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LOCAL DEVELOPMENT PLAN

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HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS

Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020.

If you are making comments about more than one topic it would be very helpful if you could fill in a separate response form for each issue you wish to raise.

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Your Details

Date: 28 July 2020

Title:	Mr
Name:	Michael Westwater
Telephone Number:	██████████
Email address:	██████████
Postal Address:	████████████████████
Postcode:	██████████

Are you happy to receive future correspondence only by email? Yes No

Are you responding on behalf of another person? Yes No

If yes who are you representing?

Barratt North Scotland

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

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Your Comments (no more than 2000 words)

Modification that you wish to see (please make specific reference to the section of the Proposed Plan you wish to see modified if possible, for example Section 9, paragraph E1.1):

1. PLDP Section 5 - Aberdeen – Huntly SGA modify para 5.12;
2. Review Appendix 6 to remove units included in the LDP 2021 allocation which are already complete;
3. Allocate GR117 within the Aberdeenshire Local Development Plan for the development of up to 500 new homes and supporting mixed uses (local retail/commercial/service facilities);
4. Amend Appendix 6 (Housing Land Allocations - page 170) to include this allocation;
5. Amend proposed OP7 allocation to remove completed units (Built by January 2019);
6. Amend Appendix 7D (Settlement Statements Garioch) Inverurie and Port Elphinstone (pages 555-574) to include this allocation.

Reason for change:

We have prepared a separate report “ABERDEENSHIRE PROPOSED LOCAL DEVELOPMENT PLAN 2020 - RESPONSE TO PROPOSED LOCAL DEVELOPMENT PLAN - LAND AT URYSIDE, INVERURIE - GR117” with supporting information and setting out in more detail the proposed modifications to the PLDP including the reasons for these.



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ABERDEENSHIRE PROPOSED LOCAL DEVELOPMENT PLAN 2020

RESPONSE TO PROPOSED LOCAL DEVELOPMENT PLAN

LAND AT URYSIDE, INVERURIE

GR117

JULY 2020

On behalf of
Barratt North Scotland



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS



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HALLIDAY FRASER MUNRO

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1. Introduction

1.1. This report has been prepared by Halliday Fraser Munro, Chartered Architects and Town Planning Consultants, on behalf of Barratt North Scotland. It is written in response to the Proposed Aberdeenshire Local Development Plan 2020 (PLDP).

1.2. This representation specifically relates to site:

- GR117 – Residential development allocation for 500 homes.

1.3. The Land at Uryside, Inverurie was the subject of a development bid (GR117) in response to the 'pre- MIR consultation' for a phase 3 extension to the existing development. It was not included in the Proposed Local Development Plan based on no perceived strategic need. This representation seeks modification of the plan to include GR117. This is outlined in detail below for clarity.

Modifications sought:

SECTION 5 THE SPATIAL STRATEGY (Aberdeen to Huntly Strategic Growth Area, para 5.12)

1. Modify para 5.12 as follows:

*"Within the Aberdeen Housing Market Area the area identified for future strategic development options by the Strategic Development Plan, **there is uncertainty in the Aberdeen/Inverurie/Huntly Strategic Growth Areas⁷** ~~is still constrained by uncertainty regarding the proposed dualling of the A96. Even once a preferred route is identified it would not be wise to promote development in this area until there is a confirmed completion date for the works to be undertaken.~~ **Whilst** currently we do not know when this is likely to be, either at Inverurie or Huntly, ~~and this restricts opportunity for further development in this area.~~ development of existing **and expanded** opportunity sites and, where available, brownfield land remains the best solution to meet housing demand **in the short term with longer term opportunities created when the dualling has completed. Where development proposals come forward in advance of the identification of a preferred route, they should safeguard the line of any proposed route.**"*

So that para. 5.12 reads as follows (**new insertions in bold italics**):

*"Within the Aberdeen Housing Market Area the area identified for future strategic development options by the Strategic Development Plan, **there is uncertainty in the Aberdeen/Inverurie/Huntly Strategic Growth Areas⁷** regarding the proposed dualling of the A96. **Whilst** currently we do not know when this is likely to be, either at Inverurie or Huntly, development of existing **and expanded** opportunity sites and, where available, brownfield land remains the best solution to meet housing demand **in the short term with longer term opportunities created when the dualling has completed. Where development proposals come forward in advance of the identification of a preferred route, they should safeguard the line of any proposed route.**"*



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APPENDIX 06 HOUSING LAND ALLOCATIONS (page 170)

2. Review Appendix 6 to remove all units included in the “LDP 2021” column which are already complete, per the “Built by Jan 19” Column (and revise the descriptions of the affected allocations in appendix 7 settlement statements accordingly). This provides a more accurate picture of the number of houses proposed from 2021 onwards.
3. Then, further amend Inverurie OP7 to include the 500 additional units from the inclusion of GR117 as a continuation of the current development of PLDP allocation OP7.

For Inverurie site OP7 the table would then look like this:

	Site Code	LDP 2017 Allocation	Built by Jan 2019	Existing Supply 2019		Allowances 2020-2032		LDP 2021 Allocation
				Effective 2019	Constrained 2019	Strategic Growth Area	Local Growth AHMA	
Garioch						Blackburn-Inverurie		
Inverurie	OP7	615	315	366		500		866

APPENDIX 7D SETTLEMENT STATEMENTS GARIOCH (Inverurie & Port Elphinstone, page 562)

