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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 type="checkbox"/> |
| | Strategic Environmental Assessment Interim Environmental Assessment | <input type="checkbox"/> |
| | Other | <input type="checkbox"/> |

Your comments

Dear Sir

I wish to make the following points to comment upon and object to the Main Issues Report's incorporation of additional, commercially priced housing in Torphins (Bids M034, M035, M060 and MR069), to the Aberdeenshire LDP2021, on the following grounds:

1. The proposed housing will encourage commuting from Torphins, is environmentally unsound and is therefore contrary to Scottish Planning and environmental Policy.
2. The proposed housing cannot be supported by secondary school capacity.
3. 3. The proposed additional housing is not justified by a need to support the local primary school, which is already in inferior accommodation and not under threat of falling rolls.
4. There is no requirement nor demand for commercially priced housing in Torphins.
5. Other planning considerations
1. The proposed housing will encourage commuting from Torphins, is environmentally unsound and is therefore contrary to Scottish Planning and Environmental Policy.

The additional houses proposed for Torphins will inevitably promote commuting by car from Torphins; this is environmentally unsound and creates an associated high carbon economy. The additional 103 houses (29+21+47+6) adds up to far more houses and additional workforce than could be supported by any additional local businesses that might be established as part of development of site OP1. This in turn will inevitably lead to Torphins becoming a dormer town with the essential commuting this imposes. This is in contradiction to many aspects of planning policy including current Scottish government Planning Policy the main principals of which include transition to a low carbon economy and sustainability (eg outlined in the Main Issues Report page 4). This is especially undesirable as Torphins lies out with the main corridors ear-marked for housing development in the broader Aberdeen City and Shire Strategic plans. In this context, additional housing schemes should and do focus on areas with appropriate public transport options and routes between housing areas and places of employment. Such routes do not exist between, for example, Torphins and Westhill or Dyce. This could be prevented by rejecting the development of the housing-only sites MR034, MR035, MR060 and MR069. It is difficult to see how development of any of the newly proposed sites in Torphins achieves the stated aim for Torphins 'To support local opportunities for employment'. (Main Issues Report Marr Appendix page 92), when none of them provide any jobs other than short term, during the building phases of the houses. They would merely encourage commuting by car which is undesirable and contrary to policy. It is additionally unacceptable on environmental grounds (greenhouse gas emissions, carbon costs and un-necessary commuting) that Academy pupils should be bussed long distances daily. The environmental dis-benefits and associated increased Carbon usage is in direct opposition to the Scottish Planning Policy that the Aberdeenshire LDP2021 purports to support eg it does not represent 'sustainable development', nor does it 'facilitate the transition to a low carbon economy'. It seems to be a flawed planning strategy that small settlements such as Torphins are proposed for significant enlargement, whilst intentionally planning to increase the environmentally damaging practice of bussing pupils, as proposed.

2. The proposed housing cannot be supported by secondary school capacity.

According to the Main Issues Report for the LDP2021: a constraint under the developments proposed for Torphins, is the capacity of Aboyne Academy. This constraint is inconsistently and in some cases inappropriately reported in the Main Issue report Marr Appendix in which the summaries are as follows:

Not Preferred by planning officers:

- MR004: The proposed site **has** a number of constraints which include ...secondary education capacity.
- MR005: secondary school capacity and... may be limited
- MR036: There **are** also constraints relating to ... secondary school capacity

Preferred by planning officers:

- OP1: Secondary school capacity not mentioned in summary, but presumably under consideration.
- MR034: There are no constraints to its development with the exception of Aboyne Academy, which may beat capacity as this development is built out, and surface water flooding which can be mitigated.
- MR035: The secondary school capacity may be a constraint to the delivery of this phase, however, this is not considered unresolvable.
- MR060: Secondary school capacity not mentioned in the main issues report.
- MR069: Secondary school capacity not mentioned in the main issues report.

Although usually acknowledged, the issue is presented in association with preferred or not preferred by planning officers with contrasting degrees of positivity or negativity. This constraint applies to *all* housing developments in the school catchment including *all* of those proposed for Torphins. It is similarly negatively summarised in the bids MR058 and MR071 at Tarland, MR017 and MR018 at Kincardine O’Neill, and MR025, MR026 and MR027 at Ballogie, and therefore it is unjustified to ignore or play down this same issue in the case of some of the proposed site at Torphins.

3. The proposed additional housing is not justified by a need to support the local primary school, which is already in inferior accommodation and not under threat of falling rolls.

The inclusion of P8 in the draft plan: ‘To protect the primary school as an important local amenity’ is a seemingly pointless inclusion. It is acknowledged that the primary school is an important local amenity but the primary school in a community the size of Torphins is not under threat and in need of protection. The main issues report states on Page 17 that even in rural contexts the need to support primary school attendance rolls via planning policy is established in very few schools. This need ‘*To protect the primary school*’ has not been established for Torphins in any formal or rigorous way and cannot justifiably be used as an argument in favour of housing development. At least one of the bids for housing land at Torphins (MR069), states that there are no capacity issues at Torphins Primary School. This is a very long way from the statement that school is in need of protection. The nursery provision at the Torphins primary school is currently housed in temporary prefab accommodation, indicating that the school and nursery functions carried out on the site already exceed the capacity of the permanent buildings. The site itself contains no further potential for extension of the school as evidenced by the crowded small playground. These points indicate that the *long-term sustained growth* of the Primary school cannot be used as justification for any or all of the many housing developments at Torphins (Main issues report – Marr Settlements page Marr 96).

4. There is no requirement nor demand for commercially priced housing development at Torphins.

The fact that 47 houses are outstanding and as yet, unconsented from the previous LDP 2017 (site OP1: bid) is strong evidence of the lack of the demand for such housing in Torphins and completely undermines the proposals for more housing under LDP2021.

A large number of houses across a wide size and price range are already for sale in the village which further emphasises the lack of need or demand for any of the commercially priced housing newly proposed for Torphins. As at 23rd March 2019, twenty houses covering a range of sizes (1-5 bedrooms) and broad price range (£115,000 – 699,000), are for sale in Torphins via the ASPC website alone. This number is not exceptional, some have been for sale for a very long time indicating the sustained lack of demand.

5. Other Planning considerations

It is of note that the Main Issues Report (Marr Appendix page 96) concludes that ‘*Torphins has had very limited development over the past 10 years given its size.*’ This statement implies that development should be shared among

settlements in turn. It would be preferable if such decisions were instead, taken on the basis of the appropriateness of their nature and location in the light of their fit to broader National and Regional planning strategies and policies.



Your comments (continued)

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