

# PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

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

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

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

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

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

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

Please email comments to [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk) or send this form to reach us by 17 July 2020.

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



## ACCESSIBILITY

If you need information from this document in an alternative language or in a Large Print, Easy Read, Braille or BSL, please telephone 01467 536230.

Jeigu pageidaujate šio dokumento kita kalba arba atspausdinto stambiu šriftu, supaprastinta kalba, parašyta Brailio raštu arba britų gestų kalba, prašome skambinti 01467 536230.

Dacă aveți nevoie de informații din acest document într-o altă limbă sau într-un format cu scrisul mare, ușor de citit, tipar pentru nevăzători sau în limbajul semnelor, vă rugăm să telefonați la 01467 536230.

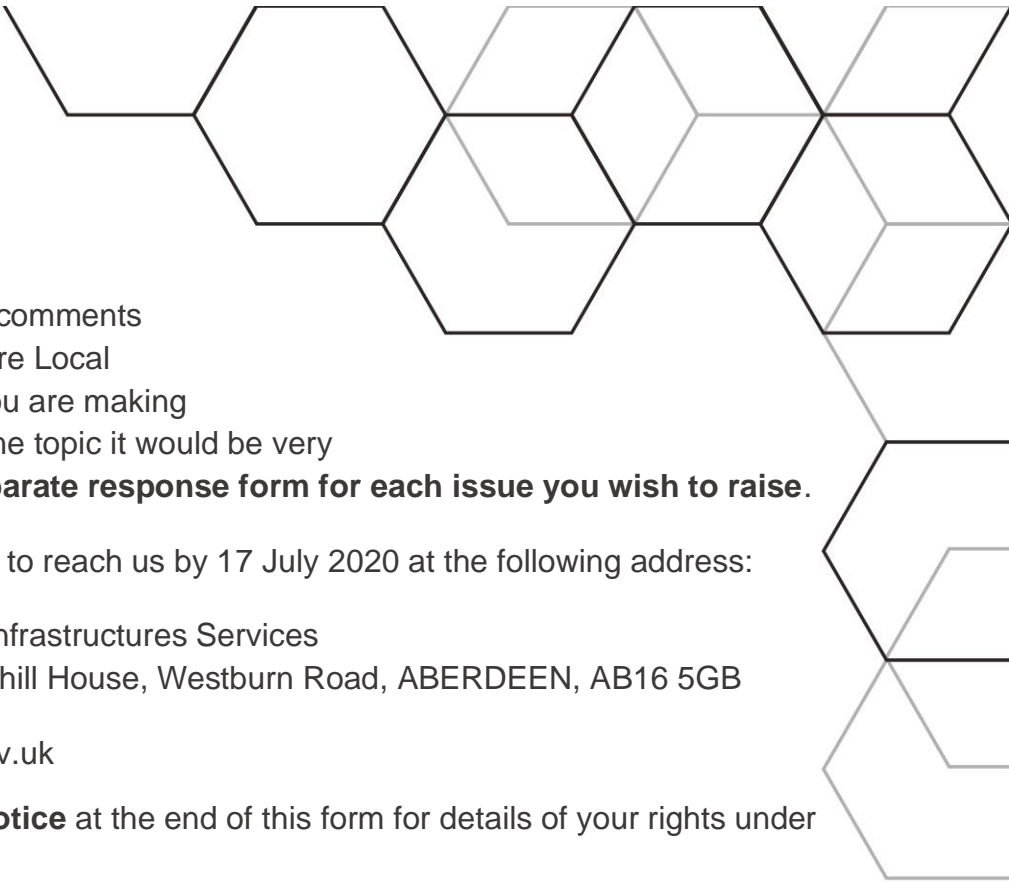
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

Ja jums nepieciešama šai dokumentā sniegtā informācija kādā citā valodā vai lielā drukā, viegli lasāmā tekstā, Braila rakstā vai BSL (britu zīmju valodā), lūdzu, zvaniet uz 01467 536230.

Aberdeenshire Local Development Plan  
Woodhill House, Westburn Road, Aberdeen, AB16 5GB

Tel: 01467 536230  
Email: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)  
Web: [www.aberdeenshire.gov.uk/ldp](http://www.aberdeenshire.gov.uk/ldp)  
Follow us on Twitter @ShireLDP

If you wish to contact one of the area planning offices, please call 01467 534333 and ask for the relevant planning office or email [planning@aberdeenshire.gov.uk](mailto:planning@aberdeenshire.gov.uk).



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

Please email or send the form to reach us by 17 July 2020 at the following address:

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

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

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

## YOUR DETAILS

Title:	
First Name:	Margaret
Surname:	Bochel
Date:	25 June 2020
Postal Address:	Aurora Planning Limited, [REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	[REDACTED]

Are you happy to receive future correspondence only by email? Yes  No

Are you responding on behalf of another person? Yes  No

If yes who are you representing? Gravitate North East

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

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

# YOUR COMMENTS

Please provide us with your comments below. We will summarise comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

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

For site R1, which is identified in the Durriss Forest Settlement Statement as reserved land to be safeguarded for outdoor recreation facilities associated with a sport/adventure centre, to be specifically allocated for the same development.

**Reason for change:**

Our client welcomes and supports the identification in the Proposed Local Development Plan of site R1 in the Durriss Forest Settlement Statement as "*Reserved Land*", to be "*Safeguarded for outdoor recreation facilities associated with a sport/adventure centre.*"

The requirement for a Phase 1 Habitat Survey and potential requirements for a Construction Method Statement and Flood Risk Assessment are also accepted, as are potential mitigation measures to minimise the impact of the development on the scheduled monument and to integrate the existing woodland and watercourses into the development as part of a future planning application.

It is recognised that the Council considers the reserved land designation as being "*...in line with Scottish Planning Policy by promoting an opportunity for tourism and recreation facilities*" and that, as such, this provides support for the proposed development. At the same time, the site being identified as reserved land does not provide the same presumption in favour of development as a specific allocation would do.

Whilst the Issues and Actions Papers – Kincardine and Mearns states that the Council "*...do not consider it appropriate to allocate a site which is neither residential nor business/employment land*", no justification is given as to why that is the case, with there being nothing in the regulations to prevent this. Indeed, there are examples throughout Scotland of sites identified in Local Development Plans for uses other than housing and employment, with allocations including uses such as retail, community uses, mixed use developments, tourism and recreation uses.

