

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.

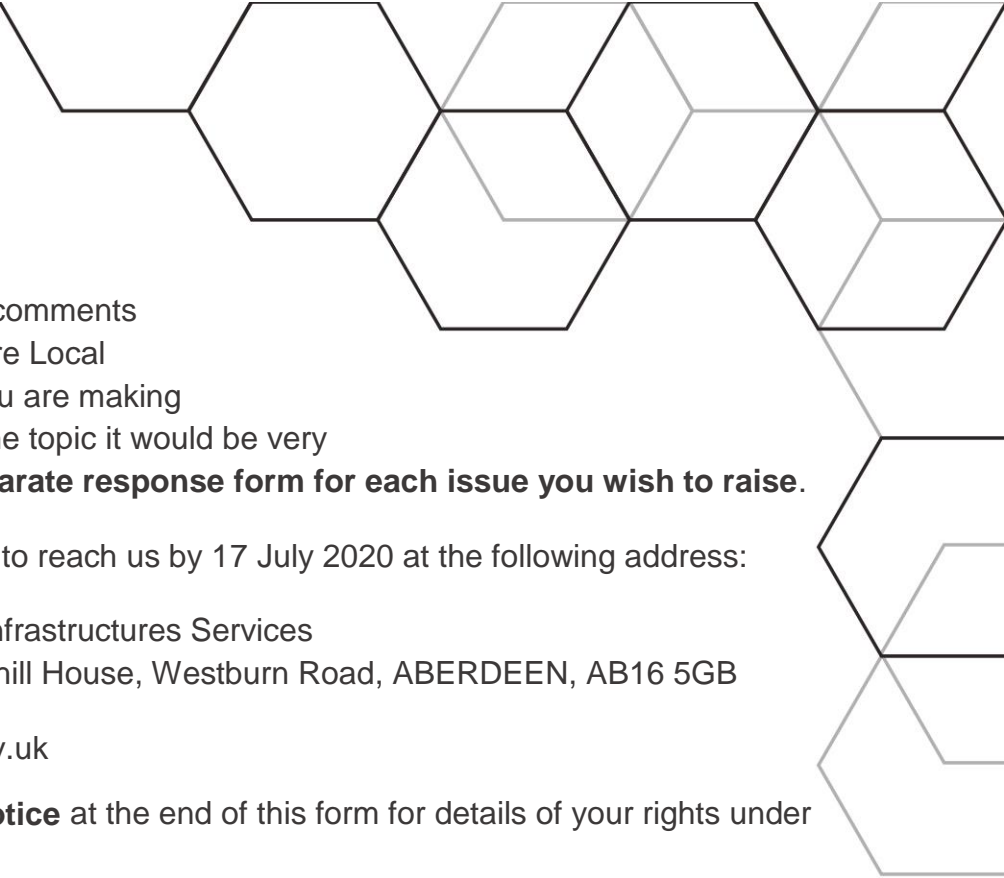
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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:	Mrs
First Name:	Marianne
Surname:	Evans
Date:	15 July 2020
Postal Address:	Stewart Milne Homes, [REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	[REDACTED]

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? Stewart Milne Homes

☒ 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):

Westhill Settlement Statement:

Spatial Strategy Section 5, paragraph 5.15

Amendments are required to the Proposed Plan to recognise that Westhill has capacity for additional development in the short term. Additional deliverable opportunity sites for housing are required.

Reason for change:

We object to the failure of Aberdeenshire Council to allocate a proportionate amount of land for residential development in Westhill. The town is located immediately adjacent to the Aberdeen Strategic Growth Area as defined by the Aberdeen and Aberdeenshire Strategic Development Plan (ACCSDP). Section 3.10 of the Proposed Local Development Plan at 3.10 advises as part of the Local Vision, the Plan "balances economic growth with the urgent challenges of sustainable development and climate change" and at paragraph 3.11 "the area around Aberdeen City continues to be the powerhouse of economic activity in the region and so the land allocations made in settlements around Aberdeen City reflect this." Unfortunately, these statements do not appear to apply in the case of Westhill as Aberdeenshire Council have failed to allocate sufficient land for housing in this sustainable settlement.

