

Main Issues Report 2013

Rural Development Position Paper

1. This position paper provides an overview of the current approach to rural development in Aberdeenshire and associated coastal areas. It assesses how effectively the current policy is working in practice and examines the relationship between rural development and the coastal zone policy. On the basis of this assessment, possible options for change are identified (that continue to promote the core principles of national policy) along with the likely implications of these. This will help to establish a preferred course of action however; all options presented will be debated through the Main Issues Report 2013. This paper should be read in the context of the policy review papers prepared for policy 3 Development in the Countryside and in particular SG Rural Development 1 Housing and Business development in the countryside. Policy review papers on SG STRL Greenbelt, and SGSTRL 2 Coastal zone are also of relevance.

2. National Policy Context

- 2.1 Scottish Planning Policy (SPP2010) outlines the overarching national policy aims for rural development in Scotland. It is supported by Planning Advice Notes (PAN) 72 *Housing in the Countryside* and 73 *Rural Diversification*. In addition, a new draft of SPP has been produced for consultation and this has also been considered in this paper.
- 2.2 The general principle being promoted by SPP in relation to rural development involves *'taking a positive approach to new development'* to improve and support the overall social and economic prosperity of rural places whilst continuing to have regard for the environment.
- 2.3 It identifies that the Development Plan will have a key role to play in the delivery of these objectives and *'should promote economic activity and diversification in all small towns and rural areas'* (Para 93).
- 2.4 The core aims of the SPP involve:
 - Supporting rural communities by *'enabl[ing] development in all rural areas which supports prosperous and sustainable communities whilst protecting and enhancing environmental quality'* (Para 92).
 - Encouraging economic growth and prosperity through development plans which *'should promote economic activity and diversification in all small towns and rural areas, including development linked to tourism and farm diversification'* (Para 93).
- 2.5 SPP identifies that these aims will be achieved through:
 - The promotion of *'new build or conversion housing which is linked to rural businesses or would support the formation of new businesses by providing funding'*.
 - The re-use of brownfield land for *'employment or community benefits'... 'particularly where they involve the imaginative and sensitive re-use of previously used land and buildings'* (Para 93).
 - Supporting the development of small scale housing *'including new clusters and groups, extensions to existing clusters and groups, replacement housing, plots on which to build individually designed houses, holiday homes'* (Para 94).
 - Supporting the redevelopment or replacement of *'rundown housing and steadings, and to provide limited new housing along with converted rehabilitated buildings'* (Para 94).

subject to appropriate design and layout which will contribute to cohesive grouping. The policy also states that *'modernisation and steading conversion should not be constrained within the original footprint or height limit'* subject to appropriate design and location.

- 2.6 Taking a more positive or 'welcoming' approach to development in the countryside is not aimed *'to see small settlements lose their identity nor to suburbanise the Scottish countryside but to maintain and improve the viability of communities and to support rural businesses'* (Para 95).
- 2.7 Another key focus of SPP, which is explored in more depth through PAN 72, is the focus on high quality design of houses in the countryside. It states that *'All new development should respond to the specific local character of the location, fit in the landscape and seek to achieve high design and environmental standards'*.

Draft SPP

- 2.8 The draft SPP does not stipulate the *'positive approach'* to rural development, however continues to promote development *'that supports prosperous and sustainable communities'*. This is seen as a significant change in the attitude of Government to rural development.
- 2.9 It removes much of the prescription in the current SPP and specifies that development plans should *'respond[s] to the specific circumstances of the area, reflecting the overarching aim of supporting diversification and growth of the rural economy'*. In addition, it has introduced a new criterion to allow single houses associated with substantial woodland planting in the remotest rural areas, which is discussed later in this paper.

3. Regional/Strategic Policy

- 3.1 The current draft of the Aberdeen City and Shire Strategic Development Plan (2013) identifies much of rural Aberdeenshire as within the local growth and diversification area. These areas lie outwith the strategic growth areas where the majority of development is focused.
- 3.2 The SDP states that growth of rural settlements must reflect local need, which is expected to vary between settlements. Therefore there should be a focus on providing a range of housing, particularly smaller homes for purchase or rent as well a substantial amount of affordable housing.
- 3.3 It is acknowledged that within the local growth and diversification areas, that there will continue to be pressure for rural housing outwith existing settlements. However the plan stipulates that *'local development plans, in line with Scottish Planning Policy, should approach this by focusing new housing in, or as an extension to, existing settlements, particularly those which are well served by public transport. This will help to create and maintain successful places and be more sustainable'*.

