

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 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.

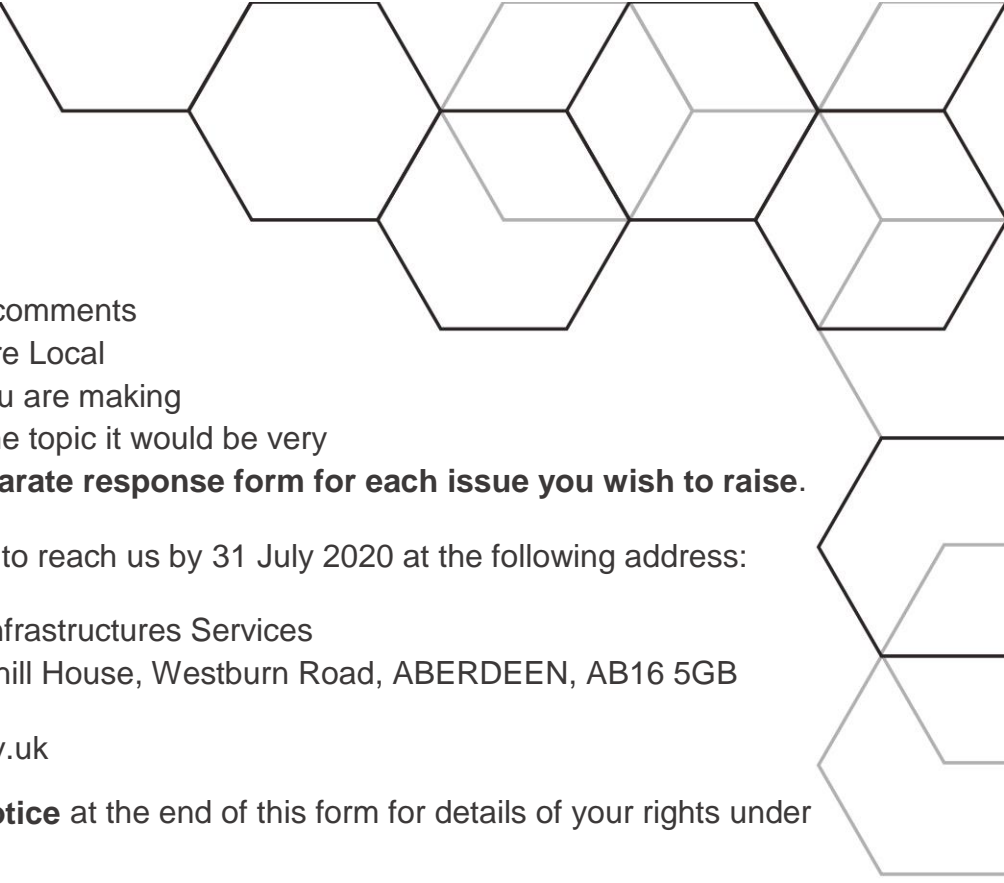
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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
Web: 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.



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

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:	20/7/2020
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):

The Proposed Plan has identified land at OP2, to the north of High Street, St Combs for the provision of 45 homes (including 19 already consented). While support is given to that designation through a separate representation, it is argued that there is scope to extend the boundary of the OP2 designation and increase the capacity of that site.

Claymore Homes consider that the entire site is suitable for 100 units (in addition to the 19 already consented). It is therefore requested that the site boundary of OP2 at St Combs (as contained on page 370 and 371 of Appendix 7b of the Proposed Plan) is extended to reflect that promoted through the development bid and the capacity of the site increased to 119 units.

Appendix 6: Housing Land Allocations should also be amended to reflect this change.

Reason for change:

Background

Two development bids related to land at St Combs were submitted to Aberdeenshire Council on 13th March 2018 on behalf of Claymore Homes. The first, which is the subject of this representation, covered the entire area and was promoted for 100 homes (Appendix 1). The second formed phase one of the larger allocation and was considered suitable for 26 homes. The Main Issues Report (MIR) was published in January 2019, which identified the entire site as BU035, with the phase 1 site identified as BU036.

Aberdeenshire Council Planning Officers identified the phase 1 site (BU036) as an Officer's Preference for the provision of 26 homes as it was well located in relation to the settlement. The wider site was not preferred by officers as it was considered to be a significant extension to the settlement. There was also considered to be school capacity issues and concern related to a second point of access onto High Street.

Representations (Appendix 2) were submitted to the Main Issues Report supporting the first phase allocation, but objecting to the failure to allocate the wider site. Issues raised by Officer's were also addressed.

This representation should therefore be read in conjunction with the development bid submitted at the pre-MIR stage (Appendix 1) and the representations to the Main Issues Report (Appendix 2), which demonstrate that the site is suitable for the development proposed. It should also be read in conjunction with the development bid and representations submitted for the phase 1 site (BU036) which is allocated as OP2 in the Proposed Plan.

