School (938).

Scottish Natural Heritage (SNH) has highlighted that drainage from bid GR116 leads into the Loch of Skene Special Protection Area which lies 1km to the west. Construction method statements and drainage assessments would be required to avoid any adverse effect on the integrity to Loch of Skene from pollution runoff and sedimentation (506).

Bid GR127

One respondent has highlighted that protected species are found adjacent to the site, and the site is adjacent to a category B-listed building. There are mature trees on two sides (221). Another respondent has suggested that development would create capacity issues at Skene School and/or other nearby primary schools and place pressure on local services (195).

SNH has highlighted that drainage from bid GR116 leads into the Loch of Skene Special Protection Area which lies 1km to the west. Construction method statements and drainage assessments would be required to avoid any adverse effect on the integrity to Loch of Skene from pollution runoff and sedimentation (506).

3. Actions

Bid GR116

Whilst comments in support of bid GR116 are noted, it is maintained that constraints associated with the bid outweigh the benefits of development, and it would not be appropriate to allocate additional housing land in Kirkton of Skene. It is considered that there are currently sufficient existing development allocations within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the Strategic Development Plan requirements. On this basis, there is not a strategic need to allocate further development opportunities in Kirkton of Skene at this time.

Bid GR127

Concerns regarding bid GR127 are noted. The site was not identified as a preferred option in the MIR and is not recommended for inclusion in the Proposed LDP.

The Draft Proposed Local Development Plan

Minor changes to the Vision and Protected Land were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. These are captured in the recommendations below.

Comments in relation to the Vision and Planning Objectives in the MIR are noted, as is support for existing areas of protected land in Kirkton of Skene.

4. Recommendations

1. Add text to the Vision to acknowledge that car parking provision associated with the church requires to be addressed, but note that options to deliver this community aspiration poses a challenge due to limited site options.

Issue 111 Lyne of Skene

1. List of Respondents

MIR Rep	Respondents
195	Mr Stewart Wallace
392	Echt & Skene Community Council
443	Stewart Milne Homes
805	SEPA

2. Issues

Vision

One respondent has agreed with a statement made in the Main Issues Report that Lyne of Skene is not an appropriate location for further expansion (392), whereas another disagrees with this statement suggesting Lyne of Skene is a sustainable location for development (443). One further respondent has highlighted that any development should be dependent upon investment in a new or expanded primary school which would have to absorb any additional capacity. The same respondent has suggested that housing development should not take place until the impact on roads and services can be assessed following completion of the AWPR and the Kingsford Stadium (195).

Flood Risk

SEPA has requested that the text, "Parts of Lyne of Skene are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required" should be added to the Settlement Statement (805).

Bid GR031

One respondent has requested that bid GR031 be allocated in the Proposed Local Development Plan for 40 homes and a retail/community facility. It is suggested that the site can be delivered in a phased manner over 2 or 3 Plan periods. The development of this site provides the opportunity to round off the village and landscaping around the southern boundary of the site will enhance the setting of the village. Provision could be made to offer self-build housing opportunities within the site. The lack of drainage infrastructure is recognised but there is scope for connecting the development to the mains drainage infrastructure or to create a standalone system. Either option is deemed viable by the respondent and would not undermine the delivery of the proposed development (443).

3. Actions

Vision

Given the lack of services and limited public transport connectivity it is maintained that Lyne of Skene is not a suitable location for substantial additional development. No change is required to the settlement Vision in this respect. The requirement for any future expansion of Lyne of Skene to account for services and infrastructure is noted.

Flood Risk

The request made by SEPA for additional text to be added to the Settlement Statement is considered appropriate and should be included in the Proposed Local Development Plan.

Bid GR031

This site constitutes significant expansion of Lyne of Skene. Given that the Vision for the settlement outlines that Lyne of Skene is not a suitable location for development, allocation of bid GR031 would be contrary to this statement. In addition, it is considered that there is currently sufficient land identified for development within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the Strategic Development Plan housing requirement. On this basis, there is not a strategic need to allocate this site for housing development at this time.

4. Recommendations

1. Add the following text to the Settlement Statement “Parts of Lyne of Skene are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required”.

Issue 112 Meikle Wartle

1. List of Respondents

MIR Ref	Respondents
62	Wartle Community Association
63	Wartle Community Association
97	Ms Margaret Donaldson
198	Mr Ewan Grant
350	Mr William Michie
813	John Wink Design on behalf of A & D Hunter
966	Bennachie Community Council
1033	Mr & Mrs Heather & Mike Czarnecki

2. Issues

Bid GR111

Respondents have agreed with Officers' recommendation ("not preferred") for bid GR111 (966).

Bid GR112

Respondents have agreed with Officers' recommendation ("preferred") for bid GR112 (62, 350, 813, 966), whereas others have objected to the bid proposal (97, 198, 1033). Reasons to reject the site include landscape impact, traffic impact, low demand for housing and a lack of services to support development.

It was requested that the integration of car parking provision for the hall be included within the site (97, 350, 1033).

Other issues

A respondent is concerned regarding the possible route of the A96 dualling being in close proximity to the settlement (1033).

It was requested that Wartle Community Association is added to the consultation database (63).

3. Actions

Bid GR111 and GR112

Support for Officers' assessment of bids in Meikle Wartle is welcomed. Objections to bid GR112 are also acknowledged, however on balance it is considered appropriate to allocate the bid as a relatively small-scale proposal that can be easily absorbed within the settlement. It is noted from the indicative site plan submitted that provision has

been included for a car park associated with the hall. This is a welcome inclusion and should be a requirement of bringing the site forward.

Other Issues

The preferred route for the A96 Dualling Project has not yet been announced. This is a matter for Transport Scotland and is not something that can be resolved by the Local Development Plan (LDP).

As a respondent to the Main Issues Report, Wartle Community Association will receive notification of publication of the Proposed LDP and subsequent publications. The Planning Service prefers to encourage non-statutory groups to keep informed through subscribing to the LDP e-newsletter.

4. Recommendations

1. Include text within the Vision acknowledging that creation of a safe route to school is a community aspiration, but also note that delivery may be challenging due to the distance from the settlement to the primary school.
2. Allocate bid GR112 for 12 homes and include a requirement within the allocation summary for car parking provision to be provided in order to serve the village hall.

Issue 113 Midmar

1. List of Respondents

MIR Ref	Respondents
99	Mr Phil Cropper
100	Ms Janina Kutscha
114	Ms Marjon van der Pol
115	Mr Matthew Brettle
129	Cluny, Midmar, and Monymusk Community Council
506	Scottish Natural Heritage
805	SEPA
876	Woodland Trust Scotland
910	Strutt & Parker on behalf of Corsindae Estate
1080	Sir/Madam A Simmers

2. Issues

Services and Infrastructure

SEPA has noted that no reference to waste water drainage has been made in the Draft Proposed Local Development Plan (LDP) for Midmar. SEPA understands that only a portion of the settlement is currently connected to the public sewer network. It should be confirmed with Scottish Water if there will be capacity issues for developments wishing to connect unless the works are upgraded. It should be ensured that the population growth is within the design criteria for the sewage treatment works otherwise the need for a growth project should be highlighted (805).

Bid GR054

A number of respondents have expressed support for bid GR054 on the basis that the development would provide affordable homes, in safe walking distance of the primary school (99, 100, 114, 115, 129, 910, 1080).

One respondent has objected to this bid citing that development is within an area of ancient woodland (876), whilst others have challenged the status of this designation (99, 100, 114, 115, 129, 910, 1080). Scottish Natural Heritage (SNH) has questioned whether the area has been replanted following recent clear felling (506).

