



PP1094

# 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.*



## 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, zvaniem uz 01467 536230.

Aberdeenshire Local Development Plan  
Woodhill House, Westburn Road, Aberdeen, AB16 5GB

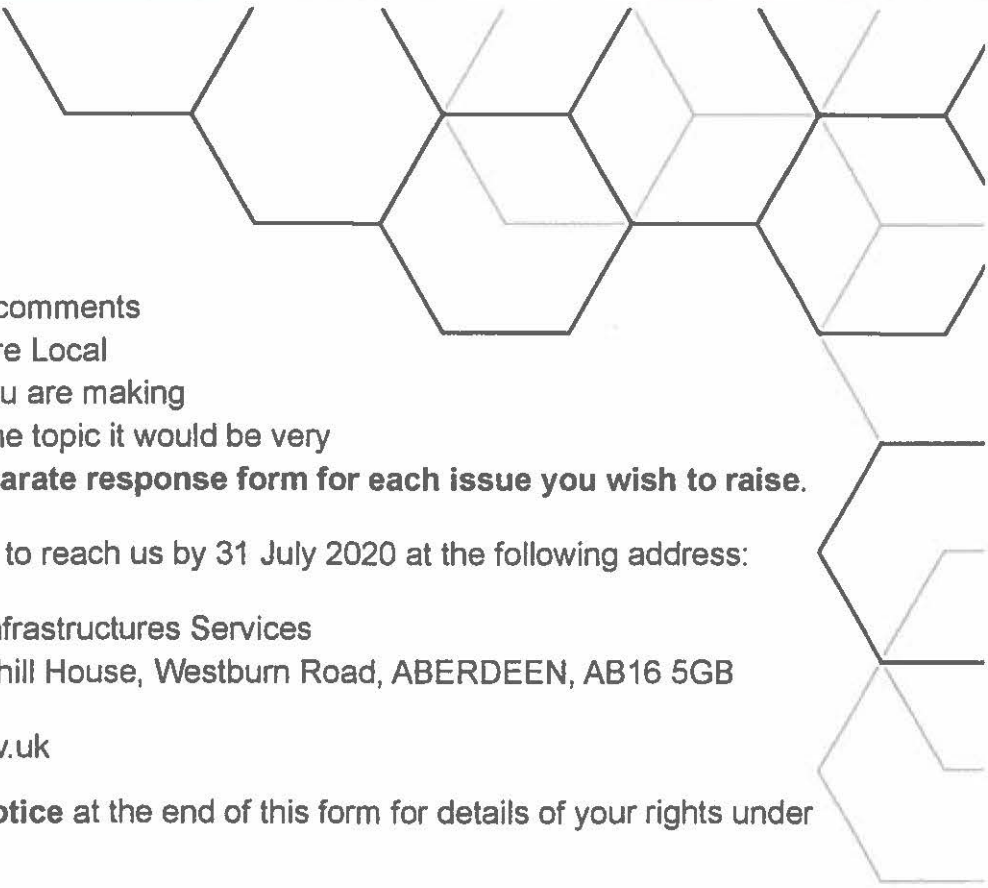
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Web: [www.aberdeenshire.gov.uk/ldp](http://www.aberdeenshire.gov.uk/ldp)

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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](mailto: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](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 OP2 site in the St Katherines settlement statement and from Table 3 of Appendix 6.

Replace the 35 house allocation with an effective alternative allocation elsewhere in the Local Growth Area of the RHMA or, if marketability constraints preclude the identification of such an allocation, in the Local Growth Area of the adjacent Aberdeen Housing Market Area.

## Reason for change:

Development of this scale as been promoted in previous local development plans and, in each, instance the Reporter responsible for examining the plan has restricted the level of development the OP1 allocation. The conclusions of the Reporter in respect of the examination of the same proposal which was advanced in the Aberdeenshire Local Development Plan : 2017 are attached. The conclusions provide a comprehensive range of reasons why the settlement of St Katherines cannot support such a high level of development.

The one argument advanced by the Planning Authority for the inclusion of such a large and inappropriate allocation was to support Fyvie Primary School which was suffering from a decreasing school roll. In the case of the 2017 LDP no residential allocations were identified within Fyvie. In the emerging local plan an allocation for 30 houses has been made in Fyvie itself to assist in supporting the primary school.

housing at Rothienorman.

39. I agree that rising land beyond the southern boundary of the site helps to contain the site in the wider landscape. I am less convinced of the landscape merits at a more local scale. The site extends out into the countryside, with open fields on three sides.

Development on the site, especially as illustrated by the Indicative Layout, would not be in keeping with the compact form of the existing village.

