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.

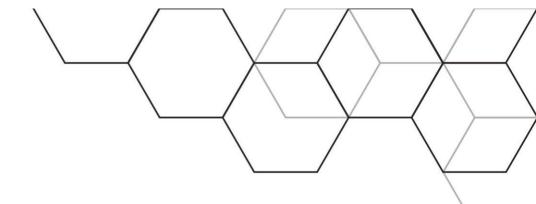
Ministers expect representations (or responses) to be concise (no more than 2000 words) and accompanied by limited supporting documents. It is important to ensure that all of the information that you wish to be considered is submitted during this consultation period as there is no further opportunity 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.

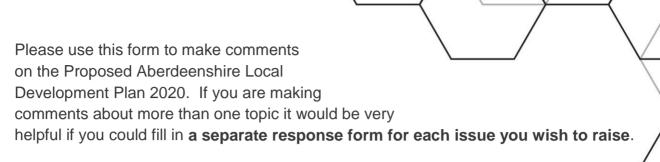
Ja jums nepieciešama šai dokumentā sniegtā informācija kādā citā valodā vai lielā drukā, viegli lasāmā tekstā, Braila rakstā vai BSL (britu zīmju valodā), lūdzu, zvaniet uz 01467 536230.

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
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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 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:	Handley	
Date:	28 July 2020	
Postal Address:	John Handley Associates Ltd,	
Postcode:		
Telephone Number:		
Email:		
Are you happy to receive future correspondence only by email? Yes x No-		
If yes who are you representing? Shell UK Limited		
x 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):

Aberdeenshire Local Development Plan 2021 – Proposed Plan Consultation Response on behalf of Shell UK Limited – Oil and Gas Pipelines

On behalf of our client, Shell UK Limited, we confirm our client's general <u>support</u> for the retention of <u>Policy P4 as set out on pages 50 and 51</u> of the published version of the Proposed LDP. However, we would also request that further consideration is given to the comments and suggested modifications that we put forward in response to the publication of the Main Issues Report in March 2019.

We would therefore request that the Proposed LDP is modified as follows:

- 1. The wording of <u>paragraph P4.2 on page 51</u> of the published version of the Proposed LDP should be modified to show the full wording as set out in the currently Adopted LDP and the draft version of the Proposed LDP. This would see paragraph P4.2 modified to read:
 - "In determining planning applications for development within the consultation zones for hazardous installations (including oil and gas pipelines) we will consult with, and take full account of advice from, the Health and Safety Executive (HSE) and the facility's owners and operators, and will seek to ensure that any risk to public safety is not increased. Prospective applicants should check whether their proposed development is within the consultation zone of a major hazard site or a major accident hazard pipeline, and should seek further advice if this is the case. This confirmation and advice can be obtained from the HSE Planning Advice Web App at www.hse.gov.uk/landuseplanning/developers.htm or from the Council'sDevelopment Management Team.".
- 2. <u>Appendix 7</u> of the Proposed LDP should be modified to show pipeline consultation zones on all relevant proposals maps for the settlements and proposals that fall within such zones.
- 3. Policy C2, at <u>paragraph C2.4 on page 83</u> should be amended to include the text: "(including the operation of existing oil and gas pipelines)". This would see paragraph C2.4 modified to read:
 - "C2.4 Turbines must not compromise health and safety (including the operation of existing oil and gas pipelines) or adversely affect aircraft or airfields (including radar and air traffic control systems, flight paths and ministry of defence low flying areas) and/or telecommunications. Unacceptable significant adverse effects on the amenity of dwelling houses, such as from noise, or on tourism and recreation interests including core paths and other established routes used for public walking, riding or cycling should also be avoided".
- 4. The settlement statement for Longside Airfield on page 318 of Appendix 7B should be amended to include the following text: "Oil and Gas Pipelines Part of the settlement is within the Health and Safety Executive (HSE) consultation distance associated with one or more oil and gas pipelines in the vicinity. Developments within this distance must comply with Policy P4: Hazardous and potentially polluting developments and contaminated land, and with the HSE 'Land Use Planning Methodology'."
- 5. **Proposal OP1: Longside Airfield on page 318 of Appendix 7B** should similarly be amended to include the following text:
 - "Part of the site lies within a pipeline consultation zone. Development on this site must accord with Policy P4 (Hazardous and potentially polluting developments and contaminated land) and the

Health and Safety Executive 'Land Use Planning Methodology' owing to the presence of one or more oil and gas pipelines in the vicinity."