Bid GR055

A number of respondents have expressed support for bid GR055 on the basis that the development would support Midmar Primary School to which safe access can be provided (99, 100, 114, 115, 129, 910, 1080).

Bid GR074

A number of respondents have objected to bid GR074 requesting that the site be protected for a public garden (99, 100, 114, 115, 129, 1080) and not housing as supported by Officers. SNH has advised that GR074 is a more suitable location for housing than bid GR054 (506).

3. Actions

Services and Infrastructure

Information received from Scottish Water confirmed that there is no capacity within the septic tank and a growth project would be triggered once development has met Scottish Water's criteria. Text should be added under 'Strategic drainage and water supply' to reflect the current position with regard to waste water drainage.

Bid Sites

Comments in support of bids GR054 and GR055 are noted.

SNH has not disputed the status of bid GR054 in respect to its inclusion on the Scottish Ancient Woodland Inventory and have advised that GR074 may be a more suitable location for housing development. The Planning Service is not aware that the felled woodland within bid GR054 has been replanted. In any case, it is important to preserve the integrity of soil ecological processes and associated biodiversity associated with areas of ancient woodland as an important and irreplaceable natural resource.

As discussed in the Main Issues Report (MIR) there does not appear to be a project in place to deliver a public garden adjacent to the village hall. This has been a long term aspiration which has not been delivered. As such it would be appropriate to consider alternative uses for the site. The MIR determined that the site was capable of accommodating 20 homes, based on a density of 25 homes per hectare. We are now of the view that allocating 12 homes on this site would be more appropriate given the landscape buffer likely to be required.

It is considered that there are currently sufficient existing development allocations within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the Strategic Development Plan requirements. On this basis, there is not a strategic need to allocate further development opportunities, in addition to bid GR074 in Midmar at this time.

The Draft Proposed Local Development Plan

Minor changes to the Vision and Protected Land were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. These are captured in the recommendations below.

4. Recommendations

1. Include within the Vision, a statement recognising that housing development should reflect the character of the settlement, particularly in terms of scale and density of development.
2. Text should be added under 'Strategic drainage and water supply' to reflect the current position with regard to waste water drainage.
3. Remove existing P4 designation and allocate bid GR074 in the Proposed Local Development Plan for 12 homes.
4. Extend the settlement boundary to include the overflow carpark adjacent to the hall.

Issue 114 Millbank

1. List of Respondents

MIR Ref	Respondents
805	SEPA

2. Issues

SEPA has indicated that a Flood Risk Assessment (FRA) may be required for bid site GR146 and that a buffer to the watercourse adjacent to the south eastern corner should be provided (805).

SEPA also noted that the Draft Proposed Local Development Plan (LDP) states that there is “insufficient capacity at Anvil Terrace”. SEPA has indicated that only part of the settlement has public waste water drainage and that it should be confirmed with Scottish Water that future population growth is within the design criteria for the sewage treatment works. If not, the need for an upgrade may be required to be highlighted in the Proposed LDP (805).

3. Actions

The existing Settlement Statement for Millbank already acknowledges that an FRA may be required for the existing OP1/bid GR146. As such, no change is required in this regard. Text should however be added to the development brief for the site to require a buffer strip to be provided.

Information received from Scottish Water confirms that there is no capacity at Anvil Terrace septic tank and a Growth Project would be required. Text should be amended under 'Strategic drainage and water supply' to reflect the current position with regard to waste water drainage.

In addition it is noted that bid GR146 is directly adjacent to a category C-listed grouping and therefore any development would need to consider its setting in accordance with Historic Environment Scotland's Managing Change Guidance.

As identified in the Main Issues Report, it is proposed that the site area should be reduced that required to accommodate the level of development promoted through the bid. As such only part of bid GR146 should be allocated in the Proposed LDP.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed Local Development Plan on the basis of early consultation with stakeholders. These are captured in the recommendations below.

4. Recommendations

1. Amend text under 'Strategic drainage and water supply' to state that the Anvil Terrace septic tank is at capacity.
2. Remove two areas currently allocated as part of OP1 to the north of the A944 and east of the B933, and allocate the extent of bid GR146 required to accommodate 30 homes and 270m² employment land. The settlement boundary should be amended accordingly.
3. Add text to the allocation summary for bid GR146 to require that a buffer strip be provided along the watercourse adjacent to the south eastern corner of the site. Text should also be added to note the proximity of the C-listed buildings and the need to develop the site with sympathy for this designation.

Issue 115 Newmachar

1. List of Respondents

MIR Ref	Respondents
127	Wardrop Strategic Planning Limited on behalf of Strategic Planning (Scotland) Ltd
191	Michael Gilmour Associates on behalf of John Barclay
321	Parish of Newmachar Community Council
506	Scottish Natural Heritage
770	Emac Planning on behalf of Kirkwood Homes Ltd
805	SEPA
885	Ryden LLP on behalf of Barratt North Scotland

2. Issues

Vision

A respondent has agreed with the assertion that delivery of an eastern relief road and rail link would require significant expansion of the village (770). One respondent has objected to all proposals for Newmachar (321).

It was requested that the employment allocation for Newmachar be significantly increased, and that no new residential land should be allocated until such time as the employment opportunities have increased (321).

Services and Infrastructure

SEPA has indicated that there are significant waste water capacity issues at Newmachar and has confirmed that a growth project is still looking for technical solutions. The growth project cannot be confirmed until a technical solution is found, and that timescales are unknown at this time and that this may limit development in the Plan period. Any development may be regarded as premature until the growth project is completed (805).

Existing Site – OP1

SEPA has advised that should the extant planning permission lapse a revised Flood Risk Assessment (FRA) and Masterplan may be required. Any new Masterplan will be required to review the buffer strip provision adjacent to the watercourse and the possible enhancement of the watercourse through re-naturalisation and removal of any redundant features (805).

Existing Site – OP2 / Bid GR008

A respondent has confirmed that the remaining capacity of site OP2 is 115 homes, not 95, and that there are no ownership constraints on the land, or any other delivery concerns (127). It was noted that a pre-application enquiry for site GR008 proposed to increase the number of units as a consequence of economic changes to create a more

sustainable use of development land. An area of agricultural land was included to rationalise an illogical settlement boundary. There are no technical impediments to the development of this whole site for 205 units, with the anomalous land being used for landscaping. The inclusion of white land would increase this number to 225 units (127).

Existing Site – OP3 / Bid GR075

A respondent has expressed support for the Officers' recommendation ("preferred") for bid GR075. The bid would meet a key planning objective to provide opportunities for employment. The respondent did however object to development of the site having to adhere to the 2012 Development Framework (191). It was requested that the existing OP3 should be reallocated for 40 homes and 5ha of employment land (770).

SEPA has advised that a buffer strip would be required adjacent to the watercourse running through the site which should be integrated positively into the development. The buffer strip would need to allow sufficient space for restoration of the straightened watercourse. Enhancement of these through re-naturalisation and removal of any redundant features should also be investigated (805).

Bid GR006 and GR007

A respondent welcomed positive statements regarding site GR006. It was requested that bid GR007 be allocated in the Proposed Local Development Plan (LDP) to follow development of GR006 (127).

Bid GR079 and GR086

A respondent has expressed support for reserving bid GR079 as a future opportunity site but requests that the employment element of the site should be allocated in the Proposed LDP. It was noted that bid GR079 could be readily delivered and would assist in delivering the proposed eastern relief road through developer contributions (770). Another respondent has suggested that bid GR086 should be delivered prior to GR079 and should be allocated in the Proposed LDP as the most logical area for development (885). It was also noted that bids GR079 and GR086 were reliant on other sites coming forward in order to secure the development of an eastern relief road. Additionally, there is no support in the Strategic Development Plan for development of the scale proposed as part of these bids (127).