Justification

It is welcomed that the phase 1 site is identified as OP2 for the development of 45 houses. This includes the initial bid proposal for 26 homes and the existing 19 homes which has consent and located to the east of the site, which is owned by the same developer. It lies adjacent to an OP1

designation for 30 affordable housing units, although this has been reduced from the 70 units considered appropriate in the Main Issues Report and Draft Proposed Local Development Plan.

The Proposed Plan removes the 2017 LDP OP1 site from the St Combs settlement statement as it is constrained due to marketability issues. As this site would have contributed to the housing land requirements within St Combs, it is argued that there has not been an adequate supply of housing delivered in the settlement during that plan period. Together with the reduction of units on the OP1 site from 70 to 30 units, it is argued that there is scope to extend the boundaries of the OP2 site and increase the capacity of that site to compensate for this loss of housing within St Combs.

The Main Issues Report raised a number of issues which justified the exclusion of the site from the Proposed Plan. The Council considered that the site was a significant extension to the village. However, the site would be seen as an extension of the OP2 site which was acknowledged by the Council as being well located to St Combs. Further to this, it is not significantly larger than the OP1 site contained in the 2017 LDP to the south of St Combs, but would be a better fit in the landscape. This was accepted by Aberdeenshire Council in their statement that **“landscape impact would be minimal in this location”**. Any extension of the OP2 site would be seen in the context of existing development in the area and would have no detrimental impact on the amenity of the area. It is therefore not accepted that it would be a significant extension of the village.

It was argued by the Council that the site would be unconnected to the village without the development of the other two bids in the village. It was never intended that the western part of the site would be developed before the OP2 designation. If the boundaries of the OP2 designation were extended, the logical location for development would be in an east to west direction. The developer controls the OP2 site as well as the consented site for 19 units and this offers good opportunities for connections from this site to the wider area. This is reflected in the layout plan for the consented site which identifies road and footpath connections with the wider area. These would be continued through the OP2 site. Concerns related to connectivity are therefore unfounded.

There was initial concerns raised to access issues and a second point of access onto High Street. A second point of access is stated as a requirement for the OP2 allocation for 45 units. It has been argued through representations to that allocation that a second point of access is not required for a development of 45 units. Should the Council deem that a second point of access onto High Street is necessary, this would require the identification of the wider site as it cannot be delivered without this land.

The larger site for 100 units was considered by Aberdeenshire Council to cause capacity issues with the Primary School. The 2019 Based School Roll Forecasts identify that St Combs Primary School has a capacity of 100 pupils. It is currently significantly under capacity at 48%. It has a fluctuating school roll, but at its highest, it is not forecast to reach over 54% capacity (2022). In 2027, it is forecast to be operating at only 35% of capacity. This is compounded by the removal of the OP1 site which would have been considered within the school roll forecasts.

The identification of the wider site for housing would support the school and make efficient use of the remaining capacity. It would also ensure that this important community facility is protected going forward. The removal of the OP1 site from the 2017 LDP means that there is unused capacity in the school and a need to identify alternative locations for housing to support the school and ensure an adequate supply of housing land is delivered in the area.

The wider BU035 site to the west of the OP2 allocation is the only alternative option for housing in the village. This land is under the control of a developer, who is currently developing other sites in the village and controls the OP2 site. This demonstrates willingness and ability to develop in this location. As such, the 40 units from the removed site, plus the reduction in units from the current OP1 site within the Proposed Plan should be directed to an increased OP2 site.

The consented scheme has been well received by the local community who have highlighted the lack of new housing in the village for young people. The identification of the wider BU035 site (as contained in the MIR) in addition to the OP2 site would ensure an adequate supply of housing land in the village, considering 40 units have been removed from the constrained site to the south of St Combs and the capacity of OP1 has been reduced.

Finally Aberdeenshire Council previously argued that the scale proposed would be overdevelopment, altering the character and sense of place in the village and this was considered to be unsustainable. This is completely unfounded. It is not accepted that the scale of development would be overdevelopment as the land has capacity for the level of housing considered appropriate by Aberdeenshire Council on other sites. Sense of place can be achieved through the design of development which would be agreed and controlled through any planning application for the site. Aberdeenshire Council provide no arguments why the development of this site would be unsustainable and considering it is within 400m of local shops, employment and bus routes, it is well related to existing development and considered a sustainable and logical location for further housing in St Combs.

Conclusion

To conclude, while support is given to the identification of site OP2 in the Proposed Plan, objection is made to the failure of the Proposed Plan to extend the boundaries of that site and increase the density.

St Combs Primary School is significantly under capacity and it is argued that there is a need to identify additional housing to support that important facility and the investment made in it. This will make efficient use of infrastructure in the village.

As site OP1 to the south of the site has also been removed from the Proposed Plan, there is a need to identify an alternative site to ensure an appropriate supply of housing and is delivered in St Combs. It is argued that the only suitable site is an extension of the OP2 land and it is considered that there is scope of both OP1 and a higher capacity on OP2 to support facilities in the village.

