



| | |
|-------------------------|--|
| Postcode | |
| Telephone (optional) | |
| E-mail (optional) | |

Doing things digitally is our preference. Tick the box if you are not happy to receive correspondence via email:

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter: yes

Fair processing notice

Please tick to confirm your agreement to the following statements: yes

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

Your Data, Your Rights

You have got legal rights about the way Aberdeenshire Council handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data.

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 Yes Draft Proposed Aberdeenshire Local Development Plan Strategic Environmental Assessment Interim Environmental Assessment Other |
|---|--|

Your comments

MAIN ISSUES REPORT

Chapter 5, Shaping Development in the Countryside addresses a policy for dealing with Brownfield Sites. This seeks to develop a preferred option within Policy R2 for dealing with larger Brownfield Sites. The proposal is to develop a policy to allow redevelopment on Brownfield Sites of up to a maximum of 7 homes during the Plan period. This Main Issue 9 is at odds with the Officers Preferred Options on the MR061 in the Banchory Settlement Area where they are supporting a bid of 50 homes on what they term as “redeveloping contaminated brownfield land” but, which also shows the clearing of substantial ancient woodland. Such clearance of woodland is not required to develop the brownfield land as, enabling works are now no longer required to assist in the redevelopment of the previous listed building.

BANCHORY SETTLEMENT

Existing Development Sites

The existing sites OP1- 4, plus application APP/2008/4366 add 130 housing units in the period of the Plan 2021. Thereafter these sites provide a further 315 units in the subsequent LDP period. In addition Officers Preferences for Reserved Sites MR039 and MR077, together with a Phase 3 extension to the existing OP2 add a further 340 units in the period 2019-2027. Over the past 5 years of the current LDP the local market and that of the national housing market has been sluggish, with new build starts not matching expectations, as can be observed by a review of housebuilders’ market performances. This sluggishness is also reflected in the fall in house prices in the secondary market as seen in the Grampian Region (ref ASPC).

Support is given to the Existing Development Sites but each of the Development Bid Sites need to take on-board the views and comments of the community in a Panning Forum for Banchory, prior to finalisation of the proposed LDP.

Development Bid Sites

The preferences in the current LDP must ensure that build allocation does not get ahead of local demand and materially affect the surrounding countryside, woodland, associated habitats and biodiversity.

Comment on Officers’ preference

MR014 - this bid proposal should be rejected for the following reasons:-

- Banchory is described in the narrative as being a thriving town, but the high street is dying as can be seen from the number of vacant properties over the past year. This is no different to other towns that are suffering from out of town retail parks and internet shopping.
- competition from edge of centre retailers, supermarkets, furniture stores and garden centres has forced the closure of a number of town centre retailers.
- yet another cafe either in the town centre or in a retail park is not required there are sufficient.



MR024- an attractive redevelopment of the current doctors surgery and health centre would enhance the view of Banchory from the car park, provided parking levels are maintained.

MR038 and MR039- Both of these Sites are outwith the settlement boundary and would require this boundary to be redrawn which, may in turn lead to further development on infill Sites in the future.

- The LDP needs to clarify the planned route of the distributor road to the north of Banchory which is urgently required to ease congestion on the town centre and A93.

MR061-The 2005 planning applications for 29 units in two planning applications for the site were called in by the Scottish Ministers and finally approved in 2011. The approvals were certainly granted in order to find a sympathetic use for the A listed Hospital building. Work never commenced, the site was insecure and the building was allowed to fall into further disrepair.

In order to preserve the planning approval granted by the Scottish Government fresh applications were submitted but this time for 36 units on the Hospital site and an enabling works submission for 10 units, to provide the cash contribution towards the Hospital restoration. These applications were met with a considerable number of objections to the proposals, prior to the applications being withdrawn, as a result of the fire to the A listed building. Objections were raised concerning the increased size of the development, the loss of woodland and biodiversity, the unsuitability of the road access and the risk to pedestrians and cyclists accessing Burnett Park and the other green areas.

Planning applications for the site date back to 1998, since that time the new hospital facilities built adjacent to the A listed building have expanded and the volume of traffic on the private unadopted road has increased significantly as, the public have become more car oriented and the NHS mini-bus service providing a link to the town centre for staff ceased operation.

- Corsee Road from Burnett Road is unsuitable for further development of the site.
- Officers Preference for the site is completely at odds with Main Issue 9 in the Report.
- if a development is to proceed on this site then an alternative access route from Glassel Road needs to be found to avoid conflict with services and deliveries to the Hospital.
- The bid is outside the settlement boundary yet, previous planning applications have not involved community engagement other than Banchory Community Council. There needs to be a wider engagement with local interested parties, in addition to BCC, to determine if there is support for the allocation of this site following the loss of the A listed Hospital.
- Now a speculative bid has been submitted for 100 units by the developer. Officers preferences have reduced this to 50 units but, this is still well above what has been previously approved.
- This speculative bid shows little detail other than it being a “sensitive residential development” with the details of the mix dependent on market conditions. The developer currently has a long-standing planning approval in principal for 5 units on Land West of Raemoir Road, which is not shown on LDP. That site has not progressed due to marketability, which is the same reason why the Glen o Dee Hospital was not progressed and was allowed to fall into disrepair. Why promote MR062 when the developer has planning approved elsewhere?



