

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

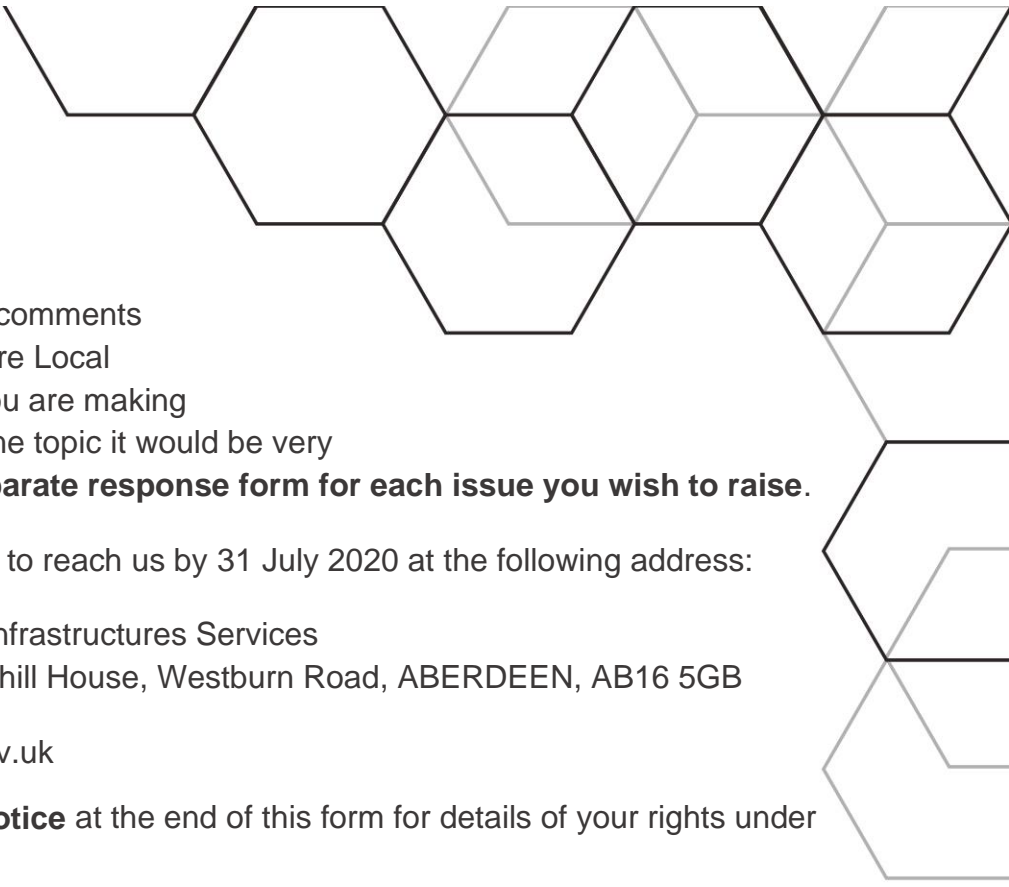
Tel: 01467 536230

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):

Our client welcomes and supports the allocation of OP4: Land at Kingsford Road for 85 homes. At the same time, references to the requirement for a significant landscape buffer to the west and a buffer strip along the watercourse should be removed from the allocation summary, or the wording be revised to refer to an appropriate buffer, the size of which would be determined through a masterplan or planning application.

Reason for change:

The Proposed Local Development Plan (PLDP) shows the allocation of bid reference MR043 as OP4, for 85 homes, continuing the allocation from the extant Local Development Plan 2017 (in which the site is also identified as OP4). The allocation is though subject to a number of requirements, including that:

- a significant landscape buffer should be provided to the west of the site to separate the development from the core of the Battle of Alford battlefield with further planting throughout the development to integrate the site into the landscape; and
- a buffer strip will be required adjacent to the watercourse and should be a positive feature of the development.

Our client welcomes the continued allocation of the site but has concerns regarding these two requirements.

