

PP0895

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.

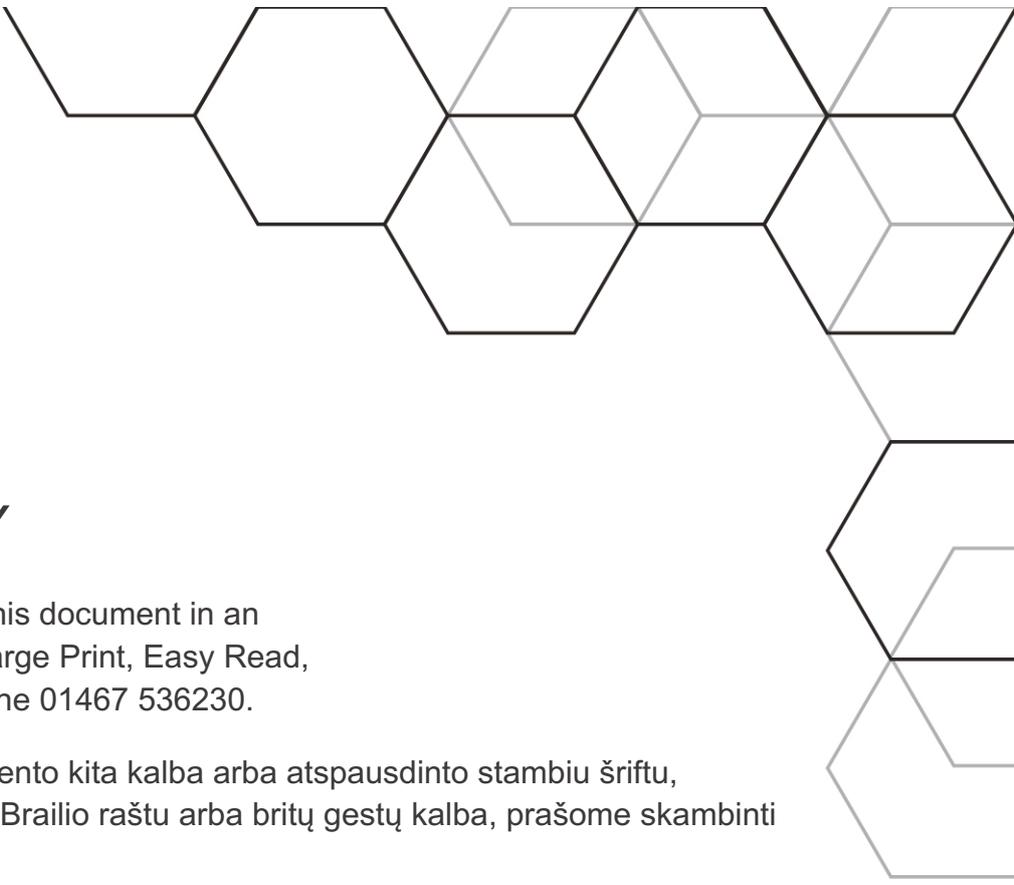
This is the only remaining opportunity to comment on the Proposed Plan. The reasons for any requested changes will be analysed and reported to Scottish Ministers. They will then appoint a person known as a Reporter to conduct a public examination of the Proposed Plan, focusing particularly on any unresolved 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.

