

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.

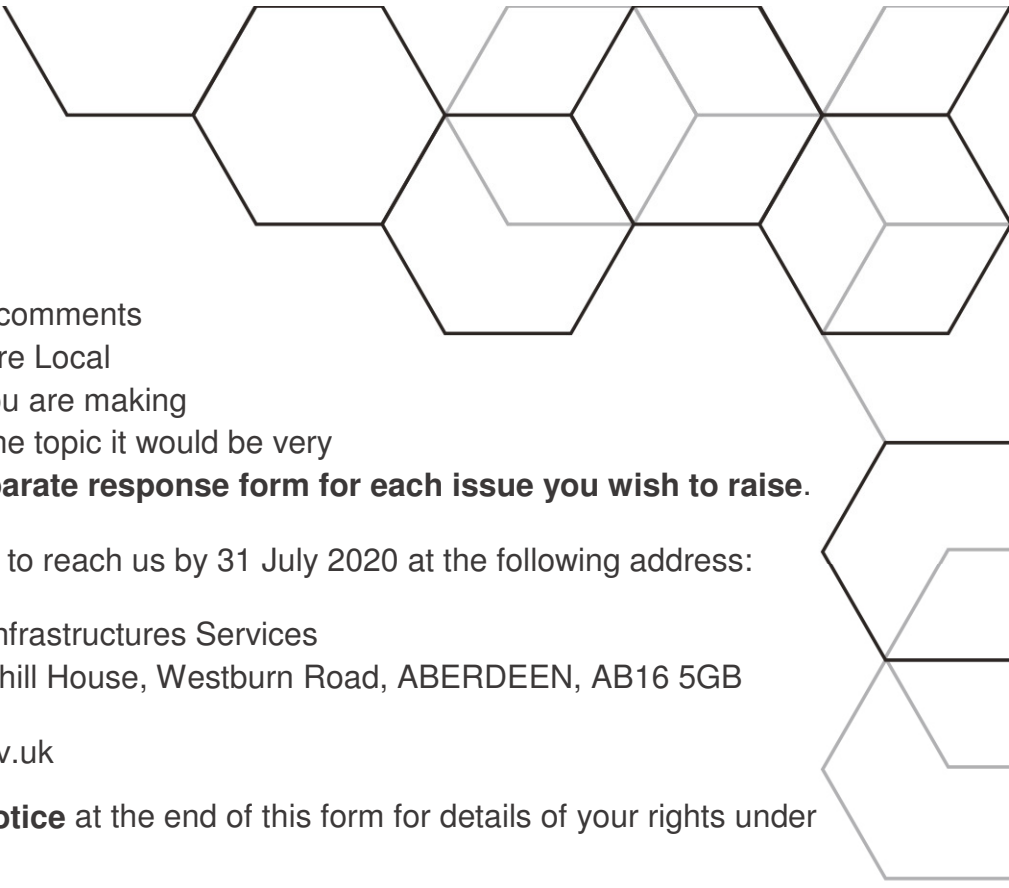
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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:	Mr
First Name:	John
Surname:	Wright
Date:	31/07/2020
Postal Address:	████████████████████
Postcode:	██████
Telephone Number:	██████████
Email:	████████████████████████████████

Are you happy to receive future correspondence only by email? **Yes** ☐ ☐

Are you responding on behalf of another person? **Yes** ☐ ☐

If yes who are you representing?

☐ Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter: **Y**

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):

Appendix 7f Settlement Statements – Marr.

Amend Monymusk settlement statement (pg.847) and Inset Map (pg.848) to reflect the allocation of P3 (46 units) of the approved Monymusk Masterplan.

Reason for change:

Identify Phase 3 (46 units) of the Monymusk Masterplan as a reserve/future allocation of land for development within the plan period, subject to mid term review, as envisaged in the Draft Proposed Plan published for consultation with the MIR ("providing a natural rounding off of the settlement both physically and visually").

In the Main Issues Report, the site was identified by Officers as a "reserve" site to be confirmed at mid-term plan review, which we supported. This land has been included for many years in the Approved Monymusk Masterplan (still listed on the Council's website as a "Masterplan"). It has previously been identified as a "fh" site in previous Local Plans for delivery in the future.

The Council's Marr Area Committee Report summarising representations indicates that;

- There is insufficient capacity at the Sewage Treatment Works and a Growth Project may be required once the 5 tests are met;
- Objection from local residents relating to sewage capacity, water supply, surface water run-off, flood risk, deterioration of water quality of the River Don, impact on natural habitat and wildlife; lack of public transport; lack of safe walking/cycling routes; increased car reliance; education capacity; prime quality agricultural land;
- Concerns expressed about impact on Conservation Area;
- Restricting any future opportunity to develop a sports facility next to the school and impact on existing football pitch;
- Not considered that the community needs more housing, nor that new houses would support local business;
- SNH have indicated that the nearby Monymusk House Gardens and Designed Landscape presents an opportunity to reflect the character and species of the designed landscape policies in the proposed landscape framework that should form part of the proposed development of this site.
- SNH has also recommended a site brief to ensure adequate woodland protection, connectivity, biodiverse open space, and active travel provision to the village centre, and to identify links the core path network.

