

## 117 - Inverurie & Port Elphinstone

Response ID	Respondent
4	Kemnay Community Council
15	Mr Richard Morris
32	Mr Paul Dalgarno
49	NESTRANS
103	Mr and Mrs Peter & Carole Hartman
569	Dr. James Beattie
571	Cruden Community Council
640	Taylor Wimpey
846	Mr Stuart Naysmith
912	Mr and Ms K & J Whyte
1122	Ms Anne Mansfield
1215	William Lippe Architects Ltd on behalf of John Sorrie
1253	Bancon Developments
1339	Wardell Armstrong on behalf of Crichton Developments Ltd
1381	Bancon Developments Ltd
1386	Mr and Ms Philippe & Gitta van Welbergen
1399	Halliday Fraser Munro on behalf of Barratt North Scotland
1457	Wardell Armstrong on behalf of Dandara Developments Ltd
1470	Kintore & District Community Council
1477	Inverurie Community Council
1510	William Lippe Architects Ltd on behalf of Sandy Anderson
1512	William Lippe Architects Ltd on behalf of John Sorrie
1514	Bancon Developments
1519	Halliday Fraser Munro on behalf of ANM Group Ltd
1522	Bancon Developments
1525	Graham & Sibbald on behalf of Crerar Hotels
1557	Scottish Enterprise
1580	SEPA
1584	Inverurie Business Association
1632	Inverurie Business Association
1634	Colliers on behalf of Kilbride Resources Limited
1636	Ryden LLP on behalf of A. Rhind & S. Wilson
1637	Ryden LLP on behalf of A. Rhind & S. Wilson
1650	Homes for Scotland
1688	Colliers on behalf of Kilbride Resources Limited
1703	Scottish Natural Heritage
1704	William Lippe Architects Ltd on behalf of ANM Group Ltd
1747	Mitchells
1809	Scottish Water
1811	Scottish Government
1812	The Scottish Parliament on behalf of Constituents
1825	ACSEF

### **1. Issues**

#### **Settlement Objectives**

Two responses supported the settlement objectives and suggested that the focus for housing and employment land should be on sites that are marketable and deliverable during the plan period, giving preference to those sites within the existing settlement

boundary to be developed first (1634, 1688). Another supported the objectives to “meet the need for employment in the SGA” and to “provide opportunity for the long term growth of the settlement” (1525).

However, one respondent expressed concern over the objective to meet housing needs in the Strategic Growth Area (SGA) as it would cause pressure on local facilities such as schools and health centres and transport infrastructure (103). Another suggested that the number of houses outstrips employment opportunities and that the pace of housing development should be slowed to prevent the town becoming a dormitory settlement (1477). Concern was also raised that the objective to “build flood resilience” is ambiguous and requires clarification (1477).

There was concern over the deliverability of some housing sites and it was suggested that new sites be allocated to meet any potential shortfall (640). One respondent stated that new allocations must be made in Inverurie to meet demand (1514), whilst two others felt that insufficient regard has been given to the future development of Inverurie and that new housing development sites should be identified beyond the plan period (1512, 1747). There was also concern over the lack of affordable housing (1747).

A number of respondents raised concern over traffic issues and parking in the town centre and Port Elphinstone (1514, 1584, 1632, 1747). It was suggested that a traffic interchange is required, along with a multi-storey car park behind Burn Lane (1584, 1632). Some respondents stated that there should be greater forward planning of road infrastructure to cope with the increase in housing developments in the settlement (1381, 1386, 1584, 1632). There was also concern that the future planning of Inverurie is being determined by the need for transport infrastructure, and instead a vision for future development should be made, determined by the needs of housing and economic growth, with Transport Scotland making decisions after allocations have been made (1514, 1584, 1632, 1747). One respondent was concerned about the MIR’s references to a “western bypass” and felt that it would be better that the trunk road bypass the settlement to the east (1477). One respondent preferred that development in Inverurie should be focussed on the improvement of public transport and active travel options (1122). Two respondents highlighted the investment potential of Inverurie and suggested that road infrastructure improvements will be necessary at the A96 Inverurie Junction in the next 2-3 years if it is to remain attractive to investors (1557, 1825).

Concern was raised regarding loss of retail footfall and it was suggested that this may be remedied with developments within walking distance of the town centre being favoured (1747).

### **Main Issue 15 Uncertainty in Inverurie – Preferred Option**

Five respondents, including NESTRANS, indicated specific support for the *Preferred Option* (4, 32, 49, 571, 1637). Concern was also raised regarding: the bridge over the railway, which was considered inadequate for traffic levels in Inverurie (4); the impact of sewerage and public facilities being overstretched (571); and the necessity, if the A96 is dualled, of an Eastern Relief Road and the potential damage to the Keith Hall designed landscape that would result (1637).