By safeguarding the site for the proposed use the Council has acknowledged that it is suitable for this type of development and has recognised the significance of providing support for the principle of development in this location in terms of helping its delivery, which is appreciated. However, given the emphasis in Scottish Planning Policy on the

need for local development plans to promote opportunities for tourism and recreation, as acknowledged by the Council, it would seem entirely appropriate for the site to be specifically allocated for that purpose. That is particularly so since the Proposed Aberdeen City and Shire Strategic Development Plan states that local development plans should “...consider opportunities to ensure the importance of sustainable tourism to the regional economy is properly recognised and safeguarded.” The most effective way of achieving that would be through the specific allocation of this site.

As such, our client would wish to see the “*Reserved Land*” status of the site be amended to a specific allocation for “Recreation facilities associated with a sport/adventure centre”.

Copies of our client’s responses to the call for sites and consultation on the Main Issues Report are also annexed here for reference.

# PRIVACY NOTICE

## LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

The Data Controller of the information being collected is Aberdeenshire Council.

The Data Protection Officer can be contacted at Town House, 34 Low Street, Banff, AB45 1AY.

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

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

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

### Your information is:

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

Personal Data	
Legal Obligations	X

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

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

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

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

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

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

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

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

Not applicable.

The retention period for the data is:

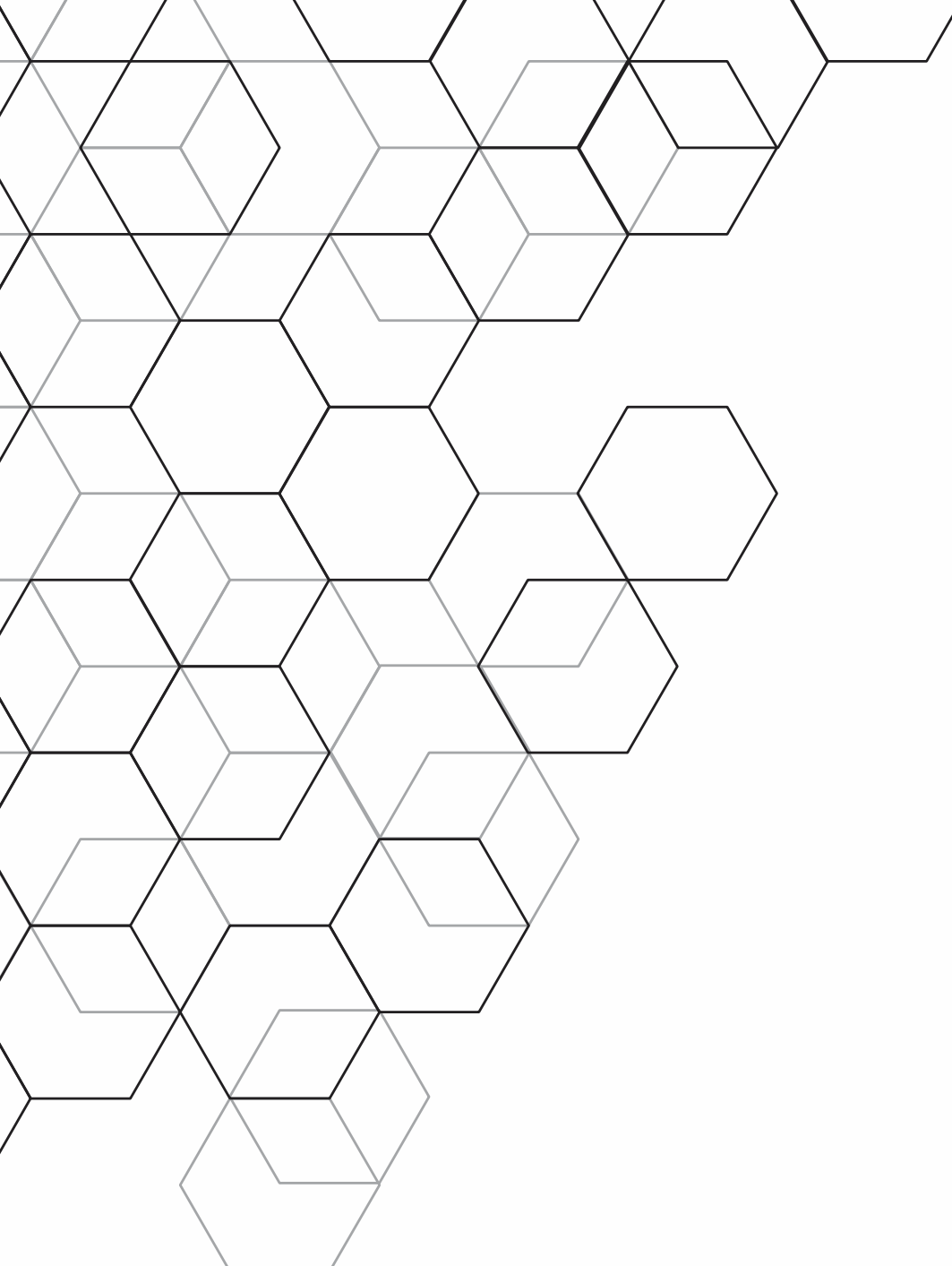
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue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

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

Not applicable.

Please note that you have the following rights:

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



# Local Development Plan 2021



## Call for Sites Response Form

Aberdeenshire Council would like to invite you to use this form to submit a site for consideration within the next Local Development Plan (LDP 2021) for the period 2021 to 2031. A separate form should be completed for each site you wish to submit.

This is not a speculative plan. It is a fresh 'call for sites', so please re-submit any sites that do not or are not expected to have planning permission by 2021.

In order for the bids to be fully assessed, it is crucial that the questions in the bid form are answered fully and concisely with clear evidence of deliverability. The submission of a supporting statement, often known as a paper apart, should be avoided, and only assessments, such as a Flood Risk Assessment that has already been undertaken, should be submitted in support of your proposed site.