An FRA is required to determine the developable area of bid GR079 (770, 805, 885).

Scottish Natural Heritage (SNH) has advised that development on the sloping land to the north of GR079 should be avoided. SNH has commented that development of bid GR086 would erode the clarity of Newmachar's setting and development on the upper slopes may contribute to significant adverse landscape and visual impacts. SNH has recommended that a development brief be required to integrate green infrastructure with existing woodland and Straloch designed landscape. Additionally, SNH believed that the proposal lacked open space and green corridors for informal recreation and wildlife (506).

SEPA has indicated that buffer strips would be required adjacent to the watercourses running through both bid sites which should be integrated positively into the development. Buffer strips would need to allow sufficient space for restoration of any straightened watercourses. Enhancement of these through re-naturalisation and removal of any redundant features will be required to be investigated (805).

3. Actions

Vision

The provision of employment land is discussed below.

Services and Infrastructure

Information received from Scottish Water confirms that a growth project is underway and is due to be completed during 2021. Capacity has not been allowed for new allocations therefore compliance with Scottish Water's five growth criteria would be required for subsequent proposals. Text should be updated to reflect the current position with regard to waste water drainage.

Existing Site – OP1

OP1 is an effective site in the Housing Land Audit. A Masterplan has been agreed for the site and planning permission obtained. As construction has not yet commenced should any revised proposal come forward for the site it should include a revised FRA and review the provision of the buffer strip adjacent to the watercourse. Text should be added to the allocation summary to reflect these requests from SEPA.

Existing Site – OP2 / Bid GR008

It is acknowledged that the area of white land that bid GR008 seeks to have included as part of the OP2 allocation, is contained within the agreed Masterplan for the OP2 site as open space. With this in mind, and in order to create a defensible boundary it is proposed to include the area of white land within the settlement boundary as protected land. The allocation summary for site OP2 should state that this area contributes towards the open space requirement for the allocated site.

The Housing Land Audit confirms that the remaining capacity of site OP2 is 95 homes. We understand that the site is no longer constrained in terms of "ownership" and we are pleased the respondent is able to confirm this is the case. We propose to amend the site boundary of OP2 to exclude the area now built out.

Existing Site – OP3/ Bid GR075/ GR079 and GR086

The Newmachar Development Framework recognises that land subject to bids GR075, GR079 and GR086 could potentially be developed in the future. Whilst it is recognised that in order to deliver an eastern relief road, these bids would need to come forward at some point in the future, given that Newmachar does not lie within a Strategic Growth Area and the extent of existing allocations for housing in the village, it is not considered appropriate to allocate these sites in the Proposed LDP. Bids GR079 and GR086 were

identified as reserved options in the MIR as a possible future opportunity site (FOP). On the basis that the LDP 2021 is no longer expected to show FOPs on the Settlement Statement maps, there is no need to reserve this site for future development. Bids GR079 and GR086 should not come forward until the existing OP1 and OP2 sites are completed. Sufficient housing land is available through existing sites to meet the requirements of the Aberdeen City and Shire Strategic Development Plan. This position is also reflective of the community view on this matter. In addition, there are considerable issues associated with waste water drainage that have been highlighted by SEPA that would require to be resolved prior to the allocation of any major new allocations.

In order to meet a community aspiration for greater opportunities for employment within the village, it is considered appropriate to extend the existing OP3 (bid GR075) allocation to the north east to provide additional land for employment uses to come forward. The part of GR075 falling outwith the existing OP3 sites should not form part of this revised site area for site OP3.

Bid GR006 and GR007

Neither bid GR006 or GR007 were identified as preferred options in the MIR. No evidence has been presented to change this view.

Bid GR101, GR102, GR103, GR104 and GR105

For clarity, no comments were received on the above bids.

The Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. With the exception of identification of GR079 and GR086 as possible future opportunity sites, these are captured in the recommendations below.

4. Recommendations

1. Amend text under, 'Strategic drainage and water supply' to reflect the current position.
2. Add text to the allocation summary for OP1 to state that a revised FRA would be required along with review of buffer strip provision should any new Masterplan or planning application come forward for the site.
3. Amend site boundary of OP2 to exclude the area now built out and allocate remaining part for 95 homes.
4. Amend the settlement boundary to show the extent of bid GR008 with the area to the south west to be protected as open space.

5. Extend site OP3 for employment uses.

Issue 116 Old Rayne

1. List of Respondents

MIR Ref	Respondents
80	Mr Lee Steed
176	Mrs Lesley Wilson
233	Mr Lee Steed
257	Lippe Architects + Planners on behalf of Mr A Walker & Mr G Skinner
274	Mr Alexander Hardie
318	Ms June Cameron
805	SEPA
966	Bennachie Community Council
1009	Historic Environment Scotland

2. Issues

Vision

It was suggested by a respondent that only small-scale development allocations should be permitted in Old Rayne (176).

Services and Infrastructure

SEPA has noted that no reference to waste water drainage was made in the Draft Proposed Local Development Plan (LDP) for Old Rayne. They request that this be confirmed with Scottish Water that future population growth is within the design criteria for the existing sewage treatment works and if not, the need for an upgrade will be required to be highlighted in the Proposed LDP (805).

Existing Site – OP2

Two respondents have objected to the retention of site OP2. It was suggested that the scale of development proposed would be out of keeping with the settlement (274), development would bring no benefits to the settlement and would increase road safety issues, particularly associated with the A96 junction (80). Other respondents have not necessarily indicated that they object to the site but have raised concern regarding the impact on waste water drainage (233) and flood risk (318). SEPA has indicated that a Flood Risk Assessment (FRA) would be required (805).

Bid GR002 and GR003

Respondents have agreed with Officers' recommendation ("not preferred") for bids GR002 and GR003 (233, 966). Another respondent has indicated that they would object to these bid sites unless a new access road was constructed to connect to the A96 (274).

Bid GR035/ Existing Site – OP1

Respondents, including Historic Environment Scotland (HES) have agreed with Officers' recommendation ("not preferred") for bid GR035 (966, 1009).

Bid GR067

A respondent has agreed with Officers' recommendation ("preferred") for bid GR067 (966). SEPA has indicated that an FRA may be required (805).

New Site

A respondent seeks allocation of 12 homes at East of Old Rayne at Strathorn Road as a replacement for existing site OP1 (GR035) that is proposed to be removed from the LDP. The site is screened to the south by trees so fits well into the landscape. The site is within walking distance of the primary school to the north-west and the playing fields lie in the immediate west. The site otherwise has no constraints (257).

3. Actions

Vision

Comment that only small-scale development should be promoted in Old Rayne is noted. It is however considered that there is capacity within the settlement to accommodate growth of a greater scale of development than small-scale.

Services and Infrastructure

Information received from Scottish Water confirm that capacity is available. As such no change is required.

Existing Site – OP2

Whilst objections to existing OP2 site are noted, the site forms part of the effective housing supply. The site was allocated by the Reporter in examining the current LDP 2017. As a mixed use site, it is considered that this site will contribute towards creating a sustainable mixed community at Old Rayne. Issues raised by respondents can be addressed at such time as a planning application comes forward. The existing allocation summary for site OP2 states that an FRA is required. As such no change is required in this regard.

