

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 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

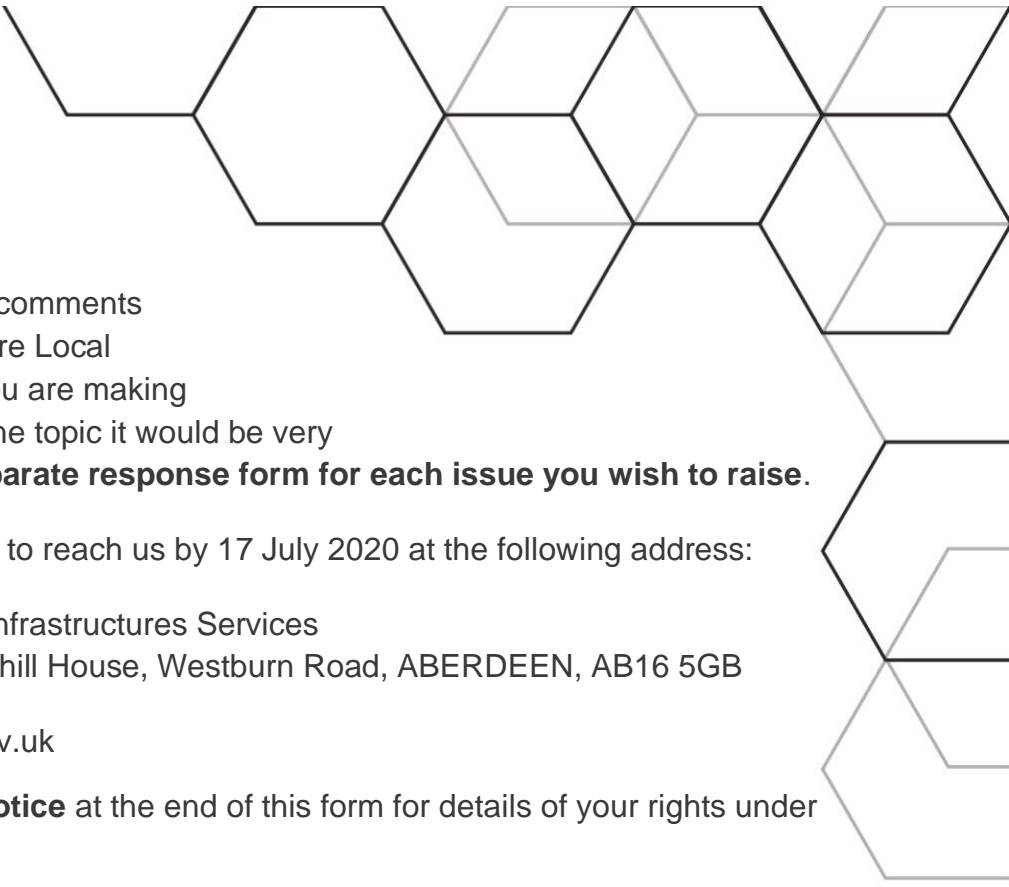
Tel: 01467 536230

Email: ldp@aberdeenshire.gov.uk

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 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

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

YOUR DETAILS

| | |
|-------------------|----------------------|
| Title: | ████████████████████ |
| First Name: | Malcolm |
| Surname: | Campbell |
| Date: | 7 July 2020 |
| Postal Address: | ████████████████████ |
| Postcode: | ████████ |
| Telephone Number: | ██████████ |
| Email: | ████████████████████ |

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 Dales, Peterhead:

1. The Local Development Plan Settlement Statement for Peterhead in Appendix 7B Settlement Statements - Buchan Area should be amended to include a new housing allocation at Dales, 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 Maps 4 and 5 for Peterhead. The proposed allocated site at Dales should make reference to the site comprising a new residential development of up to 100 new homes, including affordable housing. The site should be removed from land currently identified as BUS3 in the finalised LDP.
2. 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 Dales of 100 houses at Peterhead.
3. The settlement statement for Peterhead in addition to identifying the boundaries of the proposed new allocation at Dales, should highlight the need for the site to contribute to affordable housing 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 Dales to the emerging Local Development Plan (LDP) in March 2018 (Site BU043). This sought to remove land at Dales from land allocated for employment use (BUS3) and allocate the land as a new residential allocation in the new LDP capable of delivering up to 100 new homes.

