

# 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 31 July 2020\*.

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

*\*UPDATE 16 June 2020: Consultation period was extended from 17 July 2020 for a further two-week period.*



## 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.

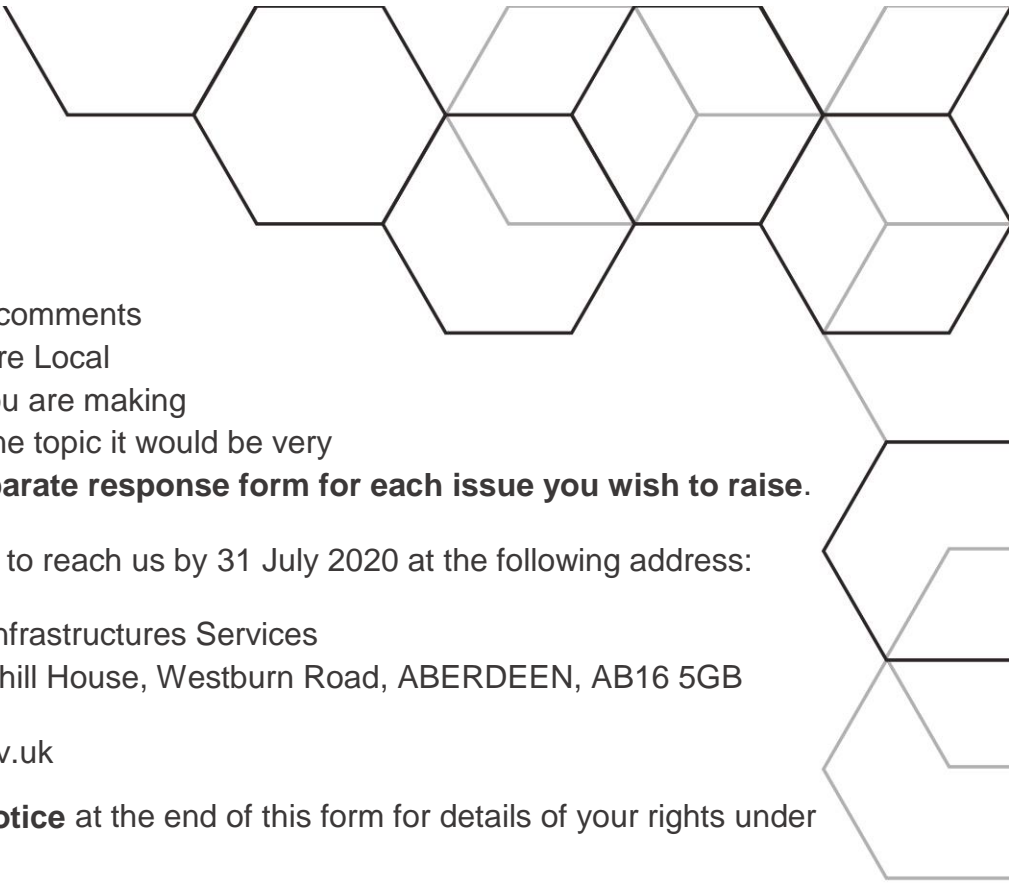
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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 31 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:	Mrs
First Name:	Claire
Surname:	Coutts
Date:	7 July 2020
Postal Address:	Ryden LLP, [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?

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):

On behalf of Marshall Farms Ltd, support is given to the identification of OP1 on page 531 of the Proposed Plan. This identifies 240 homes on land at Caskieben, Blackburn. It is requested that OP1: Caskieben in Blackburn continues to be identified for 240 homes in the Local Development Plan.

## Reason for change:

### Background

An initial development bid was submitted for the site to Aberdeenshire Council on 28th March 2018 (Appendix 1) on behalf of Marshall Farms Ltd. This considered that the site had the potential to accommodate up to 150 houses, an increase from that identified in the 2017 Local Development Plan. This increase was possible as part of the site was no longer required for a primary school.

The Main Issues Report (MIR) was published in January 2019, which identified the site as GR087 and an Officer's preference for development. Officer's increased the capacity of the site from the 150 contained in the Main Issues Report to 268. The overview stated that the **"examination of the LDP 2017 found that site OP1 would be capable of accommodating a greater scale of development than that of the current allocation"**. It went onto highlight that site p5 was previously allocated for a replacement primary school, but as that has now been delivered without the need for use of site p5, that designation would be removed from the 2021 LDP.

The Draft Proposed Local Development Plan (DPLDP) subsequently amalgamated the previous OP1 and P5 sites into one OP1 site for 268 homes.

A representation (Appendix 2) was submitted to the Main Issues Report supporting the identification of the site as an Officer's preference for development and its subsequent identification in the DPLDP for 268 homes. This representation should therefore be read in conjunction with the development bid submitted for the site at the pre-MIR stage, along with the MIR representation which together demonstrate that the continued identification of the site for residential development in the Local Development Plan is appropriate.

