

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

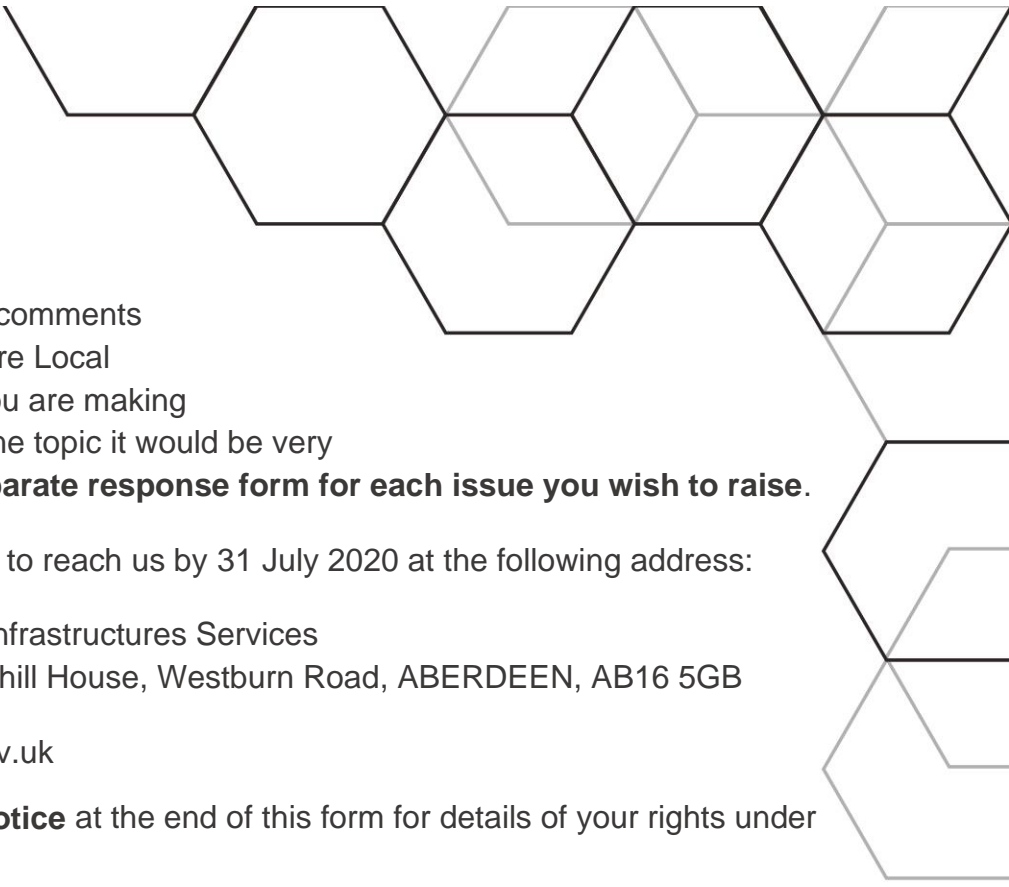
Tel: 01467 536230

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:	Dr
First Name:	David
Surname:	O'Donnell
Date:	22 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?

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):

Site Ref: R1 (KN129) Land at Durriss Forest - Proposal for Outdoor recreation facilities (page 23) should be removed from the current LDP

Reason for change:

The location has not been given proper consideration against other locations for the site.

1. Site access has not been assessed.

- A better option which provides the same amenities could be the slopes of Mongour and/or Craig Beg (GR 769912) which have better access from the A957 Slug Road along Cryne Course Road leading to the Durriss Mast. The sight lines onto the main road are significantly better and would give similar access to that for the Hillend Ski Centre in Edinburgh.
- The slope of Mongour and Craig Beg are larger in expanse and therefore provide greater amenity for mountain bike trails.
- The environmental impact of the above sites would be similar to that of the proposed site.

2. Traffic impact on the local non-classified roads and has not been assessed.

- These non-classified roads are already in a poor state or repair and have seen a significant rise in car traffic from mountain bikers from Aberdeen accessing the self-built trails currently on the site. This traffic would become significant if a trail centre were to be established and the single track roads are not built for that volume of traffic.

