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I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

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- Mr Andrew Lawson, Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

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

Your comments

Please see attached three page document.



Your comments (continued)

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Aberdeenshire Local Development Plan 2021: Main Issues Report 2019

Relating to the settlement of Alford

Response by [REDACTED]

Address: [REDACTED]

Main Issues Report

Chapter 1.

Government Priorities identify four specific outcomes to which Development Plans (DPs) must contribute by creation of: -

Successful sustainable places – not defined

Low Carbon places – self-explanatory. This appears to be ignored in the Plan – *see below for my comments*

Natural resilient places – not defined

More connected places – not defined

Background papers refer to “Development bids” being “assessed” – the reality of this process is that the Planning Department is put in the position of respondent to, rather than the initiator of, proposals for development. These proposals are Developer / Landowner led, and principally are driven by perceived profit for those concerned. It appears that in the case of the current proposals for Alford, there has been scant regard for the interests of the community and to the effect on the environment. The proposals have minimal relevance to local needs and are thus flawed.

Chapter 2.

Regional issues include: -

Infrastructure investment “*must continue to encourage development*”. – This implies that provision will be made in advance of development for such matters as: - Water supply capacity; Sewage capacity; Schools; Medical care – *see below for my comments*

Climate change effect. Specifically “*Overall our strategy is based on locating development close to public transport routes and reducing the need for the private car.....avoid creating just commuter towns*”. – Alford is already identified as a commuter town, and the development proposals, if implemented, will substantially increase the number of car journeys to areas of employment such as Aberdeen, there being a limited amount of employment opportunities in the Alford area.

Chapter 5.

The Planning Policy principle states *"planning should direct the right development to the right place"*. It requires the identification of *"pressured and easily accessible"* and *"remote"* rural areas to protect against unsustainable growth in car-based commuting – This is being ignored in the DP for Alford, for which the nearest significant centre of employment is Aberdeen some 30 miles distant. The proposals would result in 300+ additional daily car journeys to places of employment and still more for shopping. This would have a serious, and unnecessary, adverse impact on Carbon Footprint.

Organic Growth. The proposals for Alford include: -

OPs 1-5 involving a total of 373 dwellings. These, if implemented, may be assumed to result in population increases of 700+ adults and 560+ children.

Part of the DP is intended to permit small scale development sites where a need has been established. There is specific reference to schools. At Alford the schools are at capacity; there is no evidence of provision for additional places being made for the development in progress on site OP3, let alone for any of the other sites proposed.

Furthermore there is no mention of medical services in Alford, where the excellent GP Surgery is already at full capacity and would, under the present proposals, be faced with some 1200 – 1400 additional patients.

Water and Sewage systems are acknowledged to be "at capacity". There is no evidence of planning to rectify this, let alone of actually doing anything practical to overcome the problems in advance of development. Policy RD1 has particular relevance to this.

Chapter 6.

Housing numbers on sites. The LDP states there should be a maximum of 22 homes per hectare + 40% open space. In a rural settlement such as Alford it is clear that any proposal to increase this should not be permitted. Recent evidence of failure to adhere to this standard of development in the settlement shows the flaws and damage of so doing. There should be no increase in density permitted.

Chapter 8.

National Heritage and Landscape. The Policy is intended to ensure protection of Landscape Character. If residential development is permitted east of Castle Road (OP 5), it will clearly be in breach of this Policy, in that it will seriously prejudice the present established rural agricultural landscape.

Chapter 9.

Historic Environment. The Policy sets out to protect and improve the historic environment in accordance with National Policy. This specifically includes: - Listed Buildings and National Battlefields. The proposed development of OP4 with 85 homes and of OP5 with 60 homes would seriously prejudice, indeed would cause irreparable damage to, the Alford Battle site and Balfluig Castle (A Listed). These developments should not be permitted.

Marr Settlements

Alford Development Bid Sites

My comments on Chapter 1 above refer to the inherent dangers in the present Bid-Led practice. This is evidenced by the list and descriptions of the Development Bid Sites on pages 11-13 of the Marr Settlements publication.

MR043 (85 homes) covers the same area as OP4. It refers to, but dismisses, the impact on the Battlefield site. It also refers to problems with road connections, water and waste water drainage capacity, but fails to take any serious account of these issues.

MR015 (250 homes) adjoins OP5 to the east. The arguments against this expressed in the overview, particularly in relation to the Howe of Alford and Balfluig Castle, should also apply to OP5 and thus rule out any development. No mention is made in the text of the fact that the Protection Bid MR022 (see below) also extends over this site. The plan is also misleading in that respect. The Protection Bid should over-ride any bids for development of this land. The text and the plan should be corrected at the earliest opportunity.

MR022. This is in respect of blocks of land to the north and to the south and south west of MR015, and includes the area of MR015. It is a Bid specifically to protect the Howe and Balfluig Castle, and should receive the full active support of the Planning Authority.

MR042 (245 homes) adjoins MR043 to the west. The strong arguments against this, as expressed in the overview, should be sufficient to rule it out of any further consideration for development. This should be confirmed by the Planning Authority.

The “Officers’ preference” for the development of MR043OP 4 should be reviewed in the light of the above comments.

Summary.

There may be a need for a limited amount of small-scale development in Alford, in that the settlement cannot be allowed to atrophy. It is however essential that those conducting the Planning process give, and are seen to give, full regard to the issues highlighted in these comments. They include in particular: -

Carbon Footprint in the context of private car journeys for work and shopping

Improvements to local infrastructure and essential services in anticipation of increases in the population, rather than as a reaction to need after the event.

Density of any development to ensure a good and safe living environment for residents.

Protection of the Historic environment, in particular the Battlefield and Balfluig Castle.

The need for a review of the Bid-Led process.

1st April 2019