### Justification

The vision for Blackburn acknowledges that the location of the settlement, in close proximity to Aberdeen City, has contributed to the attractiveness of the settlement as a place live. Although this has placed pressure on existing facilities, a new primary school was delivered in 2018. It also benefits from an industrial estate offering employment opportunities.

As such, there is a clear demand for further housing within Blackburn, as supported by Aberdeenshire Council in the identification of this site for an increased density of 240 units compared with the 150 units contained in the initial bid submitted to Aberdeenshire Council. The

identification of OP1 at Caskieben is the most appropriate location for housing within the settlement.

This site is already allocated for development within the 2017 Local Development Plan (LDP) and has therefore long been recognised as an appropriate location for development. As the primary school has now been delivered elsewhere it is appropriate to consider other appropriate uses for that part of the site. The extension of the OP1 designation within the Proposed Plan, to cover the previous P5 site is therefore welcomed.

Although the Proposed Plan reduces the density of development from that considered suitable in the MIR and DPLFP, it continues to be increased from the density contained in the initial development bid and this is also supported going forward. Support for an increased density is found in the examination of the 2017 LDP which found that site OP1 would be capable of accommodating a greater scale of development than the current 50 unit allocation.

In addition to this, there is increased capacity within the school to absorb a higher number of houses on the site. The Reporter to the 2017 LDP examination supported this by stating **“it is possible that land for as much new housing as is compatible with the new school could be found on the east side of Blackburn”**. This would conform to the Scottish Planning Policy principle to make efficient use of capacities of land and infrastructure and would make efficient use of the investment in the new primary school.

A higher number of homes is welcomed on the site this is considered appropriate for Blackburn given its location within a Strategic Growth Area. These are the main area of focus for new housing within the 2014 Strategic Development Plan and that strategy is carried forward into the Proposed Strategic Development Plan which was consulted upon at the end of 2018. As such, Blackburn is well placed to accommodate significant housing development.

Current policy is for sites within Strategic Growth Areas to be developed at no less than 30 dwellings per hectare. Bid site GR087 extends to approximately 10.3 hectares and at current density levels would be capable of accommodating up to 309 dwellings. However, the MIR at Main Issue 10 considered a density of 25 dwellings per hectare and at this rate a development of 258 houses would be appropriate. The density contained in the Proposed Plan generally conforms to this, considering part of the site has been identified as P8, to protect an area of ancient woodland which contributes to the green-blue network.

It is clear that a number of densities have been proposed for the site and a range somewhere between 150 houses and 268 houses is therefore considered appropriate, as accepted by Aberdeenshire Council in their allocation of the site. The final number of units acceptable will be determined by detailed assessments carried out at the planning application stage in line with Policy H1: Housing Land which states that **“capacities of sites shown in Appendix 6 and Appendix 7 of this Plan are based on an indicative capacity at this stage. Higher densities would only be considered where any associated negative impacts on infrastructure, open space and residential amenity can be addressed and where the development has been justified, including through an approved Masterplan or Design Statement that has been subject to appropriate public consultation”**. This will consider access, buffer strips, core paths, flood risk, the impact on listed buildings and affordable housing as contained in supporting text to the OP1 allocation.

The merits of this site outweigh the other bid locations put forward at the pre-MIR stage. Proposals to the west of Blackburn are constrained by the location of a gas pipeline through those sites which would render large parts undevelopable for residential use. There is also substantial tree cover to the west and steep rising land could result in significant earthworks being required to develop them which may render them unviable. The topography of this land would also result in a detrimental landscape impact and the Reporter to previous plan examinations concluded that development to the west would result in a **“greater landscape impact than development to the east side of**

**Blackburn**". Development of land to the north of Blackburn would elongate the settlement further and would be more remote from the centre.

As such, the development of OP1 to the east of Blackburn is considered to be the only suitable location for additional housing as accepted through previous Local Development Plan processes. This continues to be accepted in the MIR, DPLDP and now the Proposed Plan which is supported going forward.

#### Conclusion

The continued identification of the site as OP1 for 240 homes within the Proposed Plan is welcomed and supported. A range of densities have been considered suitable for the site throughout the Local Development Plan process and the final numbers will be determined through the detailed consideration of the site in line with Policy H1 of the Proposed Plan.

#### Recommendation

It is therefore respectfully requested that OP1: Caskieben in Blackburn continues to be identified for 240 homes in the Local Development Plan.

