

Newtonhill, Muchalls & Cammachmore Community Council

This document contains the complete submission to the consultation on the Proposed Strategic Development Plan, 2018. The consultation required a separate response file for each of the eight issues raised by the Community Council.

1. Issue: Scottish Planning Policy

What would you like to say about the issue?

Section 1 of Scottish Planning Policy says: “The planning system has a vital role to play in delivering high-quality places for Scotland. Scottish Planning Policy (SPP) focuses plan making, planning decisions and development design on the Scottish Government’s Purpose of creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth.”

The proposed Strategic Development Plan (SDP) appears to be mainly about houses and where to put them with a little bit about the economy and a few other things. Strategic thinking should be about planning the growth of the economy and building the houses and infrastructure where they are most needed.

Item 1 of the proposed Action Programme tells us that Local Development Plans will need to be consistent with the SDP. The SDP does not demonstrate where it is going, so what chance is there for creating meaningful Local Development Plans.

The research has been done, although some of it appears to be quite old and in need of revisiting. As a plan, it lacks structure and coherence. As an academic exercise, it should not score more than eight out of 20.

This SDP misses an opportunity to encourage the Region to flourish, through increasing sustainable economic growth.

What change would you like to see made?

The whole Strategic Development Plan should be rewritten with a top-down approach. First, provide a strategic vision of how the economy will grow in a sustainable way and then develop the strategic plan of how the infrastructure and housing will be developed to support that vision.

2. Issue: City Region

What would you like to say about the issue?

Paragraph 1.2 includes: “The Plan covers the local authority areas of Aberdeen City and Aberdeenshire, except that part of Aberdeenshire which is within the Cairngorms National Park. The area covered by this Plan is referred to throughout as the ‘City Region’.”

Use of ‘City Region’ is a deliberate use of language to subjugate Aberdeenshire by Aberdeen City Council. It makes the whole Strategic Development Plan appear to be about the growth of Aberdeen City at the expense of those living and working in Aberdeenshire.

What change would you like to see made?

The area covered by this Plan should be referred to throughout as the ‘Region’.

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3. Issue: It is not concise

What would you like to say about the issue?

Some of the documents downloaded from your website on 9th October 2018 do not match the documents received at the Community Council Forum on 20th November, on a CD-ROM, dated 24th September 2018. For example, the web version of the ABERDEEN CITY & ABERDEENSHIRE CUMULATIVE TRANSPORT APPRAISAL is 2,202KB, whereas the CD-ROM version of the same document is 16,829KB and the contents are quite different. Other transport and housing documents only appeared on the website.

Given that the consultation opened on 8th October and the documents published on the website have a more recent publication date, then it would be correct to assume that the documents on the CD-ROM have been superseded.

Furthermore, the plan comes to around 600 pages, depending on which version. It is not concise, some of the detail is wrong, some of the detail is out of date. How much more of the proposed plan is based on flawed data?

What change would you like to see made?

The consultation is flawed as some individuals and organisations reviewing the Strategic Development Plan may not have had access to both sets of the documents or may not have been aware of the differences. The whole consultation needs to start again and be based on a single set of documents that are concise, up to date and accurate.

4. Issue: Housing density

What would you like to say about the issue?

“In the Strategic Growth Areas, housing development on sites larger than one hectare should generally have no less than 30 dwellings per hectare.”

It is generally accepted that the values set for minimum housing densities is dependent on the access to transport hubs and transport networks. Aberdeen City has a very efficient and effective public transport network. However, public transport in the Strategic Growth Areas is very patchy at best and, therefore, requires that developments have space for at least two cars per household.

Residents of Newtonhill, Muchalls and Cammachmore do not have direct access to a railway station and bus services during the morning commute are severely compromised by buses being taken out of service for school transport.

Council waste policy also requires that households have at least three waste/recycling bins.

Housing densities of 30 dwellings per hectare are not suitable in all but the largest towns in the Region.

What change would you like to see made?

Remove all references to housing densities from the Strategic Development Plan.

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5. Issue: Transport

What would you like to say about the issue?

“This Plan will help to promote the link between land use and transport to make sure that all new development is conveniently located and designed in such a way as to encourage walking, cycling and the use of public transport. Improving bus and train services and maximising the opportunities for charging and refuelling network for electric and hydrogen vehicles will make sure that people will be encouraged to use more environmentally friendly forms of transport and secure the City Region as a world leader in transport and energy technologies.”

This is a meant to be part of the Strategic Development Plan (SDP) but actually looks like a discussion about what the plan may look like and is referring to another document altogether. In what way will this proposed SDP help to promote the link between land use and transport?

What change would you like to see made?

All new development is required to promote the link between land use and transport and to make sure that it is conveniently located and designed in such a way as to encourage walking, cycling and the use of public transport. Improving bus and train services and maximising the opportunities for charging and refuelling network for electric and hydrogen vehicles will make sure that people will be encouraged to use more environmentally friendly forms of transport and secure the Region as a world leader in transport and energy technologies.

6. Issue: Education is missing from the plan

What would you like to say about the issue?

Primary and secondary school education provision is inextricably linked to housing development. Time and time again, Aberdeenshire Council has failed to provide adequate school provision when approving planning applications. This has led to overcrowded schools and has had a negative impact on the education of children in the Region.