Bid GR002, GR003, GR035 and GR067

Support for Officers' assessment of bids in Old Rayne is welcomed. It is considered appropriate to allocate bid GR067 as a brownfield opportunity to replace the existing OP1 (GR035) site which should be removed from the LDP on the basis of non-delivery. It is noted that bid GR067 sits immediately adjacent the category B-listed Pitmachie Farmhouse. It is expected that in delivering the site that any impacts on the setting of the farmhouse will be considered with appropriate mitigation measures put in place. In accordance with the Aberdeen City and Shire Strategic Development Plan sufficient additional housing land allocations are identified in the Rural Housing Market Area. It is not considered that additional land should be allocated in Old Rayne in addition to the existing OP2 and bid GR067.

New Site

Land East of Old Rayne at Strathorn Road was not submitted as a bid in response to the Council's Call for Sites in 2018 and as such has not been subject to public scrutiny as part of the Main Issues Report consultation. The respondent has not indicated that any community engagement exercise has been undertaken independently of the MIR. As a result, the community view of such a proposal is unknown at this time. It is argued that the site would be a suitable replacement for site OP1 which is recommended to be removed from the LDP. An acceptable bid has already been identified as a replacement for OP1 and as such no further land allocations in addition to those identified are required in Old Rayne at this time.

4. Recommendations

1. Remove site OP1 on the basis of non-delivery.
2. Allocate bid GR067 for 10 homes.

Issue 117 Oyne

1. List of Respondents

MIR Ref	Respondents
155	Ms Karen Lanyon
272	Mr & Mrs George & Anne Mathers
453	Mr Michael Whitcombe
506	Scottish Natural Heritage
640	Mr Christopher Fryer
805	SEPA
966	Bennachie Community Council
1009	Historic Environment Scotland

2. Issues

Services and Infrastructure

SEPA has noted that no reference to waste water drainage is made in the Draft Proposed Local Development Plan (LDP) for Oyne. However, only part of the settlement has public waste water drainage. It should be confirmed with Scottish Water that future population growth is within the design criteria for the sewage treatment works and if not, the need for an upgrade will be required to be highlighted in the Proposed LDP (805).

Existing Site – OP1

Two respondents have supported retention of the existing OP1 allocation as it is a disused site, centrally located within the settlement (272, 453).

Bid GR069

A number of respondents have agreed with Officers' recommendation ("not preferred") for bid GR069 (155, 272, 453, 640 966). Respondents have highlighted that the bid is almost entirely on prime agricultural land, is at risk from flooding and is not considered to be a logical extension to the settlement (272, 453, 966). Respondents have raised concerns regarding road safety, particularly in respect to providing a safe route to the primary school (155, 272, 640, 966). One respondent has suggested development would have an adverse effect on local amenities and involve the loss of an avenue of trees (272). It was suggested that development is constrained by the absence of public sewerage provision (155, 966).

Respondents, including Historic Environment Scotland have raised concern regarding the potential for significant adverse impact on the setting of Westhall House, a category A-listed building (453, 966, 1009).

Scottish Natural Heritage has advised that, should the site be promoted, a development brief would be required to safeguard woodland and promote green infrastructure and active travel links to settlement facilities (506).

3. Actions

Services and Infrastructure

Information received from Scottish Water indicates that there is limited capacity available at Oyne septic tank and that a growth project may be required. Text should be added to the Proposed LDP to reflect the current position.

Bid GR069

Support for Officers' assessment of GR069 is welcomed. The requirement for a development brief to be provided for bid GR069 is also noted. The bid is not preferred for development as per the Officers' recommendation in the Main Issues Report. In such circumstance that the bid did come forward a development brief should be a requirement in delivering the site.

In accordance with the Aberdeen City and Shire Strategic Development Plan sufficient additional housing land allocations are identified in the Rural Housing Market Area. On this basis, delivery of OP1 is considered to be sufficient to meet local housing needs in Oyne during the Plan period.

The Draft Proposed Local Development Plan

A minor change to the Vision is proposed in the Draft Proposed LDP on the basis of early consultation with stakeholders. This is captured in the recommendations below.

4. Recommendations

1. Include within the Vision, a statement recognising that development proposals that could lead to ribbon development and unsustainable patterns of development should be avoided in order to conserve the character of the village.
2. Add text under 'Strategic drainage and water supply' to state that there is limited capacity at Oyne septic tank. A growth project will be initiated once development meets Scottish Water's criteria.

Issue 118 Westhill

1. List of Respondents

MIR Ref	Respondents
1	Ms Aileen Osborne
6	Mr Michael Fraser
17	Wood E&I Solutions UK Ltd on behalf of National Grid
19	Nestrans
22	Mr Paul Sharp
39	Mr Colin Harvey
53	Mr Allan Pirie
64	Mr Charles Taylor
65	Professor Ian Johnson
76	Mrs Heather Cook
193	Mr C J Middleton
195	Mr Stewart Wallace
205	Mr Giancarlo Pia
207	Mr Tim Dean
226	Ryden LLP on behalf of Westhill Developments (Brodiach) Ltd
267	Mr Scott Dingwall
282	Ms Layla Degan
289	Cults Bieldside and Milltimber Community Council
392	Echt & Skene Community Council
400	Halliday Fraser Munro on behalf of ANM Group Ltd
438	Halliday Fraser Munro on behalf of The Margaret Mitchell Discretionary Trust
474	John Wink Design on behalf of Mr Kenneth Marshall
480	Ms Maureen Patricia Taylor
506	Scottish Natural Heritage
526	Bancon Homes Ltd
566	Halliday Fraser Munro on behalf of CALA Homes (North) Ltd
587	Halliday Fraser Munro on behalf of CALA Homes (North) Ltd
588	Barton Willmore on behalf of Stewart Milne Homes
590	Barton Willmore on behalf of Stewart Milne Homes
657	Mr & Mrs Michael & Kay Melville
668	Emac Planning on behalf of Stewart Milne Homes
693	Mr Donald MacDonald
742	Mr Peter Watts
752	Westhill and Elrick Community Council
782	RSPB Scotland

805	SEPA
810	Halliday Fraser Munro on behalf of CHAP Group (Aberdeen) Ltd
876	Woodland Trust Scotland
929	Farningham Planning Ltd on behalf of Barratt North Scotland and Dunecht Estates
978	Mr Fraser Tavendale
1009	Historic Environment Scotland
1050	Mr Tom Byrne

2. Issues

Spatial Strategy for Westhill

A respondent has agreed with the statement in the Main Issues Report (MIR) conclusion for Westhill highlighting that the cumulative impact of future development will need to be determined in relation to the Aberdeen Western Peripheral Route (AWPR). However, the respondent suggested that this should be widened to recognise the cumulative impact on the strategic road network generally, including roads and junctions in Aberdeen City, and the need for cross-boundary working with the relevant bodies to assess and mitigate the cumulative impacts of development (19).

A number of respondents have objected to any significant development being allocated in Westhill (53, 195, 267, 742, 978). Respondents stated that Westhill is already overdeveloped (64), particularly to the west (267, 282). This was countered by respondents suggesting that new allocations should be made in Westhill (400, 566, 587, 590, 668, 810, 929). Concern was expressed regarding the ability for services and infrastructure to cope with further development in Westhill (267, 282, 752).

Scottish Natural Heritage (SNH) expressed concern that Westhill already suffers from widespread suburban development with limited or no services, and no distinctive settlement core (506). One respondent indicated that Westhill remains predominantly a community town (53). It was requested that reference be made to the impact that the Kingsford Stadium development will have on the settlement (64,195).

A respondent has requested that the strategy for Westhill be community led, via the Community Council, rather than developer led (752).

Vision

Support was expressed for the suggestion that Westhill needed a period of time to consolidate the extensive development that has taken place (752).