Both the OP2 site, the consented site for 19 units and the land covered by the wider bid considered by this representation are controlled by the same developer. They have experience of developing in St Combs and their current development has been well received by the locals who have confirmed that there is a lack of housing for young people in the village. The backing of a developer in this instance demonstrates that it is capable of being delivered to provide appropriate and much needed housing in St Combs.

The identification of this site will enable a second point of access to be achieved onto High Street, which has been identified as a requirement of the OP2 designation in the Proposed Plan.

Recommendation

It is therefore respectfully requested that the OP2 site continues to be identified in the Local Development Plan, however, the boundaries of that site should be expanded to include all of the land promoted through bid site BU035 and BU036 (as contained in the MIR) and the capacity increased to 100 units (in addition to the 19 already consented).

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

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
--	---

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:

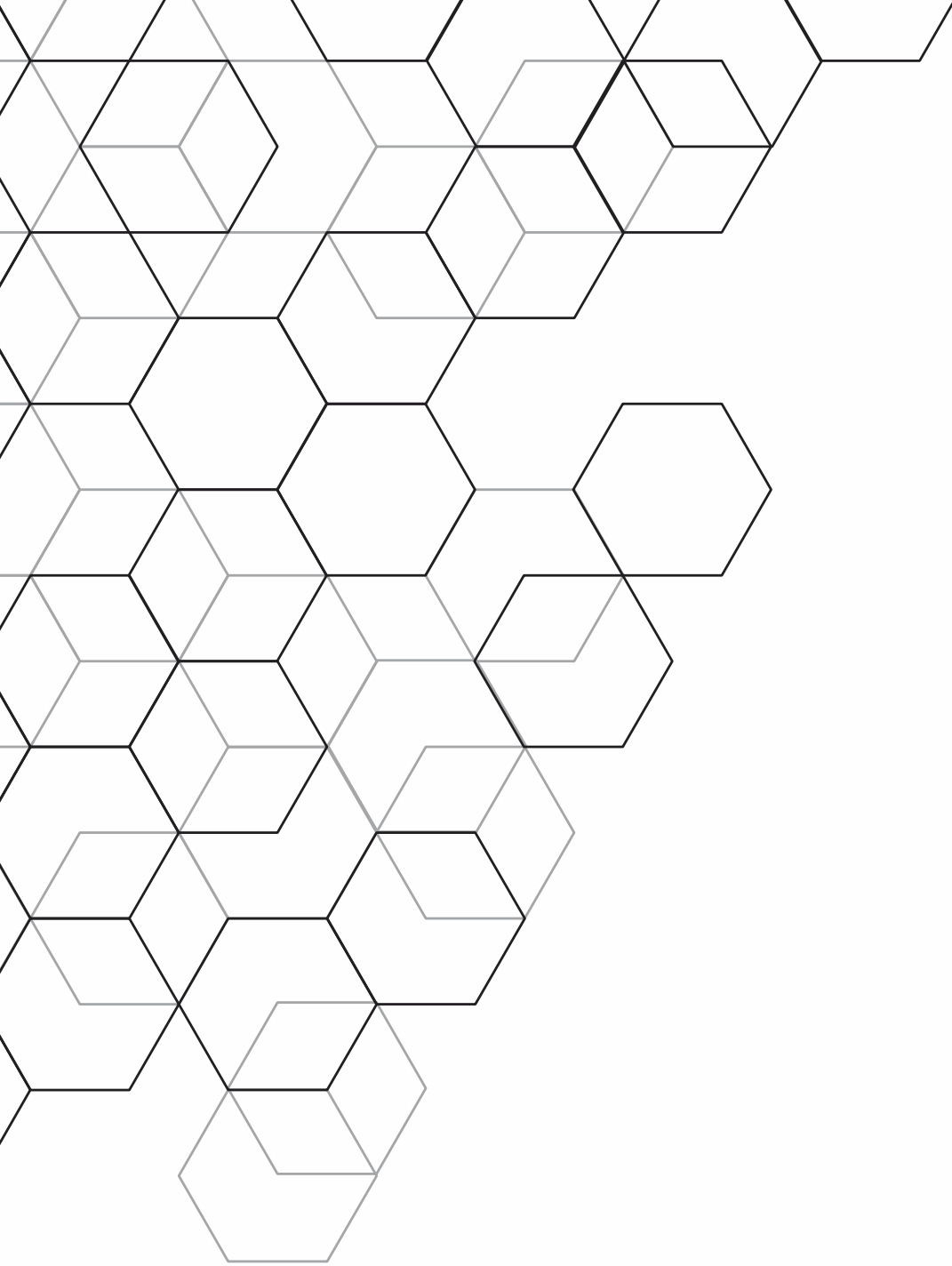
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue 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

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)	Ryden LLP
Address	
Telephone number	
Email address	
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	Claymore Homes
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