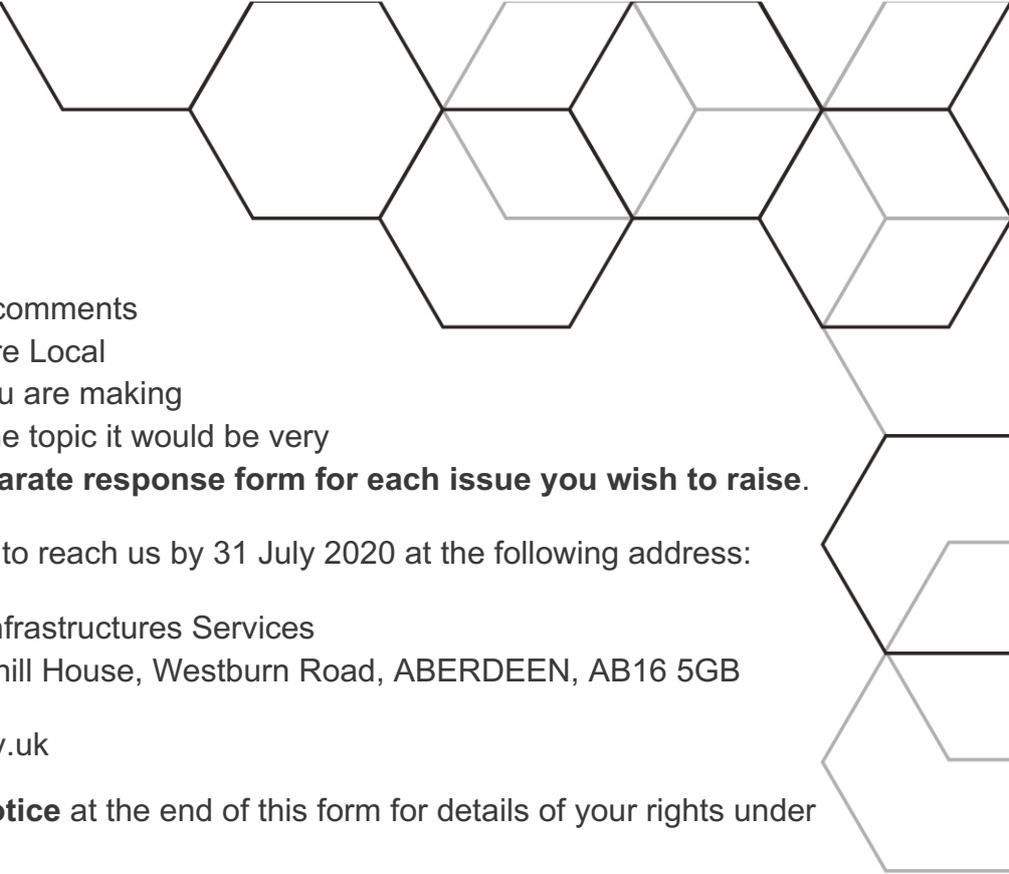
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

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](https://twitter.com/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:	David
Surname:	Murray
Date:	29 th July, 2020
Postal Address:	David Murray Associates Limited [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?

Landowner and developer

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 07c: Formartine Settlement Statements – Pitmedden (pp 470-475)

Change the land allocation of OP3 (bid site FR108) to include land contained in bid sites FR132 and FR133 to provide a combined site suitable for a mixed use development as described below.

Reason for change:

Pitmedden, within the parish of Udney, presents a unique situation and opportunity which the proposed change will allow to develop to its full potential. This potential will be thwarted if the change is not made.

A substantial community engagement exercise, Imagine Udney, was carried out during 2018 in the parish of Udney and this included a primary focus on Pitmedden. This was commissioned by Udney Community Trust with the support of Udney Community Council and carried out by Planning Aid Scotland (PAS).

The resulting Community Action Plan and Spatial Masterplan can be accessed using the following links:

Community Action Plan:

<https://www.pas.org.uk/wp-content/uploads/2019/09/Imagine-Udney-Action-Plan.pdf>

Spatial Masterplan:

<https://www.pas.org.uk/wp-content/uploads/2019/09/Imagine-Udney-Spatial-Masterplan.pdf>

The above community exercise clearly established a community preference for future development to the south of Pitmedden with a community wetland park envisaged on the agricultural land adjacent to the B999 at the southerly entrance to Pitmedden. The project to establish this park, referred to as Pitmedden Green, is one of nine projects identified for action by the community.

The community wish to see a new community hall and new primary school on the west side of the B999 and these would be accommodated, together with new housing, in the OP2 proposed site allocation in the Proposed Local Plan.