Completed forms and Ordnance Survey "Landline" site maps should be returned by email to: [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk)

Alternatively, you can return the form and Ordnance Survey map by post to:  
Planning Policy, Infrastructure Services, Woodhill House, Westburn Road, Aberdeen AB16 5GB

**All forms must be submitted by 31 March 2018.**

### 1. Your Details

Name	██████████
Organisation (if applicable)	██████████
Address	██
Telephone number	██████████
Email address	████████████████████
Do you wish to subscribe to our newsletter?	No

### 2. If you are acting as an agent on behalf of a third party, please give their details

Name	
Organisation (if applicable)	
Address	
Telephone number	
Email address	

### 3. Other Owners

Please give name, organisation, address, email details of other owner(s) where appropriate:	The forest site we propose for our development is currently part of the National Forest Estate and is managed by ██████████ ████████████████████
Do these owners know this is being proposed for development?	Yes



**For data protection purposes, please complete the rest of this form on a new page**

#### 4. Site Details

Name of the site (Please use the LDP name if the site is already allocated)	Durriss
Site address	The site does not have a formal address
OS grid reference (if available)	Appriximate centre point of proposed site - NO 78014 92480
Site area/size	256 hectares
Current land use	Commercial woodland
Brownfield/greenfield	No
Please include an Ordnance Survey map (1:1250 or 1:2500 base for larger sites, e.g. over 2ha) showing the location and extent of the site, points of access, means of drainage etc.	

#### 5. Ownership/Market Interest

Ownership (Please list the owners in question 3 above)	Option to purchase  We are a community group and registered Scottish Charitable Incorporated Organisation – our option to purchase (or indeed lease) comes through the Community Empowerment Act and the associated Community Asset Transfer mechanism.
Is the site under option to a developer?	No
	If yes, please give details
Is the site being marketed?	No
	If yes, please give details

#### 6. Legal Issues

Are there any legal provisions in the title deeds that may prevent or restrict development? (e.g. way leave for utility providers, restriction on use of land, right of way etc.)	Yes
	If yes, please give details  There are potential way leaves on the borders of our proposed site and also permitted access to telecommunications infrastructure at the top of Cairn-mon-earn. However it is a very large site and our development would be low density meaning these features can be easily incorporated
Are there any other legal factors that might prevent or restrict development? (e.g. ransom strips/issues with accessing the site etc.)	Yes
	If yes, please give details  There is a private water supply to an adjacent property on our site.

#### 7. Planning History

	Yes
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Have you had any formal/informal pre-application discussions with the Planning Service and what was the response?	If yes, please give details We are currently in pre-app discussions with Aberdeenshire Council
Previous planning applications	Please provide application reference number(s), description(s) of the development, and whether planning permission was approved or refused:  <i>Ref number ENQ/2017/2199.</i> We are currently in pre-app discussion with Aberdeenshire Council regarding the development of an adventure sports development on the site which will include mountain bike trails, dry ski slopes, a hub building, car park and chairlift.
Previous 'Call for sites' history. See Main Issues Report 2013 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>	Please provide Previous 'Call for sites'/'Bid' reference number:
Local Development Plan status <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a>	Is the site currently allocated for any specific use in the existing LDP? No If yes, do you wish to change the site description and or allocation?

## 8. Proposed Use

Proposed use		Housing/employment/mixed use/other (please specify):
Housing	Approx. no of units	
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> <li>• Detached:</li> <li>• Semi-detached:</li> <li>• Flats:</li> <li>• Terrace:</li> <li>• Other (e.g. Bungalows):</li> </ul>
		Number of: <ul style="list-style-type: none"> <li>• 1 bedroom homes:</li> <li>• 2 bedroom homes:</li> <li>• 3 bedroom homes:</li> <li>• 4 or more bedroom homes:</li> </ul>
	Tenure (Delete as appropriate)	Private/Rented/Self-Build/Supported houses (e.g. for elderly)/Other (please specify):
	Affordable housing proportion	%
Employment	Business and offices	Indicative floor space: 1,000 m <sup>2</sup>
	General industrial	Indicative floor space: m <sup>2</sup>
	Storage and distribution	Indicative floor space: m <sup>2</sup>
	Do you have a specific occupier for the site?	Yes We would be the site owners/occupiers but may sub-let concessions such a catering and retail
Other	Proposed use (please specify) and floor space	m <sup>2</sup>

	Do you have a specific occupier for the site?	Yes/No
	Is the area of each proposed use noted in the OS site plan?	Yes/No/Not applicable

### 9. Delivery Timescales

We expect to adopt the new LDP in 2021. How many years after this date would you expect development to begin? (please tick)	0-5 years	X
	6-10 years	
	10+ years	
When would you expect the development to be finished? (please tick)	0-5 years	X
	6-10 years	
	+ 10years	
Have discussions taken place with financiers? Will funding be in place to cover all the costs of development within these timescales	No	
	If yes, please give details (e.g. bank facility, grant funding, secured loan etc.)	
Are there any other risk or threats (other than finance) to you delivering your proposed development	Yes	
	<p>If yes, please give details and indicate how you might overcome them:</p> <p>Planning Permission – we need planning permission to proceed. However we are working constructively with the Planning Service and have good community support. Thus we feel very positive about the likelihood of permission being granted.</p> <p>Community Asset Transfer – we need to be successful in the CAT process. The process is new and our project is much larger than other applications to Forestry Commission Scotland currently. However we have engaged very positively with FCS throughout the history of our project and have highly persuasive social, economic and environmental arguments in favour of us securing the land.</p>	

## 10. Natural Heritage

<p>Is the site located in or within 500m of a nature conservation site, or affect a protected species?</p> <p>Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> <li>• <a href="https://www.environment.gov.scot/">https://www.environment.gov.scot/</a></li> <li>• EU priority habitats at <a href="http://gateway.snh.gov.uk/sitelink/index.jsp">http://gateway.snh.gov.uk/sitelink/index.jsp</a></li> <li>• UK or Local priority habitats at <a href="http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/">http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/</a></li> <li>• Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a></li> </ul>	RAMSAR Site	
	Special Area of Conservation	X
	Special Protection Area	
	Priority habitat (Annex I)	
	European Protected Species	X
	Other protected species	X
	Site of Special Scientific Interest	
	National Nature Reserve	
	Ancient Woodland	
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	X
	Priority habitat (UK or Local Biodiversity Action Plan)	
	Local Nature Conservation Site	
	Local Nature Reserve	
	<p>If yes, please give details of how you plan to mitigate the impact of the proposed development:</p> <p>Our site is currently a large commercial managed woodland predominately composed of exotic conifer species.</p> <p>Although not within the 500m boundary, our site it in the catchment of the River Dee SAC. We strongly recognise the need to protect this feature. The predominant threat from our development would be sediment run-off during the construction phase. We would detail sediment control measures in a construction management plan – the specific of which would be implements during site construction.</p> <p>As a large woodland site there is the potential for the presence of a number of EPS or indeed other protected or notable species. Red squirrel are certainly present, there is the potential for badgers particularly in the site margins adjacent to farmland, raptor species have been known to breed in the forest and Pine marten are also present. Thus the delivery of our development will be informed by appropriate survey work and mitigation for all relevant species. Indeed we feel we can enhance the woodland for these and other species (see below).</p>	
<b>Biodiversity enhancement</b>		
Please state what benefits for biodiversity this proposal will bring (as per paragraph	Restoration of habitats	X
	Habitat creation in public open space	