# 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:

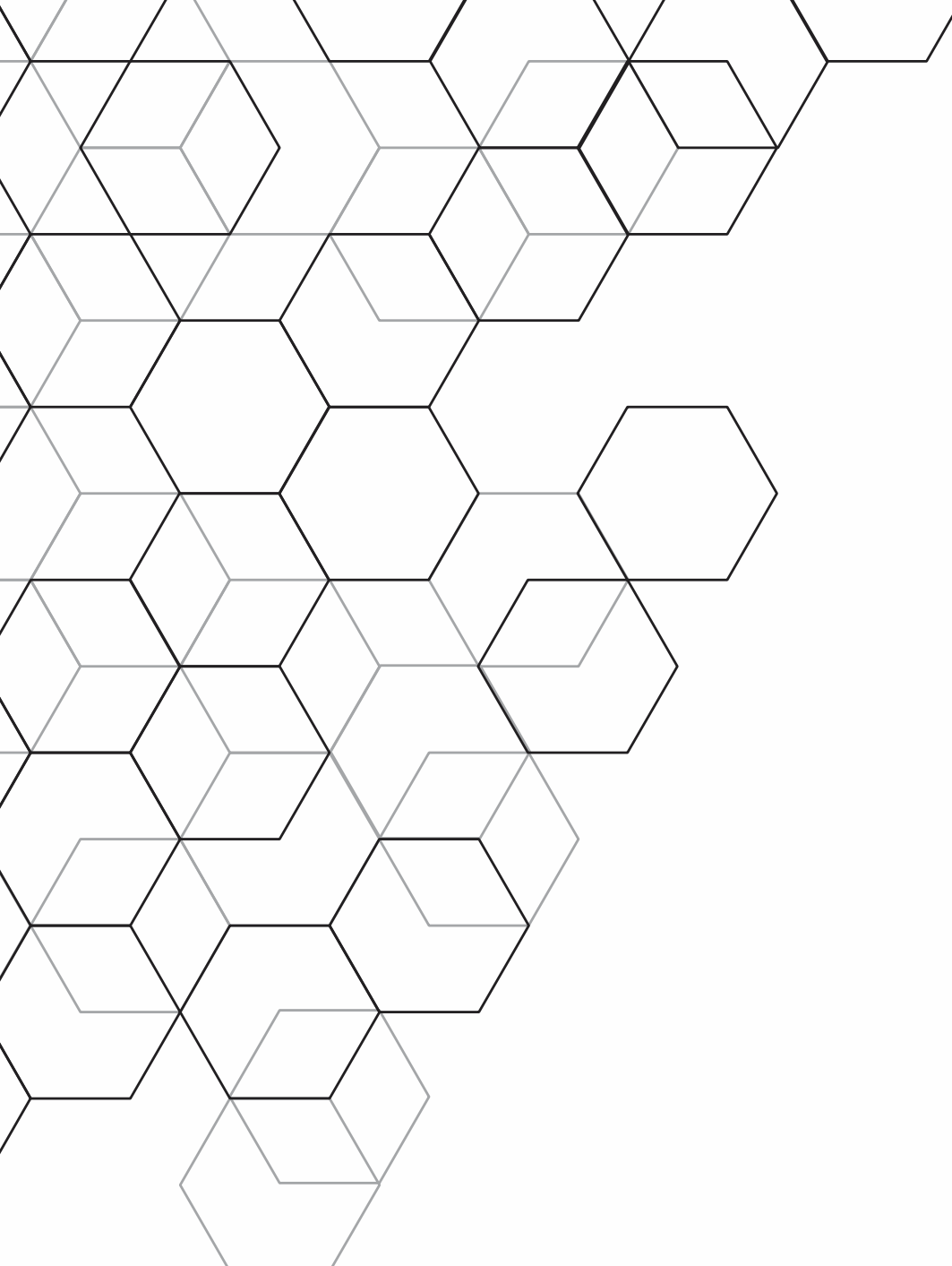
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue 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	[REDACTED]
Organisation (if applicable)	Ryden LLP
Address	[REDACTED]
Telephone number	[REDACTED]
Email address	[REDACTED]
Do you wish to subscribe to our newsletter?	Yes

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

Name	Marshall Farms Ltd
Organisation (if applicable)	
Address	c/o agent
Telephone number	
Email address	

### 3. Other Owners

Please give name, organisation, address, email details of other owner(s) where appropriate:	As above
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)	OPI (50 houses) and P5 (land for new Primary School), Blackburn
Site address	Land to the north of the B979, Blackburn
OS grid reference (if available)	OPI = NJ831126 P5 = NJ830127
Site area/size	10.3 ha
Current land use	Open fields
Brownfield/greenfield	Greenfield
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)	Sole owners
Is the site under option to a developer?	No, but a number of housing developers are interested in the site with an option deal close to being agreed.
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.)	No
	If yes, please give details
Are there any other legal factors that might prevent or restrict development? (e.g. ransom strips/issues with accessing the site etc.)	No
	If yes, please give details

