

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.

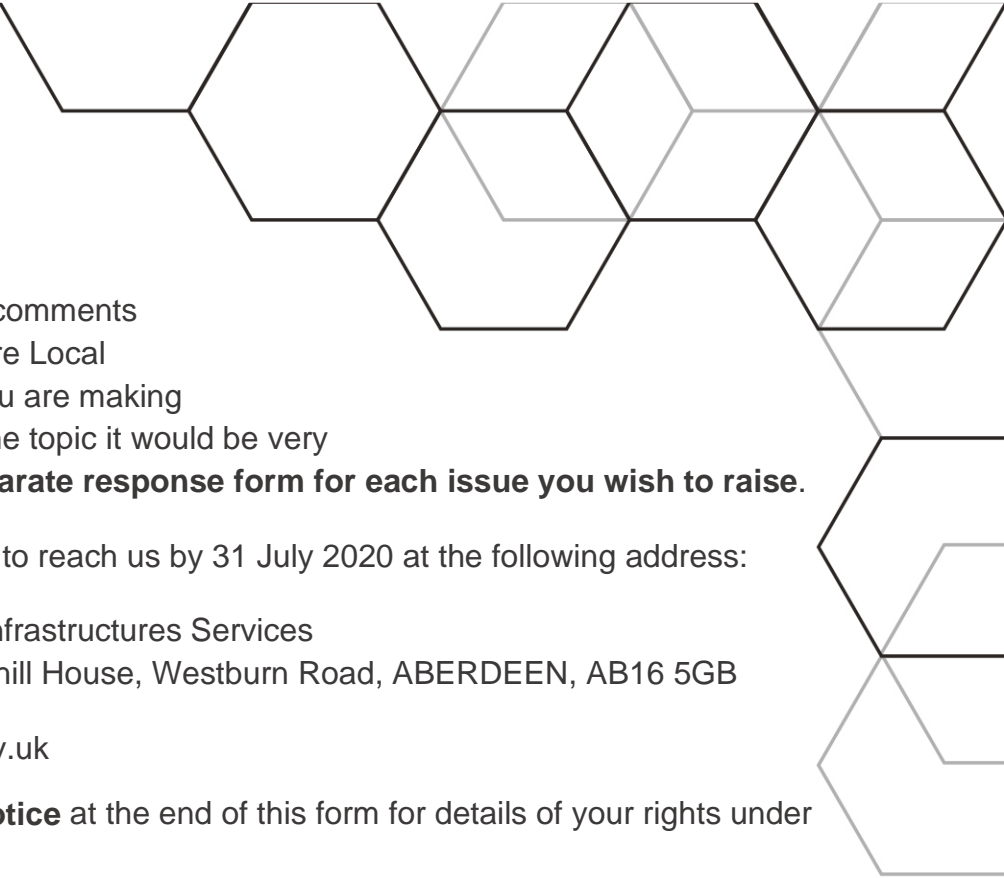
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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:	Graeme
Surname:	Fergusson
Date:	10 February 1989
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):

Appendix 7C Settlement Statements – Formartine – Belhelvie

It is requested that the Proposed Plan is amended to address the concerns raised in the section below.

- (i) consideration of primary facilities are a **mandatory** requirement before any planning is approved;
- (ii) that there is no proposed loop road connecting Cairntack Road and Cairn View;
- (iii) the number of houses included in the development is significantly reduced in order to ensure the development is proportionate to the size of the village and the impact on the local area is minimised;
- (iv) it is a **mandatory** requirement that drainage is considered before any development is approved;
- (v) it is a **mandatory** requirement to consider capacity at the wastewater treatments works before planning permission is approved;
- (vi) consideration of facilities for teenagers, secondary facilities, access to medical facilities, increased pavement requirements, local road infrastructure and increased public transport are a mandatory consideration as part of the wider local area developments;
- (vii) more appropriate developments are prioritised;
- (viii) no developments are approved in respect of the land at Potterton which was previously designated as greenbelt land.

During the first stage of preparing the new local development plan the council is supposed to talk to communities to draft the main issues report. In this instance there was no appropriate engagement with the local community. Although noted that the community council was consulted, there was no attempt by the community council to consult with the local community. It is therefore essential that community concerns are adequately considered now.

Reason for change:

1. Amenities.

These proposals would have a significant negative impact on the local community, this contradicts the “high quality, low-impact” principle.

- a. There are no facilities for teenage children.

Without facilities for teenage children it is likely that teenagers will become bored which in turn can contribute to the possibility of vandalism or underage drinking.

- b. Primary Schools:

The primary school at Balmedie, which also serves the surrounding villages (including Belhelvie) is already over-subscribed. This problem will be severely increased by the proposals to build up to 125 houses in Belhelvie, up to 600 houses in Blackdog, up to 850 houses in Balmedie and up to 233 houses in Potterton.

- c. Secondary School and pre-school:

It is unclear from the local development plan what, if any, consideration has been given to the affect the number of local proposed developments will have on secondary school or pre-school numbers in the coming years. There is no provision for transport to Ellon Academy.

- d. School drop-off – traffic generation concerns

The road near the bus stops already becomes very congested at school pick off and drop off times.

- e. There are a limited number of pavements in the village.

This already poses as a welfare risk to those in the village, which will increase with an increase in villagers.