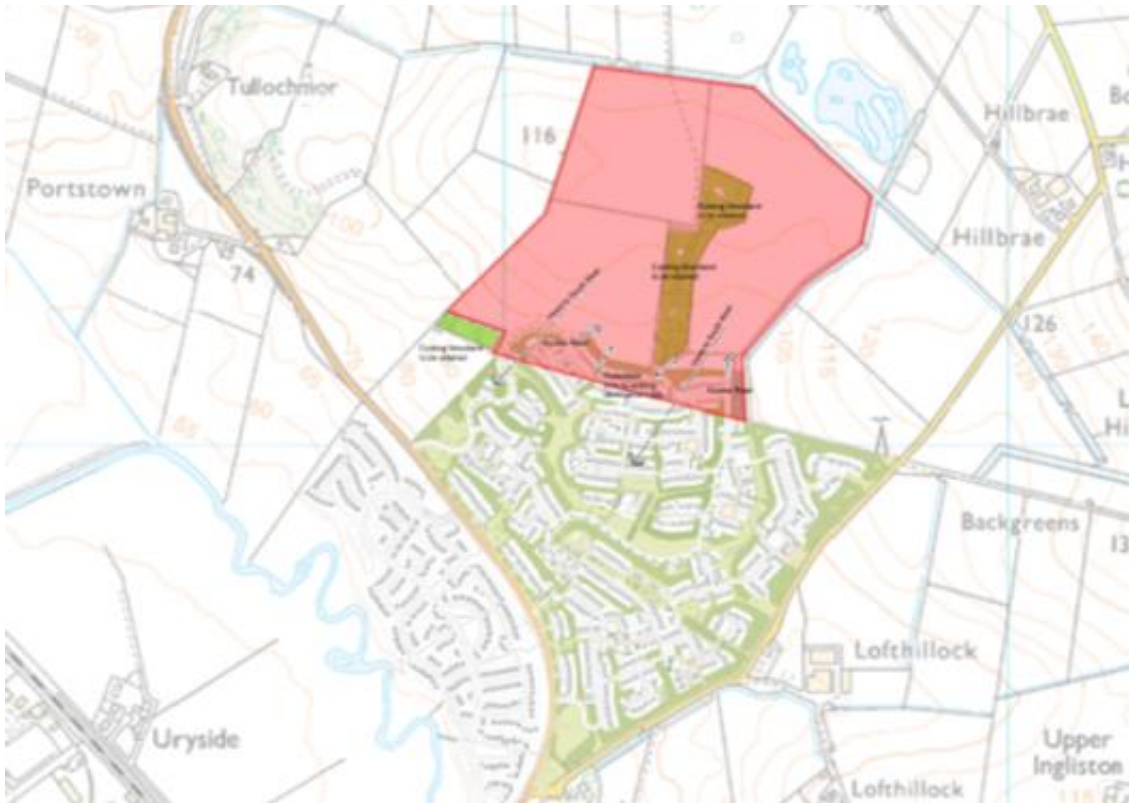


Figure 1 - Proposed OP7 Phase 3 (GR117) location plan



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4. Allocate site GR117 within the Aberdeenshire Local Development Plan 2021 for the development of up to 500 new homes as an extension to site OP7.
5. Amend the OP7 allocation to remove the 315 completed units (in the Appendix 6 “Built by Jan 2019” column), so that the LDP 2021 allocation for OP7 is for 886 units.
6. Amend the description of allocation OP7 in Appendix 7D (Settlement Statements Garioch) Inverurie and Port Elphinstone (page 562) to the following:

OP7: *Uryside Phase 2 and Phase 3*

Allocation: *866 homes (Phase 2 – 366 (remaining) and Phase 3 –500 (new))*

Much of this site was previously allocated as site OP7 and OP8 in the LDP 2017. Phase 2 of the site has planning permission and is under construction with delivery continuing in the early part of the Plan period.

As the site progresses, updates to the Transport Assessment should be provided to reflect current network conditions. Pedestrian and cycling permeability and connectivity required and connections made to the strategic cycle networks in Inverurie.

Phase 3 is newly allocated and forms a natural extension of the existing site. An updated Masterplan will be required for the phase 3 area. Future development should ensure that appropriate access is gained for the site and this should be considered in consultation with the Council’s Transportation Service.

Discussions will also be required with Transport Scotland to support future A96 improvements and upgrades until a preferred route for dualling the A96 has been selected and timescales for delivery are known. The Masterplan and development proposals must safeguard any land that has been identified as a potential route for the eastern section of the A96 Dualling Programme, unless Transport Scotland confirm that the land is no longer required.

It is expected that the additional land identified will contribute towards affordable housing in line with Policy H2 Affordable Housing. This should be delivered as part of the early phases of development and be integrated into the design of the development to provide a mix of house types and sizes to meet local need.

Reasons for changes: We set out below a full set of reasons for these proposed modifications:



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2. Strategic need

- 2.1. We believe there is a strategic need for GR117. Inverurie is a popular market town with strong demand for new housing development. Uryside is currently the main housing expansion area for the town. Inverurie is the sub-regional settlement in the Garioch Area and is central to the area's development strategy. Located in a Strategic Growth Corridor within the Aberdeenshire Housing Market Area (AHMA), the site is highly deliverable.
- 2.2. The Strategic Development Plan Inquiry found that more housing land is required to meet the housing requirement. The Aberdeenshire Council Proposed LDP housing strategy relies heavily on existing allocated sites with additional but limited small-scale allocations across the area. The proposed site, a phase 3 expansion of the existing housing development, provides a demonstrably available and realistic prospect to serve future housing needs, if delivered alongside the previously allocated site (OP7 and OP8 in the LDP 2017). It should be allocated for 500 housing units in the LDP to ensure that there is a ready supply of housing land in a location with proven capacity to support this scale of development.
- 2.3. A review of Appendix 6 within the LDP includes completed units ("Built by Jan 2019" column), for Inverurie these completed units are included within the "LDP 2021 Allocation" column, giving a false impression of the scale of proposed development. We believe that only remaining effective units should be allocated within the LDP 2021 Allocation total, to provide a more accurate picture of the number of houses proposed from the adoption date onwards. Our review of Appendix 6 in relation to those sites allocated in Inverurie shows that the LDP 2021 allocations double-count 340 units within the settlement, over OP4 (25 units) and OP7 (315 units), which should be allocated elsewhere within the settlement to compensate for this. This is set out in the following table:



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Ref	Appendix 6			A+B	LDP 2021 Double Counting
	A	B	C		
	Effective/ Constrained	New Allocation	LDP 2021 Allocation		
OP1	57		57	57	0
OP2	104		-	104	-
OP3	-	50	50	-	-
OP4	391		416	391	25
OP5	737		737	737	0
OP7	366		681	366	315
OP8	64		64	64	0
OP11	25	29	54	54	0
OP12	80		80	80	0
OP15		130	130	130	0
OP16		50	50	50	0
	Effective/ Constrained	New Allocation	LDP 2021 Allocation		LDP 2021 Double Counting
TOTALS	1824	259	2319	2033	340

There are inconsistencies throughout Aberdeenshire as to the way in which these completed units have been reported (e.g. Newmachar OP2 where the LDP 2021 allocation reflects only the 95 no. effective units and not the 70 no. completed units recorded in the “Built by” column). A full review of Appendix 6 should be undertaken to consider the impact of this.

- 2.4. GR117 is not subject to any significant environmental, technical or planning constraints. It is currently used as grazing land. Situated in part of the Boynds area and referenced in the Imagine Inverurie and Kintore Study, Inverurie Capacity Study and Uryside Development Framework, as an area for future housing development where the landscape can accommodate further housing with minimal impact. The Uryside Development Framework commented on the site being ‘...relatively flat, discrete and below adjacent horizons. This area may be worthy of detailed consideration for new uses associated with future phases of Uryside in the next Local Plan ...’ (Page 28). These local studies and existing site development are encouraging an eastwards direction of housing growth for Inverurie.
- 2.5. Phase 1 of the Uryside development is complete. Phase 2 is under construction and progressing towards the full build out of the circa 600 home consent. Phase 2 adopted the general design and layout principles from the Uryside Development Framework. Phase 3, the subject of this representation, would be a northwards extension of the existing consented development presently under construction. Adopting the same design principles in Phase 3 will create a continued sense of place, integrating with the existing consented development and the rest of Inverurie. Phasing for the proposed site is flexible. The identification of A96 dualling options provide certainty for at least the southern portion of the proposed site to be allocated. It can be programmed alongside the adjacent housing allocations at Uryside. Therefore, the proposed site would be a continuation of the previous phases and not a standalone site.