4. Aim of the Rural Development Policy

- 4.1 Currently the overall aim of the rural development policy is to welcome development in Aberdeenshire's countryside that will support and encourage socially sustainable and prosperous communities which do not compromise the surrounding natural environment or landscape. Development needs to be delivered in the places and in a manner where it is most needed to benefit and support rural communities now and in the future. This remains a valid aim.

5. Current Approach

- 5.1 The current Local Development Plan has introduced a more welcoming approach to rural development in line with the principles set out by SPP through *Supplementary Guidance Rural Development 1: Housing and business development within the countryside* (SGRD1).
- 5.2 This policy has adopted a hierarchical approach to rural development based on proximity and accessibility to Aberdeen. The hierarchy comprises three tiers, which are identified as the Greenbelt, the Aberdeen Housing Market area (AHMA) and the Rural Housing Market Area (RHMA). A different level of control is exercised in each of these three areas with strict controls in the Aberdeen City Green Belt and a more relaxed and permissive approach in the RHMA. In essence the Greenbelt and Aberdeen Housing Market Area are “pressurised” rural areas where there is greater demand for housing for people who work in Aberdeen but want to live in the countryside. There are no remote rural areas within Aberdeenshire.
- 5.3 SG RD1 provides a flexible approach to small-scale housing and business development in the RHMA, allowing development associated with business, or limited expansion of cohesive groups and villages, on the basis that it makes a greater contribution to the overall sustainability of at risk communities. Within the AHMA there is greater focus on locating new housing in or adjacent to existing settlements and in areas outwith the greenbelt and coastal zone development of disused and redundant buildings is encouraged.
- 5.4 Some parts of the AHMA and the RHMA are also within the coastal zone. This therefore requires the coastal zone policy to be considered in addition to SG RD1 for rural development proposals within the identified coastal zone area. However, the current extent of the coastal zone in some areas is quite significant, resulting in a conflict between the more restrictive coastal zone policy (STRL1) and permissive rural development policy SG RD1.

6. Discussion

- 6.1 The approach to housing and business development in the countryside is a considerable change from the previous Aberdeenshire Local Plan’s (ALP) rural development policy and was intentionally produced to be less prescriptive. This was intended to allow greater flexibility and professional judgement to be exercised in the determination of rural development planning proposals.
- 6.2 However, this has created some ambiguity regarding how the policy should be interpreted and applied. As a result, there are a number of areas which would benefit from amendment, not to significantly change the approach that has been adopted, but to provide greater clarity in what the intention of the policy is and how it should be applied.

7. SG RD1: A2 Refurbishment and replacement of existing or disused buildings

- 7.1 SG RD1 introduced a criterion which permits the ‘*refurbishment and replacement of an existing or disused building*’. This allows small-scale development (defined as up to three dwellings or 0.5 Ha of employment land in SG RD1’s reasoned justification) on sites that contain disused or redundant buildings.
- 7.2 The aim of this approach was to provide greater opportunities for development in rural areas which supports social and economic sustainability. Replacing or refurbishing an existing building is less likely to have significant impact on the surroundings as they often have a mature setting. The principle of development has already been established, reducing the take-up of greenfield or agricultural land.