Whilst the indicative plan submitted with our client's response to the call for sites in March 2018 shows a landscape buffer to the north, west and east of the site (including around the watercourse), and our client is committed to delivering quality landscaping as an integral feature of development throughout, the wording of the PLDP opens the door to any future planning application being subject to disproportionate requirements in this regard. That is particularly so with regards to the reference to the landscape buffer to the west to separate the development from the core of the Battle of Alford battlefield. As acknowledged in the Inventory of Historic Battlefields for the Battle of Alford, the location of the battle is subject to considerable uncertainty, with much of the existing built up area of Alford located on the potential site. This requires 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, it must be recognised that the indicative masterplan approved as part of planning application reference APP/2005/2835 shows no more of a

buffer than is shown in the indicative plan submitted with the bid for this site in response to the call for sites.

In addition, the Council's Proposed Plan Issues and Actions Paper for Alford highlights that, with regards to OP4/Bid reference MR043 SEPA recommended that enhancements of the straightened watercourse through re-naturalisation and removal of any redundant features should be investigated. In response to this recommendation, the document states that "*In light of SEPA's comments, a buffer strip for the watercourse has not been requested and will not be a requirement within the allocation summary*". The requirement should therefore be removed from the allocation.

Accordingly, it is submitted that:

- reference to the requirement for a significant landscape buffer to the west of the site be removed, or the wording revised to refer to an appropriate buffer, the size of which to be determined through a masterplan or planning application; and
- reference to the requirement for a buffer strip adjacent to the watercourse be removed, in accordance with the Actions set out in the Issues and Actions Paper.

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:

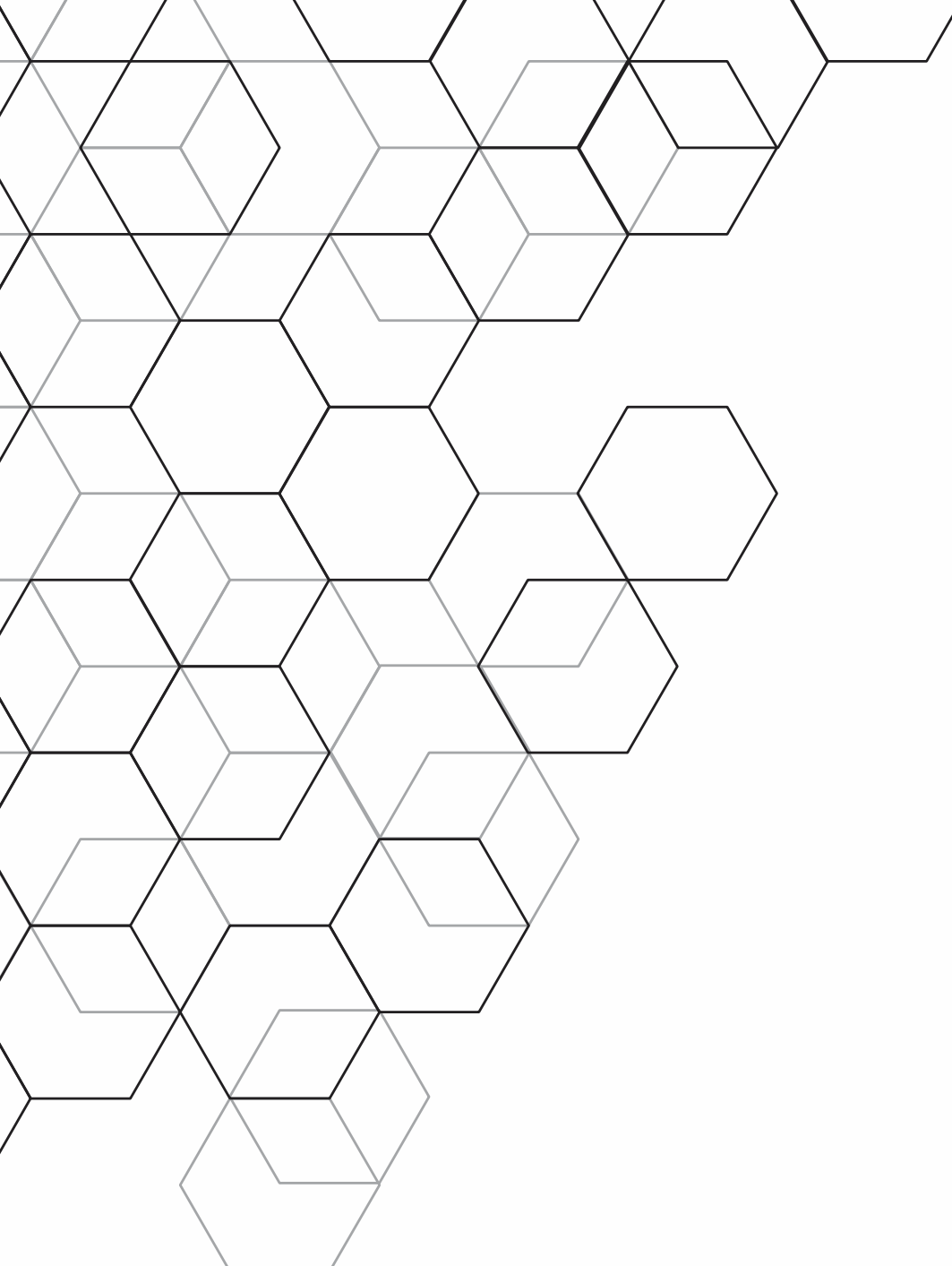
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue 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]
[REDACTED] 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 Kingsford Road, Alford
Site address	Kingsford Road, Alford
OS grid reference (if available)	
Site area / size	8ha
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
	The site is allocated in the current LDP as OP4 for 85 homes and forms part of the site granted planning permission in principle in July 2010 (application reference APP/2005/2835).
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 land, including that within OP4, in July 2010 pursuant to planning application reference APP/2005/2835.