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2.6. As the site is an extension of an existing allocation it benefits from several positive attributes;

- Phase 1 and 2 have been subject to extensive pre-application discussions, detailed consultations during planning consent and detailed evaluation. Issues that may impact on viability and deliverability and its context are well known and have been considered fully when proposing the site. The site is therefore considered more deliverable when compared to other standalone bids;
- A joint venture between developers of Uryside has resulted in the delivery of: a new Uryside Primary School; new link road between the B9001 (Rothienorman Road) and the B9170 (Oldmeldrum Road)]; alleviating congestion within the Town Centre and strengthening connectivity; and a new bridge across the railway line to the town centre (Souterford Bridge). The proposed site would be part of the venture that could help progress Uryside town Park, providing community access to a large new recreational resource.
- The proposed site can make use of infrastructure and extended services already in place;
- It would not require re-deployment of machinery, construction workers and site accommodation;
- It would connect to Phase 2 with and extend pedestrian, cycling and vehicular networks in accordance with 'Designing Streets' and relevant Council policies.;

2.7. Attributes of the site and its location:

- Proximity to the Inverurie Retail Park (1,400m) and town centre (1,800m). New shops have opened with services and employment opportunities available;
- Proximity to the rail station (1,700m) with commuter trains to Aberdeen and Inverness and onward connections. The proximity to the shops and rail station is similar to distances from the currently proposed OP7 site (former OP7 and OP8 sites);
- Proximity to the B9170 (Oldmeldrum Road) and Uryside Drive, key public transport routes (under 400m). There are bus stops along the frontage of earlier phases of the development and the potential to add new stops within the site if required in future;
- Proximity to the proposed Northern Inverurie bypass and dualling A96 options;
- Delivery of local affordable housing;
- A generally south facing site allows housing to take advantage of natural solar energy.

Further details on these attributes are set out in Appendices 1 and 2 of this submission.

3. Site analysis

3.1. As highlighted in our Main Issues Report response, the proposed site is both required and deliverable. It would support local growth and ensure compliance with requirements set out in Scottish Planning Policy and the SDP.

3.2. The council have taken a precautionary approach towards development in the Inverurie area until a preferred route for dualling the A96 has been selected and timescales for delivery are known.



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Transport Scotland has conducted a public consultation regarding the A96 dualling route. Aberdeenshire Council's response to the consultation (agreed at the Infrastructure Services Committee on 29th November 2018) set out their route preference options. The identification of options provides some certainty for the southern portion of the site to be allocated in the short term. The northern section of the proposed site can follow once a route is identified in the medium term. Barratt North Scotland would be happy to enter discussions with Transport Scotland and the Council to identify a route and help support A96 improvements and upgrades. The upgrade should be viewed as an opportunity to support growth and not restrict it as set out in Section 5 - Aberdeen – Huntly SGA (para 5.12) within the PLDP.

- 3.3. SEPA flood maps show there is minimal flood risk. Concerns around flood risk can be controlled through appropriate drainage design and providing sustainable flooding and drainage infrastructure on the site. This issue is therefore not a concern.
- 3.4. Potential tree loss will be mitigated through careful design and masterplanning to ensure robust and high- quality open space and landscaping. Existing woodland and boundary features would be retained wherever possible within the layout. All new developments present an opportunity for biodiversity enhancement, in line with Planning Advice.
- 3.5. Any visual impact of A- listed Bourtie House would be addressed through masterplanning and careful design. The Landscape and Visual Impact Assessment for Phase 2 examined the proposed site, although the housing at this location would be visible, the presence of a robust woodland boundary around the grounds of Bourtie House mitigate any potential impact. The landscape impact would also be limited due to the topography, appropriate landscape treatment within the eventual layout and be viewed as an extension of the existing approved development.
- 3.6. A large proportion of sites allocated within the Garioch area of Aberdeenshire are located on prime agricultural land. It is therefore not a reason specifically related to this site and, if required for housing land purposes, is not a credible justification to reject sites in this location.

4. Conclusions

- 4.1. Evidence lodged in other Barratt and Homes for Scotland representations in respect of housing land supply suggests that housing delivery is an issue in Aberdeenshire. The proposed site can help deliver and respond to the housing shortfall, meet demand locally, has no major or significant constraints and is demonstrably available. The delay in Transport Scotland identifying a route for the proposed dualling of the A96 should not be an indefinite constraint to the growth of Inverurie – a key settlement within the Aberdeen – Huntly SGA. As the preferred route options have been published, the necessary Masterplanning exercise can safeguard and propose appropriate design solutions to account for this, in discussion with Transport Scotland.
- 4.2. The proposed LDP 2021 allocates only 259 new homes to Inverurie for the period 2020-2032, but includes 340 units which were complete prior to 2019, giving a false impression of the scale



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of proposed development. These 340 units should be re-allocated within the settlement to ensure there is a ready supply of housing for the key settlement in the SGA.

- 4.3. Accordingly, the plan should be amended to remove completed units (Built by Jan 2019) from all LDP 2021 allocations, to provide a more accurate picture of the number of houses proposed from 2021 onwards, as the current approach to the completed units is inconsistent throughout Appendix 6.
- 4.4. The proposed site would be an extension of the current LDP allocation for Uryside. The Uryside Development Framework, the Inverurie Capacity Study and Imagine Inverurie and Kintore Study identified the proposed site has the potential for future development. As a continuation of eastward housing growth in an area where the landscape could accommodate further housing with minimal impact.
- 4.5. An extension of the allocated development demonstrates the site's deliverability and feasibility based on detailed evaluations of Phase 2. If the proposed site was allocated it would assist the joint venture to provide benefits for the wider community and connect with existing infrastructure such as pedestrian, cycle, public transport and road networks to enable permeability.
- 4.6. The site's location provides good access to the bus and rail network, town centre, local services and strategic road network. It will contribute towards affordable housing provision in Inverurie.
- 4.7. There is a strategic argument to include this site as an allocation. The Phase 3 expansion of the existing housing development can be delivered alongside the previously allocated sites OP7 and OP8 in the LDP 2017. It should be identified as an allocation for 500 housing units in the future phases of the LDP to ensure that there is a ready supply of housing in a logical location.