- 7.3 An 'existing building', for the purposes of this policy, applies to a dwelling or building that is disused and redundant for its designed purpose. However it can be interpreted as referring to any structure, meaning any building in any condition, including fully-functional buildings, could in principle be demolished and replaced with up to three new dwellings. A number of proposals have been received for the replacement of an in-use agricultural shed or building to be replaced with housing. This is not the intended purpose of the policy and could lead to the unsustainable early abandonment of sound agricultural buildings, as well as the loss vernacular buildings which are capable of retention (discussed in the following section). The reasoned justification states that previously developed land must be '*disused and redundant for its designed purpose*' however it is not stipulated that this applies to the '*existing or disused building*'. Therefore, greater clarity could be introduced to the policy to more clearly specify what is permissible under each criterion.
- 7.4 In addition, there have been some cases seeking the development of previously developed but now predominantly naturalised sites. Planning advice *13/2012 housing and business development in the countryside* was produced to provide clarity on what is and is not considered previous development. It states that '*previously developed land must be identified on the basis of its current condition*' adding '*Historic use, unless physically evident, will not be taken into consideration*'.
- 7.5 It has been contested that a predominantly naturalised site containing a single feature of previous development (such as an exposed pipe or small pile of rubble) should be considered as previously developed. This is not the intention of the policy and sites which appear by most accounts to be Greenfield or naturalised, should be considered as such. However, in order to give this issue sufficient weight there may need to be a stronger definition of previous development in the Supplementary Guidance.
- 7.6 To avoid the loss of functional buildings or valuable biodiversity, a relatively minor change to SGRD1 is required. This could be achieved by separating part A2 of the policy into two criteria which more clearly stipulate what is permissible under the policy.
- 7.7 For example, the policy could read:
- We will approve new small scale development, subject to other policies, where:*
- 1) It is for the refurbishment or replacement of an existing non-vernacular dwelling or disused building*
 - 2) It is on a (brownfield) site that has evidently been previously developed and is now disused and redundant for its designed purpose*

8. Vernacular buildings

- 8.1 Part A2 of SG RD1 has also resulted in the demolition and replacement of a number of traditional steadings and vernacular cottages which could have been refurbished and retained. Concern was raised by elected members at the Member Officer Working Group in September 2012 that the policy would accelerate the loss of valuable traditional style buildings. Whilst the policy states that '*the retention and refurbishment of vernacular buildings...will always be preferred*', it is not a prerequisite. A number of proposals have come in for and been approved for the demolition of traditional cottages and buildings, and whilst the policy encourages retention, there is no mechanism to enforce it.
- 8.2 It is considered that vernacular buildings are an important part of Aberdeenshire's cultural heritage and character and it is therefore important that they are not needlessly lost. In addition, re-using existing vernacular buildings is more sustainable as it requires less new material and the embodied energy of a new house would be higher.

- 8.3 Whilst it is understood that often these buildings are not of modern space or energy standards, re-modelling or converting them can create contemporary homes with traditional character and save them from being completely lost.
- 8.4 A criterion could be included in SG RD1 that permits development not only that involves the refurbishment of an existing traditional building, but permits the development of a new house where it retains and converts a vernacular building as part of the functional house e.g. as part of the new house or as a garage or ancillary building. This would therefore enable the creation of a modern home that reflects the past whilst continuing to enhance Aberdeenshire's rural character.
- 8.5 For example, the policy could read:
- "We will approve new small scale development, subject to other policies where:*
- 3) It incorporates the refurbishment, conversion, subdivision and/or extension of an existing or disused traditional or vernacular building that is not listed".*

9. Replacement of buildings

- 9.1 Another issue in relation to the refurbishment and replacement criterion is the location of a replacement of a house or building. There have been a number of enquiries and applications for replacement dwellings on alternative sites, with one exceptional case seeing the replacement 750m from the original site. The aim of the policy is to allow development where it has previously taken place, on sites which have greater ability to accommodate development - for example, which has existing infrastructure and fits into the landscape. SG RD1's reasoned justification states that *'No restriction is placed on the size of the replacement buildings, or of the footprint that such a building should occupy, provided development is on the same site'*. There have been cases where a single building in amongst a group of buildings (such as a within a farm) has been sought to be replaced in a site adjacent to the existing site of the original building. This would be a departure from policy, and replacement buildings should always be within the same curtilage of site from which they were removed to achieve the benefits of setting associated with replacement of buildings. The reasoned justification does highlight that the footprint of the replacement does not need to match that of the original building, however if the original site is not large enough to accommodate the size of replacement desired, it should not be considered appropriate for a replacement.
- 9.2 The wording should be strengthened within the reasoned justification to provide additional and clearer guidance relating to this criterion. Providing a section of guidance specifically on part A2 of the policy would also help alleviate this issue along with specifying what the 'site' is generally considered to be. Further guidance relating to this part of the policy could be inserted from the planning advice 13/2012.

