

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:	HARRY
Surname:	McNAB.
Date:	JULY 2020
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?

NORTH BANCHORY COY.

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):

*ADJUSTMENT TO PROPOSALS MAP FOR BANCHORY IN RESPECT OF
VARIOUS LAND PARCELS AT UPPER LOCHTON.
SEE ATTACHED STATEMENT.*

Reason for change:

SEE ATTACHED STATEMENT OF CASE

Aberdeenshire Council Transcription

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Email: ldp@aberdeenshire.gov.uk

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YOUR DETAILS

Title:	Mr.
First Name:	Harry
Surname:	McNab
Date:	
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? North Banchory Coy.

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

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YOUR COMMENTS

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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):

Adjustment to proposals map for Banchory in respect of various land parcels at upper location.

See attached statement.

Reason for change:

See attached statement of case.

OBJECTION TO LDP 2022

LAND AT UPPER LOCHTON

INTRODUCTION

This series of objections all relate to land which was the subject of a 'bid' titled as Upper Lochton West. There are several components to the objection.

These are :

- 1) Field on the south side of Upper Lochton
- 2) Land to the west of OP3
- 3) The Former R2 Site
- 4) The Upper Lochton West Bid Site

The Field to the south side of Upper Lochton (See Plan 1) : This open agricultural field has been included, with the woodland surrounding it, within the P2 allocation as protected land. The reason for its inclusion is said to be "to protect the area of woodland for its contribution to the character, as an amenity, and forming part of the green-blue network". It is suggested that this is clearly a mistake, as it is neither an area of woodland, nor an amenity. It is rather an arable field generally set to grazing, and there are no trees within it.

In this context the field has been treated differently from other fields which adjoin wooded areas, yet have been excluded from the P2 allocation. There are several such excluded fields shown on Map 1. Further it should be noted that in the Proposals Maps which accompanied the MIR, this field was shown as a potential area for future residential expansion. This distinguishes it from, for example, the fields along Upper Arbeadie Road, which are close to woodland, yet not included within the R2 area.

Given all the foregoing, there is therefore no justification for classing it as a part of the P2 allocation. It should be included within the settlement envelope as 'white land'.

Land to the west of OP3 (See Plan 2) : This objection site is the land to the west of OP3, and lying to the south of the road which leads to the recycling centre (See Plan 2). This site comprises an open field immediately to the west of OP3, along with an area of quite open scrub woodland immediately to its west. In terms of the LDP 2017, both areas of land were previously within the Banchory settlement envelope. They were effectively 'white land', available for development.

During the lifetime of the 2017 LDP planning permission was obtained to build a house immediately west of the OP3 site (PPiP Ref APP/2016/2276). In addition, about half of the scrub woodland was sold to the owner of the house at Burnfoot, which sits immediately on the south of the wooded area. Recognising that the land was within the settlement envelope, the land was acquired to extend the residential curtilage of Burnfoot. A further application to develop the remainder of the land within the settlement envelope has been discussed with the Planning Service.

Notwithstanding this, the new LDP sees both areas excluded from the settlement envelope, and the area of scrub woodland which is now part of a residential curtilage, included within the P2 designation. Given the 3 developments discussed above, it is submitted that it would be wholly unreasonable to now adjust the settlement envelope boundary, and for the land to revert back to 'countryside', and objection is taken thereto. The land should remain as white land within the settlement envelope or be included as part of OP3.

The Former R2 Site (See Plan 3) : This is the area of land which was allocated as R2 in the 2017 LDP, and which sits to the north of the road leading to the recycling centre. Like the land below the road (referred to above) the site currently zoned as R2 comprises an open field adjoining OP3, along with a quite open area of scrub woodland to the west. The whole site is currently within the settlement envelope of Banchory, and was allocated as suitable for a new cemetery. What little amenity value the site might have was accordingly seen as expendable when the site was to be developed for a cemetery.