Further representations were made to the Main Issues Report and the Draft Proposed Local Development Plan on Dales in April 2019, and these representations almost resulted in changes being made to the Local Development Plan in respect of Dales with the Buchan Area Committee at their meeting on 3 September 2019 recommending that the site be included in the LDP for housing. The recommendation of local Councillors was however overruled by the Infrastructure Services Committee on 3 October 2019. Alexander Duthie and Sons were disappointed that local decision making was overruled in respect of their site however still 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 Dales 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 Dales. "The proposed site is designated for employment land and a protected site. The site is within an HSE hazard consultation zone. In terms of landscape and setting, the topography of the ground is flat. Surrounded by industrial buildings this development is not considered to be a suitable location for housing. Furthermore, it has been forecast 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

Whilst it is accepted that the Dales site is currently allocated as an employment site the site is isolated from the rest of the industrial and business uses at Dales and relates better to the adjoining residential land to the north at OP2 Wester Clerkhill, land reserved for care and support facilities at R4 and the open space to the east at Dales Park. The loss of some 4 hectares of employment land is not a major issue in terms of the overall supply of employment land in Peterhead and would be replenished if additional employment land is allocated at Wellington Place Farm which is also controlled by Alexander Duthie and Sons and subject of representations to the LDP. Due to the substantial areas of existing landscaping incorporated with the site boundaries the net loss of employment land is less than 4 hectares. It is considered that because of its isolation from the rest of Dales Industrial Estate there are special circumstances which suggest that the site is suitable for residential use and a satisfactory residential environment and level of amenity can be created. This isolation from the industrial uses is reinforced by the substantial landscaping belts around the southern, western and eastern boundaries of the site, which effectively screen it from the industrial uses.

Whilst the site may lie within an HSE hazard consultation zone this should not prevent residential development from taking place on the site and is part of an advisory statutory consultation process required in terms of health and safety regulations.

Education

With regard to education the land at Dales 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 is however close to Dales, a primary school at Meethill. This school is currently below capacity (75%) and is still forecast to be well below capacity in 2025 (82%). A rezoning of the land at Dales to Meethill would remove the perceived education constraint and make use of the spare education capacity at Meethill. All primary schools in Peterhead are zoned to Peterhead Academy where there is more than adequate capacity now and in the future. The Dales site is also very well placed to take advantage of the new replacement Peterhead Academy proposed for a site at Kinmundy. The Dales site is within walking distance of the new academy.

In response to comments made by officers on our representations submitted in April 2019 regarding the nearest building being 60 metres from the edge of the Dales site and therefore the site not being far enough away from industrial buildings and the primary school roll being over capacity at Dales Park Primary by 2023 we would respond as follows:

1. As stated earlier in this response the site at Dales is exceptionally well screened and separated from industrial uses lying to the south and west and the landscape boundary around the site would be further enhanced through additional planting and soundproofing measures if required.
2. The issue raised regarding future capacity at Dales Park Primary School can be addressed through a re-zoning of the site to Meethill Primary School.
3. It is worth noting that the Buchan Area Committee at their meeting on 3 September 2019 voted to include Dales as a new residential allocation in the Finalised Local Development Plan subject to agreement with regard to the number of homes and appropriate access arrangements. No concerns were raised regarding proximity to industrial buildings or education capacity. This recommendation was subsequently overruled by the Council's Infrastructure Services Committee on 3 October 2019 which contains a majority of members from outside the Buchan Area.

Conclusions

The Dales site should be included in the finalised Local Development Plan. It will be necessary to prepare a site layout to establish the details of access, pedestrian and cycle links, landscaping, the mix and layout of housing including the proportion of affordable housing.

We believe that the concerns raised by officers can be successfully overcome in terms of location, screening from employment uses, health and safety 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 further 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.