3. No Carbon Impact Assessment has been made

- There will be significant long-term carbon impact due to increased travel requirements. To be successful, the site requires significant number of visitors. There are insufficient numbers in Aberdeen to justify such an investment. The catchment area would have to be broader requiring extensive travel from the Central Belt. Since this site is only accessible by car, the number of vehicle journey miles would have to increase. Given the distance to travel this would not be offset by decreased journeys to other sites (e.g. Peebles), which are closer to the areas of large population.

4. The need for this asset has not been assessed and the negative impact on other existing amenities in Aberdeen and Aberdeenshire has not been assessed

- There are a number of sites around Aberdeenshire and the city that provide similar amenities as those being proposed for this site. The number of local people attending these existing sites regularly is low and the additional number of local people that might attend a new site regularly will be limited. It is clear therefore

that a new site is likely to result in significant cannibalisation of visitors from existing sites. This is likely to make existing sites (e.g. Garthdee) non-viable which will deprive individuals with limited ability to access to this new remote site of existing amenities. Closure of such sites without costly removal of infrastructure will result these sites which will become magnets for vandalism leading to further deterioration of such community sites.

- All similar sites in Scotland (bike parks, ski slopes, Cairngorm funicular, etc.) require significant public or community funding either to set-up or to continue in operation once set-up. It would seem sensible for the council to determine if this is a resource it would be willing to support before including land in the Area Plan.

Specific comments on Environmental Assessments - Impact Assessments have not fully considered a number of issues

Air: should be classified as either “-ve” or “?”.

- The impact on air quality will be driven by two items
- The choice of power for any ski lift. Many remote lifts are diesel powered.
- The number of vehicles visiting the site. The site is not served by public transport so visitors would largely visit by car. If the visitor numbers are correct (a brave assumption) then air quality in the area will suffer.

Water: Should be classified as either “-ve” or “?”.

- Industrial size WWTW will be required and the impact of any leakages/poor performance will have a detrimental impact on water courses which flow into the Dee.
- Silt deposition and water-borne pollution even short term is likely to have significant impact the local wildlife and will be carried into the Dee
- Potential for spillage of chemicals (diesel, etc.) used during operation is significant.

Climatic: Should be classified as “-ve”

- There will be significant long-term carbon impact due to increased travel requirements. To be successful, the site requires substantial numbers of visitors. There are insufficient numbers in Aberdeen to justify such an investment. The catchment area would have to be broader requiring extensive travel from the Central Belt. Since this site is not accessible by public transport, the number of vehicle journey miles would have to increase. Given the distance to travel this would not be offset by decreased journeys to other sites (e.g. Peebles), which are closer to the areas of large population.
- There will be increased carbon emission from the requirement to remove the young growth plantation which occupies much of the site.
- Carbon emissions from what will be relatively large scale engineering works (construction of pylons for ski lift), construction of nylon ski matting is not considered.
- There may be emissions from ski lift engines if diesel powered.
- There will be increased noise – from vehicles, from lift engines.

Biodiversity: Should be classified as “-ve”

- Why does the impact assessment acknowledge that there is likely to be disturbance of protected species but considers the impact to be “0”?
- It would seem that before classifying a site, a biodiversity survey should be required to ensure that it is correct to classify said site for development – The site

has a number of rare species – red squirrel, pine marten and various species of newt.

Material Assets: Should be classified as “0”

- There is significant economic risk to development of what is effectively a civic amenity. This may require additional public money to develop or risk only partial development which will result in a detrimental impact on the location.
- The assessment does not consider the impact on other sites in the region that offer similar services (e.g. ski slopes at Alford and at Garth Dee). If this site is successful, this will be through cannibalisation of custom from existing sites – these are likely to close. Such abandoned sites will have a negative impact on those communities from vandalization to becoming magnets for undesirable activity.

Population:

- Note the above point regarding likely detrimental impact on the wider community.

Human Health: Should be a “0”

- The impact on health is likely to be zero. Similar attractions already exist through Aberdeenshire and in the city. There has not been an increase in use of these attractions, in fact use has decreased requiring additional public support. This is the same for other similar attractions in Scotland – for example Hillend ski slope in Edinburgh which requires significant public funding.
- The people who will attend this attraction already attend similar attractions and given the remote location the number of additional people who would not previously have visited similar sites is likely to be limited.

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.