However the new LDP sees the site removed from the settlement envelope, and the area of scrub woodland is now seen as worthy of protection. There is no justification given for this change in the new plan. Indeed, the SEA (for site MR077) published with the plan records that there would be no significant impact on biodiversity as a result of developing the site, and overall, the impact of development would be neutral.

However, with no new sites having been identified in Banchory (With the only identified site - Glen O Dee hospital - being a long standing opportunity site) there is a clear need to identify new land to meet local housing needs during the 10 year plan period. This land would be an ideal location to meet that need, being directly adjacent to site OP3. It should accordingly be retained within the settlement envelope as white land' or included within OP3. **Plan 5** shows how its' development might be successfully integrated with the OP3 Site.

The Upper Lochton West Bid Site MR077 (See Plan 4) : This objection relates to the whole of the bid site shown on Plan 3, including the three parcels of land referred to above. The fields concerned are what remains of a once wider farm-holding, which has been reduced over the years as residential development at Upper Lochton has proceeded. The fields comprise marginal farmland, generally let on yearly grazings.

The MIR identified all this land as having future development potential, and there was a generally evenly balanced and mixed response to that 'officer's preference' during the consultation on the MIR. Many saw development here being preferable to other areas which had been suggested for development. However, looking at the Report on the MIR, it seems that a decision 'in principle' was taken to have no reserved land identified in the LDP for future housing needs.

In relation to Banchory, this decision was taken before the Council decided to constrain development in Banchory. As a consequence, there has been no fully considered assessment of bid site MR077, either for immediate release, or as a future development option. However, from the SEA published with the plan, it can be seen that there would be no significant impact on biodiversity as a result of developing the site, and overall, the impact of development would be neutral.

In addition, it should be noted that the site is readily deliverable. With Banchory's water supply just having been reinforced, and a WWTP 'growth project' currently underway, there are no servicing constraints. Further, from the 2019 school roll forecasts, it can be seen that ample educational capacity is available, at both secondary and primary school level. It is acknowledged that the local road network needs improvement, but this is clearly a resolvable infrastructure issue, which can be secured through the normal DM process. It is suggested therefore that the extension of Site OP3 westwards into MR077 would offer an excellent opportunity to meet local housing needs.

That further sites for housing will be needed in Banchory in the plan period 2022-32 is emphasised when one looks at the proposed allocation against what has been the norm in previous LDP periods.

In the current (5 year) LDP2017, 4 main sites have been allocated for housing development. OP1 (Woodend) : A 32 home eco village, OP2 (Lochside) : A mixed development including 345 new homes, OP3 (Upper Lochton) : A proposal for 50 new homes, and OP4 (Raemoir) : A proposal for 15 new homes. In total this amounts to proposals for 442 new homes. All these sites are progressing either on site (with 160 units occupied or under construction), or through the planning process, and will provide circa 90 new homes per year. This number of completions is generally reflective of the trend over the last several LDP periods, and local schools and services have coped with the consequent growth.

This contrasts with the new LDP in which there is only one new allocation, for 40 homes on a contaminated brownfield site at the former Glen O Dee hospital. However, this allocation is said by the developer to be unviable, and accordingly unlikely to proceed.

Nevertheless, over the 10 year plan period this will produce 4 units per year, which is certainly far from reflective of identified local need.

Where then will young people from Banchory turn to be housed ? Looking at the Proposed Plan, it can be seen that none of the close surrounding settlements (Torphins, Crathes, Drumoak, or Durriss) have new housing allocations. While land has been allocated at Inchmarlo, this is either for the ICCC Retirement Village, or a longstanding allocation for an enabling development which is required to secure a hotel developer before it can proceed.

In all these circumstances, it is submitted that there is an undeniable need for new housing in Banchory, and this readily serviced site, with no significant constraints, and a proven record of delivery, should be allocated to meet that demand.