Previous 'Call for sites' history. See Main Issues Report 2013 at www.aberdeenshire.gov.uk/ldp	Please provide Previous 'Call for sites' / 'Bid' reference number: A bid was submitted for the allocation of a larger area of land, incorporating that included in OP4 in the 2017 Local Development Plan (reference number MA019).
Local Development Plan status www.aberdeenshire.gov.uk/ldp	Is the site currently allocated for any specific use in the existing LDP? The site is allocated as OP4 for 85 homes.
	If yes, do you wish to change the site description and or allocation? No

8. Proposed Use

Proposed use		Housing / employment / mixed use / other (please specify): Housing
Housing	Approx. no of units	85 (attached plan and numbers below are indicative only)
	Proposed mix of house types	Number of: <ul style="list-style-type: none"> • Detached: 85 • Semi-detached: • Flats: • Terrace: • Other (e.g. Bungalows):
		Number of: <ul style="list-style-type: none"> • 1 bedroom homes: • 2 bedroom homes: 21 • 3 bedroom homes: 44 • 4 or more bedroom homes: 20
	Tenure (Delete as appropriate)	Private / Rented /Supported houses (e.g. for elderly) / Other (please specify): Likely to be mixed tenure and mixed size and type of units.
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.	
	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:	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/0045/00453827.pdf) by ticking all that apply. Please	Restoration of habitats	
	Habitat creation in public open space	
	Avoids fragmentation or isolation of habitats	
	Provides bird/bat/insect boxes/Swift	✓

