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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.

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

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

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<b>Which document(s) are you committing on?</b>	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

### Representations to the Main Issues Report on behalf of [REDACTED] in relation to Site Ref: GR028, Site B, Mains of Blackhall, West of Blackhall Road, Inverurie

On behalf of our clients [REDACTED] objection is taken to the failure of the Main Issues Report (MIR) to identify Site Reference GR028, Site B, Mains of Blackhall, West of Blackhall Road, Inverurie as a preferred option for residential development in the short term, for release following adoption of the next Aberdeenshire Local Development Plan (LDP) 2021.

This representation requires to be read in the context of the related Development Bid submitted for the land at the pre-MIR stage. Site B (Bid Ref GR028) encompasses approximately 5ha of land to the west of, and immediately adjacent to, the Inverurie Settlement boundary. The Bid was submitted as a Phase 1 delivery (2021-2031) for 100 units, in addition to an overarching bid for the site which includes a larger portion of land to the south, for a combined total of 360 new homes.

It is respectfully requested that this site be allocated for development in the proposed Aberdeenshire Local Development Plan 2021 (LDP). A separate but interrelated representation has also been prepared in response to the MIR for the overarching Bid Site A (GR027) and this should be read in conjunction with this response for background. Bid GR028 demonstrates the capability of the site to accommodate an initial phase of development to be delivered following adoption of the next LDP and to address the housing requirements set by the Strategic Development Plan. The site abuts the existing settlement boundary, is free from constraints and offers a significant opportunity to redevelop a derelict brownfield site.

At the outset, it is important to highlight concern at the MIR's suggested approach to Inverurie, which fails to identify any additional housing land release to be accommodated within Inverurie over the lifetime of the next LDP. The reasoning behind this suggests that there are "*significant challenges*" with regard to traffic congestion, uncertainty over the Scottish Government's proposals to dual the A96 and advises that there are significant development opportunities through existing allocations to deliver housing. However,

there remains a real lack of clarity on whether this provides an accurate reflection of the level of housing need for Inverurie as set by the Proposed SDP.

As identified within the Proposed SDP, a considerable proportion of current LDP allocations are strategic allocations, and if any of these sites failed to come forward, there is a risk that the housing land supply may not be maintained. Inverurie is no exception, as the settlement has a number of strategic allocations associated with sites such as Uryside, Portstown and Crichtie, which have featured as allocations in a number of previous LDPs yet have failed to deliver at the anticipated rates. Crichtie has yet to deliver a single unit on site, therefore a serious question remains over its contribution to the effective land supply. The Proposed SDP identifies additional allocations over the period 2020 to 2032, with a Strategic Reserve of housing land that may be identified for the period 2033 to 2040. The Proposed SDP allowance for the Aberdeenshire part of the Aberdeen Housing Market Area (AHMA) is 8,158 homes for the period 2020 – 2040, with 2,500 homes to be allocated within the period 2020-2032, highlighting that new allocations should be ‘small scale’ and not reliant on any existing strategic allocations. It is therefore disappointing that Bid Site GR028, for a small scale, readily deliverable development of 100 homes has not been taken forward for development, to supplement existing strategic allocations for the settlement.

As acknowledged within the MIR Settlement Statement, Inverurie is a thriving town, which acts as a significant service and retail centre for the Garioch area and beyond. Situated within the Aberdeen to Huntly Strategic Growth Corridor, the Proposed SDP identifies significant development will take place in the road and rail corridor stretching from Huntly to Blackburn over the SDP Plan period. The proposed site benefits from direct access onto Blackhall Road, which connects with the A96 roundabout junction, where substantial investment and improvements have been made to accommodate recent residential and commercial growth to the west of Inverurie. The site would offer a modest and logical extension to these recent developments and afford the opportunity to secure delivery of much needed housing and affordable housing within a key settlement identified for Strategic Growth. The site does not form part of, or rely upon the delivery of any existing strategic allocation and could therefore be delivered timeously following an allocation to meeting housing requirements within the next LDP period.

Whilst it is accepted that there remains uncertainty over the future location and delivery of the proposed A96 bypass, given the strategic importance of Inverurie and demand for growth, it appears somewhat short-sighted to place an embargo on any new sites coming forward within the next LDP. Considering the next LDP is intended to cover a period of 10 years from adoption in 2021, the apparent lack of direction for future growth in Inverurie is concerning, both for the development industry and the local community. It should be stressed that a number of public consultation events on the proposed Route Options Plan for the A96 dualling were presented towards the end of 2018. A preferred option is set to be chosen this year

(2019), therefore it is highly likely that a route will be selected and delivery programme outlined prior to the adoption of the next LDP. Options for future growth should have been identified as part of the MIR.