- SEPA has stated that an FRA may be required for bid MR074, and that a buffer strip will be required adjacent to the Gullie Burn on the northern boundary and should be integrated as a positive feature of the development. Enhancement of the straightened watercourse and removal of any redundant features will be required to be investigated.

Issues relating to sewage treatment capacity and water supply are dealt with through the consenting process and do not need to be an impediment to development, and are funded by Scottish Water under their legal obligations to deliver capacity for the contents of the development plan. We understand that in respect of the local water supply mains the reservoir and pumps have recently been upgraded which limits the additional work required to be undertaken as part of any development. We are also aware that in respect of Waste Water, there is an historic waste water treatment works associated with the Prisoner of War Camp at Monymusk which had capacity for a population of some 22,000 – 25,000 people and may be capable of refurbishment to serve the settlement (subject to further investigation and discussions with Scottish Water). We are nevertheless comfortable that these will not be insurmountable issues and solutions can be identified to mitigate the developments impact. In the event that a growth project is required, this may affect the timing of delivery of development, but would not rule development out. The issue is that, until the site is allocated, and consented, it cannot meet the 5 tests to begin this.

The issue of impact on the River Don (as the Gullie Burn is a tributary to it) will be addressed and controlled through the consenting process and consideration of the Sustainable Urban Drainage System developed for the site and, as above, this would not rule out development of the site.

The issue of impact on natural habitat is acknowledged. However, as above, this would be considered as part of the consenting process and mitigation proposed where necessary. Ultimately the nature of agricultural fields has been described as an “ecological desert”, therefore development of the site would represent a net enhancement of biodiversity and any impact on adjacent natural features can be addressed through the application stage.

The lack of public transport is noted, however, this is no different to many of the other LDP allocations within the Rural Housing Market Area (RHMA) and is not specific to Monymusk. Whilst it is unlikely that this development on its own would fund a bus service (due to it being an existing deficiency) proportionate contributions would be considered if necessary. The additional scale of population would nevertheless improve the prospects of a bus service being provided. Almost all proposed housing development within the RHMA will be car dependant and therefore this is not an issue particular to Monymusk, rather a fact of rural life (which is acknowledged in SPP).

The lack of safe walking/cycling routes is not accepted, as part of the Monymusk Masterplan footpath and cycle links have been provided, and the final stage of this will be delivered (as anticipated in the masterplan) linking the settlement to Millennium Wood forming a circular route to the north of Monymusk.

The concerns about impact on the Primary School capacity, we believe, are not an impediment to development. As and when an application comes forward, the impact on local schools will be considered and where necessary mitigated (through developer contributions). However, as has been seen elsewhere, primary school rolls are declining in many instances and new development is being proposed by the Council to support the school roll (at Midmar for example).

Whilst the National Scale Land Capability for Agriculture mapping indicates this land is Grade 3.2 (not prime for the purposes of planning), the Local Scale Mapping indicates this land is

Grade 3.1 (prime for the purposes of planning), nevertheless, SPP (Para 80) accepts that it will be necessary to use good quality land for development as a component of the settlement strategy or necessary to meet an established need.

The impact of previous phases of this development were both far closer to the Conservation Area and were not considered to have an adverse impact at the time of their consideration. It is difficult to see how this site with the school and the Phase 2 development between it and the Conservation Area would have an adverse impact on its character. Nevertheless, this impact will be considered as part of the consenting process, can be mitigated if required and should not be an impediment to the allocation of this site.

We are unclear what additional sports facilities objectors feel might be required for a primary school of this scale beyond the current provision, however, as identified on the Monymusk Masterplan an area of land has been identified adjacent to the school for potential expansion (if additional classrooms, parking, play space, is required). It is also unclear how additional development might impact adversely on the existing playing field. As above, this impact would be considered through the consenting process and where necessary mitigation would be secured/provided at that stage.

Whilst we acknowledge that there is not perceived to be a need for new housing at this stage, this is a long term plan and what we are seeking is a “reserve allocation” for development in the next plan period. Nevertheless, if the Reporter decided that additional short term land was required, this could be facilitated on this site.

We note the assertion by SNH that the Designed Landscape adjacent to the site presents an opportunity to reflect the character within the development. This is possible through the consenting process and does not need to be an impediment to development. However, in terms of the need for a Site Brief, we consider this to be overkill. The issues, identified by SNH seeking a Site Brief, will all be addressed as part of a Full Planning Application Process and does not need the additional process of a Site Brief.

We acknowledge the requirement for a Flood Risk Assessment which will be undertaken as part of the planning application process, and will, where necessary identify buffer strips etc. This does not need to be an impediment to development of this site.