The town of Westhill was conceived as a Garden Suburb in 1964 and has grown to be a sustainable and vibrant town which is now dubbed as a "Subsea Centre for Excellence". The town has a wide range of facilities and services and a vibrant town centre. Westhill which, has a population of approximately 12,300 people (2016), is home to 3 supermarkets, a discount warehouse and a number of local shops, public houses and gyms. It hosts a farmer's market on a monthly basis and has 3 primary schools and an Academy. The town is also home to a number of businesses including Bibby, Technip, Total, Subsea 7, Power Jacks, Stewart Milne Homes and Cala Homes. The strategic location of the settlement has been enhanced as a result of the opening of the AWPR (A90 Trunk Road). Westhill also has a number of public transport links with bus services running at at least 15 minute intervals to Aberdeen via Kingswells Park and Ride (with connecting services to employment areas in Altens and Dyce). In addition, the settlement has an excellent network of footpaths and cycleways with the majority of Westhill being within a 12 minute cycle zone. In addition to this, a strategic cycle path runs parallel to the A944 connecting to Aberdeen and the Kingswells Park and Ride. As the availability of employment uses has increased 25% of residents now live and work in the town compared to 5% historically. Westhill is therefore a sustainable edge of City location.

The approved ACSSDP (2014) identifies Westhill within a Local Growth Area and at paragraph 3.43 advises “Levels of growth in individual settlements should relate to local needs, although the scale of this growth will vary from place to place.” This SDP is in the process of being replaced and the Proposed ACSSDP (August 2018) is awaiting approval by the Scottish Ministers. The Proposed SDP maintains Westhill’s status within a Local Growth Area. At paragraph 3.45 it states “encouraging sustainable mixed communities and sustainable economic growth will be an essential part of making sure Local Growth and Diversification Areas continue to contribute positively to the wider City Region. The scale and level of opportunities for new growth will vary from place to place with larger towns such as Fraserburgh, Alford, Turriff, Banchory and Westhill being the main focus for new investment.” Paragraph 3.47 advises there may be opportunities to justify development, greater than local needs within Local Growth Areas. Westhill is also located within the Aberdeen Housing Market Area where 80% of all new housing allocations are directed (paragraph 4.16). Paragraph 4.18 whilst suggesting that the focus for new allocations should be within Strategic Growth Areas also advises that “appropriate levels of growth can be provided across the rest of the City Region”. It is on this basis that opportunities for growth can exist in Westhill.

As a reason against growth in the town, the Council suggest that traffic congestion remains an issue in town particularly along Hays Way and around the town centre and that “these constraints mean that development within the Plan period will be focussed primarily on meeting local needs and maintaining Westhill’s function as a successful employment centre”. We do not accept that these local needs are being addressed through the Proposed Plan. Of the 3 sites that are proposed for housing in the Proposed Plan, 2 are historical allocations (OP1 and OP2). Whilst OP3 is a new allocation and has the potential to deliver affordable housing it does not address local needs fully. Westhill is an area of high priority for affordable housing which demonstrates demand for housing in the town. Sixty-three potentially affordable homes is not sufficient to meet the housing need. Further, whilst it is laudable to promote Westhill as a successful employment centre, new homes are required to support these employment uses in order to meet the sustainability requirements of SPP and the ACSSDP. New homes will encourage people to relocate to Westhill and will in turn reduce the need to travel. The traffic concerns raised by officers is unsubstantiated and it is therefore unreasonable to impose a moratorium to development on this basis. Individual assessments of sites have been submitted as part of development bids addressing matters such as topography and pipelines again demonstrating that these are not insurmountable constraints to development.

SPP encourages directing the right development to the right places. Westhill is an incredibly sustainable location as described above, yet far less sustainable locations in the Local Growth Areas of the Aberdeen Housing Market area such as Pitmedden, Tarves, Oldmeldrum, Newmachar, Belhelvie and Methlick which are all commuter towns with limited bus services and employment provision have allocations of a substantial scale and unproportionate to the size of the towns. Westhill on the other hand has capacity for more housing. Transportation matters can be addressed through Transport Assessments as part of planning applications. The Council should also now in the Proposed Plan give commitment to other larger releases in Westhill through the next Local Development Plan by setting out the studies it will undertake to inform that plan. The Council have considered the expansion of Westhill for a number of years, most recently through the Capacity Study in 2014 however, ultimately concluded that none of the proposed releases could be taken forward without further studies but have not committed to these studies.

Westhill has approximately 4813 homes. An allocation of at least 10% of that would not be considered unreasonable for such a sustainable location where people want to live and

work. A number of sites are suitable and being proposed for development and more importantly they are deliverable and in a marketable location. Education capacity exists in the town and transport assessments will guide the need for infrastructure upgrades. Meantime the settlement statement and action programme must fully reference and commitment to the studies for large scale releases through the next Local Development Plan.

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.