If you would like to discuss this objection further, please contact :

Harry McNab

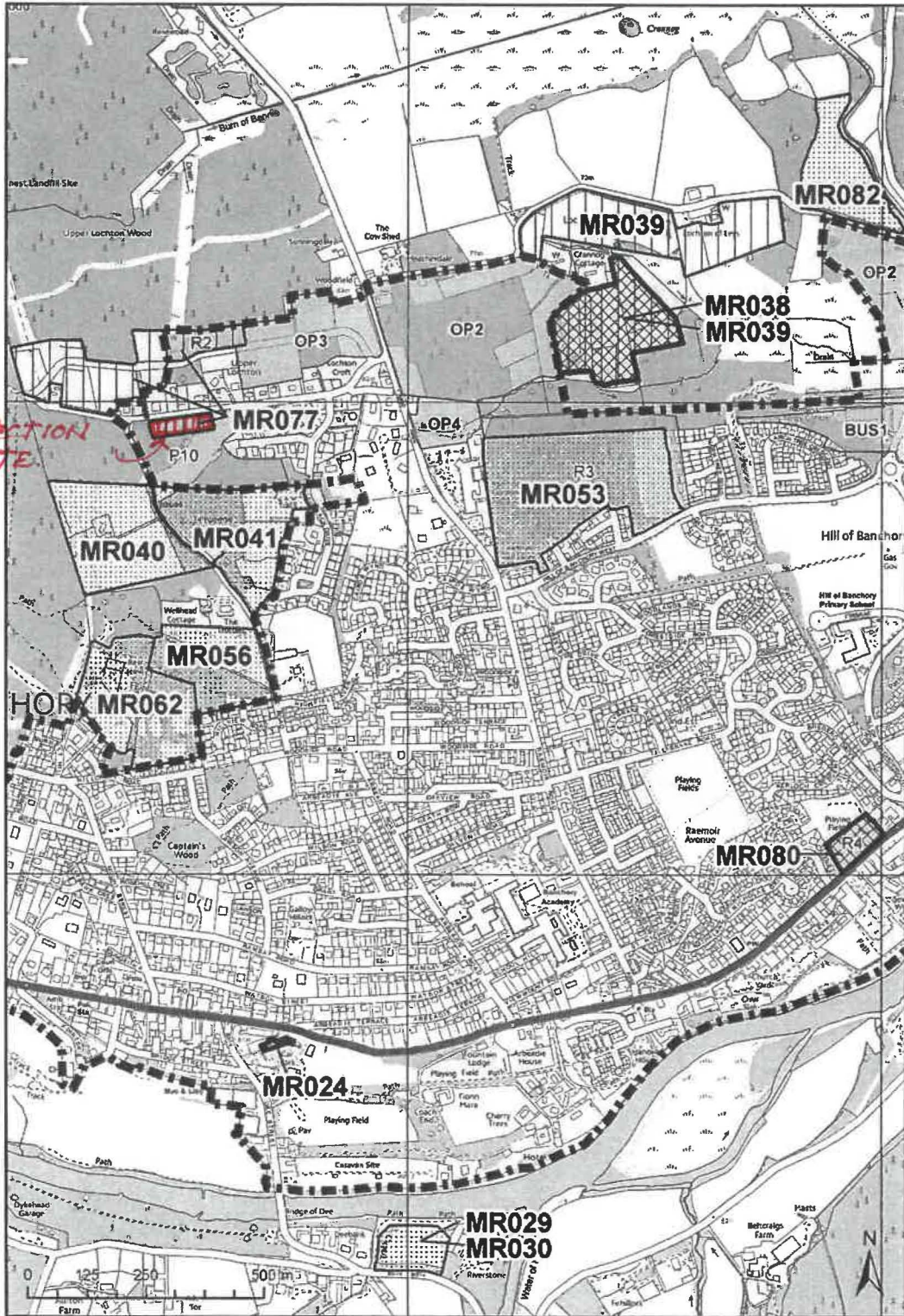
Director

The North Banchory Coy.



