



PP1113

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 60 houses towards meeting the strategic allowances from the OP1 site in Cuminstown (Table 3 of Appendix 6). Identify an alternative allocation in the Local Growth Area of the Rural HMA or, if marketability constraints preclude the identification of such an allocation, in the Local Growth Area of the adjacent Aberdeen HMA where marketability constraints are virtually unknown.

Reason for change:

While this is a new allocation it effectively replaces a previous allocation that entered the audit in 1994 with a capacity of around 32 houses. The site was extended and the capacity increased in subsequent local development plans. In the 2019 housing land audit the total capacity was 50 houses. During the past 26 years only 2 houses were delivered on this allocation which was classed as a long term marketability constrained site in the 2019 housing land audit.

Replacing a long term marketability constrained allocation with an even larger 'new' allocation does not remove the long term lack of demand for housing in this rural settlement. The OP1 statement recognises that demand does not warrant an allocation of 60 houses by stating the 'Part of this site may remain long term constrained until post 2031.' Similarly, the suggestion that the site may be suitable for self-build plots, subject to planning being granted for the development site as a whole, not as separate individual plots is completely unrealistic. No landowner is going to invest in ensuring that all infrastructure to service all plots is in place prior to any homes being constructed in circumstances where the historical demand for housing in the settlement is virtually non-existent. Even funding a planning application for the entire development is unlikely to be economically attractive to the landowner.

Even by the Planning Authority's own admission, this allocation is not going to be effective or become effective during the relevant plan period. In the absence of the confidence necessary to satisfy SPP that this site can and will deliver its full capacity during the lifetime of the LDP it cannot be considered as contributing to meeting the strategic allowances.