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By submitting a response to the consultation, I agree that Aberdeenshire Council can use the information provided in this form, including my personal data, as part of the review of the Aberdeenshire Local Development Plan. This will include consultation on the Main Issues Report (including any subsequent Proposed Plan).

I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037

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If you are unhappy with the way that Aberdeenshire Council or the Joint Data Controllers have processed your personal data then you do have the right to complain to the Information Commissioner's Officer, but you should raise the issue with the Data Protection Officers first. The Data Protection Officers can be contacted by writing to:

- Mr Andrew Lawson, Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

If you have difficulty understanding this document and require a translation, or you need help reading this document (for example if you need it in a different format or in another language), please phone us on 01467 536230.



Which document(s) are you committing on?	Main Issues Report	<input type="checkbox"/>
	Draft Proposed Aberdeenshire Local Development Plan	<input type="checkbox"/>
	Strategic Environmental Assessment Interim Environmental Assessment	<input checked="" type="checkbox"/>
	Other	<input type="checkbox"/>

Your comments

BALMEDIE INTERIM STRATEGIC ENVIRONMENTAL ASSESSMENT

BID REFERENCE: FR022 and BID REFERENCE FR116

The interim strategic environmental assessment of Bid FR022 and FR116 have not been consistently undertaken with an understatement of negative impacts of development in respect of FR116 and an overstatement of the impacts of developing FR022.

FR116 lies within the coastal protection zone which presumes against residential development in the open countryside and development which might lead to the coalescence of settlements. FR022 is not protected by such a designation.

In relation to 'Water' the FR116 site is scored '0' while the FR022 site scores '-'. If both sites had no access to existing WWTP then identical comments to the effect that this is a generic issue should have been appended to both assessments. In reality the FR022 site has access to a trunk sewer that connects Belhelvie to the Balmedie WWTP. It also has the benefit of a new trunk water main which is to be installed through the bid site to service the expansion of Blackdog and augment the supply to Balmedie. The FR116 site has neither of these advantages. The assessment of the FR022 site advises that it is a greenfield site whereas in reality it was a former golf course which is referred to elsewhere in respect of the loss of recreational land. The golf course ceased operation a decade ago. The water course referred to is within the southern part of the bid site which lies outwith the development area as it is located in the greenbelt. This has been confirmed on the draft masterplan of the development.

In respect of biodiversity the FR116 site scores '++' while the FR022 site scores '-'. The FR116 site is in open farmland seen against a backdrop of sand dunes which form a Local Nature Conservation Area which would be adversely impacted by such a large scale development visually and physically by the influx of population. There are no significant green networks and no prospect of achieving any connectivity with the existing settlement of Balmedie because the northern extremity of Balmedie which is heavily wooded is separated by a corridor of land which lies outwith the bid site. By comparison the FR022 site has established tree belts which will be retained and enhanced and there is direct and existing connectivity with Balmedie and Blackdog by means of pedestrian, vehicular and cycle links. The scores should be reversed under this heading.

In respect of material assets the FR116 site is scored '+' while the FR022 site is scored '0' after mitigation. Contrary to the assessment no grade separated junction is now proposed off the A90 to service the Menie development and all traffic will have to access the grade separated junction to the south of the village including upwards of 20 years of construction traffic during the build out of the site. The bid site is not in the same ownership as the land needed to access the location of the previously proposed grade separated junction and the Belhelvie Community Council has opposed the site's reserved status because it has not been demonstrated that it can be developed without serious adverse impacts on the existing settlement.

The FR022 site will have no long term impact on the sewage network or the school without appropriate investment anymore than the FR116 site will have. Indeed the proposal provides for a primary school site in an extremely accessible location for the wider Balmedie catchment area and mitigation by developer obligations is available remedy for any deficiency in respect of both bid sites. The after mitigation scores should be reversed for these two sites as the deliverability of the grade separated junction is by no means assured whereas the FR022 site already is connected directly to the grade separated junction.

There is no factual basis to score down the FR022 under the heading 'population' because a mix of house types has not been proposed other than to acknowledge that 25% of the development will be affordable housing. Over time the housing market may change and that will ultimately influence what house types the developer will deliver. Recently, developers have responded to the downturn in offshore oil activity by delivering smaller middle market housing at higher densities in stark contrast to what was envisaged when the development site was the subject of a bid for inclusion in a LDP. In some instances the time lapse between the initial bid and the commencement of development in Aberdeenshire can be as much as ten years for those sites included in the ALDP : 2012 but identified for development from 2017 onwards. Whatever is indicated in the MIR is speculative and not binding on the promoter particularly if the site is proposed to be reserved for potential delivery at the end of the lifetime of the emerging LDP.

In relation to human health the entry for the FR022 site is factually inaccurate as the bid site does not constitute, at present, recreational open space. It is currently utilised for agricultural purposes (grazing) but was formally a golf course which ceased to operate in 2009. The bid actually proposes to provide substantial recreational open space over and above the 40% required to satisfy current planning policy throughout the residential development.

In summary, the environmental assessment for these two bid sites has not been undertaken in a consistent and impartial manner. The assessments have been manipulated to support a pre-determined recommendation and have included false and misleading information which seriously undermines the entire process.