10. SG RD1 A3 & B2: Organic growth and cohesive groups

- 10.1 Part A3 of SG RD1 currently stipulates that small scale development will be permissible where *'it is for development that contributes to the organic growth of a settlement identified in Appendix 1'*. Appendix 1 is the list of villages (in both the Aberdeen Housing Market Area (AHMA) and Rural Housing Market Area (RHMA)) for which criterion A3 (organic growth) applies, allowing a 20% increase in the size of the existing group/village. The villages listed were identified as places where further small scale development could help support existing services, community facilities or infrastructure.

- 10.2 In addition, part B2 (the cohesive group policy) of SG RD1 permits small scale development within the RHMA where *'it is an appropriate addition, in scale and character to an existing group of at least five houses'*. This policy was intended to allow incremental growth of small groups in the countryside which would support social sustainability in more remote areas.
- 10.3 Currently there are settlements in the LDP which have individual settlement statements and in most cases settlement boundaries within which further "infill" development is permissible. In addition to these are the 81 "Appendix 1" villages (some of which are also mapped as settlements, with settlement boundaries) for which the organic growth criterion (A3) applies. 75 of these are within the RHMA. Finally, there is the cohesive group criterion which permits small-scale additions to groups of at least 5 houses also within the RHMA (an upper limit of 15 houses has been applied through planning advice but the weight of this is unsubstantiated).
- 10.4 This essentially means that some villages and settlements are not only identified as settlements in the LDP, but are also listed in Appendix 1 as well as meeting the criteria of being a cohesive group. This double or even triple overlap has created some ambiguity regarding what element of the policy should apply and raises the question as to whether there is in fact a need for both the organic growth and cohesive group policy criteria. Over 90% of the Appendix 1 villages are already located within the RHMA where the cohesive group policy also applies resulting in a distinct overlap.
- 10.5 It is therefore considered that this approach should be reviewed to provide greater clarity regarding what policies apply to which settlements, villages or groups.
- 10.6 Further guidance relating to the **cohesive group** criterion of SG RD1 is provided in *13/2012 housing and business development in the countryside planning advice* which stipulates that a cohesive group should be no greater than 15 dwellings. This was introduced to clarify the intention of the policy to allow incremental growth to existing 'groups' of houses that are not big enough to be considered villages or settlements. The threshold also aims to limit the numbers of houses being built in locations where there are no services or facilities.
- 10.7 Prior to the publication of the planning advice, houses were approved under this part of the policy for groups or villages significantly in excess of this limit. It was considered that it was not a sustainable model to permit up to 20% growth to any group in the RHMA with more than 5 houses, particularly in the absence of any local services. The introduction of the maximum threshold has been challenged by the development industry as it is not stipulated in the actual SG policy. Applications have been pursued for additions to 'cohesive groups' of more than 30 houses - larger than some identified or Appendix 1 settlements. This again presents the overlap between the organic growth and cohesive group policy. Whilst planning advice does hold material weight in terms of decision making, it is not sufficient to implement a rule such as this.
- 10.8 There is also the question of whether the cohesive group policy is achieving this aim of creating more socially sustainable communities. At the other end of the cohesive group scale, it should be reviewed whether 5 dwellings can be considered a 'community' and is actually meeting local needs. The policy is not currently delivering a mix of housing in rural areas and is encouraging larger single house developments which often do not provide the variety of rural housing that helps to create a mixed or sustainable community. This also promotes developments with higher car dependency which is not a sustainable long term settlement pattern.
- 10.9 In relation to this, there is an important need to address transport emissions as highlighted by national and regional policy. The draft SPP states that development plans should reduce CO₂ emissions by *"promoting a pattern of development which reduces the need to travel and encourages active travel and travel by public transport"*. NPF2 requires the *"promotion of compact settlements"*, while the draft NPF3 focuses on *"improving existing settlements"*.

Transport emissions a key issue in Aberdeenshire, where road transport emissions account for 27% of the total emissions in the area.