A respondent suggested that it is incorrect to promote Arnhall Business Park as the focus for subsea engineering businesses as this is unlikely to be sustainable over the long-term, nor adds diversity to employment opportunities (64).

It was suggested that the phrase used in the Banchory Settlement Statement "need for sheltered and accessible housing, affordable housing and opportunities for downsizing" should be echoed for Westhill (64, 76, 193, 267, 752).

The Westhill Settlement Statement highlights that its "significant traffic congestion also remains an issue" for Westhill but no reference is made to any proposals to improve matters, including what consideration might be made to the AWPR on this matter (64). A respondent suggested that any new development should make improvements to the A944 to ease congestion (76).

Planning Objectives

The first bullet point should be revised to "To maintain existing opportunities for employment". This highlights that no further expansion of employment opportunities beyond existing allocations is required (64).

The second bullet point should be revised to "To sustain and improve community facilities and services" (64).

It was noted that no site has been identified to deliver a community sports facility as outlined in the third objective (64).

Flood Risk

SEPA has requested that the text "Parts of Westhill are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required" should be added to the Settlement Statement (805).

Bid GR025

Support was expressed for the Officers' recommendation ("not preferred") for bid GR025 (64, 65). One respondent has requested that bid GR025 be allocated in the Proposed Local Development Plan (LDP) (400). Reasons to support the site include its relationship to the settlement and ability to meet market demand (400).

Bid GR032

A number of respondents have expressed support for the Officers' recommendation ("not preferred") for bid GR032 (39, 64, 205, 267, 392, 657), whereas one respondent has requested that bid GR032 be allocated in the Proposed LDP on the basis that the site can accommodate residential development which is situated in an area of high market demand (588).

Bid GR039, GR040 and GR041

A number of respondents have expressed support for the Officers' recommendation ("not preferred") for bids GR039 (1, 22, 39, 64, 205, 392), GR040 (1, 22, 39, 64, 205, 392) and GR041 (1, 6, 22, 39, 64, 205, 267, 392, 506, 782, 876, 1009). Support was also received for these bids (929).

In supporting the bids, the respondent suggested that development could be accommodated without adversely impacting on landscape character, coalescence and pipelines. It was believed that these bids compared favourably to other bids put forward (929).

SNH has indicated that bids GR039 and GR040 are located just over 1km from the Loch of Skene and should these sites be allocated, that construction method statements and drainage plans would be required to avoid an adverse effect on integrity from pollution run-off and sedimentation (506).

SNH has suggested that bid GR041 is likely to incur significant adverse landscape and visual impacts on the setting and approach to Dunecht House designed landscape. SNH believed that this site should be considered as part of a wider framework for growth in Westhill that takes cognisance of the findings of the Aberdeen Landscape Study to the east. Some opportunity exists to reduce the prominence of the visually 'hard' suburban edge of housing from recent development on the immediate east of the B979 and enhancing and extending the recreational opportunities currently afforded at Cairnie Woods. SNH does however note that potential impacts to the Loch of Skene could possibly be mitigated through construction method statements and drainage impact assessments to reduce sedimentation and pollution run-off. Development would reduce the foraging area for geese, and the site boundary would need to be amended to safeguard larger ancient and protected woodland areas (506).

Historic Environment Scotland (HES) has noted that bid GR041 has potential for significant impact on the scheduled monument at Springhill (SM6078) and its setting, and as such any direct impact is unlikely to get scheduled monument consent. HES has also indicated that should the bid be allocated, consideration of the impact on the scheduled monument at Woods of Cairnie (SM6077) should be considered as views to this monument may open if trees are felled (1009).

It was noted that bid GR041 crosses or is in close proximity to gas pipelines. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed (17).

Bid GR042 and GR043

A number of respondents have expressed support for the Officers' recommendation ("not preferred") for bids GR042 (64, 65, 207, 480) and GR043 (64, 65).

Bid GR063

Support was expressed for the Officers' recommendation ("not preferred") for bid GR063 (64, 65). Another respondent has requested the bid be allocated in the Proposed LDP for 100 homes (526).

In supporting the site, a respondent indicated that no objection has been received from the Health and Safety Executive in respect to pipelines and that suggested that there was no evidence that the bid area contributes to the objectives of the green belt.

Reference was made to the recent Capacity Study which identified this bid area as one of the most suitable areas for development in Westhill (526).

SNH has suggested that should bid GR063 be allocated that a development brief would be required to reduce loss of woodland and carbon rich soils and to integrate green infrastructure with existing habitats along the watercourse and promote active travel links (506).

Bid GR064, GR070, GR100 and GR132

Respondents have expressed support for the Officers' recommendation ("not preferred") for bids GR064 (53, 64), GR070 (64), GR100 (64) and GR0132 (53, 64, 392).

One respondent has requested that bid GR064 be allocated in the Proposed LDP on the basis that the site can accommodate residential development which is situated in an area of high market demand (590). Another respondent has requested that bid GR132 be allocated in the Proposed LDP as a future opportunity site to follow development of bid GR064 (438).

HES has noted that bids GR064, GR070, GR100 and GR132 have potential setting impacts on the scheduled monument at Berryhill (SM12334). Whilst the impact is not likely to be significant if new development is kept small-scale and is well related to the extent of the existing built up area, the potential for cumulative impacts with these bids would need to be considered (1009).

SNH has advised that development of GR132 would extend beyond the natural confines of the pronounced sloping landform (Hill of Keir and two adjacent tops) which forms the northern setting of Westhill and that development would suburbanise an area that is characteristically a rural agricultural landscape, incurring significant landscape and visual impacts (506).

Bid GR066

A number of respondents have expressed support for the Officers' recommendation ("not preferred") for bid GR066 (64, 65, 289, 752).

One respondent has requested that bid GR066 be allocated in the Proposed LDP on the basis that the bid area was identified as being suitable for development in the Westhill Capacity Study. It was considered inevitable that land to the south of the B9119 is the preferred direction of growth for Westhill (668) however, conversely, concern was raised regarding this approach (289).

Bid GR106

One respondent has objected to the Officers' recommendation ("reserved") for bid GR106 (64), whereas another respondent has expressed support for bid GR106 suggesting it should be allocated in the Proposed LDP, and made available for immediate development (226). It was noted that bid GR106 represents the first phase of a wider long-term development allocation (668).

Bid GR119

A number of respondents have expressed support for the Officers' recommendation ("not preferred") for bid GR119 (39, 64, 267, 392, 657, 1050).

Bid GR120, GR121, GR122, GR123 and GR133

Respondents have expressed support for the Officers' recommendation ("not preferred") for bid GR120, GR121 (64), GR122 (693), GR123 (64) and GR133 (64, 978).

One respondent believed that bid GR121 should be given further consideration and be allocated in the Proposed LDP, with GR120 reserved as a future opportunity site (474). Other respondents have requested that bid GR133 be allocated in the Proposed LDP on the basis that the constraints associated with the site could be easily overcome (566, 587) and the bid area was identified as being suitable for development in the Westhill Capacity Study (587).

SNH has advised that bids GR121, GR123 and GR133 would suburbanise an area that is characteristically a rural agricultural landscape, incurring significant landscape and visual impacts. SNH notes that the MIR states the likelihood for landscape and visual impacts and disconnect from the settlement boundary arising from bids GR123 and GR133. Additionally, development of GR121, GR123 and GR133 would extend beyond the natural confines of the pronounced sloping landform (Hill of Keir and two adjacent tops) which forms the northern setting of Westhill. SNH also notes that a core path runs through bid GR133 (506). HES has noted that bid GR133 has potential setting impact on the scheduled monument at Berryhill (SM12334) (1009).