<p>194 in Scottish Planning Policy), <a href="http://www.gov.scot/Resource/0045/00453827.pdf">http://www.gov.scot/Resource/0045/00453827.pdf</a>) by ticking all that apply. Please provide details.</p> <p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: <a href="http://www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf">www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</a></p> <p>Advice is also available from Scottish Natural Heritage at: <a href="https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers">https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers</a> and <a href="http://www.nesbiodiversity.org.uk/">http://www.nesbiodiversity.org.uk/</a>.</p>	Avoids fragmentation or isolation of habitats	
	Provides bird/bat/insect boxes/Swift bricks (internal or external)	
	Native tree planting	X
	Drystone wall	
	Living roofs	
	Ponds and soakaways	
	Habitat walls/fences	
	Wildflowers in verges	
	Use of nectar rich plant species	
	Buffer strips along watercourses	
	Show home demonstration area	
	Other (please state):	
	<p>Please provide details:</p> <p>No formal plan for environmental enhancement has been created for the site and the site has not yet had an ecological survey. However a strong focus of our project is environmental enhancement. As stated the site is currently commercial woodland and there are a range of species associated with it. However we feel we can improve on the biodiversity value of the site through the diversification of habitats on site as well as specific support for notable species. Our initial thoughts include specific work targeted at supporting the Red squirrel population in the forest – the site is known to be important for this species. However a wide range of other enhancement measures could be delivered as informed by an initial ecological survey</p>	

## 11. Historic environment

Historic environment enhancement		
Please state if there will be benefits for the historic environment.	No If yes, please give details:	
<p>Does the site contain/is within/can affect any of the following historic environment assets? Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> <li><a href="http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d">http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d</a></li> <li><a href="http://portal.historicenvironment.scot/">http://portal.historicenvironment.scot/</a></li> <li><a href="https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire">https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire</a></li> </ul>	Scheduled Monument or their setting	
	Locally important archaeological site held on the Sites and Monuments Record	X
	Listed Building and/or their setting	
	Conservation Area (e.g. will it result in the demolition of any buildings)	
	Inventory Gardens and Designed Landscapes	
	Inventory Historic Battlefields	
	<p>If yes, please give details of how you plan to mitigate the impact of the proposed development</p> <p>The only feature of archaeological interest we are aware of adjacent to our site is the summit bronze age burial cairn at the top of Cairn-mon-earn. The area in which the cairn is located is actually out with the National Forest Estate and is likely to be in the ownership of the operators of the telecommunications equipment on this hill top. Thus we would not own the land on which the feature is located. However our development will bring many more people to this hill top and thus we will need to work with the Archaeology Service within Aberdeenshire Council and the site owners to ensure the feature is not impacted. It is noted that the site is already damaged by a trig point and by public access,</p>	

## 12. Landscape Impact

Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> )	No If yes, please state which SLA your site is located within and provide details of how you plan to mitigate the impact of the proposed development:
SLAs include the consideration of landscape character elements/features. The characteristics of landscapes are defined in the Landscape Character Assessments produced by Scottish Natural Heritage (see below) or have been identified as Special Landscape Areas of local importance.	If your site is not within an SLA, please use this space to describe the effects of the site's scale, location or design on key natural landscape elements/features, historic features or the composition or quality of the landscape character:

<ul style="list-style-type: none"> <li>• SNH: Landscape Character Assessments <a href="https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment">https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment</a></li> <li>• SNH (1996) Cairngorms landscape assessment <a href="http://www.snh.org.uk/pdfs/publications/review/075.pdf">http://www.snh.org.uk/pdfs/publications/review/075.pdf</a></li> <li>• SNH (1997) National programme of landscape character assessment: Banff and Buchan <a href="http://www.snh.org.uk/pdfs/publications/review/037.pdf">http://www.snh.org.uk/pdfs/publications/review/037.pdf</a></li> <li>• SNH (1998) South and Central Aberdeenshire landscape character assessment <a href="http://www.snh.org.uk/pdfs/publications/review/102.pdf">http://www.snh.org.uk/pdfs/publications/review/102.pdf</a></li> </ul>	<p>Initial designs for our site as identified in the feasibility study for our project have taken in to account views and potential landscape impacts of the development. Although a development within woodland, it will not require significant tree loss being predominately composed of bike trails sited within the trees. Larger features such as the hub building and the dry ski slope can also be designed in a way to minimise tree loss and to be effectively screened. Our chair lift will also require minimal tree loss – it will be located in a corridor of trees reaching up to Cairn-mon-earn summit. The landform here also screens the development.</p>
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### 13. Flood Risk

<p>Is any part of the site identified as being at risk of river or surface water flooding within SEPA flood maps, and/or has any part of the site previously flooded?</p> <p>(You can view the SEPA flood maps at <a href="http://map.sepa.org.uk/floodmap/map.htm">http://map.sepa.org.uk/floodmap/map.htm</a>)</p>	<p>No</p> <p>If yes, please specify and explain how you intend to mitigate this risk:</p>
<p>Could development on the site result in additional flood risk elsewhere?</p>	<p>No</p> <p>If yes, please specify and explain how you intend to mitigate or avoid this risk:</p>
<p>Could development of the site help alleviate any existing flooding problems in the area?</p>	<p>No</p> <p>If yes, please provide details:</p>

