

# PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

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

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

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

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

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

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

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

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



## ACCESSIBILITY

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

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

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

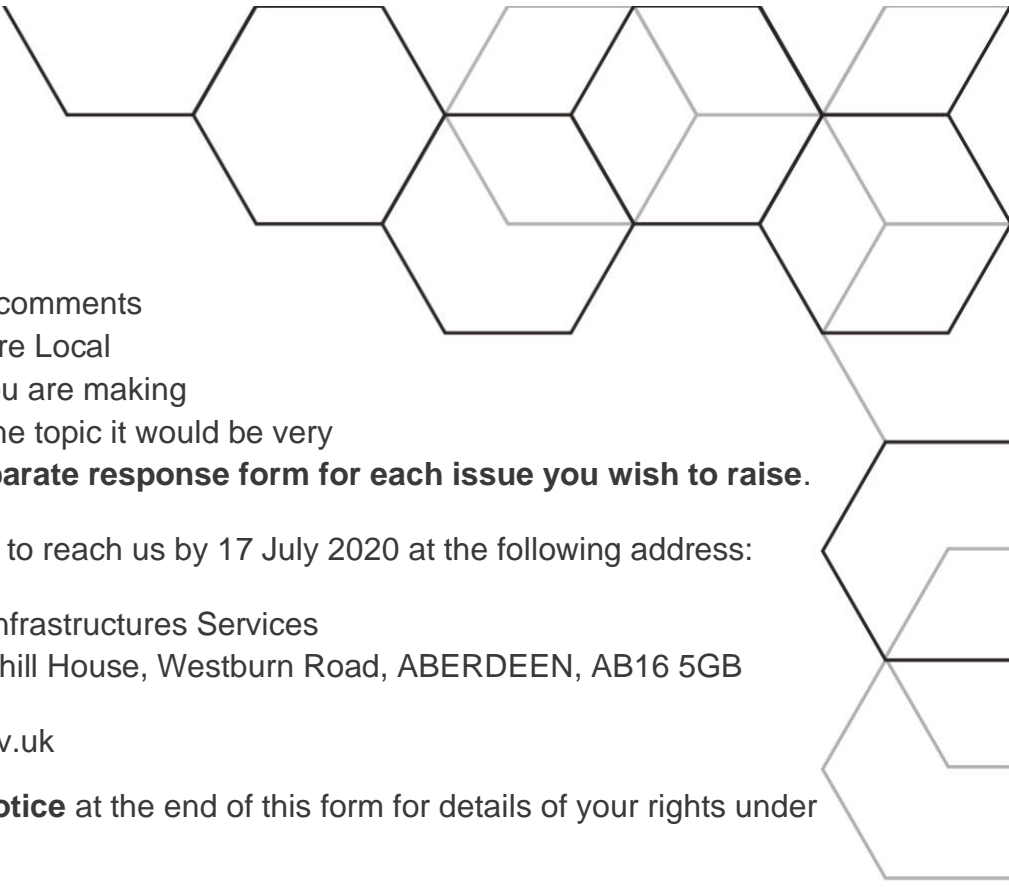
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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

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

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

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



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

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

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

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

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

## YOUR DETAILS

Title:	[REDACTED]
First Name:	Malcolm
Surname:	Campbell
Date:	7 July 2020
Postal Address:	[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? **Alexander Duthie and Sons**

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):

My clients Alexander Duthie and Sons would like to see the Local Development Plan modified as follows in respect of their development proposals at Wellington Place Farm, Peterhead:

1. The Local Development Plan Settlement Statement for Peterhead in Appendix 7B Settlement Statements - Buchan Area should be amended to include a new mixed-use allocation at Wellington Place Farm, Peterhead under the heading **Allocated Sites**. A plan of the suggested boundary of the new allocation is attached to these representations and should be included in Map 4 for Peterhead. The proposed allocated site at Wellington Place Farm should make reference to the site comprising residential and employment uses capable of delivering up to 500 new homes and 30,000sqm of industrial, business, commercial and retail floorspace. The site should be removed from land currently identified as Countryside in the finalised LDP.
2. Table 2:Employment Land Allocations in Appendix 01 - Employment Land Allocations should be amended under Buchan to include an additional allocation for Wellington Place Farm of 9 Hectares at Peterhead.
3. Table 3:Housing Allocations in the Rural Housing Market Area in Appendix 06 – Housing Land Allocations should be amended under Buchan to include an additional allocation for Wellington Place Farm of 500 houes at Peterhead.
4. The settlement statement for Peterhead in addition to identifying the boundaries of the proposed new allocation at Wellington Place Farm, should highlight the need for a masterplan to be prepared for the site to which development will require to be in accordance with. Reference should also be made to the site contributing to affordable housing, a safe crossing of the A90 Trunk Road, community facilities and other requirements as may be identified. Children will be zoned to Meethill Primary School and Peterhead Academy.

