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Which document(s) are you committing 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

This response has been submitted on behalf of Stewart Milne Homes in response to Aberdeenshire's Main Issues Report (MIR) which was published in January 2019 as well as the draft proposed Local Development Plan (LDP). As part of the MIR a site has been identified in Blackburn for housing allocation referred to as OP1 and GR087 throughout this submission. The site was allocated in the 2017 LDP for 50 units, the draft proposed LDP and MIR have identified it capable of accommodating a development of 268 units. It is contested that the site is not capable of this scale of development due to its non-delivery since 2012 and inability to provide suitable access. This will ultimately lead to a failure to deliver housing units as its allocation is not realistic and as such the Council should reconsider this allocation or risk failing to plan effective housing and achieve their housing targets.

Site OP1 in the MIR and draft proposed LDP is a combination of two sites from the 2017 LDP, these are OP1 and P5. OP1 from the 2017 plan is an allocation of 50 housing units and entered the LDP in 2012. It subsequently was included in the Housing Land Audit (HLA) in 2014, however, has not been brought forward and is noted as constrained in the HLA due to ownership. Site P5 was designated as land for a new primary school in Blackburn, the site was subsequently unutilised as the current primary school was extended on its existing site to deliver the required capacity extension. A bid was made through the call for sites for the sites to combine OP1 and P5 for an allocation of 150 units, this was referred to as GR087 in the MIR. This has subsequently been accepted as an Officers preferred site and included in the draft proposed LDP, however, the allocation is for 268 units, an increase of 118 units with no assessment of whether it is technically feasible.

The call for sites bid form for GR087 proposes that the combined sites of OP1 and P5 be developed into 150 homes, despite this the MIR and draft LDP propose 268 houses on the site. The bid form states that it was "considered that, as the school is no longer required for the P5 site, the entire OP1/P5 site had capacity for 150 houses." This point is reiterated four more times in the bid form, however, somehow the allocation has been made for 268 units. It appears the allocation has been calculated utilising the Council's proposed density policy combined with the site area, this has not been proposed by the promoter though and questions the deliverability of the site at 268 units.

It should be highlighted that approximately 50% of the site is classified as prime agricultural land as shown in Figure 1 below. This is a constraint not noted within the assessment in the MIR and is of particular note in this circumstance as there are other options in Blackburn that do not comprise such a significant area of prime agricultural land.

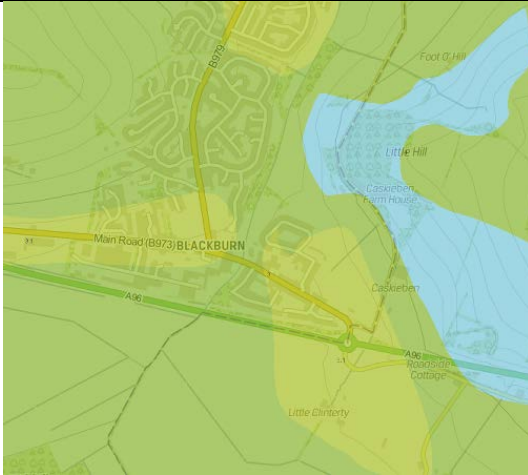


Figure 1: Land Capability for Agriculture

The OP1/P5 site is located to the east of the existing settlement, whilst there is a small amount of land with development potential to the east, this portion of the village provides limited future development opportunities. To the immediate east of OP1 and GR087 is the boundary of Aberdeen City local authority and visually separated by mature woodland on the east. This would provide a significant challenge for any potential future development. Focussing development on this side of the village provides a limited scope for the future development of the settlement and contribute towards future phases of the SDP. The west of the existing settlement provides far greater opportunity for future expansion with ample development opportunity to the north west also. Directing development towards the west of the settlement provides a more natural extension which can continue to provide development opportunities for years to come consistent with the Statutory Development Plan (SDP). OP1 as a standalone site of 50 units is deemed acceptable with future growth in line with the Regional strategy directed to the west of Blackburn where a greater opportunity exists.