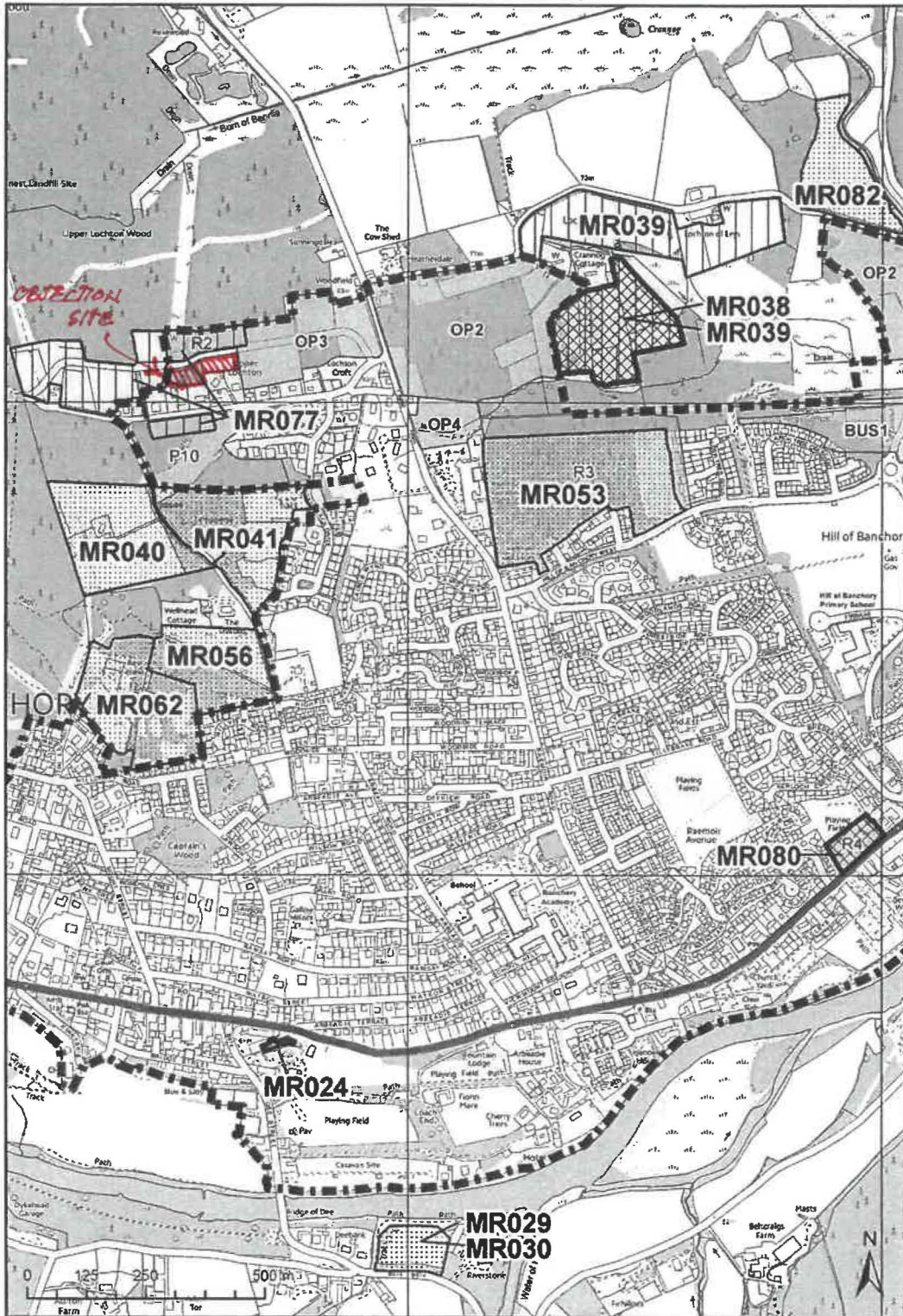
LOP OBJECTION! - LAND AT UPPER LOCHTON PLAN!