<p>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>	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, 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:</p> <p>The principle of housing development on this site has been established through its existing allocation in the LDP and the granting of the Planning Permission in Principle. In both those cases the existence of the battlefield was not considered a constraint to development. In any event, the Battlefield Inventory for the Battle of Alford acknowledges that the location of the</p>	

	battle is subject to considerable uncertainty and that much of the existing built up area of Alford is located on the potential battlefield site. In addition none of the key battlefield features are within the proposed site boundary.
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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</p> <p>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 has already been established through the existing allocation and the Planning Permission in Principle, that development 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?</p> <p>(You can view the SEPA flood maps at http://map.sepa.org.uk/floodmap/map.htm)</p>	<p>No</p> <p>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 only serves to drain the surface water from the fields. A flood risk assessment may therefore be required to accompany any future planning application.</p>
<p>Could development on the site result in additional flood risk elsewhere?</p>	<p>No</p> <p>If yes, please specify and explain how you intend</p>

	to mitigate or avoid this risk:
Could development of the site help alleviate any existing flooding problems in the area?	No
	If yes, please provide details:

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 put in previously and substantially 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.centuralscotlandgreennetwork.org/campaigns/greener-gardens	Yes Please specify: Although no detailed designs have been yet to be 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 and, as an allocated site, it is presumed that development of OP4 has been taken account of in the School roll forecasts.	
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:	
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<p>Has contact been made with the Local Authority's Transportation Service? They can be contacted at transportation.consultation@aberdeenshire.gov.uk</p>	<p>No.</p> <p>However, the Planning Permission in Principle show two access points into the site from Kingsford Road. There is also the potential to create an access from Burnbank and/or through OPI when it is developed.</p>
<p>Public transport</p>	<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 there being a regular local bus service to/from the new community campus.</p>
<p>Active travel (i.e. internal connectivity and links externally)</p>	<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.</p>
<p>d. Gas / Electricity / Heat / Broadband</p>	
<p>Has contact been made with the relevant utilities providers?</p>	<p>Gas: No If yes, please give details of outcome(s):</p>
	<p>Electricity: No If yes, please give details of outcome(s):</p>
	<p>Heat: No If yes, please give details of outcome(s):</p>
	<p>Broadband: No If yes, please give details of outcome(s):</p>
<p>Have any feasibility studies been undertaken to understand and inform capacity issues?</p>	<p>No Please specify:</p>
<p>Is there capacity within the existing network(s) and a viable connection to the network(s)?</p>	<p>No Please specify:</p>
<p>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>	<p>This will be considered as part of the detailed design process should the site continue to be allocated in the LDP.</p> <p>If yes, please specify the type of renewable energy technology(s), if it is to provide</p>

	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)):
e. Public open space	
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) You can find the boundary of existing green networks in the settlement profiles in the LDP	Yes / No Please specify:
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	Yes Please specify: Although no detailed design has been carried out this is a large site and, as shown on the accompanying plan, there will be sufficient capacity to meet the open space standards.
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/	Please specify: New play equipment could be provided in woodland to the north of the site, which is proposed to be replanted and enhanced as a usable community asset with footpaths, picnic areas and play areas. Our client has already provided land to the Council for recreation space associated with the new school campus.
f. Resource use	
Will the site re-use existing structure(s) or recycle or recover existing on-site materials / resources?	No, there are no such materials on the site. If yes, please specify:
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?	No If yes, please provide details:

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-	No

planners-and-developers/soils-and-development/cpp/	
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 https://www.aberdeenshire.gov.uk/planning/plans-and-policies/planning-advice/ and advice at http://www.hse.gov.uk/landuseplanning/developers.htm)	No
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 Academy, although longer by road)
	Sports facilities (e.g. playing fields)	400m – walking (although longer by road)
	Employment areas	400m – 1 km
	Residential areas	400m
	Bus stop or bus route	400m
	Train station	> 1 km
	Other, e.g. dentist, pub (please specify)	400m – 1 km – Transport Museum, Heritage Centre, swimming pool, GP, care home and 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: The community had the opportunity to submit comments in response to the application for Planning Permission in Principle, in addition to which it is intended that the community council will be consulted as detailed plans are prepared for the site.

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. 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.



Aberdeenshire Local Development Plan 2021

Call for sites response - OP4 Land at Kingsford Road, Alford

Our client wishes to retain land in his ownership at Kingsford Road, Alford as an allocation (OP4 Land at Kingsford Road) in the Aberdeenshire Local Development Plan 2021 for residential development of 85 units. 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 continued allocation of the site.

