

PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

As part of the production of the Local Development Plan, a 'Main Issues Report' was published in January 2019. The responses from these consultations have helped to inform the content of the Proposed Local Development Plan ("the Proposed Plan").

The Aberdeenshire Local Development Plan will direct decision-making on land-use planning issues and planning applications in Aberdeenshire for the 10-year period from 2021 to 2031. The Proposed Plan was agreed by Aberdeenshire Council in March 2020 as the settled view of the Council. However, the Proposed Plan will be subjected to an independent examination and is now open for public comment.

This is your opportunity to tell us if anything should be changed in the Proposed Plan, and why.

When writing a response to the Proposed Plan it is important to specifically state the modification(s) that you would wish to see to the Plan.

This is the only remaining opportunity to comment on the Proposed Plan. The reasons for any requested changes will be analysed and reported to Scottish Ministers. They will then appoint a person known as a Reporter to conduct a public examination of the Proposed Plan, focusing particularly on any unresolved issues and the changes sought.

Ministers expect representations (or responses) to be concise (no more than 2000 words) and accompanied by limited supporting documents. It is important to ensure that all of the information that you wish to be considered is submitted during this consultation period as there is no further opportunity to provide information, unless specifically asked.

Please email comments to ldp@aberdeenshire.gov.uk or send this form to reach us by 17 July 2020.

We recommend that you keep a copy of your representation for your own records.



ACCESSIBILITY

If you need information from this document in an alternative language or in a Large Print, Easy Read, Braille or BSL, please telephone 01467 536230.

Jeigu pageidaujate šio dokumento kita kalba arba atspausdinto stambiu šriftu, supaprastinta kalba, parašyta Brailio raštu arba britų gestų kalba, prašome skambinti 01467 536230.

Dacă aveți nevoie de informații din acest document într-o altă limbă sau într-un format cu scrisul mare, ușor de citit, tipar pentru nevăzători sau în limbajul semnelor, vă rugăm să telefonați la 01467 536230.

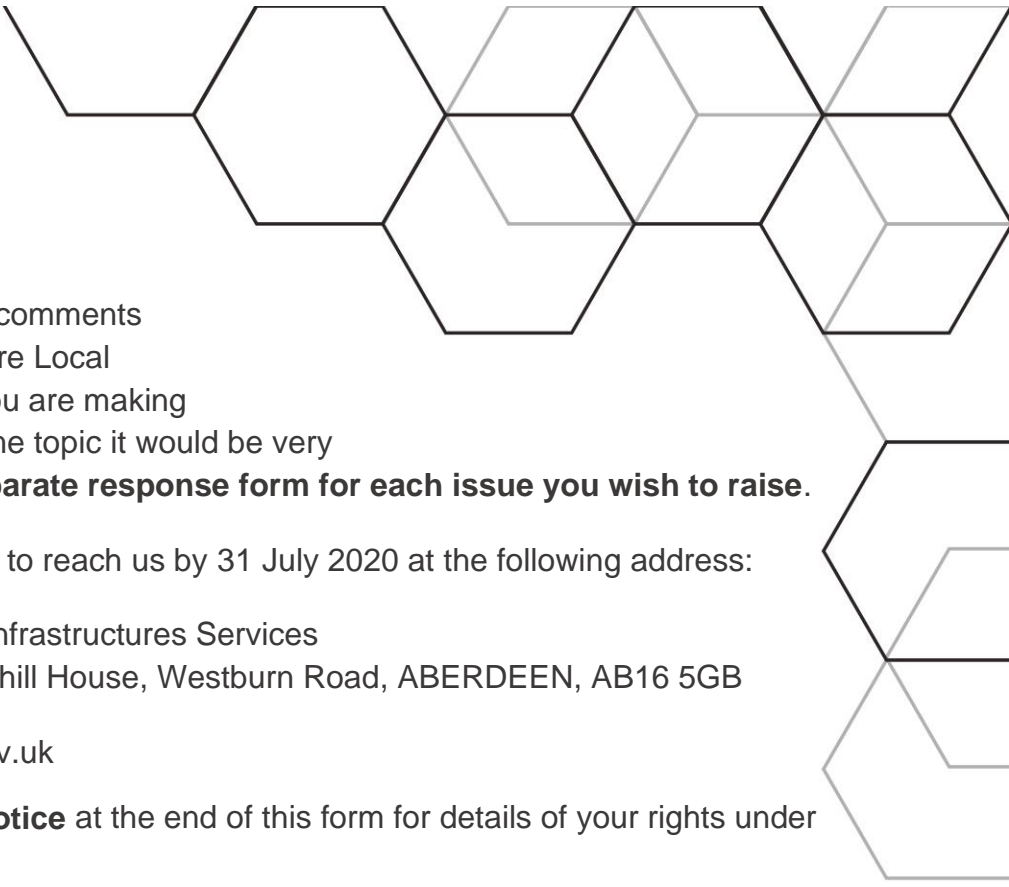
Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

Ja jums nepieciešama šai dokumentā sniegtā informācija kādā citā valodā vai lielā drukā, viegli lasāmā tekstā, Braila rakstā vai BSL (britu zīmju valodā), lūdzu, zvaniet uz 01467 536230.

Aberdeenshire Local Development Plan
Woodhill House, Westburn Road, Aberdeen, AB16 5GB

Tel: 01467 536230
Email: ldp@aberdeenshire.gov.uk
Web: www.aberdeenshire.gov.uk/ldp
Follow us on Twitter @ShireLDP

If you wish to contact one of the area planning offices, please call 01467 534333 and ask for the relevant planning office or email planning@aberdeenshire.gov.uk.



Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020. If you are making comments about more than one topic it would be very helpful if you could fill in a **separate response form for each issue you wish to raise**.

Please email or send the form to reach us by 17 July 2020 at the following address:

Post: Planning Policy Team, Infrastructures Services
Aberdeenshire Council, Woodhill House, Westburn Road, ABERDEEN, AB16 5GB

Email: ldp@aberdeenshire.gov.uk

Please refer to our **Privacy Notice** at the end of this form for details of your rights under the Data Protection Act.

YOUR DETAILS

Title:	
First Name:	Margaret
Surname:	Bochel
Date:	8 June 2020
Postal Address:	Aurora Planning Limited, [REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	[REDACTED]

Are you happy to receive future correspondence only by email? Yes No

Are you responding on behalf of another person? Yes No

If yes who are you representing? David Kenwright

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

An acknowledgement will be sent to this address soon after the close of consultation.

YOUR COMMENTS

Please provide us with your comments below. We will summarise comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

Modification that you wish to see (please make specific reference to the section of the Proposed Plan you wish to see modified if possible, for example Section 9, paragraph E1.1):

Allocation of site bid reference MR042: Land at Greystone Farm as a Future Opportunity site for 245 units.

Reason for change:

The Aberdeen City and Shire Proposed Strategic Development Plan (PSDP) supports the identification of a strategic reserve of housing land for the period 2033 to 2040. Whilst the Main Issues Report (MIR) included Future Opportunity sites to provide such a reserve, the *Issues and Actions Paper – Policies and Introduction* suggests that these will not be taken forward into the Proposed Local Development Plan (PLDP) on the grounds that it is not a requirement of the PSDP to do so, and it has concerns that such land may be drawn down prematurely. The proposal to exclude these sites is not, however, included in the Recommendations section of the Issues and Actions Paper, nor is there a Committee decision endorsing that approach.

