

Response to the Aberdeenshire
Proposed Local Development Plan 2020

by

Newtonhill, Muchalls & Cammachmore
Community Council

Prepared by 

on behalf of

Newtonhill, Muchalls & Cammachmore Community Council

July 2020

This document outlines the response of the Community Council to the Aberdeenshire Council Proposed Local Development Plan 2020.

The Proposed Plan

The Proposed Local Development Plan 2020 is well written, and the overall layout is a considerable improvement on the current adopted plan. It is easy to read as a series of documents and covers most aspects of planning that the Community Council would refer to when considering planning applications. However, there are some omissions and some areas lack sufficient explicit detail, for example, the responsibilities of developers to provide additional school places needs to be more explicit.

The text below details those areas of the Proposed Local Development Plan 2020 that need improvement.

Error in the Proposed Plan

Page 28 of the plan shows a map entitled Shaping Business Development. An 'Other Town Centre' (tc) appears just above Newtonhill. This refers to Portlethen, as listed on page 105 of Appendix 2, and should be moved.

Section 9: Shaping Places

Policy P5 Digital Infrastructure

The Policy should consider the proximity of any proposed telecommunications masts to buildings where children regularly congregate: schools, out of school clubs, mother and baby toddler clubs, scouts, etc.

Section 14: The Responsibilities of Developers

Policy RD1.2 Vehicle Charging Points

The lack of electric vehicle charging points is a barrier to reducing carbon emissions. Home electric vehicle charging points should not be discretionary. Developers must make every effort to include at least one electric vehicle charging point per household. Similarly, workplace charging points should not be discretionary.

Policy RD1.18 Terrestrial Television Reception

Digital terrestrial television uses UHF transmission, which requires line-of-sight between the transmitter and the receiving aerial; this was not the case for analogue signals. There is potential for new development to block the signal from reaching existing receivers, resulting in a loss of amenity to local residents. The policies under **Responsibilities of Developers** should include a policy that places a condition on developers to make good any loss of television reception with all costs being borne by the developer.

Policy RD2.10 Primary Education and RD2.11 Secondary Education

The Organisation for Economic Co-operation and Development (OECD) runs a Programme for International Student Assessment (PISA). Every three years it tests 15-year-old students from all over the world in reading, mathematics, and science. The tests are designed to gauge how well the students master key subjects to be prepared for real-life situations in the adult world. The results allow countries to be ranked by performance. In 2015, Scotland's schools have recorded their worst ever performance in an international survey of pupils, recording only average in all three subjects (see figure 1). In 2018, the results for mathematics and science fell further, but reading recovered. Scotland is moving down the world rankings and this needs to be addressed as a matter of urgency.

Primary and secondary school education provision is inextricably linked to housing development. Time and time again, Aberdeenshire Council has failed to provide even adequate school provision when approving planning applications. This has led to overcrowded schools and has had a negative impact on the education of children in the Region.

Aberdeenshire Council has a duty to provide and deliver world-class education. The status-quo will see Scotland’s world rankings continue to fall and Scotland will drift into ‘below average’ status. It is often said that “failure to plan, is to plan to fail’. The Strategic Development Plan (SDP) gives figures for new housing development in the Region but fails to mention education provision. The Community Council submission in response to the Strategic Development Plan Main Issues Report 2018 proposed changes to planning policy to consider the impact on school capacities when determining planning applications. Developer Obligations do not fully consider the impact that overcrowding in schools has on the quality of our children’s education. Aberdeenshire Council, council-tax payers and pupils should not have to pay the cost of development in the wrong place.