Appendix I – Development Bid (entire site)

4. Site Details

Name of the site (Please use the LDP name if the site is already allocated)	Land to west of St Combs
Site address	Land to the west of St Combs
OS grid reference (if available)	NK049630
Site area/size	9 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?	Yes Land owned by Claymore Homes who would also develop the site.
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?	No If yes, please give details
Previous planning applications	Application 2017/0016 for 3 houses and landscaping is pending on the site. Land to the east is also currently being developed by the proposer for 24 units (Ref 2016/3203) and this bid site is seen as an extension of that. The planning application for that site makes provision for access to the bid site. There has been strong support for the development of this site in St Combs. The OPI designation is currently being marketed, however, it is considered that it is unlikely to be brought forward in the timescales of the 2017 LDP. This site should be allocated instead.

Appendix I – Development Bid (entire site)

Previous 'Call for sites' history. See Main Issues Report 2013 at www.aberdeenshire.gov.uk/ldp	Please provide Previous 'Call for sites'/'Bid' reference number: No previous bids have been submitted for this site. The land to the east (Ref 2016/3203) was identified in the 2012 Local Development Plan for 40 units, but this has been taken out of the 2017 LDP with no explanation or discussion in the Report's Report on the Examination of the 2017 LDP.
Local Development Plan status www.aberdeenshire.gov.uk/ldp	Is the site currently allocated for any specific use in the existing LDP? No, but seen as a logical expansion of St Combs and the application site to the east.

8. Proposed Use

Proposed use		Housing
Housing	Approx. no of units	The site has the potential to accommodate up to 100 houses, but can be developed on a phased basis, with the first phase submitted as a separate bid.
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> Detached: Generally a mix of detached and Semi-detached: semi-detached Flats: Terrace: Other (e.g. Bungalows):
		Number of: <ul style="list-style-type: none"> 1 bedroom homes: Exact mix to be determined at 3 bedroom homes: detailed design 4 or more bedroom homes: stage
	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
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	Phase I
	6-10 years	Future phases
	10+ years	Future phases
Given the size of the site, this can be developed over a number of years. It is considered that		

Appendix I – Development Bid (entire site)

	the first phase (26 units) could commence immediately after LDP adoption, with future phases commencing after this.	
When would you expect the development to be finished? (please tick)	0-5 years	Phase I
	6-10 years	Future phases
	+ 10years	Future phases
	Again, given the size of the site and potential phasing opportunities, different phases would be completed at different times, potentially providing a long terms supply of housing in St Combs if required.	
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"> • https://www.environment.gov.scot/ • EU priority habitats at http://gateway.snh.gov.uk/sitelink/index.jsp • UK or Local priority habitats at http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/ • Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at www.aberdeenshire.gov.uk/ldp 	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	Yes
	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
<p>If yes, please give details of how you plan to mitigate the impact of the proposed development:</p> <p>Cairnbulg to St Combs Coastline is designated as a Site of Special Scientific Interest and is located approximately 480m from the site boundary. However, the bid site lies on the eastern boundary of St Combs and as such the existing built up area of the village is located in the intervening area. As such, there would be no impact on the SSSI from the development of this site.</p>		

Appendix I – Development Bid (entire site)

Biodiversity enhancement		
<p>Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy), http://www.gov.scot/Resource/0045/00453827.pdf) by ticking all that apply. Please provide details.</p> <p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</p> <p>Advice is also available from Scottish Natural Heritage at: https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers and http://www.nesbiodiversity.org.uk/.</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):	
<p>The site is currently open fields, with little biodiversity value. The development of this site will introduce 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>		

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"> http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d http://portal.historicenvironment.scot/ https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire 	Scheduled Monument or their setting	No
	Locally important archaeological site held on the Sites and Monuments Record	No
	Listed Building and/or their setting	No
	Conservation Area (e.g. will it result in the demolition of any buildings)	No
	Inventory Gardens and Designed Landscapes	No
	Inventory Historic Battlefields	No
	<p>The remains of St Combs, St Columba Church are designated as a Scheduled Monument. It lies approximately 480m from the bid site and as a result of this distance and the existing development in the intervening area, there will be no impact on this, or its setting through the development of the bid site.</p>	

	An archaeological Written Scheme of Investigation would be submitted by the applicant as part of any planning application if required.
--	--

12. Landscape Impact

Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at www.aberdeenshire.gov.uk/ldp)	<p>Yes</p> <p>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:</p> <p>The site is located within the North East Aberdeenshire Coast Special Landscape Area. These long narrow areas cover a variety of coastal landscapes, and the boundary has been drawn to reflect the approximate extent of maritime influence, largely following roads parallel to the coast.</p> <p>Designation of this area distinguishes its strong sense of place, scenic qualities and un-interrupted views out to the North Sea. It has long stretches of sandy beaches, and a more gradual, less abrupt character of coastal edge. Designation also recognises the ecological value of the area's dune systems and other features that contribute to the landscape character.</p> <p>Although the bid site lies within this area, development of the site will have no impact on the qualities of this Special Landscape Area, given the distance it lies from the coastal edge and beach, dune systems or ecological value of this area.</p> <p>The bid site lies at a slightly elevated position from the rest of the village which may enable some, limited sea views from the site. The site is well contained by existing and proposed development to the east and as a result, any development of this site will result in minimal impact on the landscape setting of the area.</p>
---	--