Whilst some of the Future Opportunity sites shown in the MIR have been included in the PLDP as Opportunity sites, many have been omitted entirely. Our client is of the opinion that this is taking a very short-term view of the future development of settlements within Aberdeenshire, including Alford. Rather, the identification of strategic reserve/future opportunity sites would provide certainty for both communities and developers on the potential scale and location of future growth, whilst the planning authority can control when such sites are released through the development management process.

Specifically in relation to Alford, the identification of site bid reference MR042: Land at Greystone Farm as a Future Opportunity site for a phased development of 245 housing units, following on from the completion of OP4 (as indicated on the plan submitted with our client's initial response to the call for sites in March 2018), would facilitate the comprehensive masterplanning of the future development of Alford, ensuring that it is well planned and sustainable, and that development is deliverable at the appropriate time. In doing that, the allocation would support the vibrancy of the town and encourage improvements to amenities, social spaces and its visual appearance in accordance with the vision for the town set out in the Alford settlement statement.

The westward expansion of the town is the logical direction for growth because:

- expansion to the east would be visually prominent, whilst growth to the north is constrained by woodland;
- it is well located for the new community campus and associated facilities; and
- it is just over 1km from the village centre, providing access to and support for local shops, pubs, cafes and other services.

The reasons for the Council's assessment of the site as not preferred, as provided in the Proposed Plan Issues and Actions Paper for Alford, along with our client's response to these, are set out below:

- **the scale of the developments is such that there would be significant traffic implications for those travelling east** – while any level of development will have traffic implications, the indicative plans submitted with our client's original response to the call for sites in March 2018 show how the site would be developed in phases, with accesses from both Kingsford Road and Old Military Road to minimise the traffic impact. At the same time, the proximity of the site to the village centre – which offers local shops, pubs, cafes and other services – allows for easy access between the two by means of transport other than the private car, again reducing the likely traffic impact.
- **it is likely to impact on the landscape setting and cultural heritage associated with the Battle of Alford battlefield designation as it is within what is considered the core of the battlefield** – the Battle of Alford battlefield extends across a significant area, including the whole of the existing built up area of Alford and beyond, a fact that is expressly acknowledged in the Inventory of Historic Battlefields which states that the location of the battle is subject to considerable uncertainty. This needs to be taken into account when assessing any proposals on or near to the potential battlefield site, and a proportionate approach taken. In this regard, our client would be open to looking at opportunities to recognise and celebrate this element of the historic environment in the public realm. In addition, and importantly, neither Historic Environment Scotland (HES) nor Scottish Natural Heritage (SNH) have objected to the allocation. Rather HES has requested that any impact on the battlefield's special qualities, key landscape characteristics, cumulative impacts, and mitigation/enhancement should be considered and SNH has recommended that a site brief be required to ensure that development incorporates suitable biodiverse open space, along with provision for active travel. It is therefore clear that development could be accommodated on this site whilst providing adequate protection for the landscape setting and cultural heritage of the site.
- **there are unresolved water and waste water infrastructure issues and contributions towards a school extension would be required** – as set out in our

client's initial response to the call for sites in March 2018, the only potential infrastructure constraint relates to the need for a new sewage treatment works, but this is already identified in the extant Local Development Plan and our client is both willing and able to provide that. In terms of the other constraints cited by the Council,

- Alford benefits from a new water main (substantially funded by our client) which would also serve the site;
- the 2019 school roll forecasts indicate that the primary school will still have capacity in 2027 (with the roll beginning to fall at that time), while the new community campus, including Alford Academy, opened in October 2015 and will be at only 78% capacity by 2027, both of which support new development in the area. In particular, whereas the Council previously considered it premature to allocate further land for housing before there was certainty about the school, now that this has opened, that certainty has been provided and new land allocations should be made accordingly; and
- the substantial contribution already made by our client to new infrastructure and community facilities in the village is testament to his commitment to ensuring that any development is properly served by adequate infrastructure.

Finally, the Council states that there is opposition to the development of the site, however that would appear to have been a comment made by one person only.

Accordingly, it is submitted that site bid reference MR042: Land at Greystone Farm be identified as a Future Opportunity site for 245 units.

Copies of our client's responses to the call for sites and consultation on the Main Issues Report are also annexed here-for reference.

PRIVACY NOTICE

LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

The Data Controller of the information being collected is Aberdeenshire Council.

The Data Protection Officer can be contacted at Town House, 34 Low Street, Banff, AB45 1AY.

Email: dataprotection@aberdeenshire.gov.uk

Your information is being collected to use for the following purposes:

- To provide public comment on the Aberdeenshire Local Development Plan. The data on the form will be used to inform Scottish Ministers and individual(s) appointed to examine the Proposed Local Development Plan 2020. It will inform the content of the Aberdeenshire Local Development Plan 2021.

Your information is:

Being collected by Aberdeenshire Council	X
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The Legal Basis for collecting the information is:

Personal Data	
Legal Obligations	X

Where the Legal Basis for processing is either Performance of a Contract or Legal Obligation, please note the following consequences of failure to provide the information:

It is a Statutory Obligation under Section 18 of the Town and Country (Scotland) Act 1997, as amended, for Aberdeenshire Council to prepare and publish a Proposed Local Development plan on which representations must be made to the planning authority within a prescribed period of time. Failure to provide details requested in the 'Your Details' section of this form will result in Aberdeenshire Council being unable to accept your representation.

Your information will be shared with the following recipients or categories of recipient:

Members of the public are being given this final opportunity to comment on the Proposed Aberdeenshire Local Development Plan. The reasons for any changes that the Council receives will be analysed and reported to Scottish Ministers. They will then appoint a person to conduct a public examination of the Proposed Plan, focusing particularly on the unresolved issues raised and the changes sought.

Your name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your

submission) will be published alongside a copy of your completed response on the Proposed Local Development Plan website (contact details and information that is deemed commercially sensitive will not be made available to the public).

In accordance with Regulation 22 of the Town and Country (Development Planning) (Scotland) Regulations 2008 where the appointed person determines that further representations should be made or further information should be provided by any person in connection with the examination of the Proposed Plan the appointed person may by notice request that person to make such further representations or to provide such further information.

Your information will be transferred to or stored in the following countries and the following safeguards are in place:

Not applicable.