Development Bid Supporting Statement

Uryside Phase 3 , Inverurie
Aberdeenshire

On behalf of Barratt North Scotland

March 2018

Halliday Fraser Munro
Chartered Architects & Planning Consultants

Aberdeen - Belfast - Dundee - Edinburgh - Glasgow

1.0 INTRODUCTION

This supporting statement is to be read in conjunction with a development bid submitted to Aberdeenshire Council proposing the allocation of 35 Ha (86 acres) of land for residential use on land at Uryside Phase 3, Inverurie. The bid is submitted on behalf of Barratt North Scotland. The site is believed to be suitable for the development of around 500 houses as an allocation in the Aberdeenshire Local Development Plan.

Uryside is the main housing expansion area for Inverurie. It has been and remains allocated for housing in previous and current Local Plans and Local Development Plans. Phase 1 is now complete and Phase 2 is under construction to allow the full build out of the c.600 home consent. Phase 3 is an extension of these first phases.

Inverurie is the main settlement in the Garioch Area and is central to the area's development strategy. Housing and employment growth has been centred on Inverurie and on Uryside area in particular. New employment areas, a recently opened primary school, the railway station, town centre and new retail facilities are located close to the proposed. Additional development located close to the facilities mentioned above is sustainable, reduces the need to travel, provides a choice of transportation modes and provides the best possible access to them. Extending an existing site also has the benefits of being able to connect into existing on-site infrastructure without the expense or physical need to create additional infrastructure to service it.

This proposed bid site is located in an area of growth, is accessible and able to access local facilities, is constraint free, available and developable.

2.0 SITE DESCRIPTION

The site is located immediately north of the existing consented Uryside development. It is presently used for agricultural purposes and forms part of the Boynds area identified in both the Uryside Development Framework (2006) and "Imagine Inverurie and Kintore" Capacity Study. It is an extension to the existing development rather than a standalone bid site.

The site is approximately 35 Ha (86 acres) and sits in an area described in the Uryside Development Framework SPG as *"...relatively flat, discrete and below adjacent horizons. This area may be worthy of detailed consideration for new uses associated with future phases of Uryside in the next Local Plan ..."* (Page 28).

3.0 DELIVERABILITY

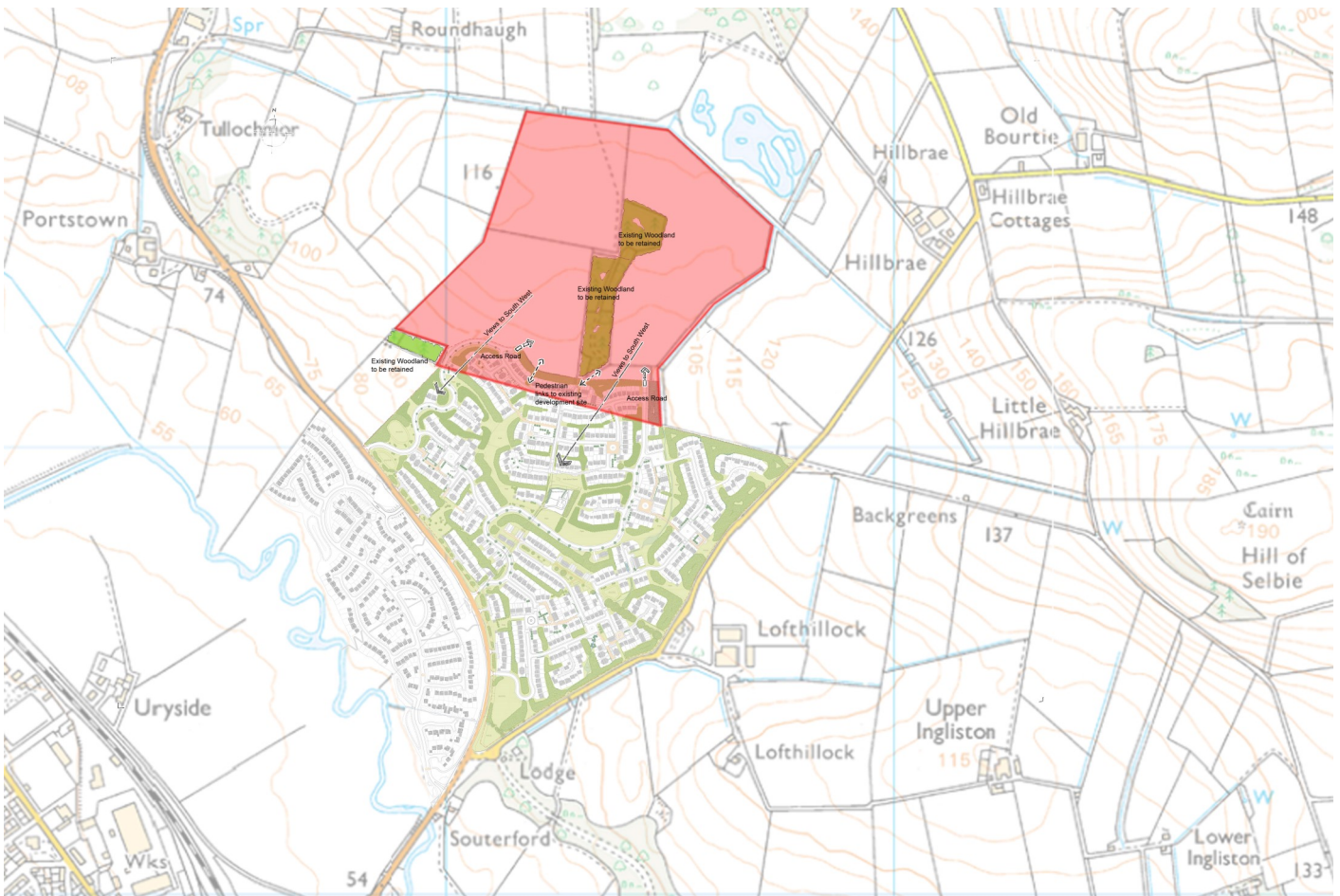


Figure 1—Location Plan (note: part of site to south has planning consent)

The bid site is an extension to an existing consented development that is presently under construction, so is not just developable but can logically be established as a continuation of the development of Phase 2 without requiring re-deployment of construction workers, site accommodation and machinery. This part of Uryside not only offers positive attributes (sustainable use of infrastructure and access to new local facilities) but also benefits from a long history of evaluation and consultation pointing to its acceptance as a sustainable and deliverable location for future development. In terms of delivering a sustainable development this site:

- Is close to the existing rail station with commuter trains to Aberdeen and onward connections, is much closer than other sites to the west or north of Inverurie and has no major barriers to making that connection;
- Is close to the town centre and therefore the services and employment opportunities available there;
- Takes advantage of integrated infrastructure improvements e.g. new segregated bridge across the railway line to the town centre (Souterford Bridge), recently opened Uryside primary school and the new Rothienorman/Oldmeldrum link road;
- Makes use of extended services and infrastructure already in place for the existing consented development

- at Uryside which is under construction; and
- Is an extension to existing development.