Udney Community Trust and Udney Community Council, having coordinated all the effort put into Imagine Udney by the community, were concerned to ensure that any decisions made in respect of Pitmedden would be made in the awareness of the outcomes of the community engagement exercise. It was clear that the Main Issues Report had not taken them into consideration in the proposed settlement statement.

Representations were therefore made to the Committee at its meeting of 10th September, 2019 on behalf of both the Udney Community Trust and Udney Community Council and this included a plan illustrating their preferred options (attached as Appendix 1 to this representation).

Bid sites FR108 (OP3 site allocation in the Proposed Local Plan), FR132 and FR133 are in the same ownership but were submitted separately. None of these three sites were initially favoured in the Main Issues Report.

The Formartine Area Committee agreed: *“to accept the community plan as proposed by The Udney Development Trust, covering bid sites FR108, FR007, FR132, and FR133, as the settlement statement for Pitmedden and Milldale, with officers to further discuss the proposals in early course with the Trust; and to remove the reference to “Milldale” in the settlement title.”*

Subsequently however, at the Aberdeenshire Council Infrastructure Services Committee meeting of 3rd October, 2019: *“..the Committee agreed to support the Officer’s recommendation that sites FR133 and FR132 should not be promoted for development as both sites impinge significantly on an area restricted by high pressure oil pipelines...”*

This decision by the Infrastructure Services Committee was clearly based on inaccurate and inconsistent advice from the officer at that meeting. Scottish Planning Policy states, with reference to proposals within the vicinity of major-accident hazard sites such as the nearby pipeline: *“Decisions should be informed by the Health and Safety Executive’s advice, based on the [PADHI](#) tool.”* The scale and type of development proposed for each of these sites, consisting of small scale employment use within the inner consultation zone and appropriately sized residential development within the middle consultation zone, are fully compliant with that permitted using the PADHI tool. The FR108 lies within the same middle consultation zone as site FR132 and is now included as the OP3 site allocation in the Proposed Local Plan.

What makes the retention of these sites as an integrated allocation so important for the village and residents of Pitmedden and the wider Udney parish? Hopefully this will become clear from what follows.

The community has achieved much by working in an imaginative and proactive way over the past few years. Most recently by developing a wind turbine which is fully owned and operated by the community and this initiative and the income it produces have enabled the establishment of the Community Trust which instigated the Imagine Udney community planning exercise. The community has recently taken ownership of the vacant hotel in the centre of the village to create a community café and other community facilities. Plans are being resurrected to develop a new community hall and the community has identified and begun to investigate the potential for a new, possibly community owned, primary school. Many other initiatives are under way.

This proactive approach differs from the norm where communities so often react to development proposals imposed on them by housebuilders and developers rather than being the instigators of ambitious and responsive projects and developments.

The development approach proposed for the combined three sites is for a fully consultative approach with the landowners and their professional advisors (all local) are committed to working in collaboration with the community to provide a form of development which conforms to needs established and agreed by all stakeholders. This approach has been set out in a project information sheet (attached as Appendix 2 to this representation) which, if the proposed change to the Proposed Local Development Plan is accepted, will form the basis of the community engagement.

The development would provide local employment opportunities in the centre of the village within short walking / cycling distance of the local population and directly on a bus route.

The smaller scale, individual and incremental nature of project delivery will allow greater opportunities for smaller local contractors and tradesmen to be involved with the delivery of the project.

Individual custom build serviced plots will be made available. This is something which is in great demand throughout the UK with sadly very little opportunity being provided, partly due to the way land allocations have historically been initiated by the housebuilding sector rather than community led initiatives.

The Covid 19 pandemic has highlighted significant deficiencies and shortcomings in many areas of life but some surprising strengths and resiliencies have been demonstrated. Communities and third sector organisations have been very responsive because of their local, grass roots appreciations of local needs and have allowed local skills and resources to be used in the most efficient ways. Local businesses and producers have risen to the challenges with speed and flexibility to address short comings in various systems. One of the most surprising effects has been the speed with which a huge number of people have been able to adapt readily to working from home using digital technology.