## Reason for changes:

Alexander Duthie and Sons submitted a development bid for Wellington Place Farm to the emerging Local Development Plan (LDP) in March 2018 (Site BU044). This sought to remove land at Wellington Place Farm from the Countryside and allocate the land as a new mixed-use residential allocation in the new LDP capable of delivering up to 500 new homes and 30,000sqm of industrial, business, commercial and retail floorspace.

Further representations were made to the Main Issues Report and the Draft Proposed Local Development Plan on Wellington Place Farm in April 2019, however these representations did not result in any changes being made to the Local Development Plan in respect of Wellington Place Farm. Nevertheless, Alexander Duthie and Sons consider that there remain sound planning reasons for their site to be incorporated into the finalised LDP.

It is disappointing that there are no additional development sites proposed to be allocated for Peterhead in the finalised LDP. It is stated in the Main Issues Report that there are a number of existing allocations which are due to complete prior or during the next Plan period and that the existing OP1 site will meet the need for further allocations for housing and employment. No other sites are therefore needed. This seems to contradict the statement made earlier in the Main Issues Report for Peterhead which states that “There is demand and opportunities in Peterhead for future development given the generally flat nature of the land and connectivity through the A90.”

Whilst it could be considered in terms of overall supply that there appears to be a reasonable area of land allocated for new residential development within Peterhead, the bulk of this land is located on two large sites to the north west of Peterhead. Much of the land (Sites OP1 and OP2) is also largely under the control of one developer. In addition, there are a number of issues relating to these two large sites. Due to their size and, in the case of Site OP1 in particular, there are difficulties in bringing land forward quickly enough to meet demand. Infrastructure costs are high, which reduce the speed at which serviced land can be made available for development. Being largely under the control of one developer also creates a monopoly situation where the release of land can be restricted which does not provide choice for new householders and can lead to higher house prices. In this situation there is also a lack of choice in housing both in terms of house types and location. Allowing a new residential site to be allocated at Wellington Place Farm would allow for more competition into the Peterhead housing market and provide a location on the south western side of Peterhead to provide more balance in terms of housing distribution, with consequential benefits to traffic flows and traffic management in Peterhead and impact on schools and community facilities.

In the Main Issues Report the following comments are made in respect of the land at Wellington Place Farm. “The proposed site is located to the west side of the A90 and although well located in relation to the settlement, the siting is not preferred as it is set directly opposite to the industrial park that would make it a “standalone” development for some time in the future. There is a constraint on education provision in the local primary school. Furthermore, it is suggested that a secondary access would be taken from the

A90 trunk road. This would result in further traffic congestion in the area. Furthermore, it has been forecasted that the local primary school will be over capacity in 2022.”

In responding to the above comments in April 2019 we asked the Council to consider the following.

### **Site Location**

It is positive that officers at that time considered that the Wellington Place Farm site is well located in relation to the settlement. Also contrary to the statement by officers about the site being located opposite an industrial site we believe it is positive in planning terms that the proposed mixed-use development is located close to employment land. This provides a synergy between employment and housing and provides the opportunity to reduce the need to travel for workers in the industrial park on the other side of the A90. In terms of minimising potential noise nuisance, the industrial park and the proposed housing will be separated by the A90, a generous landscaped boundary on the western side of the A90 and soft Class 4 business uses. A safe pedestrian and cycle access will also be provided across the A90 to ensure connectivity between the site and Peterhead. With regard to the standalone aspect the main opportunities for further expansion of Peterhead lie to the west of the A90. The precedent for development on the west side of the A90 has already been set by the OP1 development at Inverugie Meadows and the allocated land immediately to the south of the Wellington Place Farm site at OP5 and BUS 4. Any standalone element will be addressed by good and safe connectivity across the A90.

