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<p><b>Please tick to confirm your agreement to the following statements:</b></p> <p>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).</p> <p>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).</p>	<p style="font-size: 2em;">✓</p> <input type="checkbox"/>
<p>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.</p> <p>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</p>	
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<b>Which document(s) are you committing on?</b>	Main Issues Report ✓ <input type="checkbox"/>
	Draft Proposed Aberdeenshire Local Development Plan ✓ <input type="checkbox"/>
	Strategic Environmental Assessment Interim Environmental Assessment ✓ <input type="checkbox"/>
	Other <input type="checkbox"/>

## Your comments

Regarding the specific proposals within the Main Issues Report published by Aberdeenshire Council in January 2019 and the draft 2021 Local Development Plan (LDP) please find our comments below.

Kincardine O' Neil is small rural village which gained Conservation Area Status in 1985. Further, it was granted 'Outstanding' status by Aberdeenshire Council in 1994. Prior to the 2012 Local Development Plan (LDP), the community consisted of about 112 households. A new development still under construction will add a further 43 homes, bringing the total households to 155.

The current development proposals simply beggar belief and would be against the aims of conservation. **Some controlled** development would be appropriate but what is currently being proposed will overwhelm the village changing the character, integrity and setting; exactly the things its Conservation Area Status was set up to protect.

It is our view the only significant beneficiary of this will be the land owner selling off the land for development. Our comments on the specific development sites are as follows.

### 1. MR057 – Inclusion of this site in the 2021 -31 Local Plan.

The site fits in with existing development and is of a size appropriate to the village. Access, flooding and traffic management issues will need to be addressed at detailed planning stage. The design and style of the houses must also be commensurate with the surrounding area.

### 2. MR019 – Inclusion of this site as a “reserved” site in the 2021 -31 Local Plan.

This is simply ridiculous and difficult to comprehend how it can even be proposed. Considering the number of houses currently in the village the development of this site and the proposed number of houses makes absolutely no sense. The percentage increase in housing over the current village is ridiculous and well in excess of the Aberdeenshire Housing need assessment for the rural area over the same period. There is simply no justification or basis in policy for reserving an additional 8.4 ha site for potential housing development in KO'N in the 2021 - 31 plan, the only beneficiary is the land owner cashing in on the land value from developers.

As well as this there we have major concerns with all of the following,

- Access to and from the area given the number of extra vehicles.
- Insufficient amenities.
- Over expansion of the village.
- Negative impacts on the views.

- It is highly unlikely many owners would be working in K'ON, most will commute towards Aberdeen which makes little sense, expand the areas in the vicinity of Aberdeen where there are better commuter links. Public transport once west of Banchory is limited and expensive, to the point you need a vehicle and it is cheaper than using public transport. Extra housing in this area will give rise to a disproportionate number of extra vehicles.
- Impact on wildlife.

### **MR021 – Inclusion of this site in the 2021 -31 Local Plan.**

This would make sense and be acceptable however as well as developing the site the developer must be responsible for providing suitable connectivity and access to the village. This must be a condition of the development and occur **before** the site is allowed to open. The permission to develop will presumably have a contract which must have “teeth” i.e. set the development priorities so the local community benefits.

### **MR023 - Inclusion of this site in the 2021 -31 Local Plan.**

The idea of establishing a business park at this site must have been thought up by the same illogical thought process for 84 houses. It is not suitable for a business park nor is it required, keep the business parks in already established areas.

Pitmurchie Road is unsuitable for more traffic and the location is remote from the village.

## **Regarding the Aberdeenshire Local Development Plan (LDP) Environmental Report**

We fail to see how the LDP bids for development around Kincardine O'Neil have been followed especially for the MR023 proposal.

The Scottish Government and Aberdeen Planning Policies and Guidelines give quite specific guidance. The site MR023 is situated within the Conservation Area and as such should be subject to rigorous scrutiny for compliance with strict Scottish Government and Aberdeenshire Council policies along the following lines,

- The protection and enhancement of the historic environment contributes to the Scottish Government's central purpose. To support that, the Scottish Government has identified as a national outcome that '*We value and enjoy our built and natural environment and protect it and enhance it for future generations*'. (Scottish Government – National Outcomes –Environment).
- Scottish Government Policy on Conservation Areas, which the Aberdeenshire policy has to meet, is clear in that '*proposed development that fails to preserve or enhance the character or appearance of the area should normally be refused planning permission*'.
- The Scottish Government maintain that structure and local plans should continue to have particular regard to the National Planning Guidelines which are relevant to development, conservation and the protection of agricultural land in the countryside.

MR023 would not preserve, and certainly not enhance, the character and appearance of the Conservation Area and yet they have been put forward for the local development plan as preferred sites.

### **MR017/18/19 - 84 Homes (site between A93 and Pitmurchie Road)**

In the Environmental Report for site MR019 several negative effects that development on this site would bring are outlined. The means of mitigation offered are minimal and would not result in a 'neutral' effect post mitigation.

The Environmental Report for site MR019 conveniently omits to say that the site is within the Kincardine O'Neil Conservation Area, but goes on to state,

*'The site is located within the Dee Valley Special Landscape Area however the landscape experience is not likely to change significantly as the site is a logical extension to the settlement. Given that over the long term, what gets developed becomes part of the landscape, the effects are only likely to have medium-term effects.'*

How anyone can believe the statement "*the landscape experience is not likely to change significantly*" is considered misrepresentative.

Any development would have a very real visual impact on entering the village from the west or leaving the village heading west. The 'landscape experience' of site MR019 is currently one of farmland and views of an historic conservation village, including several listed buildings. It cannot be argued that the building of a large housing development will in no way change this landscape; green fields and views are being replaced by housing.

The Council's own 'Interim Environmental Report for the Strategic Environmental Assessment' (January 2019, p11) states "***We will not build on areas that are prominent and visible places***". This site will clearly be prominent and visible from multiple places, including primary vehicular routes into the village and from the Deeside Way

The 'Interim Environmental Report for the Strategic Environmental Assessment' (p34) also states that a "*proposals scale, location and design must be appropriate to the landscape character of the area, and not have an adverse impact on: the key natural landscape character elements or historic features of the landscape character ...*". The scale (area) of the current proposal (MR019) is huge and totally out of keeping in relation to the current foot-print of the village.

In summary the size, scale and types of the proposed developments at MR023 and MR019 when considering development of the village and surrounding area are totally out of keeping with the area and are simply not required.