



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](mailto: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:	<i>Mr</i>
First Name:	<i>DAVID</i>
Surname:	<i>CONROY</i>
Date:	<i>JULY 2020</i>
Postal Address:	[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? *BANCHORY COMMUNITY COUNCIL*

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):

*VARIOUS ISSUES RELATIVE TO DEVELOPMENT IN BANCHORY.  
SEE ATTACHED STATEMENT.*

**Reason for change:**

*SEE ATTACHED STATEMENT.*

## Aberdeenshire Council Transcription

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## YOUR DETAILS

Title:	Mr
First Name:	David
Surname:	Conroy
Date:	July 2020
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? Banchory Community Council

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**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):

Various issues relative to development in Banchory.

See attached statement.

**Reason for change:**

See attached statement.

# **RESPONSE TO LDP 2022**

## **ON BEHALF OF BANCHORY COMMUNITY COUNCIL**

### **INTRODUCTION**

This commentary on the Proposed LDP is submitted on behalf of BCC. In the midst of the current pandemic it has been difficult to undertake significant public participation, debate, and involvement. Nevertheless we have used responses to our 'facebook' posts and also looked back at feedback, both from the original 'bids' for development sites, and the responses to the MIR, to underpin this commentary. We have also been mindful of the terms of the Banchory Community Action Plan (BCAP) and the guidance in SPP (Para12) as to the desirability integration between the LDP and the Community Plan.

We are also aware that the Proposed Plan was largely formulated through last year, and early this year, before the current pandemic. What we say below has in mind that the plan may have to be re-focused to reflect the new normal – the significant changes to our way of living, working, and taking recreation post pandemic.

### **THE VISION FOR BANCHORY**

While generally the Vision for Banchory remains largely apt, life during lockdown has given us a greater appreciation of our surrounding environment. We have all enjoyed the surrounding countryside, walking and cycling and enjoying nature more regularly. Along the Riverside, the Deeside way, up Scolty, through the Crathes Castle policies, Corsee, and all the other woods around Banchory. Protecting these assets and the paths through them would be in accord with the advice in SPP on Valuing our Natural Heritage, and must assume a new priority. The core path network particularly needs updating.

As we emerge from lockdown we see an already struggling town centre learning to cope with a more pedestrian friendly layout, and its fragility underpinned by many jobs being under threat. It has already been mooted that Public projects will lead the way in stimulating recovery, and we feel a permanent plan for the regeneration of the town centre is required, as part of a wider economic stimulus. Overall, we feel the Proposed Plan needs to have more of a focus on measures to stimulate sustainable economic recovery.

There is also a particular concern that our children's education has suffered enormously during lockdown, so a new focus on delivering the range of education estate improvements identified in BCAP is needed.

## **THE DELIVERY SCHEDULE**

Given what is said above anent the need to update our priorities for future projects, we were very disappointed to note that the Delivery Schedule published to support the plan, seems to be little more than a catalogue of developers progress updates, as recorded through the Housing Land Audit. We would prefer to see the Delivery Schedule reflecting the ethos of Para 31 of SPP more closely. It should preferably be the key component of the Plan, setting out responsibility for, and the timetable for delivery of all the identified projects, including particularly on land reserved for the public projects. Without these, the town becomes wholly reliant on the private sector to stimulate growth, in what will be a very fragile market, over a long recovery period.

It is particularly galling that after being reserved for nearly 10 years, the best the Delivery Schedule can say about the replacement academy is that housing developers will be required to contribute towards the new school. However it is also notable that little new housing development is proposed across all the settlements within the academy catchment.

### **PROPOSAL R3 (Site For New Academy)**

Following on from the criticism of the Delivery Schedule, the BCC are very pleased that this site is to be reserved for educational use for the next plan period. The BCAP identified it as the most necessary and important improvement to the town's social infrastructure. It is for this reason that we feel the Council need to demonstrate more commitment to its delivery in the schedule.

We are apprehensive that (although clearly overdue and welcome) the recent investment in the existing school 'learning plaza' will lead to an uprating of the quality of the school at the next learning estate review, and consequent slippage in terms of the need for a replacement. Allied to this, we note that very little new housing is proposed for Banchory in the next 10 years, and we wonder whether this will affect the school roll to such an extent that any argument for replacement, on the basis of capacity, will also be diminished. Some clarity on both these factors through the Delivery Schedule review would be very welcome.

Associated with this site, we see that the core path which passes through the site, and links Woodend with Upper Lochton, is not shown. Like the walks through the woods to the west, this has been a popular walking area during lockdown, and it needs to be protected as part of the R3 and adjoining allocations.