### 14. Infrastructure

<b>a. Water / Drainage</b>		
<p>Is there water/waste water capacity for the proposed development (based on Scottish Water asset capacity search tool <a href="http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search">http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search</a>)?</p>	<p>Water</p>	<p>Yes/No</p> <p>Yet to be determined</p>
	<p>Waste water</p>	<p>Yes/No</p> <p>Yet to be determined</p>
<p>Has contact been made with Scottish Water?</p>	<p>No</p> <p>If yes, please give details of outcome:</p>	
<p>Will your SUDS scheme include rain gardens? <a href="http://www.centalscotlandgreenetwork.org/campaigns/greener-gardens">http://www.centalscotlandgreenetwork.org/campaigns/greener-gardens</a></p>	<p>Yes/No</p> <p>Please specify:</p> <p>Yet to be determined</p>	
<b>b. Education – housing proposals only</b>		

Education capacity/constraints <a href="https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/">https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/</a>	Please provide details of any known education constraints. Is additional capacity needed to serve the development?
Has contact been made with the Local Authority's Education Department?	Yes/No If yes, please give details of outcome:
<b>c. Transport</b>	
If direct access is required onto a Trunk Road (A90 and A96), or the proposal will impact on traffic on a Trunk Road, has contact been made with Transport Scotland?	Yes/No If yes, please give details of outcome:  No trunk road impacts
Has contact been made with the Local Authority's Transportation Service? They can be contacted at <a href="mailto:transportation.consultation@aberdeenshire.gov.uk">transportation.consultation@aberdeenshire.gov.uk</a>	No If yes, please give details of outcome:
Public transport	Please provide details of how the site is or could be served by public transport:  There is currently no public transport provision to the site
Active travel (i.e. internal connectivity and links externally)	Please provide details of how the site can or could be accessed by walking and cycling:  The forest is heavily used by both walkers and cyclists. However there are no non-public road links to any major towns.
<b>d. Gas/Electricity/Heat/Broadband</b>	
Has contact been made with the relevant utilities providers?	Gas: No If yes, please give details of outcome(s):
	Electricity: No If yes, please give details of outcome(s):
	Heat: No If yes, please give details of outcome(s):
	Broadband: No If yes, please give details of outcome(s):
Have any feasibility studies been undertaken to understand and inform capacity issues?	No Please specify:
Is there capacity within the existing network(s) and a viable connection to the network(s)?	Yes/No Please specify:  Unknown
Will renewable energy be installed and used on the site?	Don't know If yes, please specify the type of renewable energy technology(s), if it is to provide



For example, heat pump (air, ground or water), biomass, hydro, solar (photovoltaic (electricity) or thermal), or a wind turbine (freestanding/integrated into the building)	electricity and/or heating (i.e. space heating and/or hot water), and the scale of provision (To supplement off-site connection all the way to 100% energy provision (off-grid)):  It is a strong desire of our project to have renewable energy elements. We will own and manage a woodland so option related to biomass would be most likely.
<b>e. Public open space</b>	
Will the site provide the opportunity to <b>enhance the green network?</b> (These are the linked areas of open space in settlements, which can be enhanced through amalgamating existing green networks or providing onsite green infrastructure)  You can find the boundary of existing green networks in the settlement profiles in the LDP	Yes/No Please specify:  Not relevant to this development although encouraging public access on our site is a key aim.
Will the site meet the open space standards, as set out in Appendix 2 in the <b>Aberdeenshire Parks and Open Spaces Strategy?</b> <a href="https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf">https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf</a>	Yes/No Please specify:
Will the site deliver any of the shortfalls identified in the <b>Open Space Audit</b> for specific settlements? <a href="https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/">https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/</a>	Yes/No/Not applicable Please specify:
<b>f. Resource use</b>	
Will the site re-use existing structure(s) or recycle or recover existing on-site materials/resources?	Yes If yes, please specify:  There is the potential to use on site timber in the construction of elements of our development.
Will the site have a direct impact on the water environment and result in the need for watercourse crossings, large scale abstraction and/or culverting of a watercourse?	Yes If yes, please provide details:  It is possible that we will need to access water if there is no network connection. There is currently a private water supply (to an adjacent property) on our site although the capacity of this is unknown.

## 15. Other potential constraints

Please identify whether the site is affected by any of the following potential constraints:

Aberdeen Green Belt <a href="https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf">https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf</a>	No
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Carbon-rich soils and peatland <a href="http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/">http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/</a>	No
Coastal Zone <a href="https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf">https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf</a>	No
Contaminated land	Unknown
Ground instability	Unknown
Hazardous site/HSE exclusion zone (You can find the boundary of these zones in Planning Advice 1/2017 Pipeline and Hazardous Development Consultation Zones at <a href="https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/">https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/</a> and advice at <a href="http://www.hse.gov.uk/landuseplanning/developers.htm">http://www.hse.gov.uk/landuseplanning/developers.htm</a> )	No
Minerals – safeguarded or area of search <a href="https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf">https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf</a>	No
Overhead lines or underground cables	Unknown
Physical access into the site due to topography or geography	No
Prime agricultural land (grades 1, 2 and 3.1) on all or part of the site. <a href="http://map.environment.gov.scot/Soil_maps/?layer=6">http://map.environment.gov.scot/Soil_maps/?layer=6</a>	No
'Protected' open space in the LDP (i.e. P sites) <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a> and choose from Appendix 8a to 8f	No
Rights of way/core paths/recreation uses	No
Topography (e.g. steep slopes)	No
Other	No (please specify)
If you have identified any of the potential constraints above, please use this space to identify how you will mitigate this in order to achieve a viable development:	

**16. Proximity to facilities**

How close is the site to a range of facilities? *Delete as appropriate	Local shops	400m	400m-1km	>1km
	Community facilities (e.g. school, public hall)	400m	400m-1km	>1km
	Sports facilities (e.g. playing fields)	400m	400m-1km	>1km
	Employment areas	400m	400m-1km	>1km
	Residential areas	400m	400m-1km	>1km
	Bus stop or bus route	400m	400m-1km	>1km
	Train station	400m	400m-1km	>1km
	Other, e.g. dentist, pub (please specify)	400m	400m-1km	>1km

**17. Community engagement**

Has the local community been given the opportunity to influence/partake in the design and specification of the development proposal?	Yes/No/Not yet
	If yes, please specify the way it was carried out and how it influenced your proposals:
	If not yet, please detail how you will do so in the future:  We have met with the Community Council as well as a community group attached to the forest. We are in the process of arranging a community consultation exercise in conjunction with the Community Council, which will include a leafletting campaign and an invitation to a public meeting to talk through the proposals. All comments received will be recorded and used to shape the project.

