



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:

Fair processing notice

Please tick to confirm your agreement to the following statements:

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 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

Site BU035 – Land to the West of St Combs – 100 homes

On behalf of Claymore Homes, objection is made to the failure of Aberdeenshire Council to identify the BU035 site in St Combs for 100 units. It is argued that there is scope for this site to be identified for housing in St Combs and this representation should be read in conjunction with the representation made to the BU036 site which is identified as an Officer's preference for 26 units and within the Draft Proposed Local Development Plan as OP2.

This representation should also be read in conjunction with the development bid submitted at the pre-MIR stage which demonstrates that the site is suitable for the development proposed.

The Council's assessment within the MIR raises a number of issues to which we wish to respond

“The proposed site would consist of a significant extension to the village covering 9ha and marginally overlapping a site with planning permission for 19 homes on the eastern boundary”

As argued in the representation for the BU036 site, bid site BU035 should not overlap with the site that has planning permission for 19 homes adjacent. Although it is under the control of the same developer, it forms a separate site for the purpose of this bid. It may be that the original bid had the boundaries incorrectly plotted.

There is flexibility to amend the boundaries of the bid site should it be identified for development and it should exclude the consented scheme to the east and bid BU037. Text within the PDLDP should also be amended to reflect the fact that they do not overlap and do not require a masterplan for the two sites.

Although site BU035 would be seen as an extension to St. Combs, it is not significantly bigger than the OP1 allocation to the south as contained in the 2017 Local Development Plan. Any development on the BU035 site would be seen in the context of existing development in the area and would not have any significant detrimental effect on the amenity of the area. The Council accept that **“landscape impact would be minimal in this location regardless of being within the coastal zone and near SSSI and LNCS sites”**.

“The surface water flood risk would need to be recognised in the SUDs arrangement and overall layout, but this could be accommodated given the lower density”

It is accepted that there are pockets of surface water flood risk within the site, however, this would be considered within any drainage assessment for the site and appropriate mitigation provided. This is not considered to be an impediment to development.

“The site would be unconnected to the village without the development of the two other bids in the village”

It is argued that the other bid sites would be developed prior to any development of this site. The bid proposer controls the land under bid BU036 and the consented site. This provides opportunities for good connections to these sites and the wider area. Any arguments related to connectivity are therefore unfounded.

“There is a concern as to the access arrangements and in particular a second access point onto High Street”

As stated above, the proposer of bid site BU035 also controls the land under bid BU036 and the consented site. Therefore, access can be taken through these sites. A second point of access would be considered in more detail once the site is allocated and this is not considered to an impediment to development of the site.

“The scale of development would also cause the primary school to be over capacity”

St. Combs primary has a capacity range of 72-96 pupils. It is currently significantly under capacity at 43% (41 pupils). Although the school roll is rising and is forecast to be at 85% capacity by 2022 (81 pupils), this included the OP1 designation (2017 LDP) to the south of St. Combs which has been removed from the PDLDP due to marketability constraints.

The LDP identified land for housing in St. Combs specifically to support the primary school and the removal of the OP1 site means there is unused capacity in the school and a need to identify alternative locations for housing to support the school and deliver an adequate supply of housing land in the area.

It is argued that bid site BU035, which is under the control of a house builder, who has recently achieved consent in the village, demonstrates willingness and ability to develop at this location. As such, the 40 units from the deleted OP1 site should be directed to the BU035 site which should be identified within the Proposed Local Development Plan for housing.

It appears that the 40 units from the deleted OP1 site have been added to the BU037 site in the MIR. A new OP1 site has been created in the PDLDP with the consented site (Ref: 2016/3203) to the south, with capacity for 70 units. However, it is not clear whether this includes the 19 consented units, or whether it is for an additional 70 units and this should be clarified.

It is disputed whether the BU037 bid site has capacity for an additional 70 units. The consented scheme for 19 units (Ref 2016/3203) covers half of this site, resulting in the need to fit 70 units on the remainder of the BU037 site. Deliverability of this site is also questioned due to the need to take access through the consented site to the south which is under separate ownership. To date, there has been no agreement with Claymore Homes who own the land to the south to take access through their site.

With the deliverability of BU037 questioned, but a need to allocate land in place of the deleted OP1 (2017 LDP) site, it is requested that these houses are allocated to the BU035 bid site. Site BU035 lies adjacent to both the consented scheme and bid site BU036 which are all controlled by the same developer. This will ensure that the housing allocations within St. Combs can be considered as one and ensure the efficient use of the infrastructure on the adjacent sites.

The consented application in St Combs has been well received by the local community who have highlighted the lack of new properties in the village for young people. The identification of site BU035 in addition to the Officer's preference of BU036 would ensure an adequate supply of housing land in the village, considering site OP1 has been deleted and the capacity of BU037 is questionable.

“The scale would be overdevelopment altering the character and sense of place in the village, therefore the development is considered to be unsustainable”

It is not considered that the scale of housing would be overdevelopment as the land holding has capacity for this level of housing at the density considered appropriate by Aberdeenshire Council under Main Issue 10. A sense of place can be achieved through the design of the development which would be agreed through any planning application for the site.

Aberdeenshire Council provide no arguments as to why development is considered to be unsustainable. Considering the site is within 400m of local shops, employment, and bus routes, it is well related to existing development and considered a sustainable and logical location for new housing in St. Combs.

Conclusion

Objection is made to the failure of Aberdeenshire Council to identify bid site BU035 for housing in the MIR and the DPLDP.

Site OP1 (2017 LDP) is removed from the DPLDP and while it was originally allocated to support the primary school, if it is not delivered, there is a need to allocate additional land to ensure the viability of the primary school going forward. Bid site BU037 should be considered separately from the consented to the south as shown in the PDLDP. It is unclear whether the 70 houses allocated includes the 19 consented units, or whether this is in addition to these and this requires clarification.

It is also questioned whether the BU037 site has capacity for the units proposed or capable of delivery given the need to take access through the consented site to the south. The units identified on the BU037 site and the deleted OP1 site should be allocated the BU035 site and that site identified for development in the Proposed LDP. This site is under option to the same developer as the BU036 site and the consented site to the east. This demonstrates deliverability and will ensure an adequate supply of housing is delivered in St. Combs to support the primary school and local demand for housing.

As such it is requested that bid site BU035 is identified for housing in the first plan period of the Proposed Local Development Plan, in addition to the BU036 site adjacent.