All this highlights the need for supporting local communities and building upon the resilience they provide. A key factor in facilitating this support is in land use allocations. By nature, they are not flexible operating as they do within with a five / ten year cycle which cannot respond appropriately to rapidly and dramatically changing circumstances. Land allocations which are controlled or strongly influenced by communities and by people within those communities are essential and these need to be provided in addition to the normal land allocations to the housebuilding sector. This would allow not only the most appropriate type and amount of development but also its pace of delivery to be locally and responsively controlled.

Apologies if this representation is sounding like a manifesto but the local development plan provides a timely and urgent opportunity to provide the means to achieve something which has the potential to be an exemplar for other communities in the future.

There a need for people, post Covid, to be able to work in their home community without the need to travel. This means new homes have to be adaptable to that need by good design and space standards. However, working from home is not ideal for everyone so small scale, local business space needs to be provided within settlements. Land allocations appropriately located in central positions rather than edge of town are needed to accommodate this.

All of these needs and opportunities can be met for Pitmedden by the proposed change to the OP3 allocation.

All this will help to boost the local economy and support local businesses as they in turn provide the support to service the new facilities, homes and businesses envisaged.

The Udney community through many individuals and local organisations are seeking to encourage a host of initiatives which promote the parish as a sustainable community. The desire to encourage integrated residential and employment within Pitmedden fits with these overall aspirations.

Often land allocations for business use in rural settlements eventually fail to deliver and are then changed to residential use. A perfect example of this is the OP4 land allocation in Pitmedden. This does not mean there is no demand locally but rather highlights a delivery failure. This problem can be overcome on site FR133 since there is no possibility of residential development on the site because it lies within the inner consultation zone where HSE would advise against residential development although small scale business use is perfectly safe and acceptable.

There is currently an undeveloped gap within the settlement of Pitmedden between Allathan Park and Hunters Rise. Inclusion of OP3 expanded to include bid sites FR132 and FR132 provides a

logical and possibly inevitable infill which would provide an attractive sensitively developed edge to the B999 overlooking the proposed community wetland park on the opposite side of the road. This would provide a very unique and distinctive sense of place as one approaches the village from the south.

We are aware that others will be responding with representations on the OP3 allocation and seeking to have it removed from the Local Plan. We understand the reasoning for this.

Residents of Allathan Park are naturally concerned about new development adjacent to their homes and would prefer to see the site retained as an agricultural field. Despite this objection they have agreed to be involved in detailed consultations if the site is retained on its own or in combination with bid sites FR132 and FR133 as sought through this representation. The landowners and their agents have committed to engage with them fully to develop an acceptable development and despite objecting to sites FR132 and FR133 they have indicated that they understand the logic and principle of development along the B999.

The Community Council, which supported the representation to the Formartine Area Committee and endorsed the plan attached as Appendix 1, are now concerned at the numbers of potential new houses suggested by totalling up all the allocations within the Proposed Local Development Plan (previously at MIR stage numbers had not been provided). They have also picked up on the lobbying and concerns expressed by the residents of Allathan Park. The numbers of houses indicated in the Proposed Local Plan which have alarmed them are of course blanket assessments produced by simply dividing site areas by a notional density with no regard to the design setting, topography or any other factors which would result in much lower actual densities. In any event actual delivery will be driven by local need and market conditions. Inclusion of the enlarged OP3 site will provide a far more sensitive and appropriate range of housing options for potential house purchasers and tenants.

The Community Council, as we understand it, have not objected to the principle of inclusion of the three sites, FR108, FR132 and FR133 as an integrated site as originally envisaged in the Appendix 1 plan.

Further discussions will take place with all stakeholders, including further discussions with the residents of Allathan Park, the Community Council and members of the wider community, between the submission date for representations on the Proposed Local Development Plan and the Examination. These will focus on the detail of the proposed development of the OP3 expanded to include bid sites FR132 and FR133. The outcome of those consultations will be available by the time of the Examination to answer any specific information requests at the time from the Reporters.