**18. Residual value and deliverability**

Please confirm that you have considered the 'residual value' of your site and you are confident that the site is viable when infrastructure and all other costs, such as constraints and mitigation are taken into account.	I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable:  Please tick: <input checked="" type="checkbox"/>
If you have any further information to help demonstrate the deliverability of your proposal, please provide details.	

### 19. Other information

Please provide any other information that you would like us to consider in support of your proposed development (please include details of any up-to-date supporting studies that have been undertaken and attach copies e.g. Transport Appraisal, Flood Risk Assessment, Drainage Impact Assessment, Peat/Soil Survey, Habitat/Biodiversity Assessment etc.)

Please tick to confirm your agreement to the following statement:

By completing this form I agree that Aberdeenshire Council can use the information provided in this form for the purposes of identifying possible land for allocation in the next Local Development Plan. I also agree that the information provided, other than contact details and information that is deemed commercially sensitive (questions 1 to 3), can be made available to the public.



## Aberdeenshire Local Development Plan 2021

### Call for sites response – Durris Forest

Our client, [REDACTED], wishes 256ha of land at Durris Forest to be allocated in the Aberdeenshire Local Development Plan 2021 for a mountain biking, snow sports and adventure centre and associated facilities. Details of the site and an outline of the proposed development are set out in the Call for Sites Response Form. This paper provides further information in terms of the wider policy context that supports the allocation of the site.

#### Background

Mountain biking is estimated to contribute £149m directly to the Scottish economy per annum, supporting nearly 4,500 FTE jobs (Developing Mountain Biking in Scotland, 2016-18), with additional indirect benefits including, for example, improved mental and physical health. Mountain bikers spend 466,000 nights away from home in Scotland each year, spending an average of £355 per trip (Visit Scotland, 2017).

Whilst other parts of Scotland are able to benefit from the value that mountain biking brings, there are no large scale (greater than 10km of trails) purpose built formal mountain bike facilities in the north east. [REDACTED] has produced a comprehensive feasibility report for the creation of a new high-quality mountain biking, snow sports, and adventure centre to fill that gap, including examining three possible locations for such a centre, identified after an extensive search. The proposed centre would include associated facilities, such as a café, bike shop, bike wash, bike/ski lift, accommodation, mountain bike coaching/performance development, other outdoor learning opportunities, snow sports and multuse footpaths for, for example, dog walking, orienteering and geocaching. The feasibility study concluded that the land at Durris Forest was the optimal location and that a facility here would generate in the order of £1.83m to £2.39m per annum, supporting 35 to 45 jobs in the area.

The allocation of the land at Durris Forest for such a facility would therefore bring significant economic and environmental benefits, with this being supported by both local and national government policy as set out before.



## Contribution to economic development

**National Planning Framework 3** (NPF3) is the spatial expression of the Government Economic Strategy, and of the Scottish Government's plans for development and investment in infrastructure. Statutory development plans must have regard to NPF3, and Scottish Ministers expect planning decisions to support its delivery.

Importantly in relation to this submission, NPF3 recognises tourism as one of the key economic sectors for Scotland, and for the north east, and highlights significant opportunities for tourism, outdoor sports and recreation in rural Scotland. It would, therefore be expected that proposals for tourism facilities would be look on positively in the preparation of the emerging Local Development Plan.

That is reinforced by **Scottish Planning Policy** (2014) (SPP) which requires the planning system to:

- promote business development that increases economic activity while safeguarding and enhancing the natural and built environments;
- allocate sites that meet the diverse needs of the different sectors and sizes of business which are important to the plan area in a way which allows for the realisation of new opportunities; and
- give due weight to net economic benefit.

In relation to development planning specifically, SPP highlights the need for plans to align with relevant local economic strategies and, with tourism identified as one of four key sectors in which there are opportunities for growth, to be informed by the Tourism Development Framework for Scotland. Planning authorities are then expected to consider the potential to promote opportunities for tourism and recreation facilities in their development plans. Both the Aberdeen City and Shire Regional Economic Strategy and the Tourism Development Framework for Scotland encourage the development of outdoor sports facilities and, in particular mountain bike facilities, as set out below:

- **Regional Economic Strategy – December 2015**

The Regional Economic Strategy is rooted in making the North East region a more attractive place in which to live, work and invest. The vision to 2035 includes capitalising on natural heritage and broadening the region's economic base by growing and developing key sectors, including tourism. In this regard it is highlighted that the **Aberdeen City and Shire Tourism Partnership Strategy** aims to increase



visitor spend from £340m in 2013 to £440-£510m by 2020, with outdoor activities and sports being identified as an important area to contribute to that increase.

- **Tourism Development Framework for Scotland**

In looking at outdoor activities in general, the Tourism Development Framework for Scotland then expressly identifies potential to appeal to the mountain bike community through continued investment in track provision and maintenance, with additional opportunities around supporting infrastructure, such as visitor centres, specialist retail, catering and accommodation. Accordingly, the Framework's actions include encouraging development planning authorities to consider the potential for cycling infrastructure facilities to meet the wider tourism market.

The Framework also makes reference to the **National Strategic Framework on the Sustainable Development of Mountain Biking in Scotland** which was refreshed for **2016 – 2018**. Gaps within the geographic distribution of trail centres is the top issue identified in that Framework for developing mountain biking in Scotland, and it specifically indicates that Aberdeenshire would be of the highest priority in this regard.

If the emerging LDP is to be informed by the Tourism Development Framework for Scotland, as required by SPP, then the identified lack of a trail centre in Aberdeenshire strongly supports the allocation of our client's site for this purpose.

Returning to the SPP policy principles cited above, these are reflected in the Main Issues Report (MIR) for the current review of the **Aberdeen City and Shire Strategic Development Plan** (SDP), which recognises tourism as one of the four economic sectors with the greatest potential over the next 20 years. As such the Preferred Option for tourist development is for the new plan to clearly recognise that long-term proposals for tourism need to be dealt with sympathetically through the planning system.

