WL/MM/PL/5575

8th July 2020

Director of Planning Aberdeenshire Council Local Development Plan Team Woodhill House Ashgrove Road West Aberdeen

Dear Sirs



Aberdeenshire Local Development Plan 2020

We write to formally object to the proposed zoning change of Harlaw Park Football ground as P19 'to protect the football pitches and grounds' which has now taken place without consideration nor consultations with owners or community. Harlaw Park is a community owned private football ground with associated facilities located behind secure fencing to which the public have no general access.

In the current 2017 Local Development Plan the area of Harlaw Road and Harlaw Park are allocated for a mixed use development, but the Council have given little opportunity for this to be brought to fruition. The Council themselves delayed and deferred any other development opportunity for over two years whilst they considered relocating their headquarters to this site. It is only recently that the Health Centre has become vacant and derelict and the overall master plan can begin to develop

It is therefore premature for Aberdeenshire Council to consider a significant departure to their current Local Development Plan and reallocate the site.

Policy PR1.6 related to open space would suggest that any development at Harlaw Park would only be in <u>exceptional</u> circumstances and would be for the development of <u>essential</u> community infrastructure. This wording would significantly impact on the potential improvements of the existing facilities or development of any part of Harlaw Park for the future benefit of the Club or community. We believe the words <u>exceptional</u> and <u>essential</u> community infrastructure should be removed from the wording in relation to open space. PR1.6 also refers to <u>important</u> areas of Open Space. Harlaw Park is surrounded by a fence, surrounded on two sites by business and industrial premises and by two busy roads, and is not an 'open space'.

It also refers to the decisions having been made based on the Open Space Audit.

This audit had not been made available to the public, nor to the Counciliors when arriving at the zoning and allocations, and when the Local Development Plan Team have been questioned on its availability they advise that it is based on a 2010 open space audit which has been updated. This has not been made public and any 2010 audit does not take into account the large areas of land, in excess of 130 acres having been made available at Uryside Park.

Having now received the Open Space Audit, it confirms that Inverurie is "well provided with sports areas relative to other types of open space". This is 65% compared to the Shire average of 13%, although this will change with the addition of Uryside Park. There is a therefore no need to include Harlaw Park as protected area.

Inst, 1887



Appendix 10 Standards for Open Space in relation to organised sports facilities recommends 1 adult football and rugby pitch or 1,000 square metres of multi-use area per 1,000 – 5,000 population.

There are 14 grass football pitches already in Inverurie, 1 x 3G at Garioch Sports Centre and 1 proposed for the new Inverurie Campus. As such there are adequate facilities and provision for football pitches within the community significantly in excess of the Appendix 10 Standards and the protection of Harlaw Park is therefore not required.

It has also been suggested via Inverurie Community Council that Aberdeenshire Council have allocated it as a protected zone to ensure consistency of the policy across Aberdeenshire. However, the 2017 Plan already had Turriff, Huntly and Fraserburgh as protected areas, and we can understand the reasons for this.

However, other Highland League Clubs within Aberdeenshire, Banff (Deveronvale FC) does not have protected status in the 2020 Plan nor does Pitmedden (Formartine FC).

We would therefore ask that the P19 protected status for Harlaw Park and grounds be removed from the Local Development Plan and the site be reverted to either white land, or retain their current Master Plan Developed Area.

Policy 3.1. Infill developments within settlements allow for sites which can contribute to housing and employment land requirements. Given the site is adjacent to Town Centre, existing residential and employment uses, it would be more appropriate to retain the existing zoning or white land to fulfil the objective of this policy.

Inverurie Loco Works FC have never hidden the fact that they have aspirations to relocate to a larger facility. The existing playing surface is one of the smallest playing surfaces in the semi-professional Highland Football League, and with the boundaries constrained on all four sides there is little opportunity to expand this playing surface and as such they continue to consider relocation. To allow relocation, the existing facility would require to be developed please accept this as a robust and sincere objection.

Yours faithfully

CHAIRMAN



