



North Kincardine Rural Community Council

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Draft Local Development Plan 2009

In response to your letters of 2 Dec and 19 December, and referring to the specific settlements listed, we wish to make the following comments.

1. You ask that we identify both potential sites and suggested protected areas by marking maps. However, those maps enclosed were solely those taken from ALP and showing sites already identified as small settlements – Rural Service Centres.
2. Of the sites shown, we broadly endorse the limits shown as being appropriate for each one..
3. At Stobhall we understand that the narrow ‘corridor’ to the North and East of the large blank area was previously designated (possibly in CALP), as a protected area to mark the settlement boundary , and believe that this is an omission in the sketch as we are unable to recall that this status was ever withdrawn. We have accordingly hatched it. The ‘large blank area’ is, of course, now filled with houses.
4. In Maryculter West the area ‘fh1’ is now developed with 8 houses. .
5. Kirkton of Maryculter. Site ‘A’ is already developed. We endorse the existing settlement boundary and the protected area.
6. Cookney. This being a prominent, isolated hilltop settlement, dominating much of the surrounding area, we endorse the existing tree belt protected area. The existing settlement boundary seems to us appropriate bearing in mind the aforementioned prominence of this location. For similar reasons we believe that the slopes approaching the hilltop should also be protected in each direction, with any necessarily very small-scale development (see later comments), limited to the lower slopes some 600 – 800 yards from the hilltop.

DRAFT PLAN – LAND ALLOCATION AND HOUSING

On a more general level, this CC would be content to see some small-scale development in our area. However, we have consistently said, for many years, that we should prefer to retain the existing pattern of development in the countryside, that is to say of scattered groups of single or of very few houses. Specifically we have

always urged that close groups of 10, 20 or more houses should be avoided, describing it as ‘suburbanisation of the countryside’

We believe that to be inimical to the character not only of our area but of rural areas in general. That introduction of a discordant suburban note into the countryside should, in our view, be avoided and that view has always been, and is still, supported by similar sentiments set out in repeated references throughout both sections of past and present Development Plans. (It has also been endorsed by Reporters at Inquiries into both the Local Plan and into specific planning applications.)

Even allowing that the proposed housing allocation and population increases in the Draft Plan were to be scaled back to more realistic levels (which seems likely), it is still clear that the Plan will represent a radical change of course for the Local Authorities. We shall almost certainly see the creation of huge new settlements of thousands of houses and the destruction of much of the Green Belt around the City.

We therefore suggest that another radical, but much more modest, change could be made in the criteria governing new houses in the Countryside (as defined in ALP), which could make a valuable contribution to the overall housing allocation.

EXISTING SITUATION

There is an all-or-nothing approach in NEST and ALP, i.e. new housing forbidden (a few specific exceptions), OR a ‘suburban’ development – as above – proposed but possibly permitted (contrary to policy), in order to ‘fill up the numbers’.

The requirement, as presently expressed, that any development (even steading conversions), should be near to transport corridors / public transport / employment opportunities etc., is highly idealised but somewhat impractical. For rural areas there is scarcely any public transport, few services and little local employment.

Those ideal criteria may be suitable for development in or near medium or large settlements (and the proposed major settlements could fulfil them), but such criteria – theoretically – preclude any development in Countryside. Whether in groups of 10 or more, or in singles, twos or threes, new housing in many rural areas will not be on or near local bus routes etc etc., and to build groups of 10 or 20 would do nothing to provide, or develop, those facilities.

SUGGESTED CHANGES TO POLICY

With a view to sustaining local services – school rolls, for example – and to maintain community vitality, we suggest that the Draft Plan recognises the impracticality of the existing criteria and makes a departure from previous practice..

Our suggestion is that AREAS are designated and given a small allocation of housing but without a specific site and with a proviso that the allocation should be fulfilled through small groupings of up to 5 houses . That might include 1 or 2 to be added to existing groups, possibly some single houses, or new groups of not more than 4 or 5, perhaps a maximum of 5 if added to an existing larger group.

If applied on a Shire-wide basis that could make a useful contribution to the overall requirement whilst preserving the essential rural pattern of development and would do nothing to add to commuting that larger groups would not also do...

NKRCC AREA

The NKRCC area is a good example of where this might be applied. First, despite our proximity to the City we have few rural services. Second, the area covers roughly 30 square miles, but has only Kirkton of Maryculter and Stobhall which might loosely be termed 'villages', whilst Banchory-Devenick crossroads and Maryculter East each has a collection of 12 or 15 houses (all without services). Netherley, Cookney and the majority of Maryculter and Banchory-Devenick are simply areas with scattered house and farms.

The elected members recently recommended that Blairs, Kirkton, Maryculter East and Maryculter West, be added to the Appx 2 listing of settlements proposed for a flexible provision of plots along with Netherley .

If that amendment were to be accepted, the geographical areas of Netherley, Cookney, Maryculter and Banchory-Devenick might be designated as described above and given an overall allocation but, as stated, WITHOUT specific sites identified.

We recognise that delineation of the 'development' areas - the actual line on the map - may be controversial as also would be allocation of numbers to a given area. There would also be potential difficulties with planning applications operating on a 'first come, first served' basis, with total numbers being filled to the exclusion of later applicants.

CONCLUSION

Despite potential problems however, we believe that this suggested change of policy would

- maintain the essentially rural character of the area concerned
- avoid 'suburbanisation'
- prevent the danger of 'city sprawl' in areas close to Aberdeen
- make a valuable contribution to housing allocation if applied Shire-wide

Above all, it would maintain the vital distinction between, on the one hand, the city and huge new settlements (both in the Shire and in the Green Belt) and, on the other, Countryside (both as it is defined in the Development Plan and as it is generally understood), providing a rural environment for some and a recreational outlet for others.

2nd February 2009