### **Education**

With regard to education the land at Wellington Place Farm is currently zoned to Dales Park Primary School. At the present time this school is at 84% capacity, and is forecast to be over capacity by 2022. There are however close to Wellington Place Farm, primary schools at Meethill and Burnhaven. Both primary schools are currently below capacity (60% and 75% respectively) and are still forecast to be well below capacity in 2025 (39% and 82% respectively). A rezoning of the land at Wellington Place Farm to either of these schools, preferably Meethill, which has greater capacity, would remove the perceived education constraint and make use of the spare education capacity at these schools. All primary schools in Peterhead are zoned to Peterhead Academy where there is more than adequate capacity now and in the future. The Wellington Place Farm site is also well placed to take advantage of the new replacement Peterhead Academy proposed for a site at Kinmundy. The Wellington Place Farm site is within walking distance of the new academy.

### **Access**

In terms of access to the site, reference to a secondary access off the trunk road made in the development bid was only if required to service the proposed development. This would be established through a traffic study, however if a secondary access is required onto the trunk road it is believed that this could be provided without detriment to the road network and the trunk road. There are also opportunities to connect through to the proposed development to the south and, to the trunk road to the south to provide a second access. The OP1 Site to the north will have two new connections onto the trunk

road in addition to an existing access. This was considered acceptable to the Council's Roads officers and also to Transport Scotland following a traffic study.

In response to comments made by officers on our representations submitted in April 2019 regarding the lack of a Traffic Impact Assessment being provided and there being sufficient employment land already allocated in Peterhead at this time we would respond as follows:

1. Detailed Traffic Impact Assessment studies are normally provided at the planning application or masterplanning stage of development of a site. It would be our intention to start preparation of traffic studies on commencement of a masterplan for Wellington Place Farm.
2. Whilst it is accepted that at the current time there are good supplies of employment land in Peterhead, it is sustainable to include a small provision for employment uses in the Wellington Place Farm allocation. If necessary, the employment land can be placed in a later phase of development of the site.

## **Conclusions**

The Wellington Place Farm site should be included in the finalised Local Development Plan. It will be necessary to prepare a masterplan to establish the details of access, pedestrian and cycle links, landscaping, the mix and layout of housing and business, industrial, commercial and retail uses.

We believe that the concerns previously raised by officers can be successfully overcome in terms of location, access and education. We also believe that despite the overall level of existing housing allocations in Peterhead, there is still a need to give consideration to allocating some additional land to provide further opportunities for growth and greater choice to householders in terms of location, house types and house prices and, to ensure that a steady supply of housing continues to be available in Peterhead, which might otherwise be held back due to infrastructure constraints.

In terms of other potential sites for future development for Peterhead, Wellington Place Farm and land at Dales (also in the control of Alexander Duthie and Sons) should be the preferred options for any new development as they are providing an alternative location to the north western sector of Peterhead. The other potential sites for Peterhead submitted as developments bids at an earlier stage in the plan process are all located in the north western sector where there is already sufficient land allocated.