## **GLEN O DEE OPPORTUNITY SITE**

This is the only 'new' housing site identified in the Plan, although there have been plans for regeneration there over a long period. The BCC positively support the development of this site. It is the single area of derelict land in Banchory and is situated adjoining a much visited hospital, the grounds of which have always been enjoyed by many, and in increased numbers during lockdown.

However we firmly believe its development should not be unrestricted. Its access needs improvement and over development should not impact detrimentally on the woodland environment. Following the fire there last year, we are also very concerned about the potential for pollution arising from the redevelopment of the site, but have raised that separately with Building Control/Environmental Health.

## **UPPER ARBEADIE**

Closely related to our desire to see The Glen O Dee site rejuvenated, is the need to see the adjoining Corsee Woods and the woodland over to Upper Arbeadie Road protected. We note that the designation P2 covers most of the land, but note that certain fields over towards Upper Arbeadie are omitted. Several of the omitted fields were the subject of bids' for development during the earlier stages of the plan. Indeed, of all the 'bids' submitted for new development in Banchory those adjoining Upper Arbeadie Road attracted by far the most objection.

Although it is outwith the settlement envelope and enjoys the general 'countryside' protection, it is important that this whole area is rigorously protected from development, and we wonder if P4 which is a more general 'area-wide' protection would be more apt.

We see there are actually 16 different 'P' designations on the Banchory Proposals Maps, and wonder if these could perhaps be consolidated into a wider green space network protection ?

We touched above on the need to update Banchory's Core Path Network. Looking at this Upper Arbeadie area on Map 1 (page 700) there are several examples of this. For example, the path from the recycling centre extends to the former railway line at East Mains (rather than diverting to Glen O Dee), while there are at least 3 north/south connections missing between the housing at Corsee Road, (including over Sunset Seat), and the main east/west paths.

## **LOCHTON OF LEYS**

Looking at the response to the MIR, there is also some concern locally that the Loch of Leys LNCS needs to be protected. Proposals for housing expansion there have been deleted as a consequence. However we note that Para 196 of SPP says that 'buffer zones' should be utilised to protect areas of habitat significance, while the Council's environmental

assessment for the MR38 / 39 Site records that the development would have little or no impact on habitat and biodiversity. This needs to be clarified and perhaps the views of SNH sought. The Community Council is participating (with SNH) in a local group which has been formed to look at the regeneration and potential of the whole Loch of Leys area, and this may be a useful forum for considering the future management of the area.

### **SPECIALIST HOUSING DEMAND**

Having welcomed some new housing, but urged protection in other areas, we nevertheless feel that the statement in the 'Vision' that *"the scale of new development has to balance demand for housing in the area, with the needs of the community"* remains crucial to the recovery of our community. We have questioned above whether the lack of growth will impact on the delivery of new facilities, including for secondary education, and we are told by Scottish Government that a recovering local economy needs development led employment, investment, and spending.

As we have called for the Plan to identify significant investment in **public** projects and improved services, we wonder whether the statement in the 'Vision' – that *"No additional major new development is proposed"* remains appropriate in today's changed circumstances. We see the provision of a new academy and health centre in Banchory as 'Major new developments' for our community, and would hope they are to be delivered in the forthcoming plan period. We would prefer therefore that this part of the 'vision' made a distinction between development providing for public services, and said 'no additional major new housing developments are proposed'.

However, this would not rule out local needs provision, particularly as regards specialist housing. The BCAP identified an urgent need for more affordable, sheltered, and other special needs housing in Banchory. However, the growth proposed for the Inchmarlo Continuing Care Community seems to be the sole exception to the general embargo on new specialist house building - but, it is not in Banchory, and often seen as unaffordable. With no other significant new housing proposed in the town (and indeed the surrounding villages) for the next 10 years, we wonder how this part of the BCAP can be delivered. If further new mainstream housing is to be ruled out, does planning law allow for there being a reservation specifically for special needs such as affordable or sheltered housing?

### **SUMMARY**

Over all, we are generally supportive of the Proposed Plan. It has identified most of our key priorities, and has a lot to commend it in terms of the protection of environmental assets. However in some areas its key objectives have been overtaken by events, and we feel it needs to be re-focused as a plan for post pandemic recovery.

In relation specifically to Banchory, we feel the plan needs to be :

More protective of our recreational open spaces and surrounding environment,

Make better provision for pedestrian and cycle access, particularly to these special areas.

Be more specific about project and service delivery on the land reservations for public projects. - particularly for the new Banchory Academy.



Deliver an action plan for Banchory town centre, as part of an economic recovery plan.

Balance the improvements to services with additional local needs housing growth, particularly for affordable, sheltered, and special needs housing.

If you would like to discuss any aspect of this commentary further, please contact :

**David Conroy**

**Chair**

**Banchory Community Council.**