In the MIR, Officers had largely agreed that the constraints identified above were not “undevelopable constraints” and that the reserve designation provided the required time for the recent development to consolidate. The conclusion in the MIR was that “MR074 appropriately extends the existing OP1 and is naturally bounded to the north by the Gullie Burn”.

In short, we believe that there is no impediment (as considered by Officers in preparing the MIR and Draft Proposed Plan) to identifying this site as a reserve site to be brought forward at the Mid Term review if required, or in the event that short term housing sites are required to meet a shortfall in the RHMA it could be allocated for development in the short term.

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:

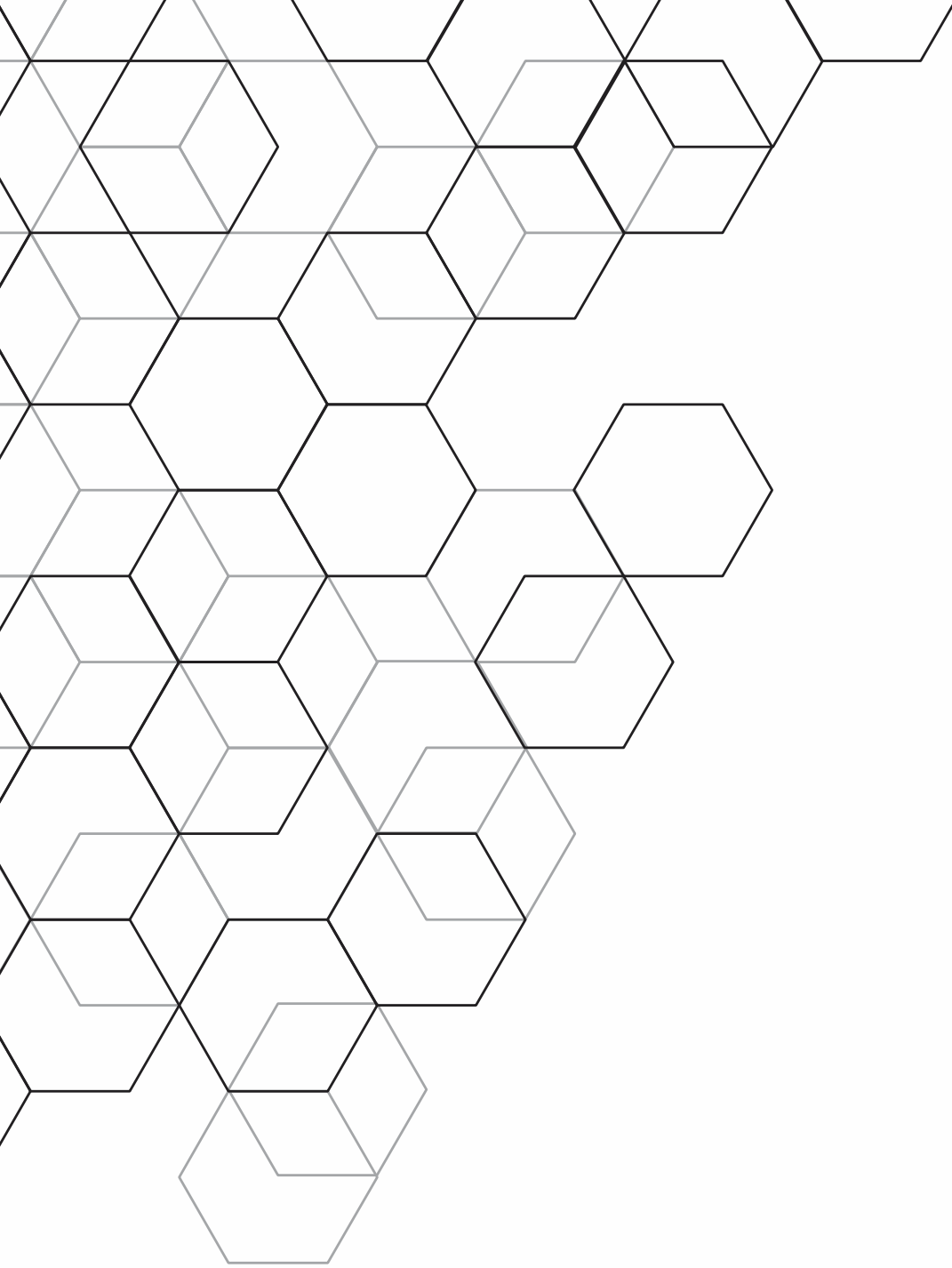
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue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





Key:

- | | |
|---|--|
|  Land allocated for future residential development |  Potential reed bed location |
|  Proposed roadway |  Services provided |
|  Proposed peripheral tree planting |  Possible extension to school |
|  Indicative open space planting | |
|  Proposed bus route | |