



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.*

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:	Ian A
Surname:	Downie
Date:	31st July 2020
Postal Address:	c a s e CONSULTING 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?

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):

Delete the contribution to meeting the strategic allowances (Local Growth Area) of 5 houses from the OP1 allocation in Towie (Table 3, Appendix 6). Identify an alternative effective allocation in the Local Growth Area of the RHMA or, if marketability constraints preclude the identification of such an alternative allocation, in the Local Growth Area of the adjacent Aberdeen HMA where marketability constraints are not an issue.

Reason for change:

This allocation came into the audit in 2011 and is logged as marketability and ownership constrained in the 2019 housing land audit. Historically, there have been just four houses built in the settlement in the past 11 years and there is no guarantee that this constrained allocation will deliver housing during the plan period. Given the scale of the settlement it would be more appropriate to accommodate development through organic growth as and if demand arises.

There is certainly no basis to assert that there is sufficient confidence to that housing will be delivered to set the capacity of this site against the strategic allowances.

The widespread recruitment of existing allocations from the constrained and sometimes long term constrained supply in the Rural Housing Market Area and the high level of marketability constraint in the supply of over 30% indicates a fundamental deficiency in the spatial strategy which has informed every local plan since re-organisation in 1996. Throughout this period the Government has placed emphasis on ensuring that all allocations are effective or capable of becoming effective during the relevant plan period. Clearly there has been a widespread disregard for this Government guidance in successive local plans produced in Aberdeenshire. In circumstances where there is an over provision of allocations in the RHMA which are incapable of delivering housing consideration must be given to increasing the supply by the transfer of allowances to the Aberdeenshire part of the Aberdeen HMA where marketability constrained sites are virtually unknown.