Bid GR125

Support was expressed for allocating bid GR125 (64, 267). It was suggested that this could deliver a new community sports facility, thus meeting a planning objective for the settlement (64).

New Sites – Protected and Reserved Land

It was suggested by respondents that land adjacent to the B9119 and the 6-mile junction should be reserved for potential future upgrade to A-road standard, if not a dual carriageway (64, 65).

A respondent has suggested a number of additional areas that should be designated as protected land. These include land to the west of Broadstraik Road, immediately north of OP1; land north of Old Skene Road, to the east of Dawson Drive and west of Crombie Acres and Lea Rig; the area surrounding the pond, north of Cairnie Crescent and south of Burnland Place; land at the eastern entrance of Westhill to the north of the A944 and south of Lawsonsdales Playing Fields. The caravan park in Elrick should also be protected to safeguard this use (64).

Draft Proposed Local Development Plan

Support was expressed for sites P1 to P11 as protected land. It was however suggested that P2 be split into two separate protected areas, with the area to the west of Westhill Drive forming one area and the east of Westhill Drive forming the second. Following completion of the Kingsford Stadium and any new Westhill community sports facility, the requirement for Lawsonsdale Playing Fields may disappear (64).

The mapping for FOP1 and FOP2 appears to be incorrect (64, 226, 805).

SEPA note that no reference is made to waste water drainage. Westhill is part of the sewer network served by Nigg Waste Water Treatment Works (WWTW). Capacity should be confirmed with Scottish Water to ensure that the proposed population growth is within the design criteria for sewage treatment works at Nigg (805).

SEPA has recommended that a buffer strip be required adjacent to the watercourse which should be integrated positively into the development (805).

3. Actions

Spatial Strategy for Westhill

The cumulative transport impact from development is something that is already considered in preparing the LDP and is addressed through Policy RD2 Developer Obligations. It is not considered necessary to duplicate this in the Westhill Settlement Statement. Should specific transport interventions be identified it would however be appropriate to reflect these within the Services and Infrastructure section of the Settlement Statement.

Mixed response has been received as to the need for major developments to be identified in Westhill at this time. As outlined in Issue 5 The Spatial Strategy, Westhill remains a sustainable location for development, given the significant constraints that operate in the settlement, significant new development should not be promoted.

The Kingsford Stadium development lies outwith the settlement boundary and does not contribute towards the built-up area of the settlement. We still do not know if Aberdeen Football Club will develop this facility, or when.

The Westhill and Elrick Community Council were engaged in pre-Main Issues Report consultation. We welcome the Community Councils, as well as the wider communities' contribution in preparing the LDP.

Vision

It is recognised that the occupants of Arnhall Business Park are not restricted to those operating in the subsea industry. However, the subsea engineering sector remains an important area for focus and Westhill continues to be seen as a centre of subsea excellence. As such it would be appropriate to continue to promote this. Given the current, and predicted future climate with regard to oil and gas in the North East, it

would also be prudent to amend the Vision to recognise the other existing, and emerging, industries that are attracted to Westhill, and thus promote Westhill as an established employment hub.

The Vision should be amended to reflect housing need in a similar way to text used in the Banchory Settlement Statement.

Planning Objectives

Comments made in respect to the planning objectives listed in the MIR are noted. It is not proposed to include these bullet points in the Proposed LDP, but instead reflect these objectives as part of the Vision statement for the settlement. It is considered that these objectives are already included within the Vision and as such no change is required.

Flood Risk

The request made by SEPA for additional text to be added to the Settlement Statement is considered appropriate and should be included in the Proposed LDP.

Bid GR025, GR032, GR039, GR040, GR041, GR042, GR043, GR063, GR066, GR064, GR070, GR100, GR119, GR120, GR121, GR122, GR123, GR132 and GR133

Comments made both in support of and opposition to these bids are noted. None of these bids were identified as a “preferred option” in the MIR. As outlined above, Issue 5 The Spatial Strategy concludes that significant constraints operate in the settlement, and significant new development should not be promoted.

Comments from key stakeholders including SNH, SEPA and HES are also noted.

In supporting a number of these bids, respondents make reference to the Westhill Capacity Study, updated in 2014. Whilst it is recognised that many bids lie within areas identified as being “most suitable” or “suitable” for potential development, the study does not identify the timeline of when it would be suitable, or most suitable in terms of delivery. Additionally, the Study identified that in order to facilitate development it would be necessary to undertake a number of significant improvements to the transport network around Westhill. The Study also recommends that a number of further studies should be undertaken to consider the more sustainable way for Westhill to develop in the future. These studies include a Transport Infrastructure Feasibility Study, a review of the green belt and a Westhill Strategic Masterplan, amongst others. Issue 7 Shaping Development in the Countryside addresses the need to review the green belt and makes commitment to delivering this by the mid-term review of the LDP. Other studies could be undertaken during the early part of the Plan period to establish exactly what sites should be allocated to facilitate future growth of the settlement, ensuring an infrastructure led approach to delivery. This would be undertaken in consultation with stakeholders to ensure that development is located in the right place.

Bid GR106 / Existing Site – R1

Comments both in support of, and in objection to, bid GR106 are noted. Whilst it is recognised that part of the bid site is reserved in the current LDP, on reflection it is considered appropriate to not allocate any part of GR106, or the existing R1 site in the Proposed LDP. As respondents highlight, giving reserved status to land south of the B9119 could be interpreted as indicating the Council's preferred direction of future growth. This may be somewhat premature given the conclusions of the Westhill Capacity Study update suggesting that areas not limited to southern expansion may be "most suitable". By removing site R1 and amending the settlement boundary to align with the B9119 road, further allows for detailed consideration to be made regarding the future expansion of Westhill, in the most sustainable way, once all the relevant evidence has been compiled.

Bid GR125

Support for bid GR125 is welcomed. It is noted that since publication of the MIR, a Proposal of Application Notice has been submitted on the site for a residential development promoting 100% affordable homes. The bid proposal justified the loss of business land at this location which was deemed to be acceptable on the basis that it will provide affordable housing and contribute to delivering an aspiration of the settlement.

The site is not considered capable of accommodating a community sports facility.

New Sites – Protected and Reserved Land

Until such time as there are any land requirements, and timescale for delivering any transportation improvements to Westhill are known, it would not be appropriate to reserve land adjacent to the B9119 for such works. Instead, as recommended above, it is considered appropriate to retain the area to the south of the B9119 as "countryside" so as not to jeopardise any future requirement of this land to contribute towards improvements needed to facilitate future growth of the settlement.

An update to the Open Space Audit has been undertaken. This included a review of the areas identified by the respondent for protecting as open space.

It is considered overly restrictive to reserve the caravan park for that use and to do so would lead to an inconsistent manner in which caravan parks are identified in the LDP. There are existing policies in the LDP (Policy B3 Tourist Facilities) that address the change of use of such developments.

Draft Proposed Local Development Plan

A number of changes were proposed in the Draft Proposed Local Development Plan on the basis of early consultation with stakeholders. With the exception of identification of a possible future opportunity site (GR106), these are captured in the recommendations below.

To ensure consistency with the Housing Land Audit it is considered appropriate to identify in the Proposed Local Development Plan windfall sites where delivery is

projected during the Plan period. In Westhill this includes land at Burnland which is subject to an extant planning permission for 38 homes.