At the same time, the Preferred Option for the overarching SDP vision is for the vision to expressly include a reference to tourism, given its importance to the region, such that the vision will read that the region will be recognised for *“our enterprise and inventiveness, particularly in the knowledge economy and in high-value markets – with a particular focus on energy, bio-pharmaceuticals, **tourism** and food, drink and primary industries”* (emphasis added).

The allocation of a site specifically for a mountain biking centre with associated facilities would clearly be consistent with the above policy support for economic development in the form of tourist facilities in general, and outdoor sports facilities, such as mountain bike trails and related facilities, in particular.



## Environmental enhancement

The proposed mountain biking, snow sports and adventure centre would not only offer economic benefits but also provide opportunities for increased enjoyment of the natural environment, as well as enhancement thereof. In this regard, SPP clearly states that:

*“The environment is a valued national asset offering a wide range of opportunities for enjoyment, recreation and sustainable economic activity. Planning plays an important role in protecting, enhancing and promoting access to our key environmental resources, whilst supporting their sustainable use.”*

It then sets out the policy principles relating to the environment, in terms of which it is stated that the planning system should, amongst other things:

- facilitate positive change while maintaining and enhancing distinctive landscape character;
- seek benefits for biodiversity from new development where possible; and
- support opportunities for enjoying and learning about the natural environment.

SPP also aims to maximise the benefits of green infrastructure and considers it to be an integral element of place making, helping build stronger, healthier communities, and encouraging investment and development. Accordingly, local development plans are expected to seek to enhance existing green infrastructure through a design-led approach, and to identify sites for new facilities.

Having carried out a desk study of habitats and designated sites it is recognised that a tributary of the River Dee Special Area of Conservation runs approximately 500m to the north of the proposed site. The area also contains evidence of some, but limited, important species (red squirrels, pipistrelles, buzzards, kestrel and short eared owls). Safeguarding measures would, therefore, be required during construction but it is anticipated that effects would be negligible. And indeed there are opportunities to enhance the natural environment and biodiversity through new planting and a proactive management regime.

The allocation of this site for a new mountain biking, snow sports and adventure centre would make an obvious contribution to encouraging more people to use and experience the green network, in accordance with SPP.





## Alignment with Local Outcome Improvement Plan

The Planning (Scotland) Bill issued in 2017 includes a new requirement for local development plans to take into account the local outcome improvement plan for the plan area. This is to ensure better alignment with wider activities and objectives and the contribution of development plans to achieving the wider vision for an area. Whilst recognising that this provision is not yet a statutory requirement, given the timescale for the preparation of the new local development plan, and the positive sentiment behind the proposals, it would seem sensible for this review of the plan to make such a linkage.

In that regard **Aberdeenshire's Local Outcomes Improvement Plan 2017-2027** includes as a priority connected and cohesive communities. It embraces connectivity in its broadest sense, including social interactions and access to services. And in relation to cohesive communities it makes reference to addressing all forms of socio-economic inequalities, including health outcomes. It is also aligned to a number of the Scottish Government's National Outcomes, including that:

- We live in well-designed, sustainable places where we are able to access the amenities and services we need; and
- We value and enjoy our built and natural environment and protect it and enhance it for future generations.

It is clear that the development of a mountain biking centre with associated facilities would contribute to achieving these outcomes, and hence the allocation of a site for such a centre would demonstrate that the Council has taken account of the local outcome improvement plan, as well as contributing to delivering national outcomes. That is particularly so given that it is increasingly recognised that, because access to the countryside is generally free or low-cost, there are fewer barriers to entry for those from lower socio-economic groups, meaning that amenities such as mountain biking trails can help to reduce health inequalities.

## Spatial strategy

Finally, in terms of the location of the proposed allocation, the policy principles of SPP include that the planning system should:

*“encourage rural development that supports prosperous and sustainable communities and business whilst protecting and enhancing environmental quality.”*



Development plans are then required to:

- set out a spatial strategy which reflects the development pressures, environmental assets, and economic needs of the area, reflecting the overarching aim of supporting diversification and growth of the rural economy;
- promote economic activity and diversification, including, where appropriate, sustainable development linked to tourism and leisure, forestry and other activities, while ensuring that the distinctive character of the area and its natural and cultural heritage are protected and enhanced; and
- consider the services provided by the natural environment.

The site at Durriss was selected as the preferred location for the mountain biking, snow sports and adventure centre based on a range of criteria. These are set out in detail in the feasibility report, but in summary they include factors such as the physical nature of the sites, but also the ease of access for visitors (including tourists), the visual impact, the potential impact on a commercial forest, environmental impacts and the ability of the site to be designed and planned to maximise economic, environmental and social outcomes. Durriss is considered particularly suitable for the following reasons:

- it includes a good mix of gradients and ability to provide longer cross-country routes, ensuring all levels of mountain bikers and skiers can enjoy the centre;
- ground conditions are generally good and the existence of a worked quarry on the site will facilitate construction;
- there is an obvious location for the hub facilities with stunning views which can be enjoyed by non-mountain bikers and skiers, and pick up passing trade from the Slug Road;
- there is easy access to site for visitors from both the Slug Road and the South Deeside Road and its proximity to the Deeside Way provide potential to attract additional visitors;
- visual impact will be minimal given the current plantation forest use, surrounding hills and existing pylon line and masts at the summit of Cairn-mon-earn;
- the summits of Cair-mon-earn and Mundernal provide stunning views across Aberdeenshire, which will be a significant attraction to both mountain bikers/skiers and other visitors; and



- there are limited identified species of interest in the forest and limited existing use of the area for recreational purposes.

Allocation of the proposed site would clearly encourage rural development, as advocated by SPP, whilst also protecting and enhancing environmental assets, as set out above. At the same time, again as set out in more detail above, this would allow diversification of the rural economy, support sustainable development linked to tourism, and show consideration to the services provided by the natural environment, all as also advocated by SPP. Further information in this regard is provided in the feasibility study which has been commissioned by [REDACTED], and which demonstrates the site's ability to deliver the benefits outlined, as supported by relevant policy principles.

## **Conclusion**

For the reasons given in the Call for Sites Response Form and this paper apart it is submitted that the allocation of the proposed site for a mountain biking, snow sports and adventure centre and associated facilities would help meet an identified demand for such facilities in the area, bringing clear economic, environmental and social benefits. As such, it is submitted that the site should be allocated accordingly.