It is submitted that this site should be maintained as an allocation in the Local Development Plan for the following reasons:

- The site is allocated in the current LDP as OP4 Land at Kingsford Road for 85 units. The supporting text to the allocation states that *“This is a committed site, previously allocated as site EH2 in the 2012 LDP. The site has outline planning permission for residential development and associated infrastructure and landscaping.”* In terms of timescales for development, it is then stated that *“Construction is expected to follow on from OP3”*. Through both the allocation and the granting of the Planning Permission in Principle, the principle of housing development on this site has been well established; the site is therefore undoubtedly appropriate for development.
- 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. The site was retained as an allocation in the 2012 Local Development Plan as being appropriate to meet that need and it continues to be so.
- Since that time, the Main Issues Report for the review of the 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 continue to be a requirement for additional housing land throughout the SDP area, including in Alford. This site will continue to help meet that need.
- With the completion of the new school campus and the installation of the new water main, substantially funded by our client, the only potential



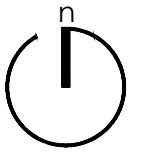
infrastructure constraint relates to the need for a new sewage treatment works. That is already identified in the extant LDP and our client is both able and willing to provide that.

- The scale of the site means that it can provide at least 25% affordable housing on site in accordance with the MIR for the SDP's emphasis on the delivery of affordable units (in terms of which it is recognised that, between 2011 and 2016, delivery of affordable units was almost 3,000 units short of the identified need).
- It should also be noted that, of the current allocations:
 - homes built on OP2 are currently being marketed;
 - OP3 is the site of [REDACTED] Silver Birches development, where homes are also currently being marketed; and
 - pre-application consultation has been carried out on OP5.

Consequently, as recognised in the LDP, OP4 is the next logical site for development.

- As the current LDP states that construction on OP4 is expected to follow completion of OP3, and development of OP3 is now underway, our client intends to progress with an application and commence development on this site as soon as practically possible following completion of OP3 and OP2. It is commercially preferable for both our client and the Council for this site to be developed at the same time as OP1, the former school campus site, in order to share infrastructure costs. However, as stated in the LDP, development of OP1 could not progress until the completion of the new community campus. The new campus opened in late 2015 and hence it is now possible to begin development on the remaining allocations. Any further delay to work progressing on OP3 will not, however, prevent the implementation of OP4.
- Importantly the site does not have any known constraints that will impede development and is deliverable within the timescale of the LDP and our client is committed to doing that.
- The development of OP4 will also allow for the future release of land to the west (as shown in a separate Call for Site Response Form – Land at Greystone Farm) on a phased based, maximising the use of existing and any required new infrastructure, whilst not being reliant upon that.





graham mitchell architects

location plan

proposed new development site

Rubislaw Terrace
 Aberdeen
 AB10 1XE

outline feasibility

Kingsford Road, Alford, Aberdeenshire

t: 01224 649949

22.03.2018

Mr D Kenwright

revision drawing **OLP**

18.09 AH Masterplan

e: office@gma-aberdeen.co.uk
 w: gma-aberdeen.co.uk

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proposed site location plan
 scale 1:5000

Appendix Two - Response to Main Issues Report

For internal use only

Aberdeenshire
COUNCIL



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 commenting 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

Bid reference MR043, Land at OP4, Kingsford Road, Alford

Our client supports the allocation of this site for residential development of 85 homes, as recommended by officers in the MIR and put forward in the Draft Proposed Plan.

At the same time, our client disagrees with the preference expressed by officers in the MIR that the site area be reduced in size and would wish to see it retained at the size shown in both the extant LDP and in the Draft Proposed Plan.

The MIR stresses the importance of consistency and continuity with previous development plans and, in light of both this and the following, it is submitted that there should be no reduction in the size of OP4.