We would also request that in the event that any other settlement boundaries are to be reviewed and new or expanded development allocations made post publication of the Proposed LDP, we would request that full recognition must be given to the existence of any pipeline consultation zones. Any new development allocations proposed in close proximity to these pipelines should take account of and reflect the advice of the Health and Safety Executive in accordance with their relevant advice and guidelines.

We trust these comments and requests will be given full consideration and the relevant amendments made to the Proposed LDP. The reasons for these suggested changes are discussed below.

Reason for change:

Introduction

This representation has been prepared by John Handley Associates Ltd, Chartered Town Planning Consultants. It is submitted on behalf of Shell UK Limited, the owners and operators of some of the oil and gas pipelines that cross the Aberdeenshire Council Area.

On behalf of Shell UK Limited, we welcome this opportunity for further engagement in the replacement LDP process and wish to provide the following comments on the published version of the Proposed Plan. These comments follow on from the submissions made on behalf of Shell UK Limited at the Call for Sites consultation stage in March 2018 and the MIR and Draft Proposed Plan consultation in March 2019.

This submission is restricted to matters relating to the safeguarding of oil and gas pipelines.

Background and Previous Comments on MIR and Draft Proposed Plan

In our response to the MIR and Draft Proposed Plan we welcomed the proposal to retain Policy P4 and Policy C2 in the replacement LDP, and supported the Council's approach to these policies. However, we also requested some minor amendments to the wording of Policy C2 to make specific reference to oil and gas pipelines, and requested that the published version of the Proposed Plan is modified to show all pipeline consultation zones on relevant proposals maps. In response to the identification of new development allocations we requested that specific reference is given to Policy P4 in all relevant settlement statements and proposals.

Having now had an opportunity to review the published version of the Proposed LDP, we are pleased to note that many of our comments have been accepted. However, it would also appear that there has been a further revision to the wording of Policy P4, which we consider reduces the effectiveness of that policy. There has also been no inclusion of pipeline consultation zones on relevant proposals maps. Similarly, the wording of Policy C2 has remained unchanged.

We would therefore wish to reiterate our client's previous comments on these matters and these are set out in full below under these headings. We have also confirmed the modifications we would wish to see to address these remaining points.

Policy P4 Hazardous and Potentially Polluting Developments and Contaminated Land (Pages 50 and 51)

The MIR (page 27) advised that the Adopted LDP Policy P4 "remains sound and no changes are proposed", and this was followed through to pages 33 and 34 of the Draft Proposed LDP. In our response in March 2019, we supported the Council's approach towards Policy P4 as set out in the MIR and the Draft Proposed LDP.

Whilst we therefore welcome and fully support the retention of Policy P4 in the published version of the Proposed LDP (as set out on pages 50 and 51), we are disappointed to see that the wording of paragraph P4.2 has been changed from the wording set out in the currently adopted LDP, and the position that was shown in the draft version of the Proposed LDP.

The reasons for this change to paragraph P4.2 have not been explained and it is not clear why the Council has considered it necessary to amend the wording of this policy. Particularly when the MIR confirmed that the policy "remains sound and no changes are proposed".

We would therefore request that the wording of paragraph P4.2 on page 51 of the published version of the Proposed LDP is modified to show the full wording as set out in the currently Adopted LDP.

This would see the reinstatement of the following introductory text at paragraph P4.2 on page 51: "P4.2 In determining planning applications for development within the consultation zones for hazardous installations (including oil and gas pipelines)..."; and the reinstatement of the final sentence which reads: "This confirmation and advice can be obtained from the HSE Planning Advice Web App at www.hse.gov.uk/landuseplanning/developers.htm or from the Council's Development Management Team".