## **Aberdeenshire Local Development Plan 2021: Main Issues Report 2019 Main Issues Report Response Form**

### **Important Information: Please Read**

The Main Issues Report (MIR) is a key stage in preparing the Aberdeenshire Local Development Plan 2021 (LDP 2021). The MIR sets out options for how the LDP 2021 could be improved both in terms of the policies that Aberdeenshire Council will use to determine planning applications as well as identifying land allocations for development. The MIR has been published along with a Monitoring Report and Interim Environmental Report of the Strategic Environmental Assessment. These, along with other supporting documents are available at: <https://www.aberdeenshire.gov.uk/planning/plans-and-policies/ldp-2021/main-issues-report/>.

**Comments are sought on the MIR and Interim Environmental Report, or indeed any other matter that you feel that we need to consider, by 5pm on Monday, 8 April 2019.** Responses can be emailed to us at [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk) or received via post, Planning Policy Team, Infrastructure Services, Aberdeenshire Council, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

Please note that in order for comments to be considered as valid you must include your contact details.

We will use these details to confirm receipt of your comments and to seek clarification or request further information as required. Should you have any concerns regarding the holding of such information please contact [ldp@aberdeenshire.gov.uk](mailto:ldp@aberdeenshire.gov.uk). Anonymous comments will not be considered as part of the consultation process. Petitions will only be noted in the name of the person submitting the document.

All comments received will be carefully assessed and will be used to inform the preparation of the Proposed Aberdeenshire Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in December 2019.

<b>Name</b>	██████████
<b>Organisation (optional)</b>	Aurora Planning Limited
<b>On behalf of (if relevant)</b>	Gravitate North East
<b>Address</b>	████████████████████
<b>Postcode</b>	██████████
<b>Telephone (optional)</b>	██████████
<b>E-mail (optional)</b>	██████████████████



Doing things digitally is our preference. Tick the box if you are not happy to receive correspondence via email:

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

## Fair processing notice

Please tick to confirm your agreement to the following statements:

By submitting a response to the consultation, I agree that Aberdeenshire Council can use the information provided in this form, including my personal data, as part of the review of the Aberdeenshire Local Development Plan. This will include consultation on the Main Issues Report (including any subsequent Proposed Plan).

I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

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

### Your Data, Your Rights

You have got legal rights about the way Aberdeenshire Council handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data.

If you are unhappy with the way that Aberdeenshire Council or the Joint Data Controllers have processed your personal data then you do have the right to complain to the Information Commissioner's Officer, but you should raise the issue with the Data Protection Officers first. The Data Protection Officers can be contacted by writing to:

- [REDACTED], Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

If you have difficulty understanding this document and require a translation, or you need help reading this document (for example if you need it in a different format or in another language), please phone us on 01467 536230.

<b>Which document(s) are you committing on?</b>	Main Issues Report	<input checked="" type="checkbox"/>
	Draft Proposed Aberdeenshire Local Development Plan	<input checked="" type="checkbox"/>
	Strategic Environmental Assessment Interim Environmental Assessment	<input type="checkbox"/>
	Other	<input type="checkbox"/>

## Your comments

### KN129 Land at Durriss Forest, East of Darnford, Durriss, Sports/Adventure Centre

Our client supports the identification of this site as “*reserved land*” for a regional mountain bike centre with associated facilities, agrees that any sensitivities can be effectively managed through the planning process, and accepts the need for a Phase 1 Habitat Survey to be prepared in support of a future planning application.

The description of the site on the interactive map as a “*Sports/Adventure Centre*” and in the Draft Proposed Plan as being “*Safeguarded for outdoor recreation facilities associated with a sport/adventure centre*” is also welcomed. That wording provides flexibility to accommodate a range of adventure sports without restricting it to being a “*mountain bike centre*” only, as suggested in the overview of the Kincardine and Mearns Landward Sites, Durriss Forest section of the Kincardine and Mearns Appendix (Part 2) of the MIR. That description has the potential to limit the viability of the proposed development and, consequently also limit its potential both to deliver the associated economic, social and environmental benefits in full, and to contribute to meeting many of the LDP and other Council objectives.

At the same time, our client wishes to see the site specifically allocated for the proposed use, rather than being a reserved site. Officers have acknowledged that the site is suitable for this type of development and have recognised the significance of providing support for the principle of development in this location in terms of helping its delivery; that recognition is appreciated. However, whilst accepting that other sites exist that could provide similar opportunities, our client has carried out a robust assessment of alternative sites in the north east, with Durriss identified as the most suitable location for the following reasons:

- it includes a good mix of gradients and ability to provide longer cross-country routes, ensuring all levels of mountain bikers and skiers can enjoy the centre;
- ground conditions are generally good and the existence of a worked quarry on the site will facilitate construction;
- there is an obvious location for the hub facilities with stunning views which can be enjoyed by non-mountain bikers and skiers, and pick up passing trade from the Slug Road;
- there is easy access to the site for visitors from both the Slug Road and the South Deeside Road and its proximity to the Deeside Way provides potential to attract additional visitors;
- visual impact will be minimal given the current plantation forest use, surrounding hills and existing pylon line and masts at the summit of Cairn-mon-earn;
- the summits of Cair-mon-earn and Mundernal provide stunning views across Aberdeenshire, which will be a significant attraction to both mountain bikers/skiers and other visitors; and

## Your comments (continued)

- there are limited identified species of interest in the forest and limited existing use of the area for recreational purposes.

In addition, Scottish Planning Policy (SPP) highlights the need for local development plans to be informed by the Tourism Development Framework for Scotland, with planning authorities expected to consider the potential to promote opportunities for tourism and recreation facilities in development plans. The vision of the Proposed Aberdeen City and Shire Strategic Development Plan (SDP) then includes a specific reference to a focus on tourism and, in setting out the SDP's objective for the economy, states that local development plans should *"...consider opportunities to ensure the importance of sustainable tourism to the regional economy is properly recognised and safeguarded."*

If the LDP is to comply with the aspirations of SPP and contribute to achieving the objectives of the SDP, then the specific allocation of a site for a use which will make a significant contribution to tourism would be entirely appropriate, rather than being considered only in a policy context as proposed in the MIR.

As such our client would wish to see the *"Reserved Land"* status of the site be amended to an allocation in the Proposed Plan.

Further details are provided in our client's response to the Call for Sites and the feasibility study submitted with that.