#### 7. Planning History

Have you had any formal/informal pre-application discussions with the Planning Service and what was the response?	Yes
	See below
Previous planning applications	The area identified for the new Kinellar Primary School was the subject of an application for a Certificate of Appropriate Alternative Development (CAAD) in 2015 (2015/3117) where Aberdeenshire Council acknowledged that the site is suitable for residential development. The remainder of the site is identified in the 2017 Local Development Plan for 50 houses. No planning applications have been submitted to date, but a developer has now been identified to bring the site forward.
Previous 'Call for sites' history. See Main Issues Report 2013 at	Please provide Previous 'Call for sites'/'Bid' reference number:

<p><a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a></p>	<p>The site was carried forward from the 2012 LDP. During the 2012 LDP process, the site was promoted and identified as G157 in the Main Issues Report. It was identified as a preferred site for a replacement primary school and 50 houses. This was carried forward into the 2012 LDP and retained in the 2017 LDP. The principle of development is therefore established.</p> <p>During the examination into the 2017 LDP, additional information was requested from Aberdeenshire Council. They considered that, as the school was no longer required on the P5 site, the entire OPI/P5 site had capacity for 150 houses and they were supportive of this amount of development. The Reporter did not have the ability to amend the housing numbers on the site but confirmed that this was a matter for consideration through future LDP processes.</p>
<p>Local Development Plan status <a href="http://www.aberdeenshire.gov.uk/ldp">www.aberdeenshire.gov.uk/ldp</a></p>	<p>Is the site currently allocated for any specific use in the existing LDP? Yes, OPI for 50 houses and P5 for a replacement Kinellar Primary School. The land for the primary school is no longer required as it is to be developed on the site of the existing primary school. Therefore, the P5 part of the allocated land should be identified for alternative uses and residential is considered to be the most appropriate. Aberdeenshire Council previously considered that the site had capacity for 150 houses.</p>

## 8. Proposed Use

Proposed use		Housing
Housing	Approx. no of units	The site has the potential to accommodate up to 150 houses, rather than the 50 identified in the LDP
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> <li>• Detached: Generally a mix of detached and semi-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: Exact mix to be determined at detailed design</li> <li>• 3 bedroom homes:</li> <li>• 4 or more bedroom homes: stage</li> </ul>
	Tenure (Delete as appropriate)	Private
	Affordable housing proportion	This would be provided in line with Policy requirements at the time of development
Employment	Business and offices	n/a
	General industrial	n/a
	Storage and distribution	n/a
	Do you have a specific occupier for the site?	n/a

## Appendix I – Development Bid

Other	Proposed use (please specify) and floor space	n/a
	Do you have a specific occupier for the site?	n/a
Is the area of each proposed use noted in the OS site plan?		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	✓
	6-10 years	
	10+ years	
	The OPI designation can be delivered immediately and an option agreement is close to being agreed with a housing developer. The school part of the site, if the allocation is amended, can also be delivered in the immediate term by the same developer.	
When would you expect the development to be finished? (please tick)	0-5 years	✓
	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	
	Funding would be available by the developer at the time of development for this site	
Are there any other risk or threats (other than finance) to you delivering your proposed development	No	
	If yes, please give details and indicate how you might overcome them:	

### 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> </ul>	RAMSAR Site	No
	Special Area of Conservation	No
	Special Protection Area	No
	Priority habitat (Annex I)	No
	European Protected Species	No
	Other protected species	No
	Site of Special Scientific Interest	No
	National Nature Reserve	No
	Ancient Woodland	No
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	Yes
	Priority habitat (UK or Local Biodiversity Action Plan)	No
	Local Nature Conservation Site	No
	Local Nature Reserve	No

