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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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- 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 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

### Representations on behalf of Marshall Farms Ltd in relation to Site Ref: GR087 – Sites OP1 and P5 Caskieben, Blackburn – 268 homes

On behalf of Marshall Farms Ltd, support is given to the identification of bid site GR087 within the Main Issues Report (MIR) as an Officer's preference for 268 homes. Subsequently support is also given to the identification of this site as OP1 within the Draft Proposed Local Development Plan (DPLDP). This representation requires to be read in conjunction with the development bid submitted at the pre-MIR stage and together they confirm that bid site GR087 is a suitable location for the development proposed.

The vision for Blackburn acknowledges that the settlement is a popular commuter town situated on the A96 and benefits from a range of facilities, including employment land and a new primary school. The demand for housing in close proximity to Aberdeen City has driven development within the settlement. As such, there is considered to be demand within Blackburn for further housing, as supported by Aberdeenshire Council in the assessment of this site. The identification of bid site GR087 is the most appropriate location for this within the settlement.

This site is already allocated for development within the 2017 Local Development Plan (LDP) as OP1 (50 houses) and P5 (replacement primary school). As such, it has long been recognised as an appropriate location for development. As the primary school has now been delivered on the site of the existing school, the P5 site is no longer required for that purpose. As a result an alternative use in the form of housing is considered appropriate (given the adjacent OP1 allocation for housing) and the Council's acceptance of this is welcomed.

Examination of the 2017 Local Development Plan found that site OP1 would be capable of accommodating a greater scale of development than the current 50 unit allocation, due to the construction of the primary school on a different site and the increased capacity for housing that has arisen from this. In addition, there is increased capacity within the school to absorb a higher number of houses on the site. The Reporter to the 2017 LDP examination supported this by stating **“it is possible that land for as much new housing as is compatible with the new school could be found on the east side of Blackburn”**. This would conform to the Scottish Planning Policy principle to make efficient use of capacities of land and infrastructure and would make efficient use of the investment in the new primary school.

Current policy is for sites within Strategic Growth Areas to be developed at no less than 30 dwellings per hectare. Bid site GR087 extends to approximately 10.3 hectares and at current density levels would be capable of accommodating up to 309 dwellings. The Main Issues Report at Main Issue 10 considers a density of 25 dwellings per hectare and at this rate a development of 258 houses would be appropriate.

The MIR increases the capacity of the site from the 150 units proposed within the initial bid, to 268 homes. A higher number of homes is welcomed on the site this is considered appropriate for Blackburn given its location within a Strategic Growth Area. These are the main area of focus for new housing within the 2014 Strategic Development Plan and that strategy is carried forward into the Proposed Strategic Development Plan which was consulted upon at the end of 2018. As such, Blackburn is well placed to accommodate significant housing development.

It is clear that a number of densities have been proposed for the site and a range somewhere between 150 houses and 268 houses is therefore considered appropriate, as accepted by Aberdeenshire Council in their assessment of the site. The final number of units acceptable will be determined by detailed assessments

carried out at the planning application stage. This will also consider access and road widening as contained in the MIR assessment.

Aberdeenshire Council consider within the MIR that this site is well located for parking and walking and this is welcomed. The merits of this site also outweigh the other bid locations contained within the MIR. Proposals to the west of Blackburn are constrained by the location of a gas pipeline through those sites which would render large parts undevelopable for residential use. There is also substantial tree cover to the west and steep rising land could result in significant earthworks being required to develop them which may render them unviable. The topography of this land would also result in a detrimental landscape impact and the Reporter to previous plan examinations concluded that development to the west would result in a “**greater landscape impact than development to the east side of Blackburn**”. Development of land to the north of Blackburn would elongate the settlement further and would be more remote from the centre.

As such, the development of bid site GR087 to the east of Blackburn is considered to be the most suitable location for additional housing as accepted through previous Local Development Plan processes. This continues to be accepted in the MIR and DPLDP which is supported going forward.

### **Conclusions**

Blackburn lies within a Strategic Growth Area and given its proximity to Aberdeen, is an appropriate location for further housing development. Bid site GR087 is the most appropriate location for such housing within Blackburn. The site has capacity for an increase in housing numbers given that the school is no longer required on the site and the new school has additional capacity to absorb further housing development.

It is therefore respectfully requested that bid site GR087 continues to be allocated for housing in the Proposed Aberdeenshire Local Development Plan, with the added flexibility in the housing numbers proposed by Aberdeenshire Council.