3.1 Constraints

The proposed bid site is not subject to any serious technical, environmental or planning constraints. It comprises grazing land adjacent to the current consented development.

3.2 Access

The site will be accessed directly from Phase 2.

3.3 Residual Value/Viability

There are no viability issues with this site.

3.4 Risks

No risks have been identified with the delivery of the proposed development site.

4.0 THE PROPOSAL

35 hectares (86 acres) of land at Uryside Phase 3 are proposed to be allocated for around 500 houses. This development is an extension of the existing LDP allocations at Uryside. The layout, open space and connections will take cognisance of the Uryside Development Framework.

5.0 PHASING

Phasing is flexible but the development of this site can be programmed alongside the adjacent housing allocations at Uryside.

6.0 MIX OF USES

This LDP bid is solely for housing with no other uses proposed.

7.0 CONTEXT—THE WIDER AREA

The following section considers how the proposed development site will integrate with the existing settlement.

7.1 Relationship to Existing Settlement

The proposed residential development is an extension of Phase 2 at Uryside. It is mentioned in the Uryside

Development Framework and the Imagine Inverurie and Kintore Study. Both documents suggest that this area should be considered for future development. The Uryside Development Framework includes general design and layout principles. These were adopted in Phase 2. Adopting the same principles in Phase 3 will help create a sense of place that relates well to the existing consented development and the rest of Inverurie.

7.2 Connectivity

The bid site will join into Phase 2 via connecting road and path networks. As stated, Uryside is located close to the proposed new primary school, town park, retail/the town centre and the railway station. A new link road is in place between the B9001 and the B9170 strengthening the connectivity of the bid site. Appropriate pedestrian, cycling and vehicular links will be provided within the development site in accordance with 'Designing Streets' and relevant Council policy.

7.3 Landscape Fit

The bid site sits on a plateau above the existing consented Uryside Phases 1 and 2 and will be seen within the landscape as an extension of that existing development. As the land levels out above Phase 2 the development will be less obvious. The landscape and visual impact assessment for Phase 2 examined this additional area and although the housing at this location would be visible their impact will be limited as a result of the topography and existing development immediately to the south. Development on the bid site will therefore have a minimal landscape impact and, with appropriate landscape treatment within the eventual layout, will be seen as an extension of the existing approved development.

7.4 Character

The character of this area will be determined by the consented development at Phase 2 rather than its present agricultural setting. However, elements that help create character (including existing woodland and boundary features) will be retained wherever possible within the layout.

7.5 Cumulative Impacts

Many of the cumulative impacts on transport, local services, education and the environment have already been identified in the Uryside Development Framework and dealt with as a result of the existing consents at Uryside. Any additional impacts on infrastructure or services should only require a strengthening of already identified mitigation.

7.6 Setting

The development bid sits on a plateau but is generally south facing. This presents opportunities for housing to take advantage of passive solar gain. Belts of existing woodland offer good natural shelter .

8.0 COMMUNITY BENEFITS

Uryside/Portstown is a collaboration between developers and this site would form part of that wider scheme. This joint venture between developers has resulted in the delivery of a new Uryside Primary School, new link road between the B9001 (Rothienorman Road) and the B9170 (Oldmeldrum Road). These road improvements help alleviate congestion within the Town Centre. Including the bid site could also help to progress the Uryside town Park, providing wider community access to a large new recreational resource. The development will also deliver local affordable housing.

9.0 ACCESSIBILITY

The bid site is close to local shops, 400m from the B9170, approximately 800m from the site of the proposed new community school , approximately 1,400m from the Inverurie Retail Park, about 1,700m from the railway station and 1,800m from the town centre. These are all on a par with the distances from the already allocated H4 site and parts of the EH1 site.

10.0 CONCLUSION

This bid site is an extension of the current LDP allocations for Uryside, using existing access points from the B9170 and upgraded (rather than new) infrastructure associated with that development. Both the Uryside Development Framework and the Inverurie Capacity Study identified this part of Uryside as having potential for future development as a continuation of housing growth in an area where the landscape could accommodate further housing with minimal impact.

The site is deliverable, represents the measured expansion of a defined settlement and will bring benefits to the wider community. It has no real constraints and reflects the existing character of Inverurie in the immediate vicinity. This bid site can be delivered alongside the EH1 and H4 housing allocations. It should be identified as an allocation for 500 housing units in the future phases of the LDP to ensure that there is a ready supply of housing in a logical location.



HALLIDAY FRASER MUNRO

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ABERDEENSHIRE LOCAL DEVELOPMENT PLAN

RESPONSE TO THE MAIN ISSUES REPORT

LAND AT URYSIDE, INVERURIE

GR117

MARCH 2019

On behalf of
Barratt North Scotland



HALLIDAY FRASER MUNRO
CHARTERED ARCHITECTS & PLANNING CONSULTANTS



HALLIDAY FRASER MUNRO
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1. Introduction

- 1.1. This report has been prepared by Halliday Fraser Munro, Chartered Architects and Town Planning Consultants, on behalf of Barratt North Scotland. It is written in response to the Aberdeenshire Local Development Plan Main Issues Report 2019 (MIR).
- 1.2. At the 'Call for Sites' stage in March 2018 a development bid was launched for the land at Uryside, Inverurie identifying the potential for a phase 3 extension to the existing development in the area.
- 1.3. This representation specifically relates to MIR site:
 - GR117 – Residential development allocation for 500 homes.
- 1.4. This report seeks to provide a reasoned and evidence-based justification for the allocation of the site within the proposed plan. Key considerations identified in this report include the specific merits of the site as a viable and deliverable development opportunity, key concerns relating to the officer's assessment of the earlier BID submission and SEA scoring and highlighting concerns to the Council's preferred approach to their housing land strategy and policies going forward. This includes highlighting concerns to Main Issue 10 and to the Homes and Housing section of the MIR.