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"> SNH: Landscape Character Assessments https://www.snh.scot/professional- 	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:
--	--

<p>advice/landscape-change/landscape-character-assessment</p> <ul style="list-style-type: none"> • SNH (1996) Cairngorms landscape assessment http://www.snh.org.uk/pdfs/publications/revision/075.pdf • SNH (1997) National programme of landscape character assessment: Banff and Buchan http://www.snh.org.uk/pdfs/publications/revision/037.pdf • SNH (1998) South and Central Aberdeenshire landscape character assessment http://www.snh.org.uk/pdfs/publications/revision/102.pdf 	
--	--

I3. 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 http://map.sepa.org.uk/floodmap/map.htm)</p>	<p>River – No. There is a burn that runs along the northern boundary, however, there is no flood risk associated with this.</p> <p>Surface Water – Yes. There are pockets of surface water flood risk within the site.</p> <p>It is not anticipated that there would be any issue with flooding on the site and no Flood Risk Assessment was required for the application adjacent. SUDs would be provided on the site, which would address any surface water flood risk on site.</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>Yes, it would resolve surface water flood risk</p>

I4. Infrastructure

a. Water / Drainage		
<p>Is there water/waste water capacity for the proposed development (based on Scottish Water asset capacity search tool http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search)?</p>	Water	Yes
	Waste water	Yes
<p>Has contact been made with Scottish Water?</p>	<p>No, but a search using Scottish Water asset capacity search tool was carried out which advised that Forehill Water Treatment Works has capacity for over 2000 properties. Fraserburgh Waste Water Treatment Works has capacity for 1694 properties. There is</p>	

Appendix I – Development Bid (entire site)

	therefore capacity for the development of the entire bid site.
Will your SUDS scheme include rain gardens? http://www.centalscotlandgreennetwork.org/campaigns/greener-gardens	To be confirmed at detailed design stage.
b. Education – housing proposals only	
Education capacity/constraints https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/	<p>St Combs Primary School has a capacity range of 72-96 pupils. It is currently significantly under capacity at 43% (41 pupils). Although the school roll is rising and is forecast to be at 85% capacity by 2022 (81 pupils) this includes the OPI designation which has yet to be developed. The LDP identified land for housing in St Combs, especially to support the primary school. If the OPI site continues to remain undeveloped, there would be more capacity going forward and a need to identify additional land to retain this required support for the primary school going forward.</p> <p>Fraserburgh Academy has a capacity of 1510 pupils and is currently at 74% of capacity (1118 pupils). It is forecast to rise to 79% of capacity by 2022 (1189 pupils).</p> <p>Although there is capacity at present, contributions would be required to deliver the entire development.</p>
Has contact been made with the Local Authority's Education Department?	No
c. Transport	
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?	n/a
Has contact been made with the Local Authority's Transportation Service? They can be contacted at transportation.consultation@aberdeenshire.gov.uk	No, but access is not considered to be an issue. The site can be accessed from the approved site to the east (Ref: 2016/3203) and provision has been made in the layout for this. It is considered that additional points of access can be provided from the Main Street, or through the Council owned land to the north which was previously allocated residential land in the 2012 LDP.
Public transport	Public transport services are provided along High Street to the south of the site. The St Combs turning circle, is located within 200m of the site. Public transport operates 7 days a week, with links to Fraserburgh and Peterhead and the surrounding area. Additional services are available from these locations, providing public transport routes to Aberdeen.

Appendix I – Development Bid (entire site)

Active travel (i.e. internal connectivity and links externally)	The site will provide an internal network of footpaths, which will link with existing footpaths outwith the site.
d. Gas/Electricity/Heat/Broadband	
Has contact been made with the relevant utilities providers?	Gas: No
	Electricity: No
	Heat: No
	Broadband: No
Have any feasibility studies been undertaken to understand and inform capacity issues?	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.
Is there capacity within the existing network(s) and a viable connection to the network(s)?	This is unknown at this stage, however, it is not considered to present an impediment to development
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)	Unknown at this stage, but would be considered in more detail at the appropriate design stage.
e. Public open space	
Will the site provide the opportunity to enhance the green network? (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	There are a number of areas of linked open space around St Combs, particularly to the south and east adjacent the coastal area. These are protected in the extant LDP. Closer to the bid site lies an area of open space, with play equipment. The approved site to the east (Ref: 2016/3203) provides areas of landscaping, which links to the existing play area outwith the site. The bid site could also link to this, providing an enhanced green network in the area. This would link with existing protected areas via the network of footpaths in the village.
Will the site meet the open space standards, as set out in Appendix 2 in the Aberdeenshire Parks and Open Spaces Strategy? https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf	Yes, the development will provide a range of open space in line with Aberdeenshire LDP standards. The site will accommodate 40% open space as well as areas of strategic landscaping. The site could provide land for community food growing if required.
Will the site deliver any of the shortfalls identified in the Open Space Audit for specific settlements? https://www.aberdeenshire.gov.uk/communities	The open space audit for St Combs states that the village benefits from a coastal location offering a range of open space, with plenty of access to semi-natural areas.