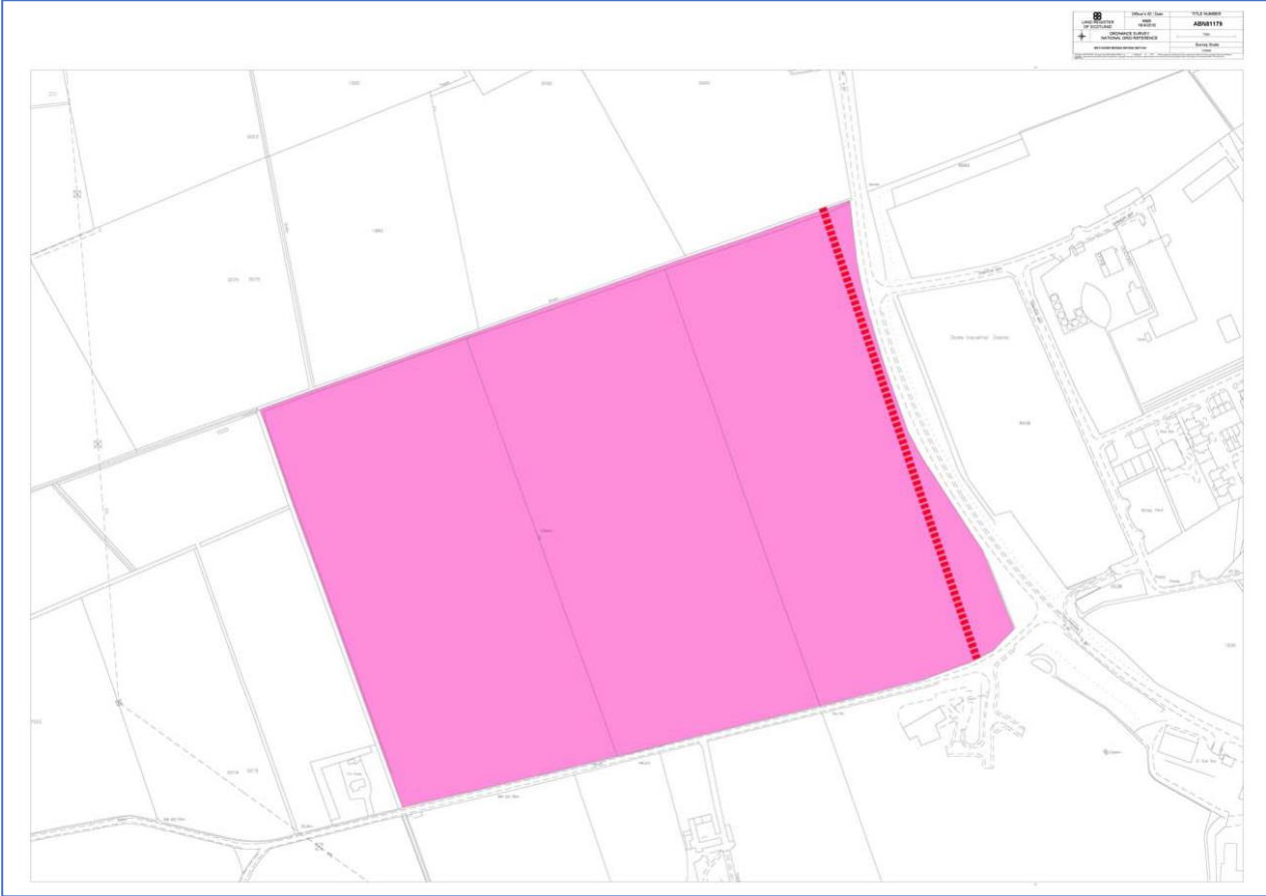
Alexander Duthie and Sons housebuilding arm, [REDACTED] are running out of suitable building land in Peterhead and a new residential allocation at Wellington Place Farm, which is in their control, would provide them with a new housing supply pipeline and help retain their current workforce of 75 employees. It would also make it easier to deliver new housing in Peterhead and provide more competition in the local housing market. Local housebuilders who know the local north east market tend to perform better in terms of delivering new housing sites and the affordable housing that comes with that.

Some additional land needs to be identified within Peterhead for future housing and employment development as it is unlikely that the current housing allocations, in

particular, will be able to deliver timeously the required amount of new housing (private and affordable) that Peterhead requires for the next 10-15 years. It is also important in terms of promoting future growth at Peterhead, which is the largest town in Aberdeenshire and a major employment and service centre in addition to being the northern anchor of the “Energetica Corridor”. If the economic and social objectives of “Energetica” are to be realised further sustainable growth has to be encouraged in Peterhead and land allocated to help deliver this. The Wellington Place Farm site is well placed to help deliver new housing and employment and should be included in the finalised Local Development Plan. We would ask therefore that the land at Wellington Place Farm (See Appendix 1) be included in the finalised Local Development Plan as a new mixed-use allocation comprising 500 houses, 20,000sqm of industrial floorspace, 5000sqm of business space and 5000sqm of mixed retail and commercial space. This is based on the planning case referenced above.



**Appendix 1 – Wellington Place Farm - Proposed Site Boundary**



# 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.