2. Bid and MIR Summary

- 2.1. Uryside is presently the main housing expansion area for Inverurie. It has been and remains allocated for housing in previous and current Local Plans and Local Development Plans. Phase 1 of the development is complete with Phase 2 under construction to allow the full build out of the circa 600 home consent. Phase 3, the subject of this representation, would be a further extension of the development. The site is presently used for agricultural purposes and forms part of the Boynds area identified in both the Uryside Development Framework (2006) and "Imagine Inverurie and Kintore" Capacity Study. It is an extension to the existing development rather than a standalone bid site.
- 2.2. Bid GR117 is not currently a 'preferred' development option. The Officers' view and associated issues will be examined in more detail in section 3 of this report, however we are concerned that there is a reluctance to allow for appropriate development in Inverurie, despite the strong demand for new housing development in the area. In particular, the Council has been reluctant to identify further development in the Inverurie area until a preferred route for dualling of the A96 has been selected and the timescale for delivery is known. A similar approach to development allocations was taken through the preparation of the 2017 Local Development Plan where this cautious approach was taken with regards to development allocations due to perceived uncertainties around the route of a 'Keithhall Link Road' and the delivery of a grade separated interchange on the A96 between the Thainstone and Port Elphinstone roundabouts. Much development has taken place in and around



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Inverurie despite such concerns, due to the strength in both the commercial and residential markets in the area. We are also aware that the current preferred option by Transport Scotland and Aberdeenshire Council is to reroute the A96 dual carriageway to the north east of Inverurie. We do not therefore consider that the future route of the A96 represents a reason not to allocate land in the town.

- 2.3. Inverurie is the sub-regional settlement in the Garioch Area and is central to the area's development strategy. Housing and employment growth have been centred on Inverurie and on the Uryside area particularly. To summarise, this proposed site is located in an area of growth, is accessible and able to access local facilities, is constraint free, available and developable.

3. Main Issues Report and SEA Comments

- 3.1. In this section we consider the officers summary and assessment of the BID which states:

"The proposed site is situated adjacent to the settlement boundary. There are a number of constraints associated with the site including the presence of prime agricultural land, flood risk, possible tree removal and impact on the setting of A-listed Bourtie House. Additionally, the site cannot be considered until a preferred route for dualling of the A96 has been selected and the timescale for delivery is known."

- 3.2. The submitted bid (attached as Appendix 1 to this report) considered the character and context of Inverurie and the subject site setting out the reasons why development would be considered sustainable and deliverable in this location. It also identified that the site would be an extension to an existing consented development that is presently under construction. On that basis it is developable and would logically be established as a continuation of the development of the previous phases without requiring re-deployment of construction workers, site accommodation and machinery. The proposed bid site is not subject to any serious technical, environmental or planning constraints. It comprises grazing land adjacent to the current consented development.
- 3.3. We are concerned that several important attributes have been set aside by officers when assessing the merits of development on the phase 3 expansion site. The bid also considered the level and location of development that has taken place in recent years adjacent to the site and in and around Inverurie generally. We have concerns about the inconsistency of approach to assessing development proposals in and around Inverurie and generalisations that have been made on a number of elements.
- 3.4. The site at Uryside not only offers positive attributes (sustainable use of infrastructure and access to new local facilities) but also benefits from a long history of evaluation and consultation pointing to its acceptance as a sustainable and deliverable location and direction for future development. Positive attributes in favour of the site include:



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- proximity to the existing rail station with commuter trains to Aberdeen and Inverness supporting onward connections, is much closer than other sites to the west or north of Inverurie and has no major barriers to making that connection;
- proximity to the town centre and therefore the services and employment opportunities available there;
- integrated infrastructure improvements e.g. new segregated bridge across the railway line to the town centre (Souterford Bridge), recently opened Uryside primary school and the new Rothienorman/Oldmeldrum link road;
- proximity to multiple options for the delivery of a northern Inverurie bypass to support improvements and upgrades to the A96 dual-carriageway;
- makes use of extended services and infrastructure already in place for the existing consented development.

3.5. The proposed site is mentioned in the Uryside Development Framework and the Imagine Inverurie and Kintore Study. Both documents suggest that this area should be considered for future development. The Uryside Development Framework includes general design and layout principles. These were adopted in Phase 2. Adopting the same principles in Phase 3 will help create a sense of place that relates well to the existing consented development and the rest of Inverurie.

3.6. Regarding the concerns around the presence of prime agricultural land, we would argue that a large proportion of sites identified and allocated within the Garioch area of Aberdeenshire are located on prime agricultural land. This begs the question of how officers are differentiating between sites in making provisions for other site allocations affecting prime agricultural land, given there is effectively no choice if allocations are to be taken forward. We are aware that this has been questioned as a reason for non-inclusion by the local Councillors and we have concerns about the credibility of this element as a reason to reject sites in this location.

3.7. We believe that the concerns around flood risk can easily be addressed by providing sustainable flooding and drainage infrastructure on the site, building upon the provisions in phases 1 and 2 of the existing development. It is clear from looking at SEPA flood maps for the site that there is a minimal flood risk on the site itself.



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Figure 1 - SEPA Flood Map extract - site location circled indicatively in red

- 3.8. Regarding the points around possible tree removal, it is understandable in the absence of any detailed design at this stage for there to be some concerns. However this can be fully addressed through careful design and masterplanning where elements that help create character (including existing woodland and boundary features) would be retained wherever possible within the layout. All new developments present an opportunity for biodiversity enhancement, in line with Planning Advice. We believe that with further detail and supporting information and through careful design, impacts on the woodland on the site can be appropriately mitigated and a robust and quality open space and landscape solution could be adopted for the site that would address any concerns. We therefore do not believe that these are robust or credible reasons against the allocation of the site.
- 3.9. Similarly, regarding potential impacts on the setting of A-listed Bourtie House. We believe that with further detail and supporting information and through careful design and masterplanning, impacts on the setting of the listed building can be addressed. Indeed the landscape and visual impact assessment for Uryside Phase 2 examined this additional area and although the housing at this location would be visible their impact will be limited as a result of the topography and existing development immediately to the south. There is visual separation at present from the site due to the relative distance from the listed building, local topography and the presence of a robust woodland boundary around the grounds of Bourtie House. We would also note that if the preferred north eastern route of the A96 upgrades were to take place, there would be a potentially more significant impact on Bourtie House as well as



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the potential for physical separation of the site and the listed buildings grounds by the new road. Development on the bid site will therefore have a minimal landscape impact and, with appropriate landscape treatment within the eventual layout, would be viewed as an extension of the existing approved development.

3.10. In relation to the concerns relating to the selection of a preferred route for dualling of the A96 and the timescale for delivery, we note the recent public consultation carried out by Transport Scotland, and the Council's response to this consultation which was agreed at a meeting of the Infrastructure Services Committee on 29th November 2018 which set out a series of preferences for the route options identified. From a review of these route options V3 and B3 potentially affect the proposed site allocation. We believe that the identification of these options provides some certainty and therefore allows for the southern portions of the site to be allocated with the northern sections able to follow once a definitive route is identified. Barratt North Scotland would be happy to enter discussions with Transport Scotland and the Council to identify an appropriate solution to this which could include identification of the northern fringes of the site to support A96 improvements/upgrades. Therefore, we do not agree that the longer-term delivery of the dualling of the A96 should hold up the allocation of the land in this area for development. In fact it should be viewed as an opportunity to support growth to the north of Inverurie without compromising on congestion and air quality concerns in the town centre.