The retention period for the data is:

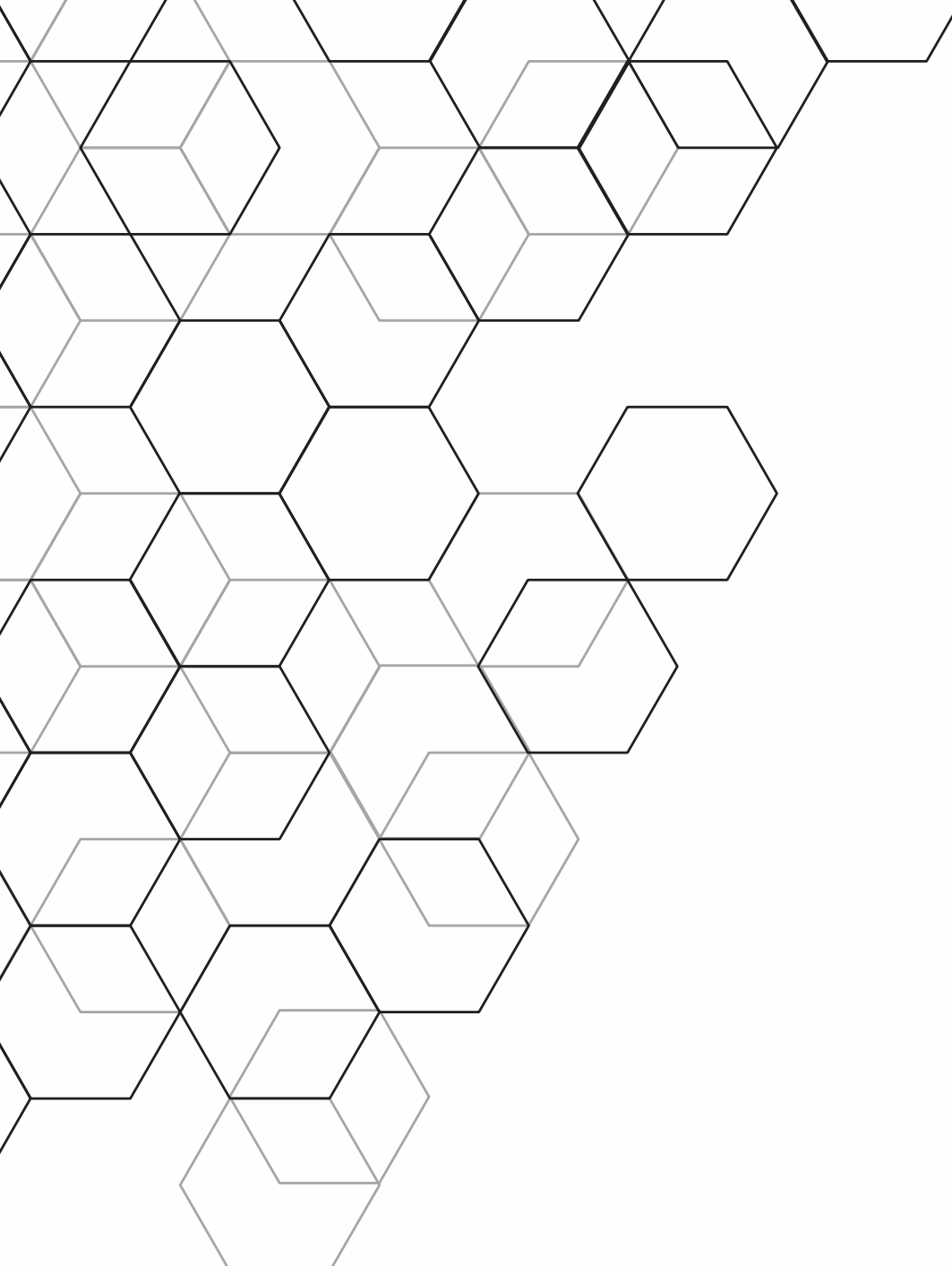
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue 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.

The following automated decision-making, including profiling, will be undertaken:

Not applicable.

Please note that you have the following rights:

- to withdraw consent at any time, where the Legal Basis specified above is Consent;
- to lodge a complaint with the Information Commissioner's Office (after raising the issue with the Data Protection Officer first);
- to request access to your personal data;
- to data portability, where the legal basis specified above is:
 - (i) Consent; or
 - (ii) Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.



Appendix One - Response to call for sites

Local Development Plan 2021 Call for Sites Response Form



Aberdeenshire Council would like to invite you to use this form to submit a site for consideration within the next Local Development Plan (LDP 2021) for the period 2021 to 2031. A separate form should be completed for each site you wish to submit.

This is not a speculative plan. It is a fresh 'call for sites', so please re-submit any sites that do not or are not expected to have planning permission by 2021.

In order for the bids to be fully assessed, it is crucial that the questions in the bid form are answered fully and concisely with clear evidence of deliverability. The submission of a supporting statement, often known as a paper apart, should be avoided, and only assessments, such as a Flood Risk Assessment that has already been undertaken, should be submitted in support of your proposed site.

Completed forms and Ordnance Survey "Landline" site maps should be returned by email to: ldp@aberdeenshire.gov.uk

Alternatively, you can return the form and Ordnance Survey map by post to:
Planning Policy, Infrastructure Services, Woodhill House, Westburn Road, Aberdeen AB16 5GB

All forms must be submitted by 31 March 2018.

1. Your Details

Name	[REDACTED]
Organisation (if applicable)	Aurora Planning Limited
Address	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Do you wish to subscribe to our newsletter?	Yes

2. If you are acting as an agent on behalf of a third party, please give their details

Name	David Kenwright
Organisation (if applicable)	
Address	
Telephone	
Email	[REDACTED]

3. Other Owners

Please give name, organisation, address, email details of other owner(s) where appropriate:	N/A
Do these owners know this is being proposed for development?	N/A

For data protection purposes, please complete the rest of this form on a new page

4. Site Details

Name of the site (Please use the LDP name if the site is already allocated)	Land at Greystone Farm, Alford (phases 2, 3 and 4 on the location plan)
Site address	Greystone Farm, Alford
OS grid reference (if available)	
Site area / size	23ha
Current land use	Grazing
Brownfield / greenfield	Greenfield
Please include an Ordnance Survey map (1:1250 or 1:2500 base for larger sites, e.g. over 2ha) showing the location and extent of the site, points of access, means of drainage etc.	

5. Ownership / Market Interest

Ownership (Please list the owners in question 3 above)	Sole owner
Is the site under option to a developer?	No, although discussions have taken place with housebuilders. The conclusion of those discussions is pending the outcome of the LDP process. If yes, please give details
Is the site being marketed?	No, see above. If yes, please give details

6. Legal Issues

Are there any legal provisions in the title deeds that may prevent or restrict development? (e.g. way leave for utility providers, restriction on use of land, right of way etc.)	No
	If yes, please give details
Are there any other legal factors that might prevent or restrict development? (e.g. ransom strips / issues with accessing the site etc.)	No
	If yes, please give details

7. Planning History

Have you had any formal/ informal pre-application discussions with the Planning Service and what was the response?	No
	Although the adjacent land is allocated in the current LDP as OP4 for 85 homes.
Previous planning applications	Please provide application reference number(s), description(s) of the development, and whether planning permission was approved or refused: Planning Permission in Principle for Residential Development and Associated Infrastructure and Landscaping was granted for the land included in OP4 in July 2010, pursuant to planning application reference APP/2005/2835.