40. With regard to the site being a logical area for expansion of the village, no comparative assessment of other possible sites has been drawn to my attention. If it were to be shown that there is a local need for more housing at Rothienorman, other sites adjacent to the village might be more worthy of being allocated for development. Other sites might be well-related to the centre of the village.

41. I accept that residential development on site FM028 would be close to the post office, primary school, football pitch and bus stops, and that these facilities are well within walking distance. However, it appears to me that Rothienorman does not have other important facilities and services such a supermarket for main weekly shopping, a range and choice of employment, a secondary school and healthcare facilities. From this I find that new housing development in the village is likely to be car-dependent. This suggests to me that Rothienorman is not a sustainable location for significant new residential development, bearing in mind what is said in paragraph 270 of Scottish Planning Policy.

42. Regarding lack of an allocation for new housing at Rothienorman, the Council points out that some small-scale growth may be permissible, but local schools are functioning close to capacity. I note that Rothienorman is not in a strategic growth area.

43. The need for land for more housing is addressed in issue 7. While there is limited justification for identifying additional housing land, in the present case any such justification is outweighed by the foregoing concerns that I have with regard to landscape and townscape, sustainability and school provision.

44. Taking account of all the foregoing considerations, my conclusion is that site FM028 should not be allocated for development. The proposed plan need not be altered.

#### St Katherines - site OP2

45. St Katherines consists of a small group of houses and a modern workshop premises set in open countryside beside the Oldmeldrum to Turriff road, A947. A number of concerns are expressed about the allocation of development to site OP2 at St Katherines.

46. From submissions and from my inspection, I find that the only services available at St Katherines are a public water supply, a half-hourly bus service on the adjacent main road and the hydraulics business in the workshop premises. St Katherines has no public drainage system. It has no school, shop, healthcare provision, choice and range of employment, leisure facility or any of the other services and facilities convenient access to which is essential for everyday living.

47. From this, I find that any residential development at St Katherines would be car-dependent. Residents of new development would be likely to use car transport to access necessary services and facilities. This is contrary to important parts of Scottish Planning Policy and the Aberdeen City and Shire Strategic Development Plan.

48. Paragraph 270 of Scottish Planning Policy says that the planning system should support patterns of development which reduce the need to travel and provide safe and convenient opportunities for walking and cycling for both active travel and recreation.

49. One of the aims of the Aberdeen City and Shire Strategic Development Plan is to "make the most efficient use of the transport network, reducing the need for people to travel and making sure that walking, cycling and public transport are attractive choices" (page 6). One of the objectives of the Strategic Development Plan is creation of sustainable mixed communities. "Retail, employment, education, health, leisure, open space and transport as well as housing are all vital for successful development" (page 36, paragraph 4.34). Another objective is accessibility: "To make sure that all new developments contribute towards reducing the need to travel and encourage people to walk, cycle or use public transport by making these attractive choices" (page 38). Under the latter, one of the targets is: "To reduce the percentage of journeys made by car" (page 38).

50. From the foregoing, I find that concerns about reliance on car transport are fully justified.

51. A further concern is lack of demand for houses. In connection with this, I note that the Aberdeen City and Shire Strategic Development Plan, under "Local growth and diversification areas" says that "Levels of growth in individual settlements should relate to local needs...." (page 22, paragraph 3.43). The submissions do not demonstrate that, at St Katherines, there is a need for new housing beyond that which might be provided on site OP1.

52. The proposed plan includes in site OP2 a hectare of employment land. Submissions do not demonstrate that there is a need and demand for employment land in this countryside location. In the proposed plan, employment land is allocated in or adjoining towns in Formartine, where supporting services are available. I find it unlikely that the proposed employment land, if developed and if employing persons living in houses on the residential part of OP2, would significantly reduce car journeys. Some employees would be likely to travel from places of residence further afield and most working residents on OP2 would be likely to travel to places of employment elsewhere.

53. Concern is also expressed about road safety. The A947 road is said to have a poor safety record. From my inspection, I note that the A947 at St Katherines is subject only to the national speed limit. The existing side road and the frontage of OP2 are on the inside of a slight bend. This restricts forward visibility for travellers on the main road. During my inspection, I noted that the speed of passing traffic was fairly high. Both approaches to the side road (the Crichneyled road) junction have "reduce speed now" warning signs. There is no footway on the A947, except for a standing area beside the bus stop lay by for south-bound buses. There appears to be no designated bus stop for north-bound buses.

54. In the interests of safety and free-flow of traffic, it is generally accepted that the number and usage of accesses to major roads in rural areas should be kept to a minimum. I find that development on site OP2 would either increase use of the existing access to A947 from the Crichneyled road or would require a new access direct to A947.