3.11. Any ongoing reluctance by the Council to identify further development in the Inverurie area until a preferred route for dualling of the A96 has been selected and timescales for delivery are known is unacceptable. The Council took a similar approach to development allocations through the preparation of the last LDP due to perceived uncertainties around the route of a 'Keithhall Link Road' and the delivery of a grade separated interchange on the A96 between the Thainstone and Port Elphinstone roundabouts. Despite these concerns development has taken place in and around Inverurie and therefore we do not consider that the future route of the A96 should represent a reason not to allocate additional land in the town.



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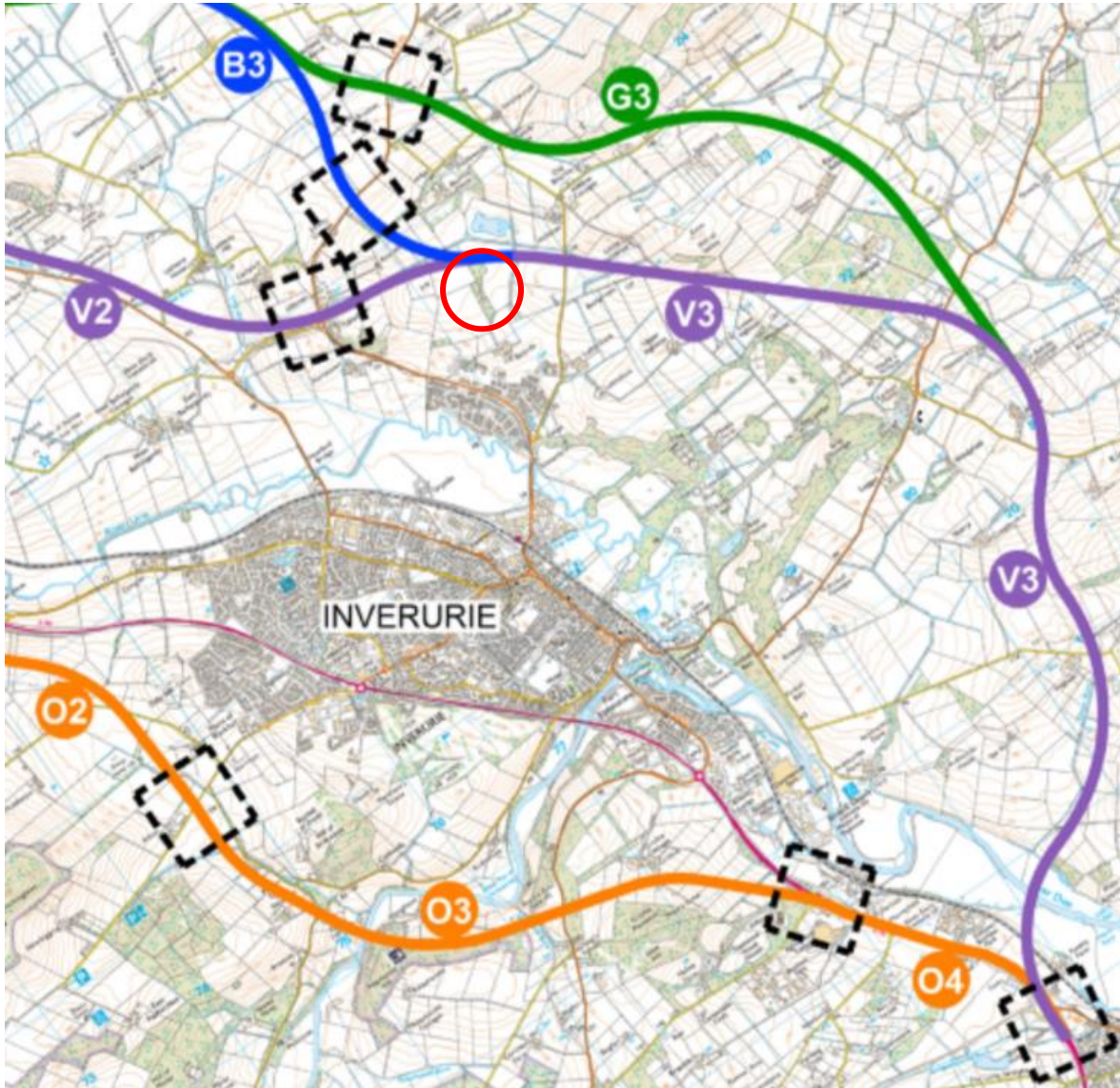


Figure 2 A96 dualling route options, subject site location circled in red (Source- Transport Scotland)

3.12. The Strategic Environmental Assessment (SEA) identifies potential negative effects on air quality, soils, landscape and cultural heritage. A number of these elements are already addressed earlier in this representation. The potential for re-routing traffic around a northern bypass of Inverurie in the future has not been given meaningful consideration or acknowledgement with regards to air quality scoring. The Council's own response to Transport Scotland on this has clearly stated that a benefit of a northern route would be the "Relief of traffic pressure in Inverurie by enabling businesses and households in the Oldmeldrum, Rothienorman and Uryside catchment areas to access the trunk road network without having to pass through the centre Inverurie, which would not be the case if the new road went to the west of Inverurie." Therefore we believe that, in the event this major transport intervention is realised, the scoring in the SEA should be reflective of this.



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3.13. The impact on soils and in particular prime agricultural land has already been discussed in paragraph 3.6 of this report. However we would reiterate that a large proportion of sites identified and allocated within Aberdeenshire are located on prime agricultural land and we have concerns as to how officials are differentiating between sites in making provisions for other site allocations affecting prime agricultural land, given there is effectively no choice if allocations are to be taken forward.

3.14. We believe that with further detail and supporting information and through careful design and masterplanning, impacts on landscape, woodland and on the setting of A-listed Bourtie House can be appropriately mitigated and meaningfully addressed and we believe that the SEA scoring could better reflect that.

4. Housing Land Strategy

4.1. The housing strategy contained within the Aberdeenshire Council Main Issues Report (MIR) relies heavily on existing allocated sites, a generic densification across sites within the AHMA and some limited small-scale allocations across the area to meet expected Strategic Development Plan (SDP) housing requirement. This raises serious concerns on the range and scale of housing that can be delivered on the back of that do-minimum strategy, the practicality of delivering significantly increased densities on certain sites, and the relationship between that strategy, the SDP in its final form when approved later this year and national policy on delivering more housing more effectively.