In light of the above it is respectfully requested that the OP3 (bid site FR108) land allocation be expanded to include land contained in bid sites FR132 and FR133 to provide a combined site suitable for the mixed use development described above.

The following documents are submitted for consideration in conjunction with these comments:-

- Appendix 1: Settlement Plan presented to Formartine Area Committee and agreed by them as the basis for the settlement statement for Pitmedden.
- Appendix 2: Project information sheet presented to residents of Allathan Park including indicative site layout on the combined site here proposed.

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:

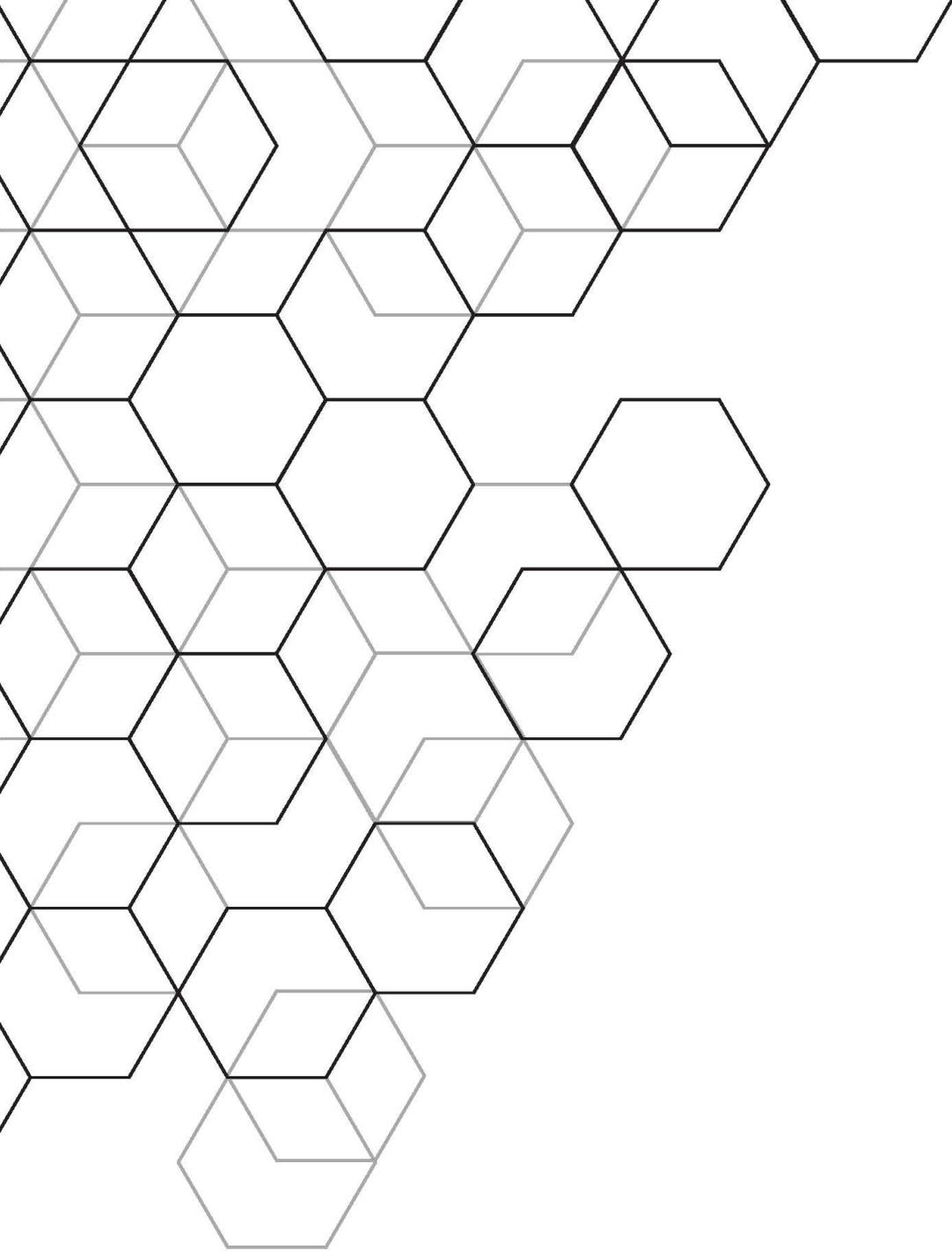
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue 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:

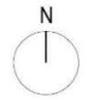
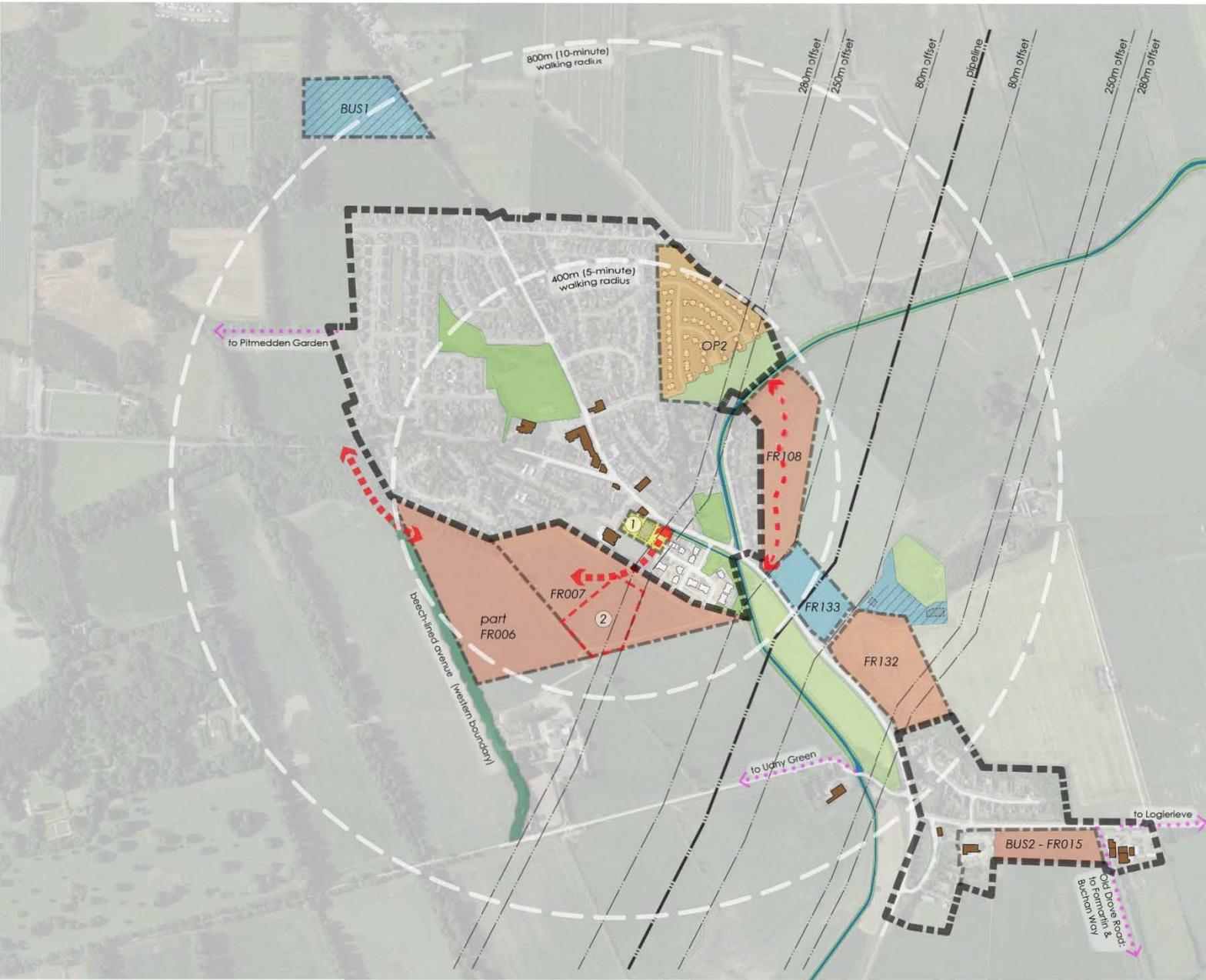
Not applicable.