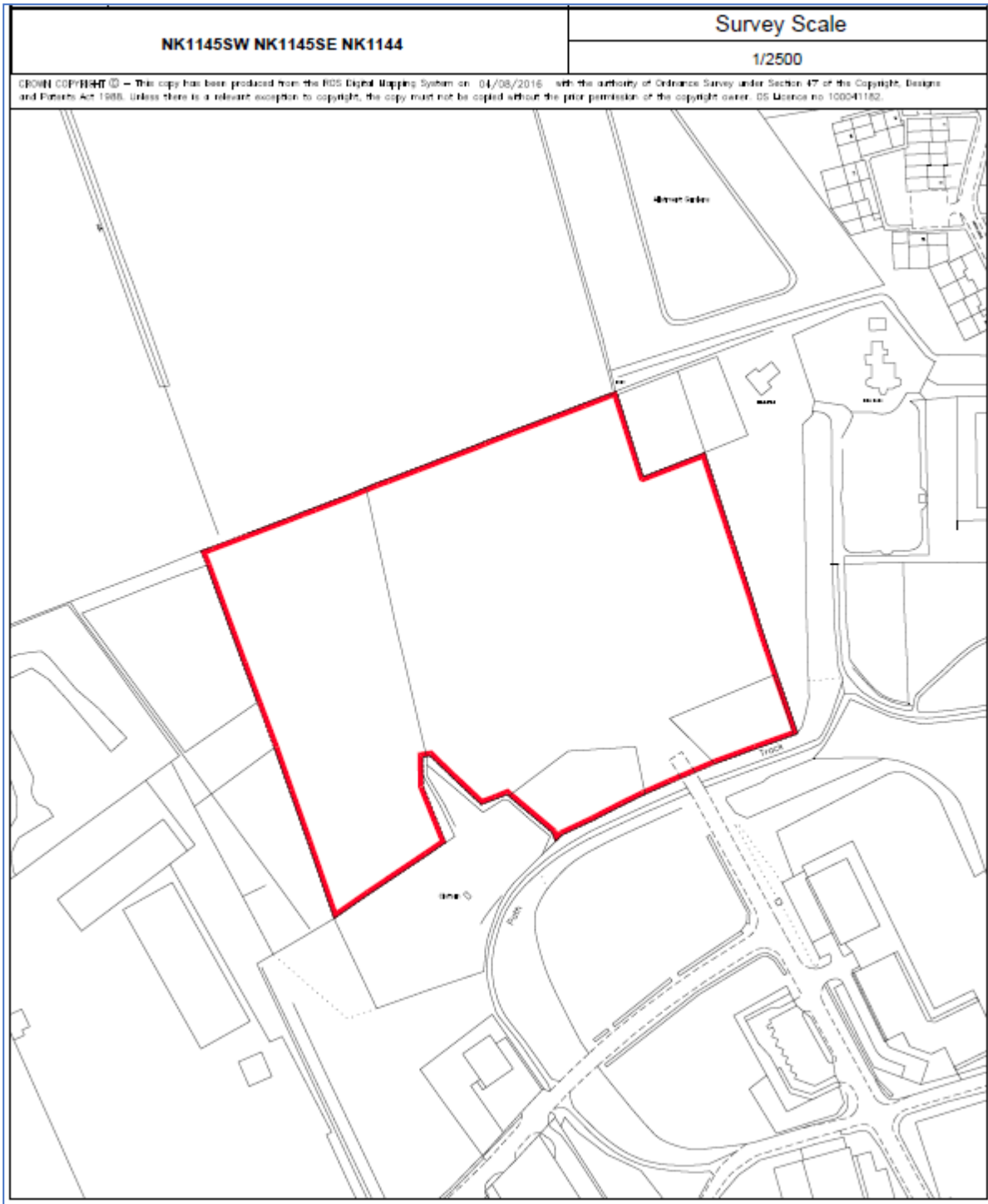
In terms of other potential sites for future development for Peterhead, Dales and Wellington Place Farm (also in the control of Alexander Duthie and Sons) should be the preferred options for any new development as they are providing an alternative location to the north western sector of Peterhead. The 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 Dales, 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 some 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. In this respect it is noted that the Main Issues Report highlights that for Peterhead “For this Plan period, there is local demand for affordable housing”.

Some additional land needs to be identified within Peterhead for future housing 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 Dales site is well placed to help deliver new housing and should be included in the finalised Local Development Plan. We would ask therefore that the land at Dales (See Appendix 1) be included in the finalised Local Development Plan as a new housing site for up to 100 new homes. This is based on the planning case referenced above.

Appendix 1 – Dales - 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

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.