55. One particular concern in the representations is the effect of development on the safety of the access to Greenacres. From my inspection, I note that, in addition to the

access to Greenacres, on adjoining land to the north there is an access to the premises of an engineering business. I find that the presence of these existing accesses means that any direct access to OP2 would be adding to slowing and turning movements on a relatively short stretch of road. This would be contrary to the interests of the safe and free flow of traffic on the main road.

56. From the considerations in the preceding paragraphs, I find that OP2 is poorly-located in terms of obtaining access to the road network.

57. I note that Fyvie Primary School has a roll that is below its capacity, that pupil numbers are expected to reduce and that at Fyvie there are "few potential development sites". Submissions do not demonstrate that there has been a thorough search for development sites in Fyvie or in any other communities that might exist within the catchment area of Fyvie Primary School. Even if there are no other development sites, I find that seeking to increase the number of primary school children does not justify encouraging development on a site that is so poorly located as is OP2 at St Katherines.

58. The need for land for more housing is addressed in issue 7. While there is limited justification for identifying additional housing land, in the present case any such justification is outweighed by the foregoing concerns that I have with regard to lack of services and reliance on car transport. Any local need for new houses can be met by development on the St Katherines OP1 site.

59. Taking into account all the preceding matters, my conclusion is that OP2 is an unsatisfactory site for residential and employment development. The site should be deleted from the proposed plan.

#### St Katherines - site OP1

60. Representation 484 says that any development at St Katherines should be in keeping with the size and character of the community. This means five houses only on site OP1. In the proposed plan, site OP1 is allocated for "up to 15 homes".

61. I note that site OP1 is allocated for housing development in the current, 2012 local development plan. The plan says that the site is allocated for "up to 5 houses".

62. Representation 350 says that planning permission in principle has been granted for 15 houses on OP1.

63. I find that existence of a planning permission does not necessarily prevent consideration being given to the appropriateness of the 15-home limit contained in the proposed plan. There are two reasons for this. First, the permission might not be implemented and might lapse. Second, the information before this examination might indicate that the 15-home limit is inappropriate.

64. As already stated in relation to the OP2 site at St Katherines, the local community lacks nearly all the services that meet everyday needs. New housing development at St Katherines would be almost entirely car-dependent. This is contrary to national and strategic planning policies. I therefore find that, if there is to be some new housing development at St Katherines to meet possible local needs, it should be on a very modest scale. Submissions do not demonstrate that the limit of five houses in the current plan is too restrictive in relation to local needs.

65. From my inspection, I find that the density of existing housing at St Katherines may be characterised as medium. Development on the OP1 site should be at a similar density to maintain the character of the hamlet. This would be achieved by a development of five dwellings, especially when bearing in mind the landscaping and screening required by the OP1 text in the proposed plan.

66. My conclusion is that the allocation for site OP1 should be five homes. In line with the recommendation made under issue 7 regarding the third paragraph of policy H1, the words "up to" should not be used. The proposed plan should be altered accordingly.

#### Woodhead

67. I note that the appraisal of site FM011 gave weight to concerns regarding drainage. The Scottish Environment Protection Agency, in its letter of 29 January 2015, says that it has no objection on grounds of foul drainage to site FM011 being included in the local development plan. The Council maintains its opposition to development on FM011.

68. Woodhead is said to have a hall and a bus stop and no other services. During my inspection, I noted that the village also has a church with a service once a month. I find that lack of facilities and services such as shops, employment, a school and healthcare means that new housing development in the village is likely to be highly car-dependent.

69. In the Aberdeen City and Shire Strategic Development Plan, the accessibility objective is "To make sure that all new developments contribute towards reducing the need to travel and encourage people to walk, cycle or use public transport by making these attractive choices" (page 38). One of the targets is "To reduce the percentage of journeys made by car" (page 38).

70. Scottish Planning Policy (paragraph 270) says that the planning system should support patterns of development which reduce the need to travel and which provide safe and convenient opportunities for walking and cycling for both active travel and recreation and which facilitate travel by public transport.

71. The Council points out that the site is within an area of prime agricultural land. I note that policy PR1 in the proposed plan says that prime agricultural land should not normally be developed. Scottish Planning Policy (paragraph 80) says development on prime agricultural land should not be permitted except in certain limited circumstances. I find that, as there is no clear justification for additional housing land in this location, development on site FM011 would not accord with the need to conserve prime agricultural land.

72. I note the Council's reference to allocations in St Katherines. I am recommending a much-reduced amount of new housing in St Katherines. In view of my observations (in relation to site OP2 at St Katherines) regarding searching for development sites in and around Fyvie, I do not find that reduced housing at St Katherines necessarily justifies additional housing at Woodhead.

73. With regard to any wider need for land for more housing, this is addressed in issue 7. While there is limited justification for identifying additional housing land, in the present case any such justification is outweighed by the foregoing concerns about sustainability and prime agricultural land. I also note that Woodhead is not in a strategic growth area.