<p>Previous 'Call for sites' history. See Main Issues Report 2013 at www.aberdeenshire.gov.uk/ldp</p>	<p>Please provide Previous 'Call for sites' / 'Bid' reference number:</p> <p>A bid was submitted bid for inclusion of this area of land, along with that included in OP4 in the 2027 Local Development Plan (reference number MA019).</p>
<p>Local Development Plan status www.aberdeenshire.gov.uk/ldp</p>	<p>Is the site currently allocated for any specific use in the existing LDP?</p> <p>The adjoining land is allocated as OP4 for 85 homes.</p> <p>If yes, do you wish to change the site description and or allocation?</p>

8. Proposed Use

Proposed use		Housing / employment / mixed use / other (please specify): Housing
Housing	Approx. no of units	245 over three phases (phases 2, 3 and 4 on the location plan)
	Proposed mix of house types	<p>Number of:</p> <ul style="list-style-type: none"> • Detached: • Semi-detached: • Flats: • Terrace: • Other (e.g. Bungalows): <p>To be determined.</p>
		<p>Number of:</p> <ul style="list-style-type: none"> • 1 bedroom homes: • 2 bedroom homes: • 3 bedroom homes: • 4 or more bedroom homes: <p>To be determined.</p>
	Tenure (Delete as appropriate)	Private / Rented /Supported houses (e.g. for elderly) / Other (please specify): Likely to be mixed tenure.
	Affordable housing proportion	25 %
Employment	Business and offices	Indicative floor space: m ²
	General industrial	Indicative floor space: m ²
	Storage and distribution	Indicative floor space: m ²
	Do you have a specific occupier for the site?	Yes / No
Other	Proposed use (please specify) and floor space	m ²
	Do you have a specific occupier for the site?	Yes / No
Is the area of each proposed use noted in the OS site plan?		

9. Delivery Timescales

We expect to adopt the new LDP in 2021. How many years after this date would you expect development to begin? (please tick)	0-5 years	
	6-10 years	✓
	10+ years	
When would you expect the development to be finished? (please tick)	0-5 years	
	6-10 years	
	+ 10years	✓
Have discussions taken place with financiers? Will funding be in place to cover all the costs of development within these timescales	No, but as stated above discussions have taken place with housebuilders. Further discussions with both housebuilders and financiers will take place pending the outcome of the LDP process.	
	If yes, please give details (e.g. bank facility, grant funding, secured loan etc.)	
Are there any other risk or threats (other than finance) to you delivering your proposed development	No	
	If yes, please give details and indicate how you might overcome them:	

10. Natural Heritage

<p>Is the site located in or within 500m of a nature conservation site, or affect a protected species?</p> <p>Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> • https://www.environment.gov.scot/ • EU priority habitats at http://gateway.snh.gov.uk/sitelink/index.jsp • UK or Local priority habitats at http://www.biodiversityscotland.gov.uk/advice-and-resources/habitat-definitions/priority/ • Local Nature Conservation Sites in the LDP's Supplementary Guidance No. 5 at www.aberdeenshire.gov.uk/ldp 	RAMSAR site:	X
	Special Area of Conservation	X
	Special Protection Area	X
	Priority habitat (Annex I)	X
	European Protected Species	X
	Other protected species	X
	Site of Special Scientific Interest	X
	National Nature Reserve	X
	Ancient Woodland	X
	Trees, hedgerows and woodland (including trees with a Tree Preservation Order)	✓
	Priority habitat (UK or Local Biodiversity Action Plan)	X
Local Nature Conservation Site	X	
Local Nature Reserve	X	
If yes, please give details of how you plan to mitigate the impact of the proposed development: The development of the site will not impact on the existing trees and woodland, rather they will provide natural screening between the recreation land protected for the new school campus and any new housing.		
Biodiversity enhancement		
Please state what benefits for biodiversity this proposal will bring (as per paragraph 194 in Scottish Planning Policy, http://www.gov.scot/Resource/0045/004538	Restoration of habitats	
	Habitat creation in public open space	
	Avoids fragmentation or isolation of habitats	

<p>27.pdf) by ticking all that apply. Please provide details.</p> <p>See Planning Advice 5/2015 on Opportunities for biodiversity enhancement at: www.aberdeenshire.gov.uk/media/19598/2015_05-opportunities-for-biodiversity-enhancement-in-new-development.pdf</p> <p>Advice is also available from Scottish Natural Heritage at: https://www.snh.scot/professional-advice/planning-and-development/natural-heritage-advice-planners-and-developers and http://www.nesbiodiversity.org.uk/.</p>	Provides bird/bat/insect boxes/Swift bricks (internal or external)	✓
	Native tree planting	✓
	Drystone wall	
	Living roofs	
	Ponds and soakaways	✓
	Habitat walls/fences	
	Wildflowers in verges	✓
	Use of nectar rich plant species	
	Buffer strips along watercourses	
	Show home demonstration area	
Other (please state):		
<p>If yes, please provide details:</p> <p>Although a detailed design for the site has not yet been prepared (pending the outcome of the LDP process) it is intended, particularly given the location of the site on the edge of the settlement to maximise the biodiversity benefits from native tree planting in particular, but also incorporating other elements of design to support biodiversity. Further details will be provided as the design progresses.</p>		

11. Historic environment

Historic environment enhancement		
Please state if there will be benefits for the historic environment.	No	
	If yes, please give details:	
<p>Does the site contain/ is within/ can affect any of the following historic environment assets?</p> <p>Please tick any that apply and provide details.</p> <p>You can find details of these designations at:</p> <ul style="list-style-type: none"> http://historicscotland.maps.arcgis.com/apps/Viewer/index.html?appid=18d2608ac1284066ba3927312710d16d http://portal.historicenvironment.scot/ https://online.aberdeenshire.gov.uk/smrpub/master/default.aspx?Authority=Aberdeenshire 	Scheduled Monument or their setting	X
	Locally important archaeological site held on the Sites and Monuments Record	X
	Listed Building and/or their setting	X
	Conservation Area (e.g. will it result in the demolition of any buildings)	X
	Inventory Gardens and Designed Landscapes	X
	Inventory Historic Battlefields	✓
<p>If yes, please give details of how you plan to mitigate the impact of the proposed development: The Battlefield Inventory for the Battle of Alford acknowledges that the location of the battle is subject to considerable uncertainty and that much of the existing built up area of Alford is located on the potential battlefield site. The existence of the battlefield was not considered an issue for the inclusion of site OP4 in the current LDP.</p>		

12. Landscape Impact

<p>Is the site within a Special Landscape Area (SLA)? (You can find details in Supplementary Guidance 9 at www.aberdeenshire.gov.uk/ldp)</p>	<p>No If yes, please state which SLA your site is located within and provide details of how you plan to mitigate the impact of the proposed development:</p>
<p>SLAs include the consideration of landscape character elements/features. The characteristics of landscapes are defined in the Landscape Character Assessments produced by Scottish Natural Heritage (see below) or have been identified as Special Landscape Areas of local importance.</p> <ul style="list-style-type: none"> • SNH: Landscape Character Assessments https://www.snh.scot/professional-advice/landscape-change/landscape-character-assessment • SNH (1996) Cairngorms landscape assessment http://www.snh.org.uk/pdfs/publications/review/075.pdf • SNH (1997) National programme of landscape character assessment: Banff and Buchan http://www.snh.org.uk/pdfs/publications/review/037.pdf • SNH (1998) South and Central Aberdeenshire landscape character assessment http://www.snh.org.uk/pdfs/publications/review/102.pdf 	<p>If your site is not within an SLA, please use this space to describe the effects of the site's scale, location or design on key natural landscape elements/features, historic features or the composition or quality of the landscape character:</p> <p>The site is within the Howe of Alford Agricultural Heartlands Landscape Character Area. It is characterised by intensive farming with scattered settlements and woodland shelterbelts and a sense of habitation. The Landscape Character Assessment states that settlement is concentrated centrally around Alford and contains a variety of architectural styles, including modern houses. It also recognises that built development is already common and that that reduced the sensitivity of the area. It is, there, submitted that the allocation of this site for housing would not adversely affect the existing landscape character. That would particularly so with the inclusion of appropriate woodland screening.</p>