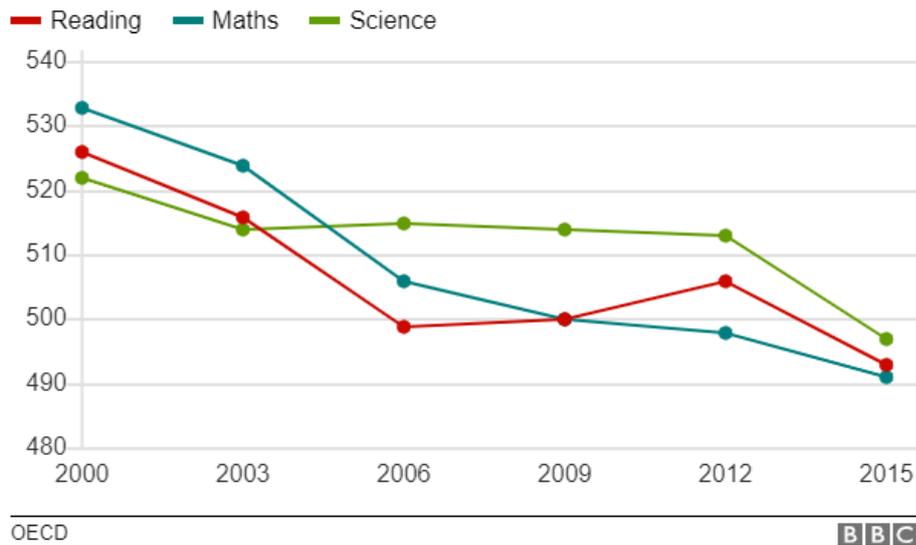
It is often said that “failure to plan, is to plan to fail’. The Strategic Development Plan (SDP) gives figures for new housing development in the Region, but fails to mention education provision.

The Organisation for Economic Co-operation and Development (OECD) has evaluated the performance of education in countries throughout the world every three years, since the year 2000. The performance of the Scottish education system is consistently getting worse. This will have a negative impact on our future economic development.

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Scottish schools' Pisa performance

Mean scores in OECD surveys



Currently in Aberdeenshire, school capacities are calculated using theoretical maximum class sizes and the theoretical number of teaching spaces in each school based on an even spread of pupil numbers in each year group. This mathematical model is not based on actual pupil numbers in each year group and can result in misleading information when calculating Developer Obligations and leave the Councils vulnerable to unexpected expenses when school rolls exceed capacity. The Councils need to develop an improved mathematical model that will take into account current actual pupil numbers and a theoretical intake based on housing targets and actual planning application housing numbers.

Portlethen Academy is approaching capacity. What will happen when new development causes the school roll to exceed capacity? Will it be necessary to use school transport to take new-entry pupils who live in Portlethen to Mackie Academy or will pupils from Newtonhill who are already enrolled at Portlethen Academy be forced to move to Mackie Academy? Are there enough taxis with authorisation to carry unaccompanied children or will another bus need to be taken out of public service? If a bus is taken from public service, then how will local residents who need public transport to go to work or attend university manage? This is what the Strategic Development Plan needs to be able to inform Local Development Planning.

What change would you like to see made?

Aberdeen City and Aberdeenshire Councils have a responsibility to provide first class education throughout the Region. It is time to ensure that the improvement in education provision linked to housing development is included in the SDP.

An action needs to be added to the Proposed Action Programme to develop an improved model for calculating school capacities.

A second action needs to be added to the Proposed Action Programme to develop a school transport system that does not impact negatively on public transport, as it does at the moment.

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7. Issue: Road safety

What would you like to say about the issue?

The Cumulative Transport Appraisal Executive Summary says under the heading of Road Safety: "The predicted rise in traffic volumes tends to point towards a general increase in the risk of accidents. Conversely, new road schemes, such as the AWPR and A90 Balmedie to Tippetty may also bring safety benefits, by providing higher quality infrastructure and diverting traffic from areas with a higher interaction with active modes."

By concentrating development in the Strategic Growth Areas, the Strategic Development Plan (SDP) will lead to further congestion, reductions in air quality and an increase in the risk of accidents.

It is not acceptable to create a Strategic Development Plan that provides for an increased risk of road accidents.

What change would you like to see made?

The SDP must include a strategy to improve public transport in the Strategic Growth Areas and, at the same time, improve road safety by modifications to road junctions and by reducing speed limits on major routes.

8. Issue: Housing Supply Targets

What would you like to say about the issue?

It is clear that the Housing Supply Targets are nothing more than a guess with a 20% "generosity".

Housing supply is governed by developer profits, rather than demand. If developers create an over-supply of new properties, then the prices will be driven down. On the other hand, an under-supply will drive prices up, which will be in the interests of developers.

The Strategic Development Plan (SDP) needs to ensure that the right houses are built in the right places which, in turn, will support sustainable economic growth within the Region.

The Community Council have been told that there are currently 40,000 houses with planning permission that have not been completed. This alone should keep pace with development needs for the next twenty years without the need for any further land allocations.

Each new planning application impacts on local amenities, education, traffic and green spaces. Each new planning application causes stress to local residents, which has a negative impact on health and wellbeing. It must not be the role of the SDP to reduce the quality of life of those living in the Region.

What change would you like to see made?

The SDP needs to include a strategy to constrain new allocations until the backlog has been reduced.

December 2018.