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.



ALDP 2021 – As aligned with Imagine Udney



- LDP 2017 settlement boundary
- - - LDP 2021 bid sites
- employment bid site
- ▨ employment site: allocated + consented
- residential bid site
- residential bid site: allocated
- community
- green + amenity space
- potential green + amenity space
- ① potential new village hall
- ② potential new primary school site
- ⋯ potential new path connections
- ➡ potential new road connections

to Pitmedden Garden

to Udry Green

to Logierieve

Old Dove's good:
to Farmham &
Burchin NW

Beech-lined Avenue
(western boundary)

Allathan, Pitmedden: Project Information

Project Participants

Landowner: [REDACTED]
 Architect: David Murray Associates

Proposal

To create an exemplary, sustainable, mixed use development characterised by good design, environmentally friendly layout, energy efficient design and construction, integral landscape design and providing local employment and a mix of housing units including affordable homes which address local need.

Key Features of Proposal

- Will be subject to full public consultation and comment at both master-planning and design development stage
- Housing mix based on established local needs
- Affordable housing integrated and constructed so that the completed development is 'tenure blind'
- Not led by developer/ housebuilder¹
- It is hoped that all houses will conform to the Passivhaus² or similar design standard
- Will create local employment opportunities
- Will utilise appropriate renewable technologies³

Housing

We envisage a mix of house sizes and types. House form may include detached, semi-detached and terraced units. A recent study carried out by Rural Housing Scotland for UCTL confirmed a significant shortfall in housing of all types and tenures in Udry Parish and particularly in Pitmedden.

Employment

A small scale commercial development (office, studio / workshop space) of a scale compatible with the village centre living will be accommodated in the heart of the development site to provide local employment opportunities.

Phased development

A development of this nature will have to be phased to allow controlled, incremental growth. A number of factors will influence how this is best achieved and these will be explored in more detail following discussions with the community council and planning officers. A phasing plan will be prepared after these discussions have taken place.

¹ The intention is for Landowner and Architect to complete the masterplanning process and submit a planning application. This will minimise the risk of the aspirations contained in this document being compromised. The eventual developer will be expected to fully subscribe to the project objectives.

² Passivhaus is a performance based set of design criteria, developed in Germany, for very low energy buildings which will significantly less energy than standard UK buildings.

Siting and Design

The land is ideally situated on a south and west facing slope whereby good solar exposure can be provided to all the proposed new buildings.

Structural planting will take place within and around the site to provide visual breaks, enhanced shelter and improved habitat.

Tree planting will provide a balancing carbon capture function to help offset the carbon footprint of the proposed development.

The line of the gas pipeline through part of the site will provide an opportunity for open amenity space within the development.