Appendix I – Development Bid (entire site)

-and-events/parks-and-open-spaces/open-space-strategy-audit/	Although the development of this site will not directly deliver any of these requirements as they lie outwith the site, the development could make provision of green links which is considered to be an important part of future development. Developer obligations could go towards improvements of the play park and benches suggested in the audit if considered necessary at the time of any development.
--	--

f. Resource use	
Will the site re-use existing structure(s) or recycle or recover existing on-site materials/resources?	No structures, materials or resources on site which could be re-used.
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?	No

15. Other potential constraints

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

Aberdeen Green Belt https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf	No
Carbon-rich soils and peatland http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/	No
Coastal Zone https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf	Yes
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 https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/ and advice at http://www.hse.gov.uk/landuseplanning/developers.htm)	No
Minerals – safeguarded or area of search https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf	No
Overhead lines or underground cables	Yes
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. http://map.environment.gov.scot/Soil_maps/?layer=6	No
‘Protected’ open space in the LDP (i.e. P sites) www.aberdeenshire.gov.uk/ldp and choose from Appendix 8a to 8f	No
Rights of way/core paths/recreation uses	No
Topography (e.g. steep slopes)	No
Other	No

Appendix I – Development Bid (entire site)

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:

The bid site lies within the coastal zone, however, the boundary has been drawn to exclude the built up area of St Combs and other settlements in the area. This indicates that any development within the settlement, which is not directly on the coastline would be suitable for development. The development of this site will have no impact on the coastline given its distance from this area.

There are overhead cables crossing the site, however, this is not an impediment to development as they can be re-routed or placed underground.

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 – 1 km
	Sports facilities (e.g. playing fields)	400m – 1 km
	Employment areas (garage)	400m
	Residential areas	400m
	Bus stop or bus route	400m
	Train station	n/a
	Hotel	400m – 1 km

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 this bid site, however, the local community would have been aware of the previous allocation and planning application submitted for the site to the east which is being developed by the same developer and indicates potential future access to this site. The local community will have the opportunity to participate in the LDP process and should the site be identified for development, public consultation would be carried out.

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>
---	---

Appendix I – Development Bid (entire site)

If you have any further information to help demonstrate the deliverability of your proposal, please provide details.

The site is under option to a developer which demonstrates the willingness to develop in this location. They have also received planning permission (Ref: 2016/3203) on the land to the east and are therefore familiar with the market in St Combs. This application has been well received by the local community who highlight that lack of new properties in the village for young people stay in the village. The development of the bid site would be an extension of that site and can provide access to it.

It is argued that the OPI allocation to the south of St Combs has not been developed in the timescales anticipated and this bid site should be identified to meet a demand in the area which is not being met through that allocated site. It is argued that the bid site can be developed more quickly than the allocated OPI site due to the developer that has an option over the land.

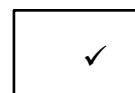
The developer is confident that there is a residual value following development of the site and the provision of the necessary infrastructure which does not pose an impediment on development.