The full wording for paragraph P4.2 should therefore read:

"In determining planning applications for development within the consultation zones for hazardous installations (including oil and gas pipelines) we will consult with, and take full account of advice from, the Health and Safety Executive (HSE) and the facility's owners and operators, and will seek to ensure that any risk to public safety is not increased. Prospective applicants should check whether their proposed development is within the consultation zone of a major hazard site or a major accident hazard pipeline, and should seek further advice if this is the case. This confirmation and advice can be obtained from the HSE Planning Advice Web App at www.hse.gov.uk/landuseplanning/developers.htm or from the Council'sDevelopment Management Team."

As set out in our submission at the MIR stage, we consider this wording to be informative, clear and unambiguous and would therefore request that the replacement LDP retains the full wording of the current LDP Policy P4.

We consider this to be necessary as it confirms the approach the Council will take in determining planning applications for development within the consultation zones. Maintaining the reference to the HSE Planning Advice Web App within the Policy is also supported and should be continued as this provides useful, informative advice to users of the LDP including developers and the public.

As we set out in our submissions on the MIR, Policy P4 is an important safeguarding policy and its retention in the replacement LDP is essential and would accord with the advice set out in the Scottish Planning Policy (SPP).

The SPP confirms that the oil and gas industry is one of Scotland's biggest employers and a significant contributor to the Scottish economy. Paragraph 235 of the SPP confirms that the planning system should recognise the national benefit of oil and gas production in maintaining a diverse energy mix and improving energy security. Further guidance is set out at paragraphs 99 and 107 on pages 25 and 26 of the SPP. Paragraph 99 confirms the need to identify and safeguard oil and gas pipelines through the development plan process, including within local development plans; and paragraph 107 notes the requirement for development to accord with the Health and Safety Executive's advice. This includes the need to maintain appropriate distances between sites with hazardous substances and new development. Further guidance has been provided though the publication of *Planning Circular 3/2015: Planning Controls for Hazardous Substances* which was issued by the Scottish Government in November 2015.

We therefore support the retention of Policy P4 in the replacement LDP but would request that the wording of paragraph P4.2 reverts to the wording set out in the Adopted LDP and the Draft Proposed LDP.

Identification of Pipeline Consultation Zones on Proposals Maps (Appendix 7)

As we confirmed in our response to the MIR, we also support the references within the relevant settlement statements in Appendix 7 to the HSE consultation zones and the requirement to accord with Policy P4.

This approach is particularly useful and we support its retention in the replacement LDP as it provides clear and unambiguous advice to developers, landowners and other users of the LDP.

However, in addition to the retention of Policy P4, we also suggested in our MIR response that there is a requirement to identify the various pipeline consultation zones that cross the Aberdeenshire area on the settlement proposals maps. As currently drafted, none of the proposals maps set out in the published version of the Proposed Plan show these pipeline consultation zones. In our opinion, it is essential that the relevant proposals maps identify the various pipeline consultation zones, as without this information, it is difficult for developers or the public to be aware of these consultation zones which may give rise to situations where these are not fully assessed.

CONTINUED...

We also raised this matter in our response to the publication of the Aberdeen City and Shire Proposed Strategic Development Plan (ACASSDP) and requested that the ACASSDP should provide a corresponding strategic policy and identification of pipeline consultation zones in the replacement SDP document. The reason behind this suggestion being that cross country pipelines are clearly a cross boundary matter. However, our suggestion on the Proposed SDP was not accepted, but both the SDP Authority and the DPEA Reporter confirmed (see paragraphs 30 and 31 on page 286 of the ACASSDP Examination Report, 17 January 2020) that it was for the Local Development Plan, and not the Strategic Development Plan to contain provisions to identify and safeguard pipelines from development proposals. The DPEA Reporter also noted in his conclusions on this matter that it would be impractical to illustrate pipelines at a strategic scale in the spatial strategy mapping included in the SDP, and instead he considered that the wider development plan, i.e. the local development plan, should provide adequate protection to ensure that pipelines are safeguarded without the need for the SDP to refer to them or include a policy provision for their protection. The SDP Examination Reporter also confirmed that the matter of identification of sites is delegated to local development plans which should take into account any safeguarding of pipelines.