Historic Scotland welcomed the *Preferred Option* as it would limit development on the Keith Hall Inventory Garden and designed landscape (1811).

Six respondents objected to the *Preferred Option* (1215, 1510, 1339, 1584, 1632, 1634). Objection was made because: insufficient consideration has been given to the future development of Inverurie (1215, 1510) and that the community wishes further allocations to be made (1215); that definite answers cannot be delivered soon and therefore decisions must be taken now to influence the future development of the

town and to influence decision-making regarding the A96 (1339); that the “buoyancy” of the town depends on action being taken now and that a broad strategy should be created for housing land development in the town (1584, 1632); that SPP supports the view that “allocating a generous supply of land for housing the development plan will give the flexibility necessary for the continued delivery of housing even if unpredictable changes to the effective land supply occur during the life of the plan”(SPP para 71) (1634, 1688).

Two respondents raised concern that uncertainty over the A96 dualling may have implications for the development of employment land allocations, which may in turn affect business development in Inverurie. They have asked for greater transparency over trunk road developments and improvements (1557, 1825).

Transport Scotland noted that the preferred option was to delete the F-Sites, however, it suggested that the evidence base presented to reach this conclusion seems “*somewhat skewed with regard to the potential effect of Transport Scotland’s proposals to dual the A96*” . They suggested that while it is likely to influence the longer term strategy, the existing F-Site allocations in the current LDP were included as “*future options which are dependent on the feasibility of an Inverurie Eastern Bypass*”. They go on to suggest that, notwithstanding the A96 issues, the indication of the MIR is that there is significant doubt regarding the deliverability of the Eastern Bypass and therefore the deliverability of the F-Sites is “*doubtful*” (1811).

#### **Main Issue 15 Uncertainty in Inverurie – Reasonable Alternative Options:**

Seventeen respondents indicated their support for the *Reasonable Alternative Options* (Maintain the “F” allocations but to identify them for development post 2023) (15, 640, 846, 912, 1339, 1477, 1510, 1512, 1514, 1519, 1522, 1584, 1632, 1634, 1650, 1688, 1747). Reasons for the support included: the need to plan for alternative solutions to cars such as public or active transport (15); the need for a better choice of effective housing sites now, as the timescale and route of the A96 dualling is not known (640, 846, 1512); concern that awaiting a decision from a third party will stifle development of the town (912, 1514, 1519, 1522, 1747); there is a need to develop a planning vision for the future of the settlement and to deliver it through controllable process (1477, 1510, 1514, 1522); that the existing F-Sites at Conglass and Balhalgardy would not be affected by the A96 dualling in any event (1514); Scottish Government guidance states that existing allocations that have been through PLI examination should not be disturbed unless justified by significantly changed circumstances (1514). One respondent suggested that it is up to the planning authority and Transport Scotland to create certainty if there is currently uncertainty (1519)

#### **Existing Allocations**

One respondent argued that the sites adjoining and including the former Inverurie Paper Mill (BUS9, BUS7, BUS5, BUS6, P14 and Ga084) form a distinct planning area. The respondent wishes to see a comprehensive planning solution found for the development of employment land on these sites. They also requested that the P14 designation be re-appraised in order to facilitate this approach (1634, 1688).

#### **Bid Sites Ga007 & Ga010**

The promoter of these bid sites argued for their inclusion in the plan as previously they had been excluded from LDP2012 pending the development of the Inverurie Bypass/Keith Hall Link Road. It was argued that this is no longer a requirement for the development of these sites and that they should therefore be considered on their other merits, including: meeting the housing land requirement; providing affordable housing; encouraging active transport in the town; and the provision of a location for

a new primary school on the site (640). Another respondent supported these sites as they are within walking distance to the town centre (1747).

One respondent raised concerns regarding flood risk on the sites, and the potential impact on the historic landscape. It was argued that the site Ga007 could also host community facilities, and that caution should be taken regarding the design of site Ga010 as it shall be prominent due to its hillside location, and it should also be designed to include employment land (1477). Historic Scotland supported the decision not to include site Ga007 in the plan, preferring to preserve the integrity of the Keith Hall designed landscape (1811).

#### **Bid Site Ga015**

One respondent considered that the site was unsuitable for development due to its topography and history (1477).

SEPA noted that much of the site is at risk of flooding and stated that they would object to the inclusion of this site within the plan unless further information is provided to demonstrate that flood risk issues could be addressed (1580).

#### **Bid Site Ga019**

The promoter of this bid site objected that it was not included as an officer's preference. They suggested that the problems stated in the MIR could be overcome through the development of a smaller number of houses (110 rather than the 360 they originally proposed and promoted in the in the MIR). They argued that the site's primary school catchment area has capacity to accommodate this scale of development; that the site is less constrained due to its reduced scale; that the Reporters comments previously have been