19. Other information

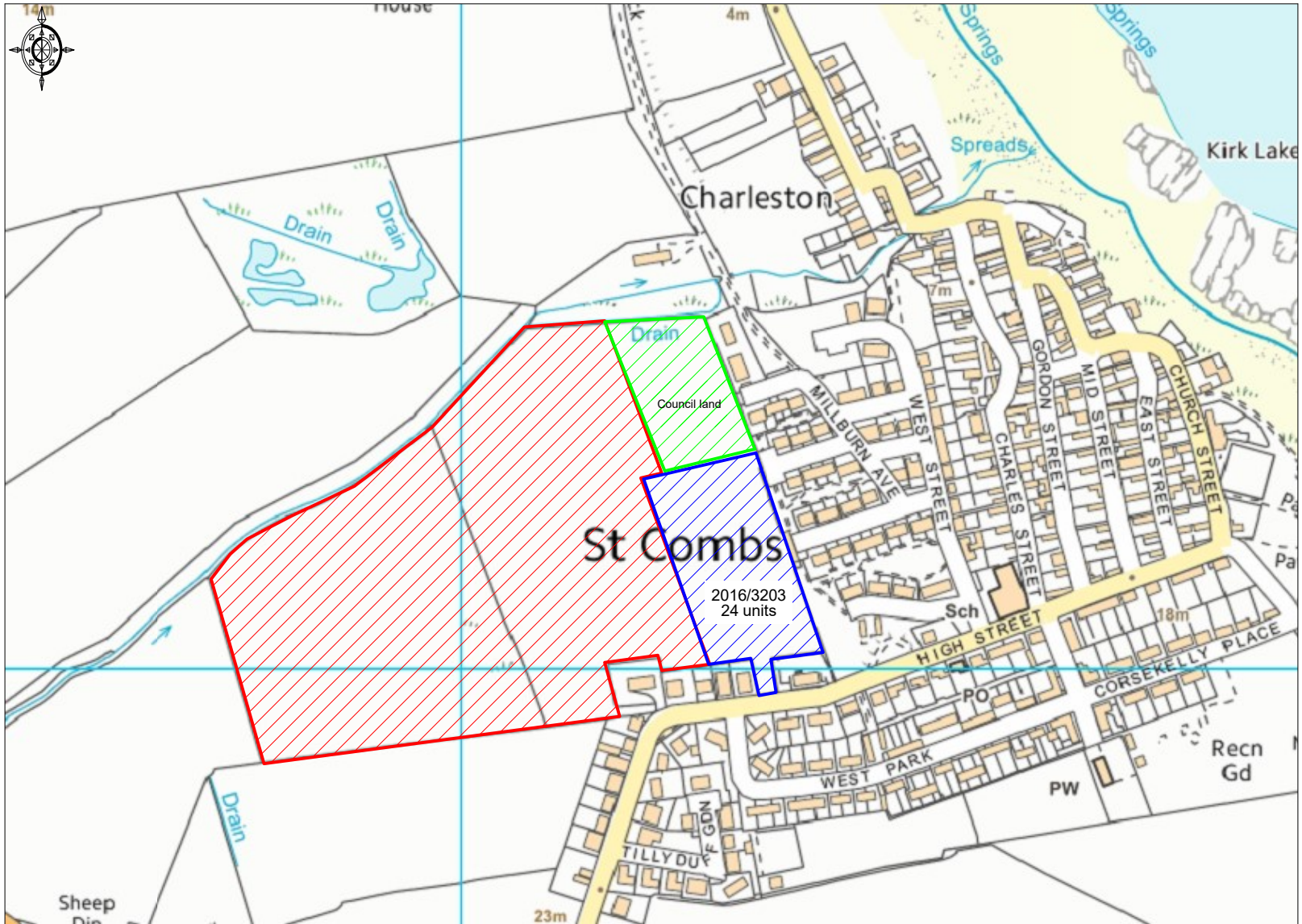
Please provide any other information that you would like us to consider in support of your proposed development (please include details of any up-to-date supporting studies that have been undertaken and attach copies e.g. Transport Appraisal, Flood Risk Assessment, Drainage Impact Assessment, Peat/Soil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

Phasing Plan

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.



Ordnance Survey © Crown Copyright 2018. All rights reserved. Licence number 100022432. Plotted Scale - 1:5000

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 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. 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.

Name	██████████
Organisation (optional)	Ryden LLP
On behalf of (if relevant)	Claymore Homes
Address	██████████ ██████████████████ ██████████
Postcode	██████████
Telephone (optional)	██████████
E-mail (optional)	████████████████████



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.

Which document(s) are you committing on?	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

Site BU035 – Land to the West of St Combs – 100 homes

On behalf of Claymore Homes, objection is made to the failure of Aberdeenshire Council to identify the BU035 site in St Combs for 100 units. It is argued that there is scope for this site to be identified for housing in St Combs and this representation should be read in conjunction with the representation made to the BU036 site which is identified as an Officer's preference for 26 units and within the Draft Proposed Local Development Plan as OP2.

This representation should also be read in conjunction with the development bid submitted at the pre-MIR stage which demonstrates that the site is suitable for the development proposed.

The Council's assessment within the MIR raises a number of issues to which we wish to respond

“The proposed site would consist of a significant extension to the village covering 9ha and marginally overlapping a site with planning permission for 19 homes on the eastern boundary”

As argued in the representation for the BU036 site, bid site BU035 should not overlap with the site that has planning permission for 19 homes adjacent. Although it is under the control of the same developer, it forms a separate site for the purpose of this bid. It may be that the original bid had the boundaries incorrectly plotted.

There is flexibility to amend the boundaries of the bid site should it be identified for development and it should exclude the consented scheme to the east and bid BU037. Text within the PDLDP should also be amended to reflect the fact that they do not overlap and do not require a masterplan for the two sites.

Although site BU035 would be seen as an extension to St. Combs, it is not significantly bigger than the OP1 allocation to the south as contained in the 2017 Local Development Plan. Any development on the BU035 site would be seen in the context of existing development in the area and would not have any significant detrimental effect on the amenity of the area. The Council accept that **“landscape impact would be minimal in this location regardless of being within the coastal zone and near SSSI and LNCS sites”**.

