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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.

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

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

Your comments

FR116

The 2014 Aberdeen City and Shire Strategic Development Plan (SDP) housing allocations illustrate that the proposed FR116 site alone exceeds the need for housing in this entire area (Blackdog to Ellon) in both the 2017-2026 period and the 2027 to 2035 period (1500). The proposed FR116 site contains up to 1650. The Blairton site is therefore not required to meet housing targets in the forthcoming LDP period or indeed the following LDP period.

The MIR (Formartine Appendix) states in the FR079 entry that "Given the lack of clarity whether such a large strategic allocation as "Blairton" can be serviced, with no realistic consideration of infrastructure needs, or whether it is likely to be required in the next 10 years..."

The infrastructure to service a site of this scale, such as new schools, are unrealistic and inappropriate in this location and consideration of the required infrastructure has not been demonstrated in the development plan site proposal. The LDP should not include sites, even reserved sites, where such fundamental questions regarding viability remain.

Site OP3 is already allocated for 500 houses in addition to 950 holiday villas, 36 golf chalets and a large hotel. The FR116 site is located in the gap between the OP3 site and Balmedie. The inclusion of site FR116 would effectively join the three areas together to form one larger sprawling development. This is contrary to the aims of the existing 2017 LDP and the preferred option of the 2021 MIR in the coastal zone which states that developments in the coastal zone should only be permitted where it is essential or proven to be necessary and cannot be located elsewhere.

The proposed site is located within a coastal zone as identified in the 2017 Aberdeenshire Local Development Plan. It is noted that development in these areas should only proceed if it is necessary to have a coastal location. There is no justification as to why a coastal location is necessary provided in the development plan site proposal. Therefore, there is no justification to overturn the current and previous safeguarded nature of this bid site.

The proposed development site is within an area identified as a Special Landscape Area. The Aberdeenshire coast, particularly the beach between Bridge of Don and Newburgh, is renowned for its scenic value. It is vitally important that such landscapes are conserved and that landscape changes are managed to protect against developments which will have a detrimental impact. The proposed development will have a significant and permanent detrimental impact on the distinctive character of this part of the Formartine Links. The large scale of the proposed development will permanently alter the landscape, the sense of place and quality of life.

The development plan site proposal does not present clear details of the environmental impact of the proposed development. It is noted that nearby developments in the coastal zone have destroyed or damaged the local geomorphological features with no prospect of recovery.

As stated in the supporting documentation for the development plan site proposal the development would increase the accessible areas for informal recreation and therefore public access to the dune system. This is certain to have a significant detrimental impact on the local environment and natural beauty. The increase in public access would have a devastating impact (litter, noise, dog walking and fouling, domestic cats) on the fragile local flora (Marram grass, Northern Marsh Orchid, Wild Pansy) and wildlife (deer, Buzzards, marine birds and mammals, etc). Areas of natural beauty and established woodland should be protected wherever possible.



Your comments (continued)

The proposed site is not connected to the village of Balmedie and cannot be seen as an extension of the local community, it is an entirely separate development. It is noted in the Officers Responses in the Main Issues Report that this site is considered to provide the most benefit to the proposed development at Menie and not to the existing village and community of Balmedie.

The proposed development site is not well served by public transport and could only be expected to increase commuter traffic both through Balmedie and on the A90, particularly single occupant commuter vehicles. The existing access road to the A90 through the village of Balmedie is not suitable for a significant development to the North. The potential construction traffic and subsequent commuter traffic would have an unacceptable impact on the number of vehicles using the Old Aberdeen Road and have a detrimental impact on the residents of Balmedie.

Tertiary site access appears to be indicated using an existing single-track road with passing places which has mature trees on each side which is maintained by the current owners through a factor. The access route has no lighting or pavement which would be hazardous to pedestrians. The significance increase in traffic on this single track road due to development of the site increases the likelihood of an accident. Widening of the access road would require felling of the existing mature woodland which is understood to be protected by a tree preservation order in place for the area around Shady Neuk Gardens.

The existing primary school in Balmedie is predicted to be beyond capacity from 2020 and could not support the number of additional pupils such a development would bring. It is noted that no contact has been made with the local authorities education department.

The site is currently classified as prime agricultural land and the proposals would lead to the loss of a significant area of this prime agricultural land. For this site it is not demonstrated that the economic and social benefit would outweigh the loss of prime agricultural land.

The need for additional housing is understood however it appears that the land previously given a reserved status on the South and West sides of Balmedie is more appropriate for development of this nature. These sites have the road infrastructure already in place and do not appear to be in the coastal zone or the special landscape area.

For the numerous reasons outlined above the FR116 site should not be included as development site or reserved site in the 2021 LDP.

I fully support the recommendation of the Belhelvie Community Council that FR116 is not reserved.

FR103

The primary access to the proposed site is via a single-track road with passing places which has mature trees on each side which is maintained by the current owners through a factor. The access route has no lighting or pavement which would be hazardous to pedestrians. The significance increase in traffic on this single track road due to development of the site increases the likelihood of an accident. Widening of the access road would require felling of the existing mature woodland which is understood to be protected by a tree preservation order in place for the area around Shady Neuk Gardens.

I do not agree with the recommendation that this site is included in the development plan.

However, should FR103 be included in the development plan, I support the recommendation of the Belhelvie Community Council that that it is reduced to a maximum of 10 houses.