

PP1090



# 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](mailto: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](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:	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 towards meeting the strategic allowances in respect of the OP1 allocation in St Fergus from Table 3 of Appendix 6. Identify an alternative effective allocation in the Local Growth Area within the RHMA or, if marketability constraints preclude the identification of site an allocation, in the Local Growth Area of the adjacent Aberdeen HMA.

## Reason for change:

The 2019 housing land audit indicates that this allocation came into the audit in 2012. That is incorrect. Part of the site fronting the road was released into the audit in 2006 under reference U/SF/R/011 with a capacity of 10 houses.

There was a planning application for 4 houses submitted in 2018 which was withdrawn in May 2019 and a further application for 21 houses which was also withdrawn in May 2019. It would appear from a perusal of the planning file that there may be an access issue that the applicants might not have been able to overcome due to the restricted road frontage and the proximity of the proposed site access to a sharp bend in the existing access road.

By 2014 the Planning Authority was toiling to meet the strategic housing requirements in the current LDP and the site was doubled in area. The capacity of the overall site was increased to 55 houses without any regard to the fact that the prime part of the site had lain dormant for nearly a decade.

By 2017 the site had moved into the constrained supply on grounds of ownership. It is understood that the site is in more than one ownership and this has stifled recent attempts to move forward with its development.

Given these impediments to development there is no logical or competent basis to assert that 13 units can contribute to the strategic allowances. It appears just to be an arbitrary contribution made without any cognisance that the site is obviously constrained. The confidence that the site will deliver 13 houses towards meeting the strategic allowances when it has failed to do so in every previous local plan since 2006 cannot be demonstrated by the Planning Authority to any extent let alone to the extent necessary to satisfy SPP.