4. Recommendations

1. Amend the Vision to reflect community concerns raised during pre-Main Issues Report consultation.
2. Amend the Vision to recognise existing, and emerging, industries that are attracted to Westhill as an established employment hub.
3. Add text to the Vision to state that, "there is a need for sheltered and accessible housing, affordable housing and opportunities for downsizing in Westhill".
4. Add the following text to the Settlement Statement "Parts of Westhill are in an area potentially vulnerable to flood risk as identified by the National Flood Risk Assessment. Flood Risk Assessments may be required".
5. Allocate bid GR125 for affordable housing. The BUS (Safeguarded for Business Uses) boundary should be amended accordingly.
6. Remove existing R1 site and amend settlement boundary accordingly.
7. Allocate land at Burnland as an opportunity site in the Proposed LDP for 38 homes.

Issue 119 Whiteford

1. List of Respondents

MIR Ref	Respondents
771	Ryden LLP on behalf of Drumrossie Land Development Company Limited

2. Issues

New Site

A respondent sought extension to the settlement boundary to encompass land associated with an extant permission for 3 homes (APP/2013/2710) at Whiteford Road. It was requested that the land subject to this permission be identified in the Proposed Local Development Plan for 9 affordable homes. The site was previously identified as fH1 for 15 homes in the Aberdeenshire Local Plan 2006 and subsequently removed in the LDP 2012. Discussions have taken place with the Council's Housing Strategy Team about a potential development of 12 to 15 homes. Discussions are ongoing between the respondent and a number of Housing Associations regarding the potential to deliver the site for affordable housing as a joint venture. The site is free from infrastructure constraints and provides an opportunity to sustain Logie Durno Primary School which is forecast to be under capacity. There is no flood risk associated with the site (771).

3. Actions

There has been no material change in circumstances since preparation of the current LDP 2017, particularly in addressing comments raised by the Reporter in examining a wider proposal for 15 homes (2013 bid reference Ga043). Despite a reduced site area, the site capacity appears to be undefined at somewhere between 9 and 15 homes. It is considered that constraints associated with the lack of services in the locality resulting in high car-dependency and concerns regarding the A96 junction remain. Development of the site is not deemed to be essential to sustain the primary school. In addition, the site was not submitted as a bid in response to the Council's Call for Sites in 2018 and as such has not been subject to public scrutiny as part of the MIR consultation. The respondent has not indicated that any community engagement exercise has been undertaken independently of the MIR to gauge community feeling towards the proposal. As a result the community view of such a proposal is unknown at this time.

It may be appropriate once the 3 homes subject to APP/2013/2710 have been built out to include the application site within the settlement boundary as contributing towards the built up area of Whiteford.

4. Recommendations

1. No Action is required.

Issue 120 Garioch Landward

1. List of Respondents

MIR Ref	Respondents
58	Mr David Simon
140	Mr Moray Macdearmid
163	Ms Kirsten Campbell
169	Mrs Susan Redshaw
218	Dr James Black
229	Ms Lisa Strachan
238	Mr Stephen McMinn
283	Mr John Horsburgh
291	Mrs Margaret Buglass
318	Ms June Cameron
392	Echt & Skene Community Council
414	John Wink Design on behalf of Mr Graeme Sutherland
424	Mr & Mrs Simon & Vicki Glazier
425	Fintray Community Council
481	Ryden LLP on behalf of Cabardunn Development Company Limited and Dunecht Estates
491	Ms M A Roberts
506	Scottish Natural Heritage
541	Mr & Mrs Booker
683	Mrs Maxine Callow
805	SEPA
811	Morris Associates Architects
843	Kintore and District Community Council
864	Ms Michele Clark
865	Inverurie Community Council
867	Ms Karen Barker
876	Woodland Trust Scotland
923	Halliday Fraser Munro on behalf of Drum Property Group
924	Halliday Fraser Munro on behalf of W. Maitland & Sons
966	Bennachie Community Council
980	Mr Paul Davison
1006	Savills on behalf of Cullerie Estate
1007	Savills on behalf of Cullerie Estate
1009	Historic Environment Scotland
1029	Ms Janet Rennie
1053	Mr Stuart Rennie

2. Issues

Bid GR098 and GR099, Cullerlie

Two respondents have agreed with Officers' recommendation ("not preferred") for bids GR098 and GR099 on the basis that Cullerlie is not a settlement and the area lacks facilities and access to public transport (291, 392).

Another respondent has requested that bid GR098 be allocated in the Proposed Local Development Plan (LDP) as a small-scale, mixed use site offering opportunities for self-build and employment uses. The respondent considered that the bid should not be dismissed due to proximity to pipelines (1006).

One respondent has requested that bid GR099 be allocated in the Proposed LDP as an extension to an existing employment site, include proximity to Westhill. It was argued that many sites in rural areas are not accessible by public transport, and this should not be a reason to disregard the site. Screening would be provided to soften any landscape impact and reduce impact on nearby scheduled monuments. The respondent considered that there would be demand for such a site in the location. Constraints associated with waste water could be resolved (1007).

Historic Environment Scotland has noted that development of bid GR099 could have potential for impacts on the setting of a scheduled monument at Tillyorn (SM12161), including views to and from. However, it was considered likely that some views could be screened (1009).

Bid GR095, Garlogie

Respondents have agreed with Officers' recommendation ("not preferred") for bid GR095 on the basis of lack of infrastructure, promotion of ribbon development and proximity to archaeological sites (58, 392).

Another respondent has requested that bid GR095 be allocated in the Proposed LDP on the basis that development would enhance the village and support existing services. Garlogie has not experienced any development for 30 years. Development would help sustain Skene Primary School. It was contended that development would have no impact on the setting of the archaeological site. It was noted that in examining the current LDP, the Reporter acknowledged the site would be well contained in landscape terms and create a core to the settlement. The scale of development proposed in the Main Issues Report (MIR) based on a 25 house per hectare would be out of character (481).

It was also requested that Garlogie be identified as a settlement on the basis that it has numerous services and facilities, and that it is a conservation area (481).

Bid GR143 and GR144, Goval Junction, Dyce

One respondent has challenged the Officers' assessment of bids GR143 and GR144. These sites have not been appropriately appraised. It was considered that bid GR143

offered an opportunity to plan for appropriate roadside commercial facilities that serve the new A90 Aberdeen Western Peripheral Route (AWPR) rather than deal with future ad-hoc applications for such uses. A revised bid layout has been presented to increase the buffer area to eliminate the impact on woodland. Bid GR144 could act as a small extension to an existing settlement. A revised site area for bid GR144 has been presented showing an area suitable for 15 homes (923).

A respondent has objected to bid GR143 on the basis of potential impacts on ancient woodland (876). Scottish Natural Heritage (SNH) has commented that ancient woodland found in both bid areas should be protected and enhanced (506).

Bid GR113, Keithney, Inverurie

SNH has commented that ancient woodland found in the bid area should be protected and enhanced (506).

Bid GR110, Kellockbank, Inch

A respondent has requested that bid GR110 be allocated in the Proposed LDP on the basis that the principle of employment in this location has been established through the approval of APP/2017/2607. It was not considered that development would have impact on listed buildings or the Newton House Gardens and Designed Landscape (414).

Bid GR073, Kirkton of Rayne

A significant number of respondents object to Officers' recommendation ("preferred") for bid GR073 (163, 238, 318, 541, 683, 864, 867, 966, 1029, 1053). Reasons to dismiss the site included lack of infrastructure, including drainage provision, road safety, flood risk and presence of prime agricultural land.

One respondent does not object to the bid but raises similar concerns to those who have formally objected to the bid (229).

SEPA has requested that the Proposed LDP highlight that there is no public waste water infrastructure available in Kirkton of Rayne. SEPA consider that development where no public waste water infrastructure is available is unlikely to contribute to long-term sustainability and therefore would pose concerns for SEPA in the absence of First Time Sewerage provision. SEPA's preference would be for all proposed properties within this development to be connected to a single adoptable waste water treatment works. SEPA would be reluctant to approve any proposal for single individual waste water discharges (805).