- 10.10 The draft SPP identifies that development plans must '*make[s] provision for housing and other residential accommodation in the countryside, taking account of the development needs of communities*'. However the cohesive group policy is not necessarily meeting the development needs of communities. Retaining the policy as it currently stands has the potential in the long term to result in sporadic rural clusters resulting in high car dependency and lack of local services which is not a long term sustainable approach to rural development.
- 10.11 An alternative would be to increase the minimum threshold for a cohesive group to ten for example along with a clear maximum upper threshold. This could continue to provide the opportunity for development in small groups in the countryside but to a slightly lesser degree as well as limit the extent to which a group of houses can grow in the absence of any services. However, the cohesive group policy would still not provide a sustainable pattern of development and continue to result in high car dependency. It would also continue to overlap with the organic growth policy.
- 10.12 Removal of this criterion completely would result in development being focused in and around specified small rural villages, groups and settlements (some of which are comparable in size to a cohesive group) providing a more sustainable model of rural development and significantly more consistent with the vision promoted by the Strategic Development Plan. Part A3 of SG RD1 currently allows organic growth to over seventy small villages within the RHMA (many of which are not identified settlements within the LDP) and this already provides significant opportunity to deliver housing in the countryside. The cohesive group policy simply replicates much of what the organic growth criterion is already doing.
- 10.13 In addition, part A2 of SG RD1 continues to provide a significant opportunity for development in rural areas and monitoring statistics have identified that there are ten times more applications considered under this than the cohesive group policy (B2). This demonstrates that more rural development is being delivered through the refurbishment and replacement of existing buildings or on previously developed land than through cohesive groups.
- 10.14 The cohesive group policy is not currently fit for purpose and it is considered that there is sufficient provision for rural development to be delivered through other parts of the Supplementary Guidance.

11. Appendix 1 settlements

- 11.1 The principle of allowing incremental growth of small villages presents a sustainable pattern of growth in rural areas and should be retained. Promoting development within and in close proximity to existing small villages and settlements supports social cohesion and sustainability.
- 11.2 One issue with this part of the policy is in relation to the list of villages contained within Appendix 1. There have been enquiries as to why some villages were not included and additions for inclusion have been suggested due to the potential benefits this may provide (See Appendix A). In addition, there may be some villages which have grown to a scale where further expansion would not be appropriate. Retaining the list of Appendix 1 settlements as it currently stands may not provide the most accurate or up-to-date overview of villages that would benefit from organic growth.
- 11.3 The Appendix 1 settlements should be reviewed to include any others that may benefit from incremental development to help support existing services or community facilities. A criteria

based approach could be implemented to provide consistency to the types of villages and groups where organic growth is permitted. This could include putting all settlements into a hierarchy which then could determine at which levels incremental development should be permitted.

12. SG RD1: B1 RHMA employment proposals

- 12.1 Part B1 of SG RD1 approves small scale development in the RHMA where it is for an employment proposal. The reasoned justification defines small-scale in relation to employment as 0.5 Ha or a business employing 5 people or less.
- 12.2 The requirement for proposals to employ 5 people or less was intended to limit the scale of business proposals which may not be compatible within rural surroundings. However, restricting new rural businesses to employing 5 people or less may limit the benefits that such proposals could have for the local area in terms of employment and economic prosperity. The draft SPP states that the development plans and policies should *'reflect... the overarching aim of supporting diversification and growth of the rural economy'* (2013).
- 12.3 It can be difficult to ascertain from the outset of a business start-up exactly how many people will be employed. Many businesses will naturally expand and grow once established so would be likely to take on additional people following the approval of permission. SPP states that taking a welcoming approach to rural development *'can help to create the right conditions for rural businesses and communities to flourish'*.
- 12.4 This requirement should be removed. The scale of employment proposals permitted (0.5Ha) already provides some limitation on the physical scale of an employment proposal but does not unnecessarily restrict the number of people who can be employed by it. Depending on the type of business, employees may not be permanently located at the site so it could be difficult to monitor even under the current policy.