## Appendix I – Development Bid

<ul style="list-style-type: none"> <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>	<p>If yes, please give details of how you plan to mitigate the impact of the proposed development:</p> <p>There is an area of woodland to the north of the site and some trees within the site along field boundaries. The area of woodland will not be affected by the development and trees within the site will be retained where possible. In any case, the site is already allocated in the 2017 Local Development Plan with the development of this site considered to have minimal impact on natural heritage.</p>																												
<b>Biodiversity enhancement</b>																													
<p>Please state what benefits for biodiversity this proposal will bring (as per paragraph 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>	<table border="1"> <tr> <td>Restoration of habitats</td> <td></td> </tr> <tr> <td>Habitat creation in public open space</td> <td style="text-align: center;">✓</td> </tr> <tr> <td>Avoids fragmentation or isolation of habitats</td> <td></td> </tr> <tr> <td>Provides bird/bat/insect boxes/Swift bricks (internal or external)</td> <td></td> </tr> <tr> <td>Native tree planting</td> <td style="text-align: center;">✓</td> </tr> <tr> <td>Drystone wall</td> <td></td> </tr> <tr> <td>Living roofs</td> <td></td> </tr> <tr> <td>Ponds and soakaways</td> <td></td> </tr> <tr> <td>Habitat walls/fences</td> <td></td> </tr> <tr> <td>Wildflowers in verges</td> <td></td> </tr> <tr> <td>Use of nectar rich plant species</td> <td style="text-align: center;">✓</td> </tr> <tr> <td>Buffer strips along watercourses</td> <td></td> </tr> <tr> <td>Show home demonstration area</td> <td></td> </tr> <tr> <td>Other (please state):</td> <td></td> </tr> </table> <p>The site is currently open fields, with little biodiversity value. The development of this site will introduce areas of open space and landscaping which will provide opportunities for biodiversity enhancement. This will include native tree planting, and nectar rich plant species. The creation of private gardens will also increase the opportunities for biodiversity.</p>	Restoration of habitats		Habitat creation in public open space	✓	Avoids fragmentation or isolation of habitats		Provides bird/bat/insect boxes/Swift bricks (internal or external)		Native tree planting	✓	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):	
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Other (please state):																													

## II. Historic environment

<b>Historic environment enhancement</b>		
<p>Please state if there will be benefits for the historic environment.</p>	<p>No impact on the historic environment</p> <p>If yes, please give details:</p>	
<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>	<p>Scheduled Monument or their setting</p>	<p>No</p>
	<p>Locally important archaeological site held on the Sites and Monuments Record</p>	<p>No</p>
	<p>Listed Building and/or their setting</p>	<p>Yes</p>

## Appendix I – Development Bid

<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>	Conservation Area (e.g. will it result in the demolition of any buildings)	No
	Inventory Gardens and Designed Landscapes	No
	Inventory Historic Battlefields	No
	The B Listed Gardener's Cottage lies to the north east of the P5 site. Historic Environment Scotland were consulted and had no locus to comment on applications that may affect the setting of B or C listed buildings.	

### 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 <b>If yes</b> , 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. <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>	<b>If your site is not within an SLA</b> , 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:  The site has no natural landscape elements. The principle of residential development is already established on the OPI part of the site and this should continue going forward.  The principle of development is also established on the P5 part of the site. It is well contained by existing residential properties to the south as well as woodland and an unclassified road to the north east. It is screened by existing development or landscaping and the identification of housing on this part of the site would have minimal impact on the landscaping setting of Blackburn, considering the site is already identified for development.

### 13. Flood Risk

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?	River - No. The Black Burn lies to the west of the site, but any potential flood risk from this lies outwith the site boundary. Surface Water – No.
	The LDP allocation advises that a Flood Risk Assessment may be required, however, it is

## Appendix I – Development Bid

(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> )	considered that there is minimal risk of flooding on the site due to open space that exists adjacent to the burn which would protect this site.
Could development on the site result in additional flood risk elsewhere?	No If yes, please specify and explain how you intend to mitigate or avoid this risk:
Could development of the site help alleviate any existing flooding problems in the area?	n/a

### 14. Infrastructure

<b>a. Water / Drainage</b>					
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> )?	<table border="1"> <tr> <td>Water</td> <td>Yes</td> </tr> <tr> <td>Waste water</td> <td>Yes</td> </tr> </table>	Water	Yes	Waste water	Yes
Water	Yes				
Waste water	Yes				
Has contact been made with Scottish Water?	No, but the site is allocated in the Local Development Plan for development. Any additional capacity required due to the development of additional units on the site can be provided should the primary school site be reallocated for housing.				
Will your SUDS scheme include rain gardens? <a href="http://www.centalscotlandgreennetwork.org/campaigns/greener-gardens">http://www.centalscotlandgreennetwork.org/campaigns/greener-gardens</a>	To be confirmed at detailed design stage.				
<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>	Kinellar Primary School is operating over capacity, however, the 50 unit allocation on the OPI site will have been taken into consideration in the school roll forecasts. The new Kinellar Primary School is due to open in August 2018 and has capacity for 450 pupils. This is significantly more than the current capacity. During the 2017 LDP examination, Aberdeenshire Council confirmed that the OPI/P5 site had the capacity for 150 units and that the school had the capacity for this level of development.				
Has contact been made with the Local Authority's Education Department?	No				
<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?	Transport Scotland were consulted as part of the CAAD application due to the proximity of the A96. They did not advise against the granting of planning permission and were satisfied that the proposed access to the east of Blackburn Garage on the B979 was far enough from the Clinterty roundabout to have no impact on the A96.				