Bid GR109, Lamington Court, Fintray

Respondents have agreed with Officers' recommendation for bid GR109 on the basis that the site is situated in the green belt, road safety and development would constitute suburbanisation of the countryside (283, 424, 425, 491).

Bid GR080 and GR081, Lethenty

A number of respondents have agreed with Officers' recommendation ("not preferred") for bids GR080 and GR081 on the basis of lack of infrastructure, road safety, impact on biodiversity, presence of pipelines and prime agricultural land (140, 169, 218, 865).

A revised proposal for bid GR081 has been presented with a request that the 7 homes in the northern proportion of the site be allocated in the Proposed LDP, with a further 7 homes to the south identified as strategic reserve. The respondent has challenged reasons presented in the MIR for dismissing the site (924).

It was requested that Lethenty be identified as a settlement. There are smaller, more remote places across Aberdeenshire classified as settlements in the LDP. In the Draft Aberdeenshire Local Plan 2000 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 dwelling houses being consented making a strong case for it being identified as a settlement in the LDP 2021 in line with the strategy for other similar places (924).

Bid GR018, Leylodge

Respondents have agreed with Officers' recommendation ("not preferred") for bid GR018 (843, 980).

Bid GR026, The Blair, Fintray

Respondents have agreed with Officers' recommendation ("not preferred") for bid GR109 on the basis that development would constitute suburbanisation of the countryside (424, 425, 491).

Bid GR068, Upper Cottown

Respondents have agreed with Officers' recommendation ("not preferred") for bid GR068 (843, 980). The respondent has indicated that no further development should be permitted until road safety issues have been addressed (843).

Bid GR014, Wester Ord

One respondent has challenged the Officers' recommendation ("not preferred") for bid GR014. It was suggested that the site forms part of the curtilage of a farmhouse and contains the ruins of a former mill. As such the site should be considered as brownfield with a capacity of 7 homes. It was suggested that the site was well within cycle distance to both Westhill and Peterculter and that impact on roads has reduced significantly with the opening of the AWPR (811).

3. Actions

Bid GR098 and GR099, Cullerlie

Whilst comments in support of bids GR098 and GR099 are acknowledged, it is maintained that Cullerlie is an unsustainable location and that development should be focused towards existing settlements, as per Scottish Planning Policy. No established

need for housing or employment has been demonstrated. In addition, it is considered that there are currently sufficient existing development allocations within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the Strategic Development Plan requirements. On this basis, there is not a strategic need to allocate further development opportunities, in addition to those identified within settlements at this time.

Bid GR082, Drum of Wartle

No comments were received in response to bid GR082. The site was not identified as a preferred option in the MIR and it is not recommended that the site be allocated in the Proposed LDP.

Bid GR095, Garlogie

Whilst comments in support of bid GR095 are acknowledged, it is considered that there are currently sufficient existing development allocations within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the Strategic Development Plan requirements. On this basis, there is not a strategic need to allocate further development opportunities in Garlogie at this time.

Arguments put forward that Garlogie should be considered as a settlement are accepted. Garlogie does meet the criteria of being classed as a “settlement” in that it serves a residential function with at least 15 homes and has sufficient urban characteristics and facilities. Although there are no protected, reserved, or opportunity sites identified it would be appropriate to include Garlogie within the “Settlement Statement” Appendix of the Proposed Local Development Plan on the basis that it has a Conservation Area. This is consistent with the approach taken for other settlements in Aberdeenshire, such as Pennan.

Bid GR143 and GR144, Goval Junction, Dyce

Whilst the comments in support of bids GR143 and GR144 are acknowledged, it is maintained that constraints associated with these bid proposals do not override any benefits associated with development of these sites. In addition, it is considered that there are currently sufficient existing development allocations within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the Strategic Development Plan requirements. On this basis, there is not a strategic need to allocate further development opportunities at Goval at this time.

Bid GR113, Keithney, Inverurie

The comment received from SNH in respect to bid GR113 is noted. The site was not identified as a preferred option in the MIR and it is not recommended that the site be allocated in the Proposed LDP. No other submissions were received.

Bid GR110, Kellockbank, Inch

Whilst comments in support of bid GR110 are acknowledged, it is maintained that the bid is sited in an unsustainable location and that development should be focused towards existing settlements, as per Scottish Planning Policy. Outwith settlements it is

expected that only small-scale employment uses should be permitted. In addition, it is considered that there is not a particular need for additional employment land and existing sites are available within existing settlements that are without constraint. In light of this it is not proposed to allocate any additional employment land at Kellockbank at this time.

Bid GR073, Kirkton of Rayne

Based on the body of objection to bid GR073 and having considered comments from SEPA it is considered that there is no need at this stage to identify land for housing development in Kirkton of Rayne. There are sufficient development opportunities identified at Old Rayne to meet local housing need and support the primary school roll at Rayne North. Consequently, the Settlement Statement for Kirkton of Rayne prepared and included in the Draft Proposed LDP would not need to be included in the Proposed LDP.

Bid GR109, Lamington Court, Fintray

Support for Officers' recommendation for bid GR109 is noted. The site was not identified as a preferred option in the MIR and it is not recommended that the site be allocated in the Proposed LDP.

Bid GR080 and GR081, Lethenty

Support for Officers' recommendation for bids GR080 and GR081 is noted. Despite efforts to address the impact of development through phasing, it is maintained that constraints associated with the bid proposal do not override any benefits associated with development of the site, either in part or as a whole.

Although Lethenty was identified in a previous Draft Local Plan it was not identified in the eventual Local Plan 2006, nor any subsequent LDP. In addition, inclusion within the Settlement Statements does not set a precedent for inclusion in future LDPs. Lethenty does not meet the criteria of being classed as a "settlement" as it does not have sufficient urban characteristics or facilities to support it as a settlement. Transport access is very poor. In addition, as there are no protected, reserved, or opportunity sites identified it would not be appropriate to include Lethenty within the "Settlement Statement" Appendix of the Proposed LDP.

Bid GR018, Leylodge

Support for Officers' recommendation for bid GR018 is noted. The site was not identified as a preferred option in the MIR and it is not recommended that the site be allocated in the Proposed LDP.

Bid GR071, Marionburgh, Midmar

No comments were received in response to bid GR071. The site was not identified as a preferred option in the MIR and it is not recommended that the site be allocated in the Proposed LDP.

Bid GR026, The Blair, Fintray

Support for Officers' recommendation for bid GR026 is noted. The site was not identified as a preferred option in the MIR and it is not recommended that the site be allocated in the Proposed LDP.

Bid GR068, Upper Cottown

Support for Officers' recommendation for bid GR068 is noted. The site was not identified as a preferred option in the MIR and it is not recommended that the site be allocated in the Proposed LDP.

Bid GR014, Wester Ord

Whilst comments in support of bid GR014 are acknowledged, it is maintained that the site does not form a brownfield opportunity on the basis that it has become naturalised and development would lead to suburbanisation of the countryside. In addition, it is considered that there are currently sufficient existing development allocations within the Aberdeen Housing Market Area that are effective or capable of becoming effective to meet the Strategic Development Plan requirements. On this basis, there is not a strategic need to allocate further development opportunities in addition to those identified within settlements at this time.

4. Recommendations

1. Include a Settlement Statement for "Garlogie". The Settlement Statement should emphasise the importance of the Garlogie Conservation Area and protect areas of open space. No opportunity sites should be identified.