The findings from the recent ACASSDP Examination Report therefore confirm that it is the local development plan that should contain policies to safeguard pipelines from inappropriate development, and the matter of identifying and illustrating pipeline consultation zones is effectively "delegated" to the LDP.

This approach would also be consistent with other planning authorities, including neighbouring Aberdeen City and Angus Councils who both identify and illustrate pipeline consultation zones on their proposals maps. Perth and Kinross Council also identifies pipeline consultation zones on its LDP proposals maps. We can provide the Council, and the LDP Examination Reporter with further details on this matter should that be necessary.

We would therefore request that the Proposed LDP is modified to show all pipeline consultation zones on relevant settlement statement proposals maps. A corresponding entry in the key at the beginning of all settlement statements (i.e. Appendix 7) should also be included.

This suggested amendment to the Aberdeenshire Proposed LDP would therefore ensure a consistent approach to this important land use matter across Scotland, and would accord with the requirements of the SPP. It would also accord with the approach recommended in the recent SDP Examination Report.

This approach would also ensure that pipeline operators, developers, and local residents are fully aware of any development proposals which may impact upon the pipeline system. This should in turn ensure that any proposed development is progressed in accordance with the HSE's Planning Advice.

Policy C2 Renewable Energy (pages 82 and 83)

In our MIR submission we supported the Council's approach towards retaining Policy C2 Renewable Energy in the replacement LDP. However, we also suggested that it would be helpful to make specific reference to oil and gas pipelines within the text of paragraph C2.4 on page 45 of the Draft version of the Proposed LDP as this would ensure a consistent and clear approach to the safeguarding of oil and gas pipelines for the reasons discussed above.

Our requested change has not been included and the published version of the Proposed LDP has not been amended. We would therefore request that paragraph C2.4 on page 83 of the Proposed LDP is amended as follows:

"C2.4 Turbines must not compromise health and safety (including the operation of existing oil and gas pipelines) or adversely affect aircraft or airfields (including radar and air traffic control systems, flight paths and ministry of defence low flying areas) and/or telecommunications. Unacceptable significant adverse effects on the amenity of dwelling houses, such as from noise, or on tourism and recreation interests including core paths and other established routes used for public walking, riding or cycling should also be avoided".

CONTINUED...

Assessment of proposed developments within pipeline consultation zones

In our response to the Call for Sites and MIR consultations we requested that the existing pipeline consultation zones should be considered when assessing and determining where there may be capacity to accommodate new development throughout the Aberdeenshire area. We requested that full consideration of these pipeline consultation zones should be taken into account when identifying any new or amended development allocations in the replacement LDP. This equally applied to the principal settlements, rural service centres, and smaller settlements.

We also recommended that if any new or amended development allocations are being considered in close proximity to these pipelines, then the Council should take account of and reflect the advice and guidance of the Health and Safety Executive.

Following the publication of the Proposed LDP we have carried out a review of all development allocations set out in the various Settlement Statement Appendices and have appraised these against the pipeline consultation zones covering the Shell NGL Pipeline System as it crosses the Aberdeenshire LDP Area. The NGL Pipeline System runs in a generally north to south direction through Aberdeenshire, and lies close to a number of settlements, including west of Peterhead, east of Westhill, west of Stonehaven and east of Laurencekirk. The pipeline corridor also passes close to a number of smaller settlements and rural areas, including Longside Airfield, Tipperty, Foveran, Kingseat and Netherley.

We are pleased to note that references to the pipeline consultation zones have, in the main, been acknowledged in the various Settlement Statement Appendices, with very few new or amended development allocations being proposed within the Proposed LDP which have the potential to adversely affect the existing pipelines.

We are also pleased to note that the references to the pipeline consultation zones and the need to accord with Policy P4 have been retained in the relevant Settlement Statements and development proposals, and we fully support this approach.

Longside Airfield – pages 318 and 319 of Appendix 7B Settlement Statements Buchan

There is, however, one settlements/proposal which we would suggest requires further consideration and amendment. This is the proposal at Longside Airfield which is set out on pages 318 and 319 of Appendix 7B.