## Appendix I – Development Bid

<p>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></p>	<p>Yes. The site is already allocated and the Council’s Transportation Service would have been consulted at that time. Caskieben Road is unlikely to be appropriate as a route for a major access to the site, but would be suitable as an emergency access. Access to the site adjacent to Blackburn Garage is acceptable to the Council. Access to the P5 site would be from the same point and Aberdeenshire Council prepared an appropriate roads layout for this. This layout would be similarly suitable for residential development on the site. The Roads service were also consulted as part of the CAAD application and had no objections to the site being developed for residential use.</p>
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<p>Public transport</p>	<p>Public transport services are provided along the B979 south and west of the site, within 400 metres of the site. Public transport operates 7 days a week, with links to Aberdeen, Inverurie, Kintore and the surrounding area.</p>
<p>Active travel (i.e. internal connectivity and links externally)</p>	<p>The site will provide an internal network of footpaths, which will link with existing footpaths outwith the site.</p>
<p><b>d. Gas/Electricity/Heat/Broadband</b></p>	
<p>Has contact been made with the relevant utilities providers?</p>	<p>Gas: No</p>
	<p>Electricity: No</p>
	<p>Heat: No</p>
	<p>Broadband: No</p>
<p>Have any feasibility studies been undertaken to understand and inform capacity issues?</p>	<p>No feasibility studies have been undertaken at this stage, however, there are utilities in the area and this is not considered to be an impediment to development, given the residential development located to the east.</p>
<p>Is there capacity within the existing network(s) and a viable connection to the network(s)?</p>	<p>This is unknown at this stage, however, it is not considered to present an impediment to development</p>
<p>Will renewable energy be installed and used on the site? For example, heat pump (air, ground or water), biomass, hydro, solar (photovoltaic (electricity) or thermal), or a wind turbine (freestanding/integrated into the building)</p>	<p>Unknown at this stage, but would be considered in more detail at the appropriate design stage.</p>



e. Public open space	
<p>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)</p> <p>You can find the boundary of existing green networks in the settlement profiles in the LDP</p>	<p>There are a number of areas of open space within Blackburn, the closest being P2, being located directly adjacent to the P5 part of the site. This land is protected too conserve the landscape/setting, which contributes to the green network in Blackburn.</p> <p>The LDP states that the OPI part of the site should consider proposals for the enhancement of the nature conservation value of the Black Burn to extend the green network to this area, and up to the woodlands of “Sycamores” and Caskieben Road. This would be extended onto the P5 part of the site should it be allocated for residential use and would provide opportunities to directly enhance the green network</p>
<p>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></p>	<p>Yes, the development will provide a range of open space in line with Aberdeenshire LDP standards.</p>
<p>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></p>	<p>The open space audit for Blackburn states that there are a wide range of open spaces in the settlement and the Averon path network received a high score in terms of usage levels and attractiveness and provides an excellent amenity area for the local community. Blackburn is also the interface between a proposed Core Path between Aberdeen City Kirkhill Forest area, and links westward to Kinnellar Hall Wood, and beyond to Kintore, Port Elphinstone and Inverurie</p> <p>Although the development of this site will not directly deliver any of the requirements as they lie outwith the site, the development would retain and extend the green network into the site and provide links to the surrounding countryside which is considered important. Developer contributions could go towards off site requirements if necessary.</p>
f. Resource use	
<p>Will the site re-use existing structure(s) or recycle or recover existing on-site materials/resources?</p>	<p>No structures, materials or resources on site which could be re-used.</p>
<p>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?</p>	<p>No</p>

### 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
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	No
Ground instability	No
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	No
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>	Yes
'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	Yes
Rights of way/core paths/recreation uses	No
Topography (e.g. steep slopes)	No
Other	No
<p>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:</p> <p>Part of the site is identified as 3.1 agricultural land. This means it is <i>capable</i> of being used to produce a wide range of crops and is therefore considered to be prime agricultural land. It does not mean that it is utilised as prime agricultural land. In any case, the principle of development on the site is already accepted by the Op1 and P5 designation.</p> <p>The site is identified in the LDP as P5, protected for the provision of a new primary school. It is not protected as open space like most P designations are. The land is no longer required for the primary school as it is being constructed on the site of the existing school. As a result, this land no longer needs to be protected and an alternative needs to be identified. The principle of built development is established on the site and the most appropriate alternative is residential use as recommended by Aberdeenshire Council in the CAAD application. The P5 designation should therefore be removed and the site identified for housing instead. Aberdeenshire Council considered that the site had capacity for 150 units, based on the capacity of the new primary school. The LDP should therefore be amended to address this.</p>	

**16. Proximity to facilities**

How close is the site to a range of facilities?	Local shops	400m
	Community facilities (school, public hall, health centre)	400m – 500m
	Sports facilities (e.g. playing fields)	400m – 500m
	Employment areas	400m, 400m-1km
	Residential areas	400m
	Bus stop or bus route	400m
	Train station	n/a
	Hotel	400m

**17. Community engagement**

Has the local community been given the opportunity to influence/partake in the design and specification of the development proposal?	No
	If yes, please specify the way it was carried out and how it influenced your proposals:
	There has been no community engagement in relation to the reallocation of the site from school use to residential use, however, the local community would have been aware of the LDP process when the OPI site was allocated. The local community will have the opportunity to participate in the new LDP process.

**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.	<p>I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable:</p> <p>Please tick: <input checked="" type="checkbox"/></p>
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If you have any further information to help demonstrate the deliverability of your proposal, please provide details.

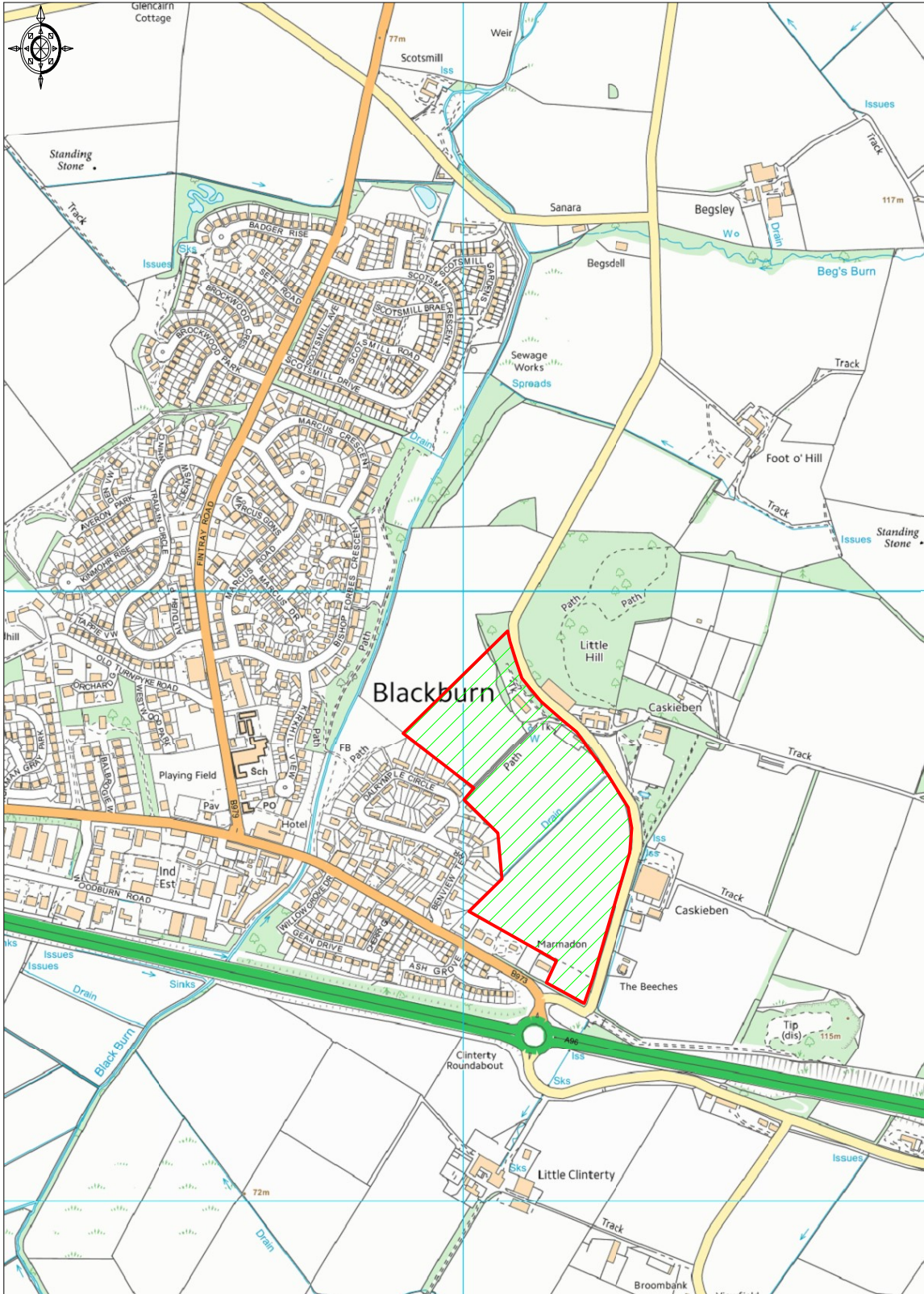
The wider OPI site is allocated in the Local Development Plan for housing and the reallocation of the primary school site (which is no longer required for such uses) to residential use is a logical and appropriate alternative use. An option agreement is close to being agreed with a house builder which demonstrates the willingness to develop in this location. The developer is confident that there is a residual value following development of the site and the provision of the necessary infrastructure which does not pose an impediment on development.

**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.



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## Appendix 2 – MIR Representation

### **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>	Ryden LLP
<b>On behalf of (if relevant)</b>	Marshall Farms Ltd
<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

### Representations on behalf of Marshall Farms Ltd in relation to Site Ref: GR087 – Sites OP1 and P5 Caskieben, Blackburn – 268 homes

On behalf of Marshall Farms Ltd, support is given to the identification of bid site GR087 within the Main Issues Report (MIR) as an Officer's preference for 268 homes. Subsequently support is also given to the identification of this site as OP1 within the Draft Proposed Local Development Plan (DPLDP). This representation requires to be read in conjunction with the development bid submitted at the pre-MIR stage and together they confirm that bid site GR087 is a suitable location for the development proposed.

The vision for Blackburn acknowledges that the settlement is a popular commuter town situated on the A96 and benefits from a range of facilities, including employment land and a new primary school. The demand for housing in close proximity to Aberdeen City has driven development within the settlement. As such, there is considered to be demand within Blackburn for further housing, as supported by Aberdeenshire Council in the assessment of this site. The identification of bid site GR087 is the most appropriate location for this within the settlement.

This site is already allocated for development within the 2017 Local Development Plan (LDP) as OP1 (50 houses) and P5 (replacement primary school). As such, it has long been recognised as an appropriate location for development. As the primary school has now been delivered on the site of the existing school, the P5 site is no longer required for that purpose. As a result an alternative use in the form of housing is considered appropriate (given the adjacent OP1 allocation for housing) and the Council's acceptance of this is welcomed.

Examination of the 2017 Local Development Plan found that site OP1 would be capable of accommodating a greater scale of development than the current 50 unit allocation, due to the construction of the primary school on a different site and the increased capacity for housing that has arisen from this. In addition, there is increased capacity within the school to absorb a higher number of houses on the site. The Reporter to the 2017 LDP examination supported this by stating **"it is possible that land for as much new housing as is compatible with the new school could be found on the east side of Blackburn"**. This would conform to the Scottish Planning Policy principle to make efficient use of capacities of land and infrastructure and would make efficient use of the investment in the new primary school.

Current policy is for sites within Strategic Growth Areas to be developed at no less than 30 dwellings per hectare. Bid site GR087 extends to approximately 10.3 hectares and at current density levels would be capable of accommodating up to 309 dwellings. The Main Issues Report at Main Issue 10 considers a density of 25 dwellings per hectare and at this rate a development of 258 houses would be appropriate.

The MIR increases the capacity of the site from the 150 units proposed within the initial bid, to 268 homes. A higher number of homes is welcomed on the site this is considered appropriate for Blackburn given its location within a Strategic Growth Area. These are the main area of focus for new housing within the 2014 Strategic Development Plan and that strategy is carried forward into the Proposed Strategic Development Plan which was consulted upon at the end of 2018. As such, Blackburn is well placed to accommodate significant housing development.

It is clear that a number of densities have been proposed for the site and a range somewhere between 150 houses and 268 houses is therefore considered appropriate, as accepted by Aberdeenshire Council in their assessment of the site. The final number of units acceptable will be determined by detailed assessments



carried out at the planning application stage. This will also consider access and road widening as contained in the MIR assessment.

Aberdeenshire Council consider within the MIR that this site is well located for parking and walking and this is welcomed. The merits of this site also outweigh the other bid locations contained within the MIR. Proposals to the west of Blackburn are constrained by the location of a gas pipeline through those sites which would render large parts undevelopable for residential use. There is also substantial tree cover to the west and steep rising land could result in significant earthworks being required to develop them which may render them unviable. The topography of this land would also result in a detrimental landscape impact and the Reporter to previous plan examinations concluded that development to the west would result in a **“greater landscape impact than development to the east side of Blackburn”**. Development of land to the north of Blackburn would elongate the settlement further and would be more remote from the centre.

As such, the development of bid site GR087 to the east of Blackburn is considered to be the most suitable location for additional housing as accepted through previous Local Development Plan processes. This continues to be accepted in the MIR and DPLDP which is supported going forward.

### **Conclusions**

Blackburn lies within a Strategic Growth Area and given its proximity to Aberdeen, is an appropriate location for further housing development. Bid site GR087 is the most appropriate location for such housing within Blackburn. The site has capacity for an increase in housing numbers given that the school is no longer required on the site and the new school has additional capacity to absorb further housing development.

It is therefore respectfully requested that bid site GR087 continues to be allocated for housing in the Proposed Aberdeenshire Local Development Plan, with the added flexibility in the housing numbers proposed by Aberdeenshire Council.