13. STRL1: Coastal zone policy

- 13.1 STRL1 currently permits development within the identified coastal areas subject to other policies where it is within an identified settlement boundary, requires a coastal location or is the redevelopment of an existing building or within the curtilage of an existing building for which there is no alternative. Maps of the coastal zone boundaries can be found in the supplementary guidance.
- 13.2 The coastal zone itself comprises large areas of countryside where SG RD1 also applies. SG RD1's reasoned justification states that *'The special characteristics of coastal areas are managed by separate supplementary guidance which should be applied in addition to this policy'*.
- 13.3 This has resulted in competing policy objectives whereby both policies - the more restrictive coastal zone and more welcoming rural development - apply. This is in part due to the extent of the defined coastal zone boundaries. In many cases the boundary extends a significant distance beyond the sensitive coastline for which the policy was designed to protect. For example, at Whinnyfold south of Cruden Bay, the coastal zone extends 2.5 kms inland. This results in ambiguity regarding what policy should take precedence when determining an application that is both rural and within the coastal zone. This could lead to a more restrictive approach to development being taken in some areas which would not affect

the sensitive coastal areas or conversely, a more permissive approach being taken in some coastal areas which could negatively impact on the sensitive coastal qualities

- 13.4 Currently decisions being made in coastal zone locations are weighted in terms of the area type they most accurately represent i.e. if the proposal is 1km inland and does not represent sensitive coastal characteristics, the rural development policy will be used. This is currently an issue that requires modification to ensure a consistent application of the policy.
- 13.5 The coastal boundaries should be revised to more accurately represent the sensitive coastal areas that require greater protection, thus a more restrictive policy. SNH's Landscape Character Assessments provide a sound basis for reviewing and identifying the new coastal boundaries based on landscape. Much of the coast is defined as having landscapes of increased sensitivity to development and therefore this approach would provide more focused protection for these areas.
- 13.6 In addition the coastal zone policy (STRL1) could be given exclusivity within the identified coastal zone areas meaning there would no longer be overlap with SG RD1. This would provide a more suitable approach which ensures the continued protection of sensitive coastal areas and does not unnecessarily restrict areas inland of the coast.

14. Division of AHMA and RHMA policies

- 14.1 Currently SG RD1 outlines the policy criteria to be used for all rural development outwith the greenbelt. As previously mentioned, it has adopted a hierarchical approach to rural development based on proximity and accessibility to Aberdeen. Thus the greenbelt policy (most strict) and *part A* apply in both the AHMA and RHMA, and *part B* only applies to the RHMA. This provides the RHMA with the greatest opportunity for development where there is lesser demand and more restriction within the AHMA which has greater development pressures.
- 14.2 This hierarchy is currently referred to in SG RD1 and outlined in more detail in the 13/2012 planning advice. SG RD1 is currently a single SG which identifies the policy criteria for both the AHMA and RHMA. Whilst this layout has not raised any significant issues, dividing the policy into two separate SG's - for the AHMA and the RHMA - may provide greater clarity regarding what is permissible within each geographical area and could result in faster and improved interpretation of how the policy should be applied.

15. Single houses associated with woodland planting

- 15.1 The current draft SPP (2013) has introduced a criterion for remote rural areas to '*allow the construction of single houses outwith settlements where they are well sited and designed to fit with local landscape character, or where landscape and carbon impacts are mitigated by significant woodland planting*' where development can sustain fragile rural communities. SG RD1 currently provides sufficient opportunities for the construction of single houses outwith settlements through part A2 for the replacement or refurbishment of buildings. However it does not allow for individual houses associated with woodland.
- 15.2 Allowing a house with significant woodland planting is likely to be beneficial in terms of carbon mitigation and would contribute to meeting national woodland planting targets. It would also be unlikely that a single dwelling would have a significant landscape impact where it is surrounded by woodland. However, when the house is built, the woodland will not yet be established and could take some time (likely years) to provide the woodland setting for the house to be integrated into.

- 15.3 However, There a number of issues with this principle: Firstly, it is likely to benefit those who have access to or own a large area of land to plant the woodland, which is likely to exclude a large proportion of local rural people. In addition, the requirement for the woodland to actually be planted prior to the commencement of the building would need to be addressed through conditions. It is wholly possible that a house with associated woodland is granted, but the woodland never materialises. It would also be important to emphasise that the house is only permissible where new planting is proposed and not existing.
- 15.4 Introducing a criterion into the rural development policy such as this should be carefully considered. On the basis that nowhere in Aberdeenshire is truly remote and that this is only proposed in the draft SPP, there is not requirement to take it forward or implement this. However, whilst this may have to be re-considered at a later stage, it is not recommended that it is included within the revised SG RD1.