13. Flood Risk

<p>Is any part of the site identified as being at risk of river or surface water flooding within SEPA flood maps, and/or has any part of the site previously flooded? (You can view the SEPA flood maps at http://map.sepa.org.uk/floodmap/map.htm)</p>	<p>No The SEPA flood maps do not show the site to be at risk of flooding, although there is a small watercourse running through the site, which serves to drain the surface water from the fields, and therefore a flood risk assessment may be required to accompany any future planning application.</p>
<p>Could development on the site result in additional flood risk elsewhere?</p>	<p>No If yes, please specify and explain how you intend to mitigate or avoid this risk:</p>
<p>Could development of the site help alleviate any existing flooding problems in the area?</p>	<p>No If yes, please provide details:</p>

14. Infrastructure

a. Water / Drainage		
Is there water / waste water capacity for the proposed development (based on Scottish Water asset capacity search tool http://www.scottishwater.co.uk/business/Connections/Connecting-your-property/Asset-Capacity-Search)?	Water	Yes – a water main for the village was largely funded by our client
	Waste water	No – although our client is aware that there may be a need to upgrade the sewage treatment works should the site be allocated.
Has contact been made with Scottish Water?	No If yes, please give details of outcome:	
Will your SUDS scheme include rain gardens? http://www.centralscotlandgreennetwork.org/campaigns/greener-gardens	Yes Please specify: Although no detailed designs have been yet been drawn up pending the outcome of the LDP process, it is intended that, given the nature of this site, it would incorporate elements of rain gardens, both as a means of creating a successful place and for managing water efficiency.	
b. Education – housing proposals only		
Education capacity / constraints https://www.aberdeenshire.gov.uk/schools/parents-carers/school-info/school-roll-forecasts/	Please provide details of any known education constraints. Is additional capacity needed to serve the development? The new Community Campus opened in October 2015. The 2016 school roll forecasts show capacity at both the primary and secondary schools to 2022 and beyond, with the roll at the primary dropping over this time.	
Has contact been made with the Local Authority's Education Department?	No If yes, please give details of outcome:	
c. Transport		
If direct access is required onto a Trunk Road (A90 and A96), or the proposal will impact on traffic on a Trunk Road, has contact been made with Transport Scotland?	N/A If yes, please give details of outcome:	
Has contact been made with the Local Authority's Transportation Service? They can be contacted at transportation.consultation@aberdeenshire.gov.uk	No, but there are a number of options to access the site, including from the Old Military Road, Burnbank Road, Greystone Road, a number of points along Kingford Road and from the new school campus relief road.	

Public transport	<p>Please provide details of how the site is or could be served by public transport:</p> <p>The site lies within 400m of regular bus services (218 and x20) as well as being served by a local bus service running to/from the community campus.</p>
Active travel (i.e. internal connectivity and links externally)	<p>Please provide details of how the site can or could be accessed by walking and cycling:</p> <p>The site is well located to be accessed by active modes of travel to the new community campus and local shops and services, being just over 1km (13 minutes walk and 3 minutes cycle) from the village centre. The masterplan also shows a number of potential new pedestrian links to the community campus and the village centre.</p>
d. Gas / Electricity / Heat / Broadband	
Has contact been made with the relevant utilities providers?	Gas: No If yes, please give details of outcome(s):
	Electricity: No If yes, please give details of outcome(s):
	Heat: No If yes, please give details of outcome(s):
	Broadband: No If yes, please give details of outcome(s):
Have any feasibility studies been undertaken to understand and inform capacity issues?	No Please specify:
Is there capacity within the existing network(s) and a viable connection to the network(s)?	No Please specify:
Will renewable energy be installed and used on the site? For example, heat pump (air, ground or water), biomass, hydro, solar (photovoltaic (electricity) or thermal), or a wind turbine (freestanding / integrated into the building)	<p>This will be considered as part of the detailed design process should the site be allocated in the LDP.</p> <p>If yes, please specify the type of renewable energy technology(s), if it is to provide electricity and/or heating (i.e. space heating and/or hot water), and the scale of provision (To supplement off-site connection all the way to 100% energy provision (off-grid)):</p>

e. Public open space	
<p>Will the site provide the opportunity to enhance the green network? (These are the linked areas of open space in settlements, which can be enhanced through amalgamating existing green networks or providing onsite green infrastructure)</p> <p>You can find the boundary of existing green networks in the settlement profiles in the LDP</p>	<p>Yes / No Please specify:</p>
<p>Will the site meet the open space standards, as set out in Appendix 2 in the Aberdeenshire Parks and Open Spaces Strategy? https://www.aberdeenshire.gov.uk/media/6077/approvedpandospacesstrategy.pdf</p>	<p>Yes Please specify:</p> <p>Although no detailed design has been carried out this is a large site and as such there will be sufficient capacity to meet the open space standards.</p>
<p>Will the site deliver any of the shortfalls identified in the Open Space Audit for specific settlements? https://www.aberdeenshire.gov.uk/communities-and-events/parks-and-open-spaces/open-space-strategy-audit/</p>	<p>New play equipment to address the identified shortfall in the Burnbank Road area could be provided through the delivery of the current OP4 allocation. Our client has already provided land to the Council for recreation space associated with the new school campus.</p>
f. Resource use	
<p>Will the site re-use existing structure(s) or recycle or recover existing on-site materials / resources?</p>	<p>No, there are no such materials on the site. If yes, please specify:</p>
<p>Will the site have a direct impact on the water environment and result in the need for watercourse crossings, large scale abstraction and/or culverting of a watercourse?</p>	<p>No If yes, please provide details:</p>

15. Other potential constraints

Please identify whether the site is affected by any of the following potential constraints:

Aberdeen Green Belt https://www.aberdeenshire.gov.uk/media/20555/appendix-3-boundaries-of-the-greenbelt.pdf	No
Carbon-rich soils and peatland http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/	No
Coastal Zone https://www.aberdeenshire.gov.uk/media/20176/4-the-coastal-zone.pdf	No
Contaminated land	No
Ground instability	No
Hazardous site / HSE exclusion zone (You can find the boundary of these zones in Planning Advice 1/2017 Pipeline and Hazardous Development Consultation Zones at	No

https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/ and advice at http://www.hse.gov.uk/landuseplanning/developers.htm)	
Minerals – safeguarded or area of search https://www.aberdeenshire.gov.uk/ldpmedia/6_Area_of_search_and_safeguard_for_minerals.pdf	No
Overhead lines or underground cables	No
Physical access into the site due to topography or geography	No
Prime agricultural land (grades 1, 2 and 3.1) on all or part of the site. http://map.environment.gov.scot/Soil_maps/?layer=6	No
‘Protected’ open space in the LDP (i.e. P sites) www.aberdeenshire.gov.uk/ldp and choose from Appendix 8a to 8f	No
Rights of way / core paths / recreation uses	No
Topography (e.g. steep slopes)	No
Other	No (please specify)
If you have identified any of the potential constraints above, please use this space to identify how you will mitigate this in order to achieve a viable development:	