It is maintained that this site could come forward for immediate delivery of 100 homes, without reliance on a decision being made on the preferred route of the A96 dualling. The contained nature of the site and scale of development would present no conflicts should a future eastern or western bypass route be favoured. The development could be accommodated on the recently upgraded transport network and any application would be supplemented by a Transport Assessment to further demonstrate this.

A large portion of the land contained within the Phase 1 Bid (GR028- Site B) comprises a former farm complex associated with Mains of Blackhall. The site and buildings are redundant and therefore present a brownfield redevelopment opportunity. Considering that Scottish Planning Policy advises that planning should enable “*high-quality development*” and make “*efficient use of land to deliver long-term benefits for the public*”, actively encouraging the re-use or re-development of brownfield land before new development takes place on greenfield sites, the site presents a significant opportunity to adhere to SPP requirements. These matters were also highlighted by the Reporter when considering a bid for a larger area of land (similar to current bid site GR027) at examination stage during the preparation of the extant LDP, that “*the area to the north is relatively contained wrapping around the existing farm buildings particularly given that the settlement boundary is already extended to the south to accommodate the area referenced as P15*”. The Reporter also highlighted future expansion of the settlement within this area would be better considered under the next LDP. It is therefore disappointing that the MIR has failed to recognise that this bid, which focuses purely on the northern area of land around Mains of Blackhall, could be brought forward for development through the next LDP and has further delayed release of this land, despite the previous advice offered by the Reporter during the previous LDP Review.

Notwithstanding matters relating to the A96 as discussed above, Officers have acknowledged that “*the site is situated adjacent to the settlement boundary of Inverurie*”. Suggestion is made that the boundary may need to be altered to account for constraints associated with the site. It is assumed that this relates to overhead pylons which pass through the north eastern corner of the site. The position of the pylons is recognised and rather than any need for a revision of the proposed boundary, the site would be appropriately masterplanned to accommodate their presence, incorporating them into a landscape/ open space corridor. Officers clearly recognise that this land forms a logical expansion to the settlement of Inverurie, without presenting any negative impacts on the landscape, natural and built heritage, waste water requirements or school capacity.

Scottish Planning Policy (SPP) promotes the creation of “successful, sustainable places”, which can be achieved through directing the “right development to the right place” (SPP paragraph 15). SPP goes on

to advise that development should seek to utilise land next to settlements for a mix of uses (Paragraph 40). These principles are also to an extent echoed within the MIR, within the Policy Groups relating to “Shaping Homes and Housing” and “Shaping Places”, which set out their intention to promote successful, sustainable places. The proposed residential development of the land subject to development Bid GR028 would make a positive place-making contribution to Inverurie, through modest expansion of the existing settlement boundary to the west, encompassing a brownfield redevelopment opportunity, as well as a small element of supplementary greenfield land release. Significant opportunities exist to link in with the recent and ongoing residential development to the immediate east, thus providing fluid connectivity with established footpath connections into Inverurie, the employment land at the Highclare Business Park and ongoing Westgate development associated with the OP10 allocation.

Allocation of the bid site for 100 homes would facilitate the preparation of a masterplan for the site, which would build upon the conceptual masterplan details submitted at the Bid stage, identifying how the development could be accommodated on site and delivered through the lifetime of the next LDP.

In summary, Site GR028 at Mains of Blackhall, Inverurie should be preferred for a modest development of 100 new homes through the next LDP. The land is free from constraints, sits immediately adjacent to the settlement boundary and provides an excellent opportunity to create a sympathetic extension to the recent residential and commercial development to the west of Inverurie. It would secure redevelopment of a redundant brownfield site with an element of supplementary greenfield land. The A96 dualling should not be perceived to be a barrier to the growth of this strategically important settlement for the entire lifespan of the next LDP Plan period. Instead, the next LDP should offer the opportunity to appropriately plan for growth. The site could be accommodated on the existing and recently improved transport network to the west of Inverurie, without the need to await the outcome of the dualling route and delivery programme. Accordingly, it is hereby requested that the site be identified for development within the Proposed LDP, as the settled view of Aberdeenshire Council on the content of the next LDP.