16. The Reasoned Justification

- 16.1 The reasoned justification for SG RD1 currently outlines further information with regards to how the policy should be applied. Whilst it provides key information, it is not in a particularly ordered way and does not correspond to the structure of the policy. This can make it difficult to find information quickly as there are no headings to guide the reader to the relevant parts. In addition, there is guidance within the rural development planning advice (13/2012) – particularly with regards to previously developed land – that may be more beneficial within the reasoned justification. As mentioned, the planning advice does not hold the same weight as supplementary guidance, and therefore can be easily overlooked. It is difficult to give weight to a planning decision, even if it adheres to the relevant specifications, if it is based on planning advice no matter how appropriate the decision may be.
- 16.2 The Reasoned Justification should be restructured in a way that corresponds with each part of SG RD1. This would allow easy reference to further guidance on each part of the policy aiding interpretation. In addition inclusion of some parts of the 13/2012 planning advice within the reasoned justification would give greater weight to some more relevant and well used parts of the planning advice, as well as provide a more comprehensive clarification of the policy within the SG.

17. Compliance with national policy / Conclusion

- 17.1 This position paper has highlighted a number of issues with regards to the current rural development (SG RD1) and coastal zone (STRL1) policies. It is not considered that the issues raised and options proposed are likely to significantly change Aberdeenshire's welcoming approach to rural development. The aim of the policy is to deliver development that is appropriate and also supports the overarching aim of prosperous and sustainable communities (SPP). The intention of any suggested changes are not to unnecessarily restrict development in the countryside but to encourage development that will enhance and promote rural sustainability.
- 17.2 SPP states that:

'In more accessible and densely populated rural areas most new development should be in or adjacent to settlements. In less populated areas, small scale housing and other development which supports diversification and other opportunities for sustainable economic growth whilst respecting and protecting the natural and cultural heritage should be supported in a range of locations'. (SPP, Para 95).

17.3 It is considered that the proposed amendments to the rural development policy would continue to promote the fundamental principles outlined in SPP. The approach of having differing policies for development within the AHMA (the more accessible and populated rural area) and RHMA (more remote) is retained. The more accessible parts of Aberdeenshire's countryside continue to face pressures as a result of their proximity to the city, and development needs to be provided in the more remote rural area's where it supports and encourages mixed and sustainable communities. SG RD1 therefore continues to apply greater control of development within the AHMA and provides more opportunity within the RHMA.

References

- Aberdeen City and Shire Strategic Development Plan Authority, 2013. *Proposed Aberdeen City and Shire Strategic Development Plan Proposed Plan*
- Aberdeenshire Council, 2006. *The Aberdeenshire Local Plan*
- Aberdeenshire Council, 2012. *Aberdeenshire Local Development Plan*
- Aberdeenshire Council, 2012. *Planning Advice 13/2012: Housing and business development in the countryside and greenbelt*
- The Scottish Government 2005. *PAN 72 Planning Advice Note: Housing in the Countryside*
- The Scottish Government 2005. *PAN 73 Planning Advice Note: Rural Diversification*
- The Scottish Government, 2010. *Scottish Planning Policy*
- The Scottish Government, 2013. *Scottish Planning Policy Consultation Draft*

Appendix A

Criteria for selection

The Appendix 1 settlements are based on a number of different criteria. These are summarised below and have been used in to the proposed changes determine which settlements should or should not be considered for limited organic growth.