16. Proximity to facilities

How close is the site to a range of facilities?	Local shops	> 1 km
	Community facilities (e.g. school, public hall)	400m – walking to the community campus, (although longer by road)
	Sports facilities (e.g. playing fields)	400m – walking (although longer by road)
	Employment areas	400m
	Residential areas	400m
	Bus stop or bus route	400m
	Train station	17km to Inch railway station
	Other, e.g. dentist, pub (please specify)	400m – 1 km (Transport Museum, Heritage Centre, swimming pool, GP, care home, sheltered housing)

17. Community engagement

Has the local community been given the opportunity to influence/partake in the design and specification of the development proposal?	Not yet, see above re progressing design pending the outcome of the LDP process.
	If yes, please specify the way it was carried out and how it influenced your proposals:
	If not yet, please detail how you will do so in the future:

	Following confirmation that the site has been allocated in the LDP a development framework will be drawn up and discussed with the community council to inform more detailed designs.
--	---

18. Residual value and deliverability

Please confirm that you have considered the 'residual value' of your site and you are confident that the site is viable when infrastructure and all other costs, such as constraints and mitigation are taken into account.	I have considered the likely 'residual value' of the site, as described above, and fully expect the site to be viable: Please tick: <input checked="" type="checkbox"/>
---	--

If you have any further information to help demonstrate the deliverability of your proposal, please provide details.

This response is accompanied by a location/phasing plan and a paper apart to provide further background and information in support of the allocation of this site for residential development. In summary, the key points are that the allocation of this site, with clear phasing, would:

- meet a demonstrable need for additional housing land in line with both local and national government policy; and
- would allow for a quality masterplanned extension to Alford, with development that would be delivered in the timescales of the emerging LDP.

For further details, please see paper apart.

19. Other information

Please provide any other information that you would like us to consider in support of your proposed development (please include details of any up-to-date supporting studies that have been undertaken and attach copies e.g. Transport Appraisal, Flood Risk Assessment, Drainage Impact Assessment, Peat / Soil Survey, Habitat / Biodiversity Assessment etc.)

Please tick to confirm your agreement to the following statement:

By completing this form I agree that Aberdeenshire Council can use the information provided in this form for the purposes of identifying possible land for allocation in the next Local Development Plan. I also agree that the information provided, other than contact details and information that is deemed commercially sensitive (questions 1 to 3), can be made available to the public.



Local Development Plan 2021

Call for sites response – Land at Greystone Farm, Alford

Our client wishes to submit land in his ownership at Greystone Farm, Alford for inclusion in the Aberdeenshire Local Development Plan 2021 for residential development of 245 units over three phases (phases 2, 3 and 4 on the location plan). Details of the site and an outline of the proposed development are set out in the Call for Sites Response Form. This paper provides further background and information in terms of the wider policy context that supports the allocation of the site.

Our client also has ownership of adjacent land identified as Site OP4 in the extant Local Development Plan (LDP), and a separate response to the call for sites seeks the retention of this allocation in the emerging LDP. While these two sites are the subject of separate responses, our client is keen to masterplan the combined area, in order to deliver a high quality and sustainable development that benefits both the place and the people who will live there. This is reflective of our client's longstanding commitment to the community, and track-record for delivering on this, by, for example, providing land to the Council for recreation space associated with the new school campus and contributing significantly to the cost of putting in a new water main for the village. In turn, our client's record in this regard indicates that the allocation of this site will not just create the potential for a positive development, but that this will in fact be delivered on the ground.

It is submitted that this site should be allocated for the following reasons:

- Alford is identified in the Strategic Development Plan (SDP) 2014 as being within a Local Growth and Diversification Area, within which levels of growth in individual settlements should relate to local needs, albeit with recognition that the scale of this growth will vary from place to place. In Alford, it is submitted that recent investment in infrastructure capacity, particularly in the new school campus, means that local demand for housing will be high, and that further housing land should be allocated accordingly.
- In terms of future housing growth, the Main Issues Report (MIR) for the review of the Strategic Development Plan (SDP) points to the need to anticipate high levels of growth and an increase in the housing supply target, fuelled by economic recovery. That being the case, there will be a requirement for additional housing land throughout the SDP area.



- Specifically, the Preferred Option in terms of the MIR is for Local Development Plans to identify sufficient land to allow for the delivery of new homes at levels not seen for 20 years, with the aim of building 2,190 homes over the next 25 years, and to allow for a higher rate of delivery if there is demand for this. The alternate option of having no further allocations in LDPs is not preferred.
- This is in line with Scottish Government policy in terms of which priority has been accorded to the delivery of more new housing through:
 - **Scotland's Economic Strategy**, published in 2015, which identifies four priorities for sustainable growth, one of which, investment, specifically highlights housing.
 - The **Joint Housing Delivery Plan for Scotland (2015)** which identifies a number of themes with regards to housing, including a lack of housing supply in both public and private sectors.
 - Related to that, the Government launched its **More Homes Scotland** approach in 2016 to deliver more homes across all tenures.
 - Recognising the centrality of housing in its overall ambitions for Scotland, the Government also made supplying more homes a national strategic “*social infrastructure*” priority in the 2015 **Infrastructure Investment Plan**.

It is therefore clear that the Government is seeking to increase the supply of housing throughout Scotland, placing the impetus on local authorities to allocate more housing land accordingly.

- This emphasis on increasing the supply of housing land, as well as the evolving status of existing allocations, also means that the current submission falls to be considered in a different policy context from when the extant LDP was being prepared, when the allocation of significant additional housing land was not considered necessary. Specifically, whereas then there was less of a drive for housing to be delivered, and a greater existing housing land supply, now that land has limited remaining capacity pressure for new housing land to be allocated is greater. Looking at the current site bid in this context, it is submitted that there is significant support for its allocation.