There are concerns regarding the availability of vehicular access points for the proposed OP1 site, given it is allocated for development of 268 residential units it would now require two primary access points. The MIR states that "Matters associated with access and road widening would require to be resolved." However, there is no detail as to how this could be resolved. In a Certificate of Alternative Development submission for the former primary school site P5 in Blackburn, the Council noted the issue of access to the site where applicants sought to propose a residential development on the former school allocation. It was noted by the Council that, "it would not be desirable to utilise the unclassified Caskieben to Hatton of Fintray Road." This statement was made when only 50 houses were proposed, now this is 268 and compounds original concerns. There is further comment on the access in the draft LDP which states, "The Caskieben Road is unlikely to be appropriate as a route for a major access to the site, due to its narrow nature and the significant contribution that the mature trees make to the setting of the town."

Fairhurst conducted a Transportation Appraisal on the OP1 site to assess the potential access points for a development of 268 houses. The appraisal concluded that the number of units allocated cannot be delivered on the OP1 site due to access issues. The report notes, "*The Caskieben Road is unsuitable for a main site access given the locations of its junction with the B979 immediately to the north of the A96(T) roundabout.*" The report further notes that access from the B979 is possible, however, only one access junction could be provided which would not be sufficient for the level of development. The report concludes by noting that the site could cope with development of 100 houses and not 268 which is proposed, this is consistent with what is put forth in this submission.

It is suggested that the site should take access through the Blackburn Garage site in the draft proposed LDP, this site does not form part of the allocation and there is no indication of how ownership of this land would be acquired. This lack of certainty further constrains the site and provides another hurdle which would have to be overcome to facilitate the development. Further, this would only provide a singular access point and no reference is made to a second making further argument for allocating the site to a much lesser scale.

There was serious constraint regarding access to this site when it was proposed for 50 houses, now that this has been increased to 268 this only furthers the issues and it should not be allocated for this scale of development. It is considered that a development at a scale consistent with the previous LDP is more acceptable and could be delivered in Blackburn as a complementary site to another development which can realise the strategic policy.

Homes for Scotland provide advice on ownership as a constraint that builds on PAN 2/2010, this advice is extremely relevant for OP1. They state, "Homes for Scotland considers that a site can only really be considered effective if it is owned or controlled by a developer." OP1 does not fall within this definition and therefore is constrained due to ownership and this has been the case since 2012. It is doubtful whether the extension to the site with P5, as proposed in the draft plan, will have any impact on removing this constraint given the access issues. This ownership constraint must be considered by the Council and there remains significant risk that the site will not be brought forward by the end of the forthcoming plan.

As previously noted, Blackburn sits within the Strategic Growth Area (SGA) as allocated by the SDP between Aberdeen and Huntly. The SDP expects 75% of all housing development in the Aberdeen region to be directed towards the SGAs and as such Blackburn requires sufficiently effective sites to align itself with the regional policy. Whilst a housing development in such a strategic location is welcomed, this site is not capable of delivering development of a scale required to realise this regional strategy.

Blackburn has had no housing units completed in the last 5 years, this position appears unlikely to change given the only allocation for the village is OP1 which has made no real progress in seven years and now appears to be afforded an unrealistic allocation. Several sites were submitted for the town but all were turned down for a variety of reasons, except OP1 which received a considerable extension to its allocation. Thus, Blackburn now has a site which has shown little likelihood of progressing and this is the sole housing allocation in the village. It is suggested that the Council should reconsider this position against the SGA vision of the Region, it does not appear that this site is aligned with this.

Ultimately, this response seeks to highlight the ineffectiveness of site OP1 in Blackburn as proposed for 268 units, the Council have erred in allocating more than 50 units on this site and should remove this unrealistic allocation from any subsequent versions of the forthcoming LDP. Any reliance on this site needs to be tempered with the fact that the site was identified as a potential development site 30 years ago having been zoned in the Gordon District Local Plan in 1989. At that time the land owners were objected to it being zoned yet 30 years on and the site still does not have a developer and a sizeable housing allocations is proposed on it. The site cannot provide the two primary access points required with the extension to 268 units. A small allocation at OP1 of 50 units is considered acceptable and it is put forth that future growth should be directed to the west of the village where other sites have a greater likelihood of being developed.