



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?

Various developers and landowners

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 of 442 houses to meeting the Local Growth RHMA allowances from the OP1 allocation in Turriff. Identify alternative and effective allocations with an equivalent capacity in the Local Growth Area of the Rural HMA or, if marketability constraints preclude the identification of such allocations, in the Local Growth Area of the adjacent Aberdeen HMA.

Reason for change:

This allocation entered the housing land audit in 2013 with a capacity of 130 houses. At that time there were three other identified residential development sites within the settlement boundary with a total capacity of 153 houses. During the following six years the OP1 allocation was extended and its capacity increased to 450 houses. The total number of houses completed in Turriff between the 1st January 2013 and 1st January 2019 according to the Council's Housing Land Audit data is 31 or little more than five per annum.

Planning permission in principle was granted for the erection of 8 houses on the 12 September 2014 under reference APP/2013/1097 prior to the preparation and approval of any Masterplan for the whole site. A subsequent application under Section 42 of the Act was approved on the 4th March 2019 removing the three year time constraint for the submission of the Matters Specified in Condition application. No houses have been delivered on the site. These applications have been lodged on behalf of the landowners and are not associated with any reputable house builder. 442 of the 450 houses are marketability constrained in the 2019 audit and are likely to remain so throughout the lifetime of the LDP.

In the same period from 2013 one of the other sites in Turriff has attracted a major housebuilder who has obtained full planning consent for the erection of 231 houses. The 2019 audit indicates that it is anticipated that this site should be completed in 2027.

Before a 450 house allocation can be considered viable it requires to be associated with a major housebuilder with the capacity to complete at least 30 - 40 houses per annum. A major housebuilder, in turn, will only be attracted to this allocation if demonstrable and unsatisfied demand can readily be established. Moreover, the site would require to be readily developable and relatively free from constraints. The description of the OP1 allocation on page 502 of the LDP is far from helpful particularly with regard to unresolved site access and transportation issues. The settlement statement also advises that there is insufficient capacity in the WWTP. The initiation of a growth project by Scottish Water is dependent upon the five criteria being met. One of these criteria would require the OP1 site to have a planning permission for the entire development. The landowner is clearly not going to underwrite the costs of preparing and submitting such a planning application in circumstances where demand for this level of development has not been established.

For an allocation to meet the strategic allowances it must be effective or capable of being effective during the lifetime of the plan to satisfy SPP. In this case, the OP1 site is marketability constrained, has attracted no interest from a housebuilder in the last 8 years, has no planning consent, and no prospect of obtaining a consent in the absence of housebuilder interest, has a number of unresolved infrastructure issues that cannot be addressed unless and until planning consent is obtained and is located in a settlement where a competing site is expected to be delivering housing at 30 houses per annum until 2027. There is no basis to support any confidence that this allocation will move from the constrained supply within the lifetime of the LDP.