OBJECTION SITE

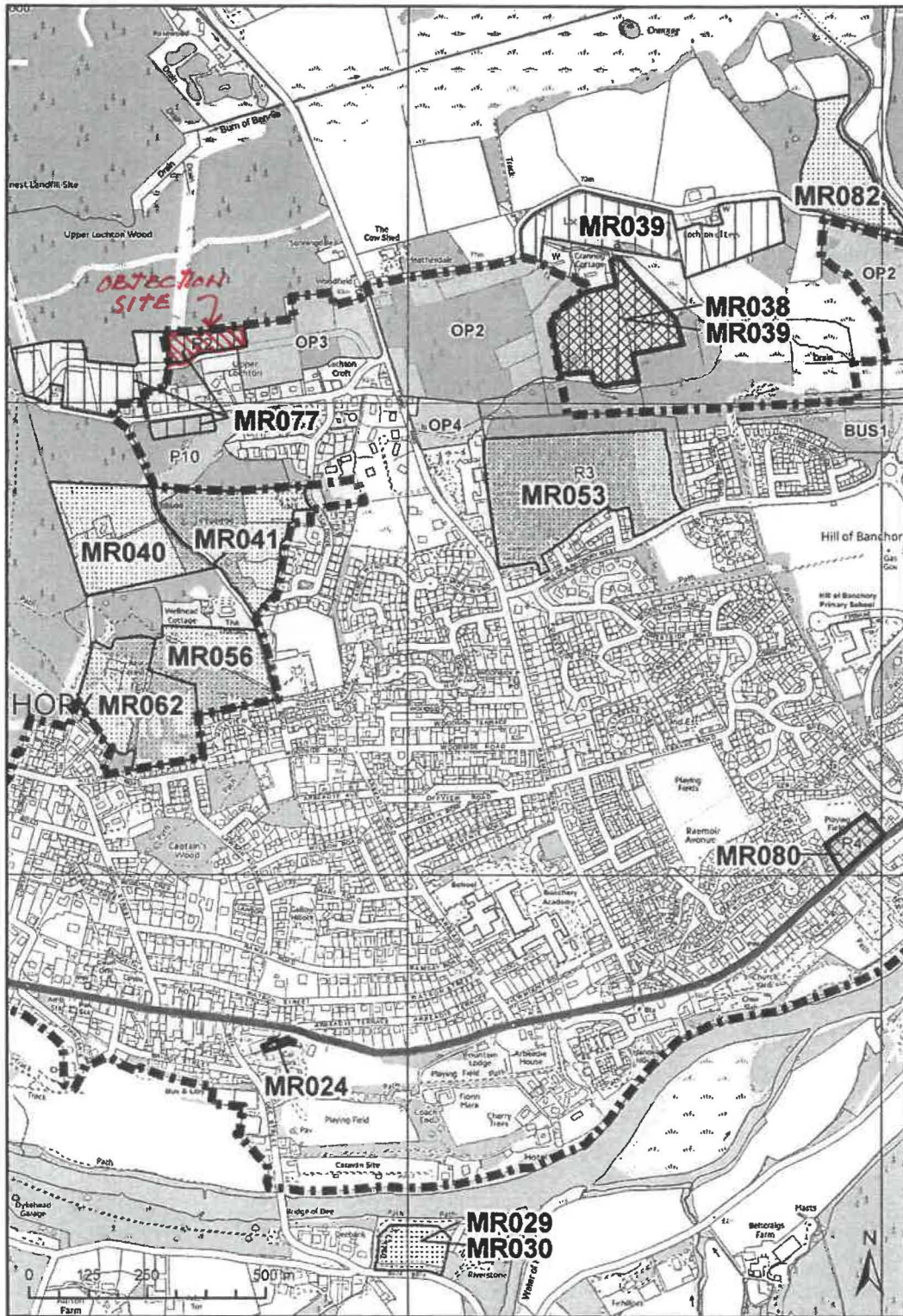


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LOP OBJECTION : LAND AT UPPER LOCHTON PLAN 2.



LDP OBJECTION : LAND AT UPPER LOCHTON PLAN 3.



LOP OBJECTION:
LAND AT UPPER LOCHTON
PLAN 5.



CALA AT RAEMOIR ROAD BANCHORY
Site Layout Sketch Proposal | Phase 1 & 2 Private

1:500 @ A0
NL00075