4.2. The MIR itself, in respect of Policy H1, indicates that it sets out to comply with Scottish Planning Policy (SPP), "... especially paragraph 110 that requires development plans to identify a generous supply of land across all tenures and to maintain at least a 5-year supply of effective housing land at all times". More specifically the MIR is very clear that "**a sharp focus on delivery is required**" (p19). There is clear developer industry concern that the Plan as proposed does not provide that sharp focus and will not improve housing delivery across Aberdeenshire.

4.3. SPP 2014 relates closely to the requirements of the National Planning Framework 3 which aims to facilitate new housing development, particularly in areas within Scotland's cities network where there is continuing pressure for growth. Figures from the 2018 Aberdeenshire Housing Land Audit show that effective supply and combined housing land supply in the area are lower than anticipated (22,172 compared to 22,994 suggested in the MIR). This equates to over 800 units and it is therefore recommended that additional sites should at least be allocated to address this shortfall.

4.4. A review of housing trends across the last four HLAs in Aberdeenshire identified evidence of:

- Housing delivery on currently allocated sites falling below medium-term HLA predictions;
- Over-optimism on housing delivery that becomes less accurate the further in the future it predicts; and
- A need therefore for a greater supply and range of housing allocations to supplement existing allocated sites and help deliver more housing over the life of the Plan.



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4.5. Barratt North Scotland are also concerned that the blanket approach proposed by the Council to increase densities across allocated and preferred sites is often unrealistic and creates an artificially inflated housing land supply. The principle of the development bids was such that those making the bids considered their sites in some detail, considered context and constraints and, in some cases, provided indicative layouts that took all of these into account. Increasing densities across the board in that scenario is unlikely to be achievable and can only suggest, at best, a maximum development capacity which ignores context and site-specific circumstances. The actual development capacity is likely to be significantly less. This, therefore presents an unrealistic housing supply figure which overplays the impact of increasing densities as a policy response.

4.6. The proposed uplift in site capacity by increasing the site density on bid sites amounts to approximately 550 houses, an almost 50% increase in housing numbers over those that were proposed. Barratt Scotland North are concerned that such increases would be unrealistic. On reviewing these bid sites and the indicative bid layouts, it is unclear how the additional houses could be accommodated across these sites. It is also inappropriate that the work undertaken by prospective bidders has been set aside. This uplift in numbers is considered to be undeliverable, resulting in an artificially inflated housing land supply and consequently an artificially low set of housing land allocations. In that scenario the MIR housing allocations will not meet the requirement of the Strategic Development Plan. Between these basic criticisms of the MIR approach there seems to be a potential shortfall of around 4,000 homes based on:

- Difference in effective housing land supply between 2016 Housing Land Audit and 2018 Housing Land Audit = 800 homes;
- Shortfall in projected actual housing delivery when compared to historic trends in HLA medium-term predictions i.e. a realistic view of what will be achieved = 2,765 homes; and
- Impracticality of delivering the MIR proposed theoretical increase in housing density = 550 homes.

4.7. Even accepting that these figures are estimates there is clear evidence that the proposed MIR allocations are very unlikely to provide the sharp focus on delivery that the MIR sets out to achieve. The area clearly needs other credible development options if the Council is serious about addressing housing delivery shortfalls and meeting housing requirements in the area as required by NPF3, SPP and the Strategic Development Plan. The only solution as we see it is to allocate additional sites across the region, including within the Accessible Rural Areas and Aberdeen's Housing Market Area.

4.8. It is also of concern that the Council has added to the Chapelton new settlement allocation with a suggested Strategic Reserve allocation of an additional 4,000 new homes. This has implications for the delivery of housing across the whole Housing Market Area. The intention of this Strategic Reserve is of course to supplement housing supply should it slow down. However, allocating more houses on this large single site that is already failing to deliver will evidently not help address the continuing shortfalls in housing delivery across Aberdeenshire. The 2018 HLA shows that Chapelton only delivered 19 housing units for the year with no affordable housing delivery. In fact, since construction of the new



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settlement began with the first recorded completions in 2016 a mean rate of delivery has been only been 34 units per annum. Even in the unlikely event that future HLA predictions miraculously increase to an average of around 80 units per annum being delivered, as is identified in the Aberdeen City and Aberdeenshire Housing Land Audit 2018, it would still take over 50 years to build out that development of 4,000 units.

- 4.9. We are aware that several local Councillors highlighted concerns at the Area Committees (9th October 2018) where the MIR was being discussed. They recognise that this allocation is just not delivering at a pace that is needed to meaningfully address the housing shortfall.
- 4.10. It would therefore seem that the ongoing reliance and concentration of development on Chapelton for the future of new homes at the pace required is inappropriate, as is the blanket approach to increasing site densities in the area. The area clearly needs other credible development options if the Council is serious about addressing housing delivery shortfalls and meeting housing requirements in the area as is required by NPF3, SPP and the Strategic Development Plan.

5. Conclusions

- 5.1 The inclusion or otherwise of this site for development is considered to be a matter of strategy rather than detail. The lack of housing delivery is a recognised issue in Aberdeenshire and this site, located in a highly sustainable location with access to the rail network, bus services and strategic road network as well as close to existing local services.
- 5.2 This site would be an extension of the current LDP allocations for Uryside, using existing access points from the B9170 and upgraded (rather than new) infrastructure associated with that development. Both the Uryside Development Framework and the Inverurie Capacity Study identified this part of Uryside as having potential for future development as a continuation of housing growth in an area where the landscape could accommodate further housing with minimal impact.
- 5.3 The site is deliverable, represents the measured expansion of a defined settlement and will bring benefits to the wider community. It has no real constraints and reflects the existing character of Inverurie in the immediate vicinity. It should therefore be identified as an allocation that could accommodate up to 500 housing units in the phases to ensure that there is a ready supply of housing in this strategic growth corridor and key settlement.
- 5.4 The housing strategy contained within the Aberdeenshire Council Main Issues Report (MIR) relies too heavily on existing allocated sites, a generic densification across sites within the AHMA, a concentration of housing land at Chapelton and some limited small-scale allocations across the area to meet expected Strategic Development Plan (SDP) housing requirement. This raises serious concerns on the range and scale of housing that can be delivered on the back of that do-minimum strategy, the practicality of delivering significantly increased densities on certain sites, and the



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relationship between that strategy, the SDP in its final form when approved later this year and national policy on delivering more housing more effectively. The current Strategic Growth Corridor and its allocations are expected to be the main delivery mechanism for both private and affordable housing in this part of Aberdeenshire. In summary we do not believe that any of the issues raised through the MIR assessment of the GR117 site represents robust reasons not to allocate it. A Phase 3 expansion of the existing housing development provides a reasonable and realistic prospect to serve future housing needs in the area.