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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.

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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 committing 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

1)- Introduction and background

The main objective of the MIR for the LDP2021 is to assess what if any changes are needed to the current 2017 LDP (with a key objective being 'consistency and continuity with previous development plans' -MIR p4). Also, a council priority is to 'protect our special environment' (MIR p3).

Since the last LDP cycle that culminated in the 2017 LDP, the oil and gas industry situation is such that, the oil and gas industry downturn has continued, with only minor evidence of small improvement - indeed, further waves of redundancies are still occurring (as in my husband's previous employer, Lloyds Register) and further companies are still going under. The era of large scale N Sea O&G development is over. The offshore renewables industry is developing - but is not focussed on Aberdeen, so will not replace the scale of O&G employment enjoyed locally in the past 25 years.

The 'housing needs assessment' that is being used as a main driver for the housing quantity required in the 2021 plan utilises data only up to 2016, showing only the first phase of the O&G downturn.

This economic situation is reflected in the fact that the existing residential housing market is still slow, with houses staying unsold for many months or even years.

In Torphins, the housing approved in the 2017 plan of 47 houses on site MR060 are slowly moving through the detailed planning phase and are still yet to be built.

2)- The proposed development sites

The Torphins bid sites at MR034, MR035, MR036 and MR005 are similar in scale –if not larger than, those submitted for consideration in the 2017 plan

The conclusion from the Reporter on the 2017 Plan included the following; *'the bid sites (very similar to the sites proposed for 2021) proposed are substantial in scale and not considered appropriate alternatives for the village.'*

Therefore my main comment is that the 2017 conclusion should continue to be adhered to and NO large scale sites are required- namely MR034, MR035, MR036 and MR005.

I do not agree with the MIR statement that 'The scale and location of this proposed site (MR034-35) ...enhances the character of settlement' (MIR).

3)-Comments re particular Policies:

In particular, the proposed large scale developments at Torphins, do not comply with several key MIR objectives or LDP Policies including:

LDP 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.

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 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.'

The rural outlook to the west of the village has been designated as a significant landscape; planning applications have been turned down citing this aspect. The visual asset amenity value of the fields to the south of Beltie Rd (MR034,035, 036 site) have become even more valuable as housing has been built in the last 15 years on the streets to the north which overlook these sites. Due to the local topography, the housing west of the village looks out to the south from the various streets that rise up in terraces to the north. This means approx 100 households look out on the MR034,035,036 area in winter and possibly 80 in summer, with leaf cover obscuring the view. Therefore these sites do in effect comprise an 'amphitheatre' for those residents. As has been recognised elsewhere in the MIR, eg in rejecting the development of large areas at Auchattie near Banchory, visual asset is important in defining character, and should be highly weighted in any assessment; as the MIR objectives state, we should 'protect our special environments.'

- The MR034-36 sites have historically been kept free of development, safeguarding the open aspect of housing to the north of the road, as in the LDPs in 2012 and 2017. My house, the Village Farm House, was built in approx 1815 and is the second oldest house in the village; the house has hardly any windows on its north side so the southern aspect is critical. From this building westwards, Beltie Road has taken 194 years to develop, a totally unique built heritage with a very diverse mix of house types and materials. Most houses are similar in that their southerly aspect is the most significant.
- The western approach is almost unique in that highly productive agricultural land is worked within the heart of the village reinforcing the much sought after rural village ambience. These productive fields directly about the historic Learney Hall, the main hub of village community life (and one of the busiest public halls in Grampian region), which emphasises the landscape feature's importance in defining the village character. Therefore building on MR034-36 would have negative landscape value, would have adverse visual impact on the setting of Torphins, particularly on a main approach into the

village. An attractive open aspect to the south would be lost to the overall detriment of the village. As the MIR objectives state, 'we should safeguard views of surrounding countryside of landscape significance'. I wholly concur with the LDP 2017 Reporters view that this site would have significant adverse visual impact on the approach to the village.

- The MR034-36 Site is very large, with no natural features to contain or limit development. Although the current planning officers preference that only MR034-35 should be developed, and not MR036, there is no boundary to prevent this westerly expansion. Thus any development would cause a precedent to be set for further westwards expansion. It is notable that the MR034-35 proposed development layout plan **ALREADY INCLUDES** a stub road link provision through to the 'next phase' (MR036) development site beyond its current western limit; proving that this risk is already a reality.

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

In addition, 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.

4)- Infrastructure- Schooling

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. So if a smaller school roll was to arise, the school could finally remove these temporary facilities and restore the missing play space.

Then the children move on to Aboyne Academy - also at 'over capacity' (according to the previous Main Issues Report) - this is before many of the new developments approved in the catchment in the 2017 Plan, are actually built.

Aboyne is forecast to be at 94% capacity by 2021.

Therefore Torphins I believe cannot support the large scale developments proposed at MR034,035,036 and MR005, and I disagree with the Planning Officers views as to the ability of the infrastructure to cope, as described in the MIR/LDP Development Bid Sites Overviews.

5)-Summary

I consider that the existing MR060 site, plus possibly small scale appropriate infill development for Torphins , where a number of small sites have been identified in various locations in and around the the village (MR069, and including the old Station Garage paintshop site in Station Rd) provide ample additional housing potential for the foreseeable future.

The large scale sites MR034, 035, 036 and 005, are not appropriate, do not comply with key policies and/or objectives of the MIR/LDP, are not favoured by residents, (as per the Community Council survey in 2018) and are not needed.

Maintaining consistency with the LDP2012 and 2017 (a key MIR principle), the conclusions of the Reporter in the LDP 2017 Plan should continue to be adhered to: 'the bid sites (very similar to the large sites proposed for 2021) proposed are substantial in scale and not considered appropriate alternatives for the village.