“The surface water flood risk would need to be recognised in the SUDs arrangement and overall layout, but this could be accommodated given the lower density”

It is accepted that there are pockets of surface water flood risk within the site, however, this would be considered within any drainage assessment for the site and appropriate mitigation provided. This is not considered to be an impediment to development.

“The site would be unconnected to the village without the development of the two other bids in the village”

It is argued that the other bid sites would be developed prior to any development of this site. The bid proposer controls the land under bid BU036 and the consented site. This provides opportunities for good connections to these sites and the wider area. Any arguments related to connectivity are therefore unfounded.

“There is a concern as to the access arrangements and in particular a second access point onto High Street”

As stated above, the proposer of bid site BU035 also controls the land under bid BU036 and the consented site. Therefore, access can be taken through these sites. A second point of access would be considered in more detail once the site is allocated and this is not considered to an impediment to development of the site.

“The scale of development would also cause the primary school to be over capacity”

St. Combs primary has a capacity range of 72-96 pupils. It is currently significantly under capacity at 43% (41 pupils). Although the school roll is rising and is forecast to be at 85% capacity by 2022 (81 pupils), this included the OP1 designation (2017 LDP) to the south of St. Combs which has been removed from the PDLDP due to marketability constraints.

The LDP identified land for housing in St. Combs specifically to support the primary school and the removal of the OP1 site means there is unused capacity in the school and a need to identify alternative locations for housing to support the school and deliver an adequate supply of housing land in the area.

It is argued that bid site BU035, which is under the control of a house builder, who has recently achieved consent in the village, demonstrates willingness and ability to develop at this location. As such, the 40 units from the deleted OP1 site should be directed to the BU035 site which should be identified within the Proposed Local Development Plan for housing.

It appears that the 40 units from the deleted OP1 site have been added to the BU037 site in the MIR. A new OP1 site has been created in the PDLDP with the consented site (Ref: 2016/3203) to the south, with capacity for 70 units. However, it is not clear whether this includes the 19 consented units, or whether it is for an additional 70 units and this should be clarified.

It is disputed whether the BU037 bid site has capacity for an additional 70 units. The consented scheme for 19 units (Ref 2016/3203) covers half of this site, resulting in the need to fit 70 units on the remainder of the BU037 site. Deliverability of this site is also questioned due to the need to take access through the consented site to the south which is under separate ownership. To date, there has been no agreement with Claymore Homes who own the land to the south to take access through their site.

With the deliverability of BU037 questioned, but a need to allocate land in place of the deleted OP1 (2017 LDP) site, it is requested that these houses are allocated to the BU035 bid site. Site BU035 lies adjacent to both the consented scheme and bid site BU036 which are all controlled by the same developer. This will ensure that the housing allocations within St. Combs can be considered as one and ensure the efficient use of the infrastructure on the adjacent sites.

The consented application in St Combs has been well received by the local community who have highlighted the lack of new properties in the village for young people. The identification of site BU035 in addition to the Officer's preference of BU036 would ensure an adequate supply of housing land in the village, considering site OP1 has been deleted and the capacity of BU037 is questionable.

“The scale would be overdevelopment altering the character and sense of place in the village, therefore the development is considered to be unsustainable”

It is not considered that the scale of housing would be overdevelopment as the land holding has capacity for this level of housing at the density considered appropriate by Aberdeenshire Council under Main Issue 10. A sense of place can be achieved through the design of the development which would be agreed through any planning application for the site.

Aberdeenshire Council provide no arguments as to why development is considered to be unsustainable. Considering the site is within 400m of local shops, employment, and bus routes, it is well related to existing development and considered a sustainable and logical location for new housing in St. Combs.

Conclusion

Objection is made to the failure of Aberdeenshire Council to identify bid site BU035 for housing in the MIR and the DPLDP.

Site OP1 (2017 LDP) is removed from the DPLDP and while it was originally allocated to support the primary school, if it is not delivered, there is a need to allocate additional land to ensure the viability of the primary school going forward. Bid site BU037 should be considered separately from the consented to the south as shown in the PDLDP. It is unclear whether the 70 houses allocated includes the 19 consented units, or whether this is in addition to these and this requires clarification.

It is also questioned whether the BU037 site has capacity for the units proposed or capable of delivery given the need to take access through the consented site to the south. The units identified on the BU037 site and the deleted OP1 site should be allocated the BU035 site and that site identified for development in the Proposed LDP. This site is under option to the same developer as the BU036 site and the consented site to the east. This demonstrates deliverability and will ensure an adequate supply of housing is delivered in St. Combs to support the primary school and local demand for housing.

As such it is requested that bid site BU035 is identified for housing in the first plan period of the Proposed Local Development Plan, in addition to the BU036 site adjacent.