- It should also be noted that of the current allocations in Alford, OP3 has been fully developed out, while development at OP2 is underway with a number of units completed to date, and pre-application consultation has been carried out on OP5 with this site also expected to be developed out in the course of the extant LDP. Consequently, if further housing is to be delivered beyond 2020 in accordance with the ambitions of both local and national governments, additional housing land will need to be allocated in the emerging LDP for this.
- Although this would be a large allocation in total, and involve an extension to an existing allocation (OP4), that would not result in any delay to the delivery of development given the single ownership, a comprehensive vision for the combined area, and proposed phasing, as shown on the phasing plan submitted with this bid. As can be seen from that plan, OP4 can be built out as phase 1, and completely independently, with work starting on the site to which this submission relates during the course of the emerging LDP, and then itself can be built out in a number of separate phases.
- Each of the proposed phases comprises less than 100 units. That is consistent with the Main Issues Report for the current review of the SDP which states that “...any new greenfield (land which has never been built on) allocations should preferably be under 100 units in size, aim to deliver affordable housing above 25%, and not be extensions to existing sites which could delay their delivery.” (paragraph 6.5). The allocation of this site with clear phasing and the ability to accommodate 25% affordable housing provision, would be consistent with that Preferred Option and would contribute to meeting a local housing need over the longer term. That is particularly important that under the new Planning (Scotland) the 2021 LDP could be a 10-year plan.
- In this regard, it is submitted that the scale of the site means that it can be properly masterplanned and phased to ensure the sensitive and timely growth of the village in accordance with the six qualities of successful placemaking, as required by Scottish Planning Policy, whilst also maximising the use of existing and any new infrastructure.
- As stated above, the scale of the site also means that it is capable of providing at least 25% affordable housing on site; the more units allocated, the greater the level of affordable housing provision, in accordance with the MIR for the SDP’s emphasis on the delivery of affordable units (in terms of which it is recognized that, between 2011 and 2016, delivery of affordable

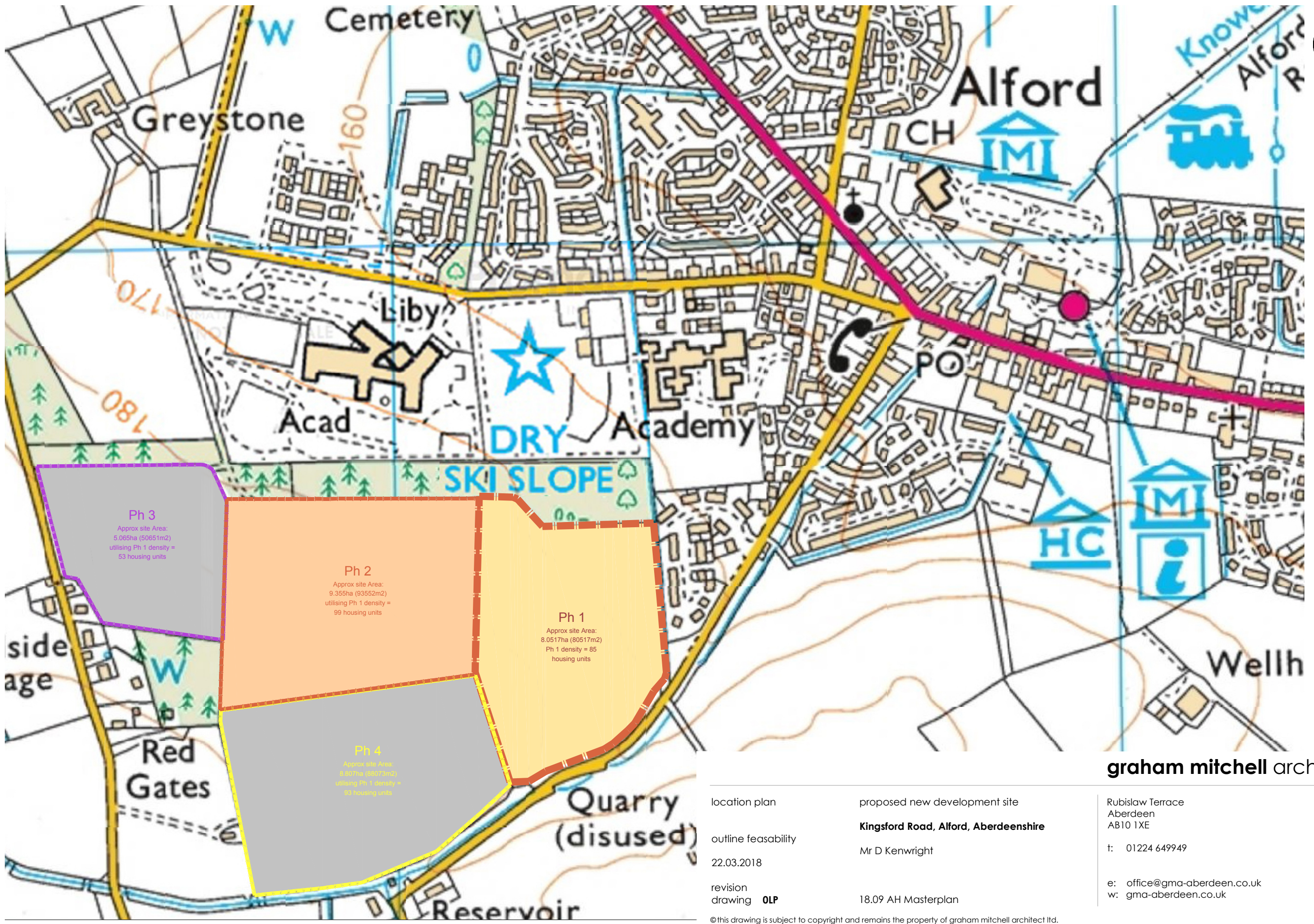
units was almost 3,000 units short of the identified need).

- In terms of infrastructure, it should be taken into account that a new water main has been recently been installed and passed through our client's land, which also provides capacity for the development of this site. In addition, a new sewage treatment works would be required for further development of the village and any development allocated to this site would help to support that level of infrastructure. The substantial contribution already made by our client to new infrastructure and community facilities in the village is testament to his commitment to ensure that any development is properly served by adequate infrastructure.
- At the same time, the recent opening of the new Alford community campus supports new development in this area. In this regard it should be noted that, in preparing the extant LDP, the Council's view was that it would be premature to allocate further land for housing until there was more certainty about the new school. Now that this certainty has been provided, it is submitted that new land allocations should also be made accordingly.
- Also in regard to education, the 2016 school roll forecasts indicate a declining primary school roll, allocation of additional housing land which is capable of being delivered within the life time of the plan will help to maintain the school roll, and hence the viability of the village, in the longer term.
- Importantly the site does not have any known constraints that would impede development (see call for sites response form for further details) and is deliverable on a phased basis within the timescale of the LDP.
- Finally, a westwards expansion of the village through the allocation and development of this site is the logical direction for growth because:
 - expansion to the east would be very visually prominent, whilst growth to the north is constrained by the woodland – in this regard, it is noted that the Examination Report for the extant LDP indicates that sensitive landscaping could potentially mitigate adverse impacts of eastwards expansion but, prevention being better than cure, it is submitted that the preference should be to allocate land for which no such mitigation is required in the first place, as is the case with this site.

- It is well located for the new community campus and associated facilities and would form a natural extension to these new developments.
- It is just over 1km from the village centre, providing access to and support for local shops, pubs, cafes and other services.

Conclusion

For the reasons given in this paper apart, it is submitted that the allocation of this site, with clear phasing, would meet a demonstrable need for additional housing land in line with both local and national government policy, and would allow for a quality masterplanned extension to Alford, with development that would be delivered in the timescales of the emerging LDP. As such, it is submitted that the site should be allocated accordingly.