- The bid proposal would extend a ribbon development along the Corsee Road cul-de-sac with an increased dominance of vehicle traffic, this would appear to be contrary to the Scottish policy document, Designing Streets. A single access of 1 km in length to service the existing 32 households requiring access from the junction of Burnett Road, plus the current level of Hospital traffic and services, and then a further 50 units would appear to be contrary to the Scottish Government document!
 - Is there still backing of the community council for the development of the site since the Hospital was destroyed? There would appear to be no requirement for enabling works.
 - The previous applications submitted showed significant tree removal on a site of ancient woodland. The Masterplan sketch proposal shows the clearing of significantly more woodland than was previously shown in the tree surveys (loss of 128 trees out of 154 counted). Promotion of this site would appear to conflict with officers comments on MR040 and MR041 where they are concerned on the impact on woodland and associated habitats.
 - The Ryden Paper refers to mitigation of a supplementary planting scheme, but previous applications indicated this would be some distance from Banchory on land owned by the developer. This would result in a net loss of woodland to Banchory.
 - Officers and the bid applicant in their overview emphasis the benefits to the community of greater access to the wider woodland and path network. The public already have this access along Corsee Road and such a development would severely impact the ease of access which the public currently enjoy. Previous applications showed no footpath linking the site, only grass verges. Very easily destroyed by the heavy transport accessing the Hospital should traffic volume increase.
 - The applicants bid deceives, stating the site offers “excellent public transport links” but, this is only 3 buses per day during Hospital visiting hours between 14 and 16 hours. Cars and pedestrians beware as this bus service demands the full road width.
 - The location will lead to increased car dependency to access the town centre 1.5 km away.
 - There would be concern with regard to ongoing water supply to the residences on Corsee Road and Roscobie Park. A 10” water main from the reservoir runs through the proposed development and then along the upper part of Corsee Road. Over the past 6 years there have been on average one burst per year causing flooding, water shortages and road access chaos to the Hospital.
 - At Q8 of the Paper supporting the Development Bid, Ryden state that all the land subject of the Bid is owned by Forbes Homes. The proposed development from Roscobie Park is accessed by a private road under the control of the Forestry Commission. Does the developer have the approvals to take over the road from The FC and widen it sufficiently to create verges and paths? There is a FC area along this private road which is required for storage of logs during tree felling, this may be compromised by the development. A transport assessment is surely required!
 - The site is described as gently sloping but, the road access to the Hospital within the site is on a steep slope with a long bend near the bottom, close to one of the accesses to the site as shown on the plan. This will be a traffic risk!
 - If this site is allocated then the residents along Corsee Road and Roscobie Park, as well as the Hospital services, face 10 years of construction traffic (Q9 of Rydens’ Paper). This would be unacceptable along this cul-de-sac.
-
- MR077 - There is a case for allowing development within the current settlement boundary including the previously reserved R2 site. However allowing development outwith the settlement boundary at this stage appears to be premature and should be resisted.
 - MR029 - Extending a ribbon development along the B974 should be resisted as proposed. There would also be concern with regard to such a development causing traffic issues on the main entry to Banchory from the South on the B974.

- MR030 - The more suitable location for a visitor centre has to be within the town centre. There would be even more traffic issues than the use put forward in MR029.
- MR031 - This is an over development on the south side of the river and the officers recommendations should be supported for all the reasons stated.
- MR033 - The site is outwith the settlement boundary and would add to the perception of a ribbon development on the south side of the A93, and urban sprawl as stated by the Reporter in a previous planning application.
- MR040 - This site, well outside the settlement boundary, is a step to far at present given the other developments proposed for the town. There would be a severe impact on the beauty of woodland which surrounds the town as stated in the overview.
- MR041 - If developed, the loss of woodland on this site needs to be mitigated or reduced to a minimum. Dual access to the site from the two roads stated in the overview may assist in making the site a future development opportunity.
- MR031 - this site needs to be retained for a future Banchory Academy. The town deserves better educational facilities than it currently has. A development plan needs to be brought forward for the current Banchory Primary/Academy site. Improving the Primary facility on site, relocating the Academy and in-filling the then surplus land with housing units rather than expanding housing outside the current settlement boundary on greenfield and woodland sites.
- MR056 - Although outside the settlement boundary the site lies adjacent to existing housing on Hillview Road and would appear to be a good extension of the town. An extension to Upper Arbeadie Road north towards Upper Lochton and the distributor road would ease access to the site and should be considered in any planning application. Woodland on the site would however require to be preserved.
- MR062 - This site involves too much woodland loss to merit consideration as a developable site for 50 units. Access to this site also appears problematic from the plans submitted.
- MR076 - The loss of such a beautiful facility to 40 houses would be a disgrace. The vistas from all directions enhance the town, both entering and leaving, from the golf centre and Burnett Park.

Your comments (continued)