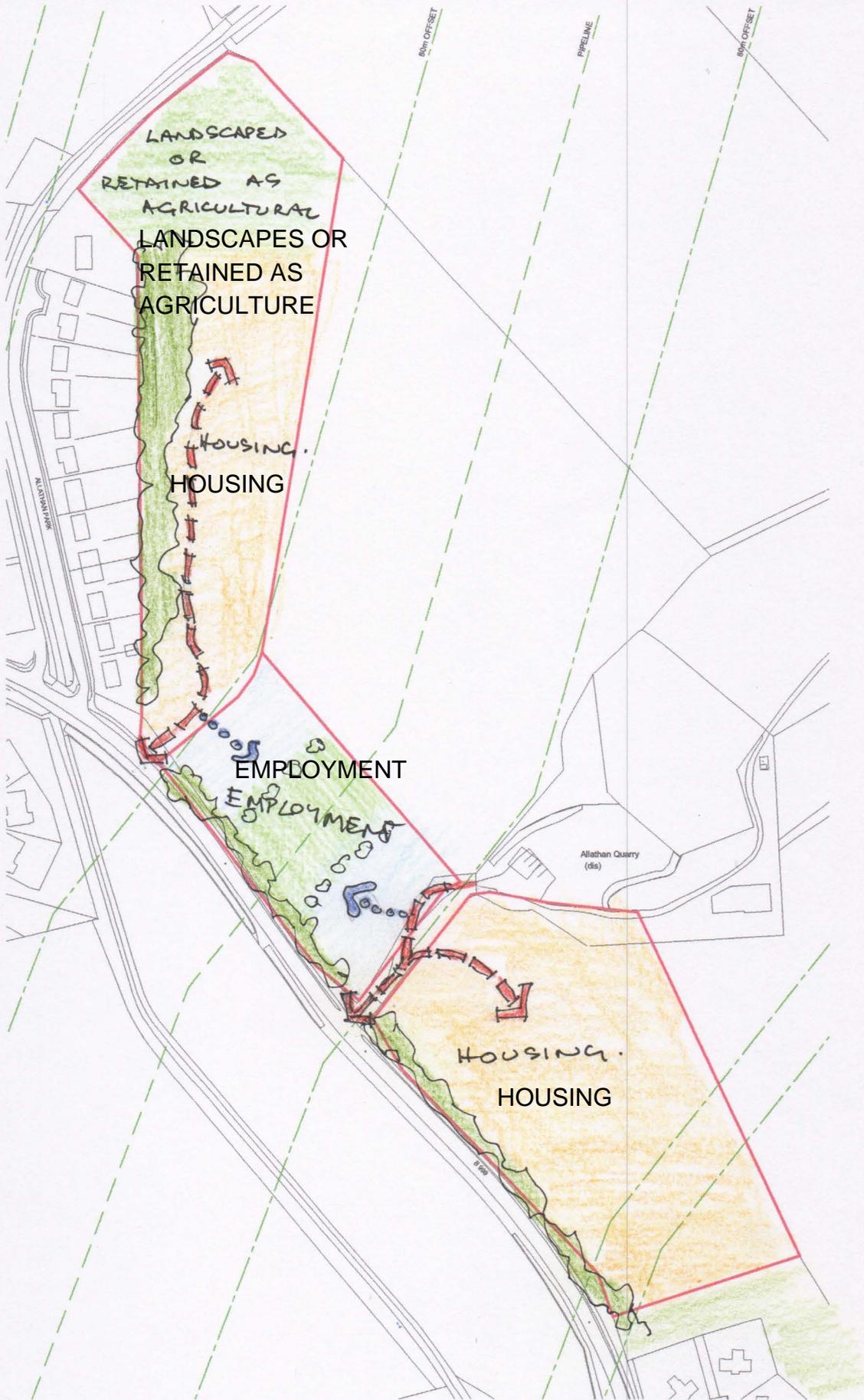
A landscape statement and design statement will be prepared for submission with a planning application in due course.

Site Constraints

The presence of the St. Fergus to Aberdeen pipeline adjacent to the proposed development site places constraints on the position and number of houses which can be built.

Most of the proposed housing land lies in the middle consultation zone and the proposed employment use lies in the inner consultation zone therefore the amount of development will be limited to numbers appropriate for these locations and determined in consultation with HSE.

³ The approach to this development which starts with a masterplan and aspires to achieve Passivhaus standards means that the choice of sustainable technologies to suit the development cannot be determined at this stage but will emerge naturally as part of the design development process.



PITMEDDEN - ALLATHAN
DEVELOPMENT SITES

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