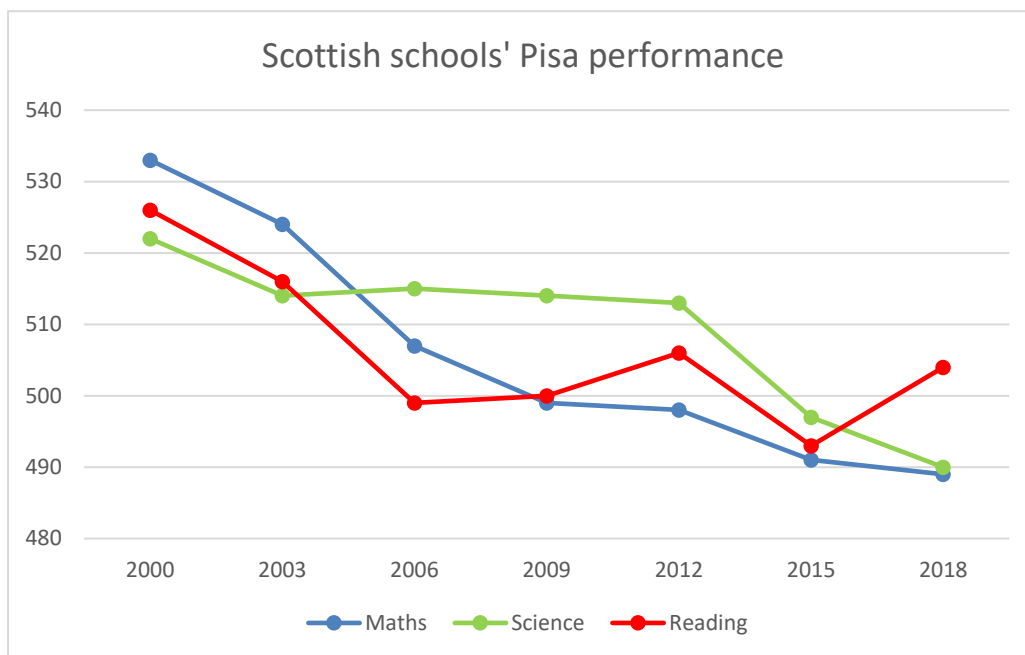


Figure 1 Scottish Schools' PISA performance

When considering education, appendix 7 says that “All residential development may be required to contribute to the provision of additional capacity”. Policies RD2.10 and RD2.11 need to make it clear that contributions will be required to ensure that schools can, if necessary, be expanded to include additional teaching facilities and staff.

The Community Council proposes a new policy to protect educational resources:

Proposed Policy PR4 Protecting Education Resources

We will not approve developments that have a negative effect on important resources associated with the pre-school, primary or secondary education. In all cases development which impacts on any of these features will only be permitted when public economic or social benefits clearly outweigh the value of the educational resources to the local community, and there are no reasonable alternative sites.

The developer will need to provide an eight-year prediction of school roll, class sizes and class numbers that highlights any loss of amenity.

Kincardine and Mearns Settlement Statements

The Community Council agrees with the decision made by Aberdeenshire Councillors to reject proposed development bids KN059, KN101, KN132, and KN133 as these would have made the communities of Newtonhill, Muchalls and Cammachmore unsustainable. It is important to protect the coastal environment of Newtonhill and Muchalls as a tourist destination to enhance the local economy in the long term. Furthermore,

the residents of Newtonhill, Muchalls and Cammachmore have expressed an extraordinarily strong sense of pride and community in their respective villages and these settlements must not be allowed to coalesce.

In section 3.38 of the proposed Strategic Development Plan 2018, Chapelton is described as a significant new development which has the potential to set the standard for future development in Aberdeen City and Shire and beyond. The Local Development plan 2021 has the responsibility to ensure that Chapelton is allowed and encouraged to thrive without undue competition from other allocated sites.

Newtonhill: site OP1, Park Place

In 2014 the Community Council held a community engagement exercise where residents were asked if they supported the Community Council in asking for site OP1: Park Place to be removed from the Settlement Statement, 85% of respondents agreed. With 4045 new houses being built at Chapelton, less than a mile away, there was no need to keep OP1 in the Local Development Plan and we asked for it to be removed.

In 2018 this site was subject to a planning application for 121 houses. The Community Council engaged with the local community to gauge public opinion and it is also clear, from 651 submissions against the planning application and only one in support, that the vast majority of residents are strongly opposed to this development. There were several valid objections to the application on grounds of planning policy and the application was refused by the Kincardine & Mearns Area Committee but was allowed on appeal.

The Community Council opposes any development at this location and allocation OP1 should be removed from the plan.

Newtonhill: site OP3, West Monduff

In terms of policy B2.1, this site is poorly located due to the limited and potentially dangerous access from the A92 slip-road. In order for this allocation to be viable, an alternative access route is required that does not involve traffic obstructing or crossing the slip-road.

YOUR DETAILS

| | |
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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?

Newtonhill, Muchalls & Cammachmore Community Council

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