- f. There are no pavements outside of the village

This creates difficulty for anyone looking to walk outside the village. There are no local amenities therefore there is little activities other than walking available. The number of developments proposed in the area will also result in more traffic on these roads.

- g. There is no local shop in the village

As a result, everyone essentially must drive for shopping. The limited public transport available makes it very difficult to take public transport to the shop. This contravenes the principles of reducing climate emissions.

- h. Local medical support

The local doctor surgeries are already difficult to get appointments in a timely fashion. Adding such a significant number of families (when considering the proposed developments in the surrounding areas) will significantly exacerbate this already difficult situation.

- i. The play park at the bottom of Cairntack Road is waterlogged after rain making it unusable for children.

Increased play park usage will make this problem worse. It is difficult to know what affect the building works will have on this problem. As the only local amenity available to the village it is imperative to the villagers that the park is usable.

Conclusion

A development the size proposed in Belhelvie does not normally support commercial or education facilities. However, given the fact that the development is planned in Balmedie, Potterton, Belhelvie and Blackdog it is essential that the local commercial and education facilities are properly considered and upgraded. The local development plan contains no commitments in this area, this is a huge concern to residents.

It is worth noting that the site West of Balmedie for 500 houses would likely come with a commitment to support commercial and education facilities. As a result, this site should be prioritised as it is a more sustainable solution to any housing shortage that may exist.

2. Transport and Roads

- a. The bus service is only every 2 hours and often not reliable.

The bus service does not allow you to get to work for a 7a.m. start, does not match many work patterns and is unfeasible for those who need flexibility. Therefore, it is highly possible that most people would be unable to take the bus to get to work (there are little to no local employment options). This does not support the aim of reducing carbon emissions.

It is also worth noting that the need to own a car (and often more than one car per a household) could preclude affordable housing being a feasible option in Belhelvie as there would be a need to get a car as well as pay towards a house. This is counter to the governmental aim to achieve 25% of new houses being affordable housing.

- b. Parking Concerns

It is expected that each household will need 2 or 3 cars, most houses do not support this level of on-site parking. When cars park on the road this effectively makes the road a single carriage road, which will cause significant issues especially with increased traffic.

This problem could be slightly mitigated if the proposed loop connecting Cairntack Road and Cairn View is not used. If traffic is limited to the farm access road the impact on Cairntack Road will be decreased. Developers in OP3 can ensure the road designs and parking options are appropriate.

- c. Traffic through the village

When there are accidents on the by-pass or around Dyce, traffic is diverted through the village. This increase in traffic will make for an increased danger for children crossing roads in the village. The roads out of the village are narrow and not suitable for increased traffic. The quarry already generates a high volume of large lorries.

Proposed local developments will lead to a significant increase in traffic and an increase in crashes.

- d. Local road infrastructure

The current local roads are not to modern day standards and are not built to handle this additional capacity.

3. Ingress and Egress

- a. Proposed Loop Road connecting Cairntack Road and Cairn View – Traffic generation concerns

It is currently proposed that the dead end at the far southern end of Cairntack Road is opened-up with a new road either through or round the proposed new development on OP3. This would generate a significant increase of traffic through Cairntack Road.

If this road was not opened-up and the farm access was prioritised the impact on Cairntack Road would be decreased. At the time of design and construction the developer has the opportunity to design the new OP3 site in such a way that ensures roads and parking are sufficient. Cairntack Road was not designed for this proposed use and is not fit for purpose.

- b. Road safety during icing conditions

During winter months Cairntack Road becomes dangerously icy. The dangers and problems posed by will be increased by further development and the significantly increased road usage.

4. Drainage issues, Flood Risks and Wastewater Treatment Works

- a. Flood Risks and drainage issues

Within the Main Issues Report it is highlighted that the site has surface water flooding issues. However, the local development plan does not contain the requirement to make drainage improvements.

- b. Wastewater Treatment Works

The Main Issues Report notes that there is insufficient capacity at Balmedie Wastewater Works.

5. Other

- a. The wildlife in our area is currently prolific and would be adversely.
- b. The developments will cause a significant increase in respect of current noise, traffic, light nuisance and pollution.
- c. It is a fundamental principle that there should be green-blue networks between settlements. The number of proposed developments in the local area contravenes this principle.
- d. Development may pose a risk of loss of light or overshadowing to houses in the immediate vicinity (only relevant for some houses).
- e. The development will likely overlook and cause a loss of privacy to the houses in the immediate vicinity (only relevant for some houses).
- f. It is anticipated that the development will have a negative visual impact particularly on the landscape.
- g. Detrimental effect of proposed development on the **character of the local area**.

Developments need to be proportionate and sympathetic to the needs of the community. Thus far there has been very little consideration of the needs of the community. It is very difficult to see how a development proposal that essentially doubles the size of the village with no commitments in terms of local infrastructure and amenities is proportionate.

Developments in the countryside must meet local needs, encourage prosperous, sustainable communities and business whilst protecting and improving the quality of the environment. The inclusion of the OP2 and OP3 sites within the development plan does not this.

The proposed development is in direct contravention of these objectives.

General comments on local development plan:

Redevelopment of brownfield sites is at the core of the UK Sustainable Development Strategy, however within the proposed 2021 Local Development Plan only 1 of the 60 proposed sites are brownfield sites.

The local development plan does little to address employment growth opportunities.

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
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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.