The officers' preference for the site area to be reduced is on the basis that the density proposed is low. However, the indicative plan submitted with our client's initial response to the call for sites shows how the site could be developed at a density which reflects that of neighbouring development. Reducing the site size and increasing the density risks the resultant development being out of keeping with what is around it, with less quality green space within the development, and less affordable housing delivered as part of this, all directly contrary to the aspirations of the Draft Proposed Plan (which are discussed below).

However, should the Council wish to see the density increased - which our client accepts would make more efficient use of land, as promoted in Scottish Planning Policy and the Aberdeen City and Shire Proposed Strategic Development Plan - then the site could remain at the same size but the indicative number of units be increased. Our client would be happy to provide an indicative layout for a higher density development if that would be helpful.

The MIR also suggests that contributions towards a school extension would be required and that there remains uncertainty as to road connections and water and waste water drainage capacity in the area, factors our client also disagrees with.

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:

- the new community campus opened in October 2015 and, as an allocated site at that time, development of OP4 will have been taken account of in the school roll forecasts;
- the indicative plan submitted with the initial bid shows how the site could be developed with two vehicle accesses from Kingsford Road, plus a potential third connection through to the west if there were to be development there in the future. Our client is not aware of any capacity issues on Kingsford Road that would affect these accesses; and
- Alford benefits from a new water main (substantially funded by our client) which would also serve the site.



In terms of other points raised in the MIR in respect of this site, our client would endorse the officers' assessment that development of the site is likely to follow on from the completion of OP3, such that marketability is unlikely to hinder its delivery, and that development would not impact on the historic Battle of Alford battlefield. 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.

It is also emphasised that, while the MIR states that no masterplan, development framework or planning application is in place for the site, planning permission in principle for residential development and associated infrastructure and landscaping on land including that within OP4 was granted in July 2010 pursuant to planning application reference APP/2005/2835. The same application also covered the land identified as OP3 and, with houses on OP3 currently being marketed, OP4 is the next logical site for development in Alford. As set out in our client's initial bid, this site is also deliverable within the timescales of the LDP.

The Draft Proposed Plan then states that development should be designed in such a way as to integrate new housing into the existing settlement, with consideration of pedestrian connectivity to the north and the east, and that the site is expected to provide a mix of housing types to meet local needs and contribute towards the delivery of affordable housing (which should be delivered as part of the early phases of the development).

As is clear in our client's initial bid, our client is committed to the delivery of at least 25% affordable housing on the site as part of a mix of units, while the plan submitted with that bid indicatively shows how the site could be developed in a way that integrates it with the existing settlement, with pedestrian connections to existing development to the east and woodland paths to the north. As such, our client supports the wording of the Draft Proposed Plan in this regard.

Our client does however have concerns about wording in the Draft Proposed Plan which states that:

- a significant landscape buffer should be provided to the west of the site to separate the development from the core of the Battle of Alford battlefield, with further planting throughout the site to integrate the site into the landscape; and
- a buffer strip will be required adjacent to the watercourse and should be integrated as a positive feature of the development.

While the indicative plan submitted with our client's initial bid shows a landscape buffer to the north, west and east of the site (including around the watercourse), and our client is committed to delivering quality landscaping as an integral feature of development throughout, the wording of the Draft Proposed Plan opens the door to any future planning application being subject to disproportionate requirements in this regard. This is particularly so with regards to the reference to the landscape buffer to the west to separate the development from the core of the Battle of Alford battlefield. As acknowledged in the Inventory of Historic Battlefields for the Battle of Alford, the location of the battle is subject to considerable uncertainty, with much of the existing built up area of Alford located on the potential site. 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, it must be recognised that the indicative masterplan approved as part of planning application reference APP/2005/2835 shows no more of a buffer than is shown in the indicative plan submitted with the bid for this site in response to the call for sites.

As such, our client seeks the removal of the above two sentences from the Draft Proposed Plan or, alternatively, these to be reworded to refer to an appropriate buffer, the size of which should be determined through a masterplan or planning application.

Further details are provided in our client's initial bid submitted in response to the call for sites.