Ph 3
 Approx site Area:
 5.065ha (50651m²)
 utilising Ph 1 density =
 53 housing units

Ph 2
 Approx site Area:
 9.355ha (93552m²)
 utilising Ph 1 density =
 99 housing units

Ph 1
 Approx site Area:
 8.0517ha (80517m²)
 Ph 1 density = 85
 housing units

Ph 4
 Approx site Area:
 8.207ha (82073m²)
 utilising Ph 1 density =
 93 housing units

graham mitchell architects

location plan
 proposed new development site
Kingsford Road, Alford, Aberdeenshire
 outline feasibility
 Mr D Kenwright
 22.03.2018
 revision
 drawing **OLP** 18.09 AH Masterplan

Rubislaw Terrace
 Aberdeen
 AB10 1XE
 t: 01224 649949
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 w: gma-aberdeen.co.uk

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 contractor to check dimensions. If any problems arise contact architects prior to construction / fabrication.

proposed site location plan
 scale 1:5000

Appendix Two - Response to Main Issues Report

For internal use only

Aberdeenshire Local Development Plan 2021: Main Issues Report 2019 Main Issues Report Response Form

Important Information: Please Read

The Main Issues Report (MIR) is a key stage in preparing the Aberdeenshire Local Development Plan 2021 (LDP 2021). The MIR sets out options for how the LDP 2021 could be improved both in terms of the policies that Aberdeenshire Council will use to determine planning applications as well as identifying land allocations for development. The MIR has been published along with a Monitoring Report and Interim Environmental Report of the Strategic Environmental Assessment. These, along with other supporting documents are available at: <https://www.aberdeenshire.gov.uk/planning/plans-and-policies/ldp-2021/main-issues-report/>.

Comments are sought on the MIR and Interim Environmental Report, or indeed any other matter that you feel that we need to consider, by 5pm on Monday, 8 April 2019. Responses can be emailed to us at ldp@aberdeenshire.gov.uk or received via post, Planning Policy Team, Infrastructure Services, Aberdeenshire Council, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

Please note that in order for comments to be considered as valid you must include your contact details.

We will use these details to confirm receipt of your comments and to seek clarification or request further information as required. Should you have any concerns regarding the holding of such information please contact ldp@aberdeenshire.gov.uk. Anonymous comments will not be considered as part of the consultation process. Petitions will only be noted in the name of the person submitting the document.

All comments received will be carefully assessed and will be used to inform the preparation of the Proposed Aberdeenshire Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in December 2019.

Name	██████████
Organisation (optional)	Aurora Planning Limited
On behalf of (if relevant)	David Kenwright
Address	c/o Aurora Planning Limited ██████████ ██████████
Postcode	██████████
Telephone (optional)	██████████
E-mail (optional)	████████████████████



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:

- [REDACTED], 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 committing on?	Main Issues Report	✓
	Draft Proposed Aberdeenshire Local Development Plan	✓
	Strategic Environmental Assessment Interim Environmental Assessment	<input type="checkbox"/>
	Other	<input type="checkbox"/>

Your comments

Bid reference MR042, Land at Greystone Farm, Alford

Our client wishes to contest the planning officers' assessment of this site, and the reasons given for this not being identified as a preferred option in the MIR and submits that the site should be allocated as a Strategic Reserve for housing land in the new LDP.

The reasons given for the site not being a preferred option are that:

- the proposed site would form a southern extension to the settlement and a significant extension to existing allocation OP4;
- the scale of the site is considerable, such that there would be significant traffic implications for those travelling east;
- it is likely to impact on the landscape setting and cultural heritage associated with the Battle of Alford battlefield designation as it is within what is conserved of the core of the battlefield; and
- there are unresolved issues with water, waste water, infrastructure and education capacity.

Each of these are looked at in turn below.

The proposed site would form a southern extension to the settlement and a significant extension to existing allocation OP4

As set out in our client's initial bid submitted in response to the call for sites, this site has specifically been promoted as an extension to allocation OP4 (which is also within our client's ownership) on the basis that a masterplan could then be prepared for the combined area. That would ensure that the future of Alford is well planned and sustainable, and that new development is deliverable at the appropriate time. As such, the size of the proposed extension should be seen as one of its strengths, allowing for a long-term strategic approach to be taken. This is particularly so given the context of the Aberdeen City and Shire Proposed Strategic Development Plan (PSDP) which supports the allocation of a strategic reserve of housing land for the period 2033 to 2040. The indicative plans submitted with the initial bid show how the site could be developed in phases following on from OP4, delivering exactly the kind of medium and long term housing land envisaged by the PSDP in order to achieve its target of increasing the range, quality and design of new development across the city region.

The scale of the site is considerable, such that there would be significant traffic implications for those travelling east

While any level of development will have traffic implications, the indicative plans submitted with the initial bid show how the site would be developed in phases, with accesses from both Kingsford Road and Old Military Road to minimise the traffic impact. At the same time, the proximity of the site to the village centre – which offers local shops, pubs, cafes and other services - allows for easy access between the two by means of transport other than the private car, again reducing the likely traffic impact.

It is likely to impact on the landscape setting and cultural heritage associated with the Battle of Alford battlefield designation as it is within what is conserved of the core of the battlefield

The Battle of Alford battlefield extends across a significant area, including the whole of the existing built up area of Alford and beyond, a fact that is expressly acknowledged in the Inventory of Historic Battlefields which states that the location of the battle is subject to considerable uncertainty. This needs to be taken into account when assessing any proposals on or near to the potential battlefield site, and a proportionate approach taken. In this regard our client would however be open to looking at opportunities to recognise and celebrate this element of the historic environment in the public realm, as suggested in the MIR in relation to site OP4 (bid reference MR043).

There are unresolved issues with water, waste water, infrastructure and education capacity

As set out in our client's initial bid, the only potential infrastructure constraint relates to the need for a new sewage treatment works, but this is already identified in the extant LDP and our client is both willing and able to provide that. Each of the other points raised in the MIR are addressed as follows:

- Alford benefits from a new water main (substantially funded by our client) which would also serve the site;
- the 2016 school roll forecasts indicate a declining primary school roll, while the new community campus opened in October 2015, both of which support new development in the area. In particular, whereas the Council previously considered it premature to allocate further land for housing before there was certainty about the school, now that this has opened, that certainty has been provided and new land allocations should be made accordingly; and
- the substantial contribution already made by our client to new infrastructure and community facilities in the village is testament to his commitment to ensuring that any development is properly served by adequate infrastructure.

Strategic Reserve land

Our client also wishes to highlight that the PSDP recognises that a considerable proportion of current LDP allocations are strategic and that there is a risk that the housing land supply may not be maintained if any of these sites fail to come forward. To address this, the PSDP proposes additional allocations be made over the period 2020 to 2032, with provision for a Strategic Reserve of housing land to be identified for the period 2033 to 2040. As the PSDP represents the settled view of the Strategic Development Planning Authority, with which the next LDP would be expected to align, the proposal to allocate this site as a Strategic Reserve of housing land should be treated positively. This is particularly so given that, as set out in the PSPD, the total effective

land supply across the region is currently 37,077, this being only just over half of the total housing land requirement for the Plan for 2016 to 2040 of 64,272.

In light of the points raised above, in addition to those raised our client's initial bid submitted in response to the call for sites, we would ask that this site be reconsidered as a Strategic Reserve of housing land for the period 2033 to 2040 to allow for the future of Alford to be well planned in line with both local and national government policy.