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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

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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: GR027, Site A, Land 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 GR027, Site A, land to the West of Blackhall Road, Inverurie as a preferred option for residential development either in the short term, for release following adoption of the next Aberdeenshire Local Development Plan (LDP) 2021, or as a reserved allocation for future development to be unlocked through an interim review of the LDP or indeed, a combination of both.

This representation requires to be read in the context of the related Development Bid submitted for the land at the pre-MIR stage. Site A (Bid Ref GR027) encompasses approximately 34.1ha of land to the west of, and immediately adjacent to, the Inverurie Settlement boundary. It was submitted as an overarching bid for approximately 360 new homes for a sympathetic expansion of Inverurie. An indicative Masterplan / Phasing Plan was also submitted with the Bid, illustrating how the development could be delivered through the next Local Development Plan (LDP), as well as capacity for accommodation of future growth, to be unlocked through a subsequent interim review of the LDP. Accordingly, a further related bid for Site B (GR028) was also submitted for the northern portion of the site around the former Mains of Blackhall Farm, seeking an allocation for Phase 1 of the development (2021-2031) for 100 new homes.

It is respectfully requested that this site should 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 Bid Site B (GR028) and should be read in conjunction with this response. The Bids demonstrate the capability of the site to accommodate an appropriately phased development to address the housing requirements set by the Strategic Development Plan.

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 the settlement over the lifetime of the next LDP. Instead, the MIR relies on existing allocations to be delivered through 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 suggests that there are significant development opportunities through existing allocations to address SDP housing requirements. However, there remains a real lack of clarity within the MIR 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 only 2,500 homes to be allocated within the period 2020-203 and a further 5,660 identified as strategic reserve. It is requested that Bid GR027 is identified for the delivery of 100 homes in the first plan phase, with the remaining 260 homes locked in as strategic reserve for future delivery, following an interim review of the LDP.

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 undertaken recently to accommodate growth to the west of Inverurie to coincide with Westgate residential development and also the Highclere Business Park. The site would offer a logical extension to these recent developments and capitalise on its location within the Strategic Growth Area to secure delivery of much needed housing and affordable housing. The site does not form part of any existing strategic allocation and could therefore be delivered in an appropriately phased manner, meeting both short and longer term housing requirements.

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 intended 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 Accordingly, options for future growth should have at least been considered and appropriately consulted on as part of the MIR.

The MIR has adopted an approach to reserve numerous sites for future growth as 'FOP' (Future Opportunity) allocations, typically where it has been identified that additional housing is not required in the short term, or to allow identified constraints or infrastructure requirements to be resolved before the allocation can come forward. These FOP sites are subject to future consideration, prior to release through an interim review of the plan. It therefore seems a missed opportunity that a similar approach has not been adopted for Inverurie, whereby land could be identified as an FOP site for future growth, with ultimate delivery subject to a resolution being achieved with regard to the A96. This was a position promoted through the submission of the GR027 Development Bid, which sought an initial phase of development for early release of 100 units, with the remaining balance of 260 units reserved for future release. It is therefore requested that the site be taken forward on that basis, with the land to the north around Blackhall Farm allocated as an 'OP' Opportunity Site for immediate delivery and the southern portion of the site reserved as a 'FOP' Site for 260 units for future release.

A substantial portion of the land contained within the Phase 1 area (subject of related Bid GR028- Site B) comprises a former farm complex and associated buildings at 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 Phase 1 land presents a significant opportunity to adhere to SPP requirements. As highlighted above, substantial investment has been made upgrading the junctions at Blackhall Road Roundabout, which could more than adequately accommodate a modest development of 100 units in the short term, without any reliance on the outcome of the A96 dualling options. Whilst it is also maintained that the existing network could accommodate the remaining 260 units promoted through the Bid, without reliance on delivery of the A96 dualling, allocating this as a future opportunity would provide more than sufficient time for identification of a route and delivery timescales to have been undertaken.

Notwithstanding matters relating to the A96 as discussed above, it is pleasing to note that Officers have acknowledged, "*there are very few constraints associated with the site*". This further demonstrates that this land forms a logical expansion of the settlement of Inverurie, without presenting any negative impacts on the landscape, natural and built heritage, waste water requirements or school capacity. Furthermore,

the MIR also acknowledges that part of the site is already located within the settlement boundary of Inverurie, which is identified as Protected Site 'P15' within the existing LDP, to enable the relocation of St Andrews Special School if required. This land was identified within the bid as reserved for new community/educational use. Disappointingly the MIR remains silent on this issue, however from inspection of the Draft Proposed LDP, the site reserved for relocation of St Andrews School has been removed from Blackhall Road and the associated text entry proposed for deletion. A new P15 allocation has been applied to safeguard Inverurie Hospital for health-care facilities. Some clarity on this proposed change should have been provided within either the MIR or Draft Proposed LDP. In the absence of such information, my clients must assume that the relocation is no longer deemed necessary but are content to retain that portion of the Bid site for community use.

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-led development of the land subject to development Bid GR027 would make a positive place-making contribution to Inverurie, through an appropriate expansion of the existing settlement boundary to the west. It would encompass land already contained within the settlement boundary, promote a brownfield redevelopment opportunity, as well as a modest 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, as well as employment land at the Highclare Business Park and ongoing Westgate development associated with the OP10 allocation to the east.

An appropriate allocation would facilitate the preparation of a masterplan for the site, which would build upon the conceptual masterplan details submitted at the Bid stage. The Masterplan would identify how the proposed 360 units and community use could be accommodated on site, as well as establishing the design context for this appropriately phased expansion to Inverurie, both in the short and longer term.

In summary, Site GR027 to the west of Blackhall Road, Inverurie should be preferred for a phased development of 100 new homes through the next LDP, with a further 260 homes identified for future growth. The land sits immediately adjacent to the settlement boundary and provides an excellent opportunity to create a sustainable mixed community through the provision of a sympathetic extension to the settlement and phased development of new homes, affordable homes and community facilities. 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. Instead the next LDP should offer the opportunity to appropriately

plan for future growth. The initial phase of 100 homes could be accommodated on the existing and recently improved transport network to the west of Inverurie, without the need await the outcome of the Dualling route and programme. Similarly, the balance of the site (260 units) are proposed for future release and would be subject to a subsequent interim review of the next LDP, by which time it is highly likely that matters concerning the delivery of the A96 dualling will be much clearer. 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.