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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 commetning on?	Main Issues Report box is ticked	<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

I feel obliged to comment on the MIR submitted by the Council regarding proposed development in Torphins, as I am strongly opposed to anything which contradicts the Council’s very own key points raised in this MIR/LDP for 2021. These are as follows.

- *Any development must 'protect our special environments'.*
- *Any development 'should provide confidence for affected communities'*
- *The plan should 'empower communities to take responsibility for their area'.*

In particular, the MIR Policies relevant to the proposed developments at Torphins include:

Policy 1.6 : All new development should enhance rather than erode settlement character or sense of place.

The SNH document on Local Landscape Guidance also quotes:

'An understanding and awareness of the landscape features and special qualities that make specific places distinctive is vital in giving communities a 'sense of place'.

Policy E2 - This sets out a general presumption against development that would cause unacceptable effects on a landscape's overall character and quality.

In all cases the precautionary principle (only allowing development when there is clear scientific evidence that it will do no harm) is adopted.

The recently designated 'Dee Valley Special Landscape Area' includes the outskirts of Torphins, includes the Annesley site and is overlooked by the Beltie Rd and Craigmyle sites.

The guidance on the SLA states: 'Development proposed in surrounding upland areas should be assessed to minimise the visual impact on the SLA, including views and vistas along the valley.'

All the larger proposed sites would impose significant impact on the SLA within the Beltie strath.

The River Dee with its tributaries is an SAC. Development of any of the proposed sites of the size planned would cause increased pollution in the Beltie Burn, a Dee tributary and salmon spawning stream.

Policy E2 Landscape E2.1 The Policy states: We will refuse development that causes unacceptable effects through its scale, location or design on key natural landscape elements, historic features or the composition or quality of the landscape character. These impacts can be either alone or cumulatively with other recent developments.

In taking the above points into consideration, it is very clear that the proposed development plan for Torphins for 2019 contravenes many of these points. I would refer to comments made in 2017 and the reasons for not pursuing development.

Regarding the Beltie Rd site (Ma056):

'Any development on this site would have adverse visual impact on the approach to the village from the west, and consequently on the character of the village; it is not accepted that visual impacts are constrained and minimal. Furthermore, the lack of natural boundaries to development in this location could lead to pressure for further development to the south of Beltie Rd'

Regarding the Annesley Farm site (Ma005) :

'the proposed development would have significant impact on the landscape setting of Torphins on the approach on the B993.'

Regarding the Craigmyle Rd site (Ma038) :

'the site is visible from the A980. and could have a negative effect on the village.'

To summarise, the government reporters were not keen on sites that would have a significant visual impact on the village as it stands, and were clearly not in favour of substantial development. There is no reason to suggest that the situation has changed re. the 2019 plans. Indeed, it can clearly be seen that the proposed sites at Beltie Rd and Annesley for 2019 are the same as or larger than those considered 'too substantial ' in the review of the 2017 plan above. In addition, a key statement of the final version of the 2012 plan - that was prepared **prior** to the oil and gas downturn states **'On the basis of what we can reasonably foresee, there is already sufficient land to meet needs until 2026.'**

It is also very clear than the case for further development since 2017 has weakened considerably for the following reasons.

- The oil and gas industry downturn has continued – the main driver for any employment in the area.
- No industry or jobs of any numerical significance have emerged to replace it. Plans for same do not count – they are just plans, and cannot be considered as anything of substance until bricks and mortar are laid.
- Many houses remain unsold in Torphins – many suitable for first time buyers.
- House prices continue to fall.
- Population estimates continue to fall.
- The old school house in Torphins remains undeveloped.
- New Development has already been sanctioned. Some of the 2012 selected development sites across the Marr area have begun to be developed, and in Torphins, a site by Station Garage has been approved for 48 housing units. The erection of which still remains.
- Torphins School has 184 pupils in 2018-19, despite the Council forecasting there would be 150. The school is still using temporary classrooms to accommodate its occupants, contributing to Aberdeenshire's 'worst in Scotland' rating for use of temporary classrooms- and also denying the children play space. Should a smaller school roll arise, the school could finally remove these temporary facilities and restore the missing play space.
- There is already considerable traffic flow through the centre of the village at peak times. Additional significant developments to the west of Torphins would only make this worse. These would be commuters are passing the primary school (with children being dropped off/picked up), the main pickup point for pupils going by bus to Aboyne school, and the bottle neck caused by parking outside the shops.

Conclusion

Torphins is a small village, which myself, my family and many other residents have chosen for their home because of its size and character. The disadvantages of limited facilities and distances to employment and major retail, travel and entertainment hubs are tolerated because of the high worth placed by ourselves on the settlement's small size, close community, and situation within what has been determined as 'significant landscape'. Additional development of any size will inevitably damage this worth and landscape, increase risk of further vehicle accidents in the village centre, and further strain the already overflowing school and local infrastructure.

In mitigation for any development, I would not be particularly opposed to development of the old school house, any infill development, nor perhaps the already sanctioned 48 houses at the East end of the village. These seem sensible and sympathetic to the village, and would be more than adequate to meet future requirements. However, to propose a development on the scale of that shown on the 2019 application would ruin the character and visually negatively impact upon the landscape of the village as described by government reporters in 2017 - even more so given the increased scale. It cannot possibly be seen to satisfy any housing need as there is simply no need to satisfy, and it clearly does not comply with the Council's very own MIR/LDP 2021 policies in any way - in blue above. This 2019 development plan should therefore be comprehensively refused.

Your comments (continued)

Empty box for comments.