In our submissions on the MIR we highlighted that the proposed development allocations at Longside Airfield fall within the HSE's pipeline consultation zones, but noted that this has not been acknowledged in either the MIR or the Draft Proposed Plan. We therefore requested that this is addressed by amending the settlement statement for Longside Airfield to make specific reference to the pipeline consultation zones that cross this site. We suggested that the same text that has been adopted in other settlements/proposals is used at Longside Airfield.

From a review of the published version of the Proposed LDP, whilst we welcome and support the confirmation that the proposals for Longside Airfield has been restricted to Class 6 (storage and distribution) uses, it would appear that our recommendation regarding the inclusion of text referring to the pipeline consultation zones has not been included. This means that the settlement statement for Longside Airfield conflicts with the approach adopted in all other settlements.

For consistency and clarity across the replacement LDP, we would therefore reiterate our previous request that the settlement statement for Longside Airfield which is set out on pages 318 and 319 of Appendix 7B is amended. We would therefore suggest the following modification to the published version of the Proposed LDP to address this point:

 <u>Longside Airfield</u> – The settlement statement for Longside Airfield (page 318) should be amended to include the following text:

"Oil and Gas Pipelines - Part of the settlement is within the Health and Safety Executive (HSE) consultation distance associated with one or more oil and gas pipelines in the vicinity. Developments within this distance must comply with Policy P4: Hazardous and potentially polluting developments and contaminated land, and with the HSE 'Land Use Planning Methodology'."

CONTINUED...

 Proposal OP1: Longside Airfield on page 318 should similarly be amended to include the following text:

"Part of the site lies within a pipeline consultation zone. Development on this site must accord with Policy P4 (Hazardous and potentially polluting developments and contaminated land) and the Health and Safety Executive 'Land Use Planning Methodology' owing to the presence of one or more oil and gas pipelines in the vicinity."

New Land Allocations Made Post Publication of the Proposed LDP

In addition to these requested amendments at Longside Airfield we would also request that in the event that any other settlement boundaries are to be reviewed as part of the Examination of the Proposed LDP, and in the event that any new or expanded development allocations are made, that full recognition is given to the existence of any pipeline consultation zones and development allocations are made in accordance with the relevant Health and Safety Executive advice and guidelines where relevant.

Any new development allocations proposed in close proximity to these pipelines must be assessed against the advice of the Health and Safety Executive, and any new allocation must stress the need to ensure new development is undertaken in accordance with Policy P4 and the relevant Health and Safety Executive advice and guidelines. We would welcome the opportunity to provide further advice in this respect should this be required.

Summary & Requested Modifications

In summary, we wish to confirm our client's general support for the approach adopted in the replacement LDP as set out in the published version of the Proposed LDP. This includes our support for the retention of Policy P4 which is welcomed and encouraged.

However, and for the reasons set out above, we would also request the following modifications are made to the Proposed LDP:

- The wording of paragraph P4.2 on page 51 of the published version of the Proposed LDP should be modified to show the full wording as set out in the currently Adopted LDP and the draft version of the Proposed LDP.
- 2. Appendix 7 of the Proposed LDP should be modified to show pipeline consultation zones on all relevant proposals maps for all settlements and proposals that fall within such zones.
- 3. Policy C2, at paragraph C2.4 on page 83 should be amended to include the text: "(including the operation of existing oil and gas pipelines)".
- 4. References to oil and gas pipelines and pipeline consultation zones should be included in the text relating to the settlement statement for Longside Airfield and Proposal OP1: Longside Airfield as set out on page 318 of Appendix 7B.

We would also request that in the event that any other settlement boundaries are to be reviewed and new or expanded development allocations made, we would request that full recognition must be given to the existence of any pipeline consultation zones. Any new development allocations proposed in close proximity to these pipelines should take account of and reflect the advice of the Health and Safety Executive in accordance with their relevant advice and guidelines.

We trust these comments and requests will be given full consideration and the relevant amendments made to the Proposed LDP. We would also welcome the opportunity to discuss these points with the Council in further detail should this be required. We would also be grateful if you would acknowledge safe receipt of this submission, and keep us updated on the progress of the replacement LDP.

JOHN HANDLEY ASSOCIATES LTD

Chartered Town Planning Consultants

Privacy Notice COUNCIL 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:

The Legal Basis for collecting the information is:

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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.

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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;
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