The criteria are as follows:

- *Promoting economic development and regeneration:* The draft strategic development plan identifies areas where inequality exists and where brownfield regeneration and improving the economy and the competitiveness of business have a particular role. *There is a need in such areas.*
- *Sustaining services:* Information from the rural facilities monitor shows the range of services (including primary schools) available in a settlement. There is an argument for targeting development to support sustainable accessibility to key rural services such as schools, shops and post offices. Where there is a key rural service there is a need. To aid the assessment, settlements are rated against two levels of provision: more than 3 facilities and more than 1 facility; in each case covering certain key categories. Further to this, at the most basic level of provision, groups of very small settlements which are physically close together are identified, which can function symbiotically in utilising services and can be treated as one classifiable settlement. Similarly, there are some small settlements identified that can function as ‘satellites to larger settlements and help sustain facilities in those settlements.
- *Strategic role:* Some settlements have a particular role as rural service centres, serving a wider rural catchment. These settlements are likely to require specific and substantial allocations of land to support these roles.
- *Size:* “Settlements” of less than approximately 50 households are unlikely to require specific allocations. Experience has shown us that the rate of change in these places is slow and organic, and that the allocation of small sites may actually hinder local development (as there may be no market, locally, for the number of houses required by the allocation).
- *Infrastructure capacity:* There is an argument for avoiding targeting development in those areas that are remote from key transport routes, due to the increased requirement for private travel and the consequent strain on infrastructure. Further, where there is a significant infrastructure constraint (which could not be overcome by a scale of development appropriate to the settlement) then this is a justification for avoiding allocations for development in the settlement.
- *Deliverability:* Where the settlement already has housing land allocations, but there are known issues with demand for that land, there is no point in making further allocations. As part of the action planning process which will be required to support the Local Development Plan these constrained sites will have to be evaluated and an assessment made as to what could be done to make them marketable. The rate of recent housing completions can be an indicator of deliverability in a settlement.
- *Urban form:* some settlements (particularly the planned villages of Buchan, but also some coastal settlements) do not lend themselves to “organic” growth through a criteria based policy approach. Organic growth may be alien to a close-knit fishing village or detract from the planned settlement layout. In such cases allocations may be required to preserve these aspects of built heritage.

On account of these criteria, it is considered that the villages of Echt and Rora should be included within Appendix 1 of SG RD1. Echt has a Primary School with a falling school roll which could benefit from small scale development.

Following the reassessment of the existing settlements, it is recommended that Park is removed. This is on the basis that it is in almost immediate proximity to an existing settlement and does not require additional population to support the village.

In addition, Cruden Bay, Maud, Longside, St Fergus, Strichen and Stuartfield will be removed on the basis that they are existing settlements of a scale would not be appropriate for organic growth. They all have existing allocations which are substantial and it is considered that this provides sufficient capacity for further development. In addition, Lumphanan has existing effective housing land within the settlement and is considered that development should be focused within the existing village to deliver the housing consented rather than allow development around the settlement. It is also suggested that Whitehouse is removed. It is in fairly close proximity to Alford and has no services. It is therefore considered that further growth would not be appropriate.

The proposed revised list of settlements included within Appendix 1 of SG Rural Development1: *Housing and business development in the countryside* would be as follows:

Banff and Buchan	Formartine	Marr
Bogton / Forglen	Berefold	Ballogie
Cornhill	Daviot	Blairdaff
Crudie	Fintry	Bogniebrae
Gordonstown	Fisherford	Bridge of Alford
Inverboyndie	Fyvie	Bridgend of Gartly
Kirkton of Alvah	Kirkton of Auchterless	Cairnie
Ladysbridge	Rothienorman	Clatt
Memsie	Ythanbank	Finzean
Netherbrae		Forgue
New Aberdour	Garioch	Gartly
New Blyth	Auchleven	Glass
Rathen	Chapel of Garioch	Glenkindie
Rora	Echt	Keig
Rosehearty	Kirkton of Rayne	Kennethmont
Sandend	Meikle Wartle	Kennethmont Distillery
Sandhaven / Pittulie	Oyne	Kirkton of Tough
Tyrie		Largue
Whitehills	Kincardine and Mearns	Logie Coldstone
Buchan	Arbuthnott	Lumsden
Crimond	Benholm	Muir of Fowlis
Fetterangus	Fettercairn	Montgarrie
Longhaven	Woodlands of Durriss	Rhynie
New Deer	Kirkton of Durriss	Strachan
New Leeds	Roadside of Kineff	Tarland
New Pitsligo		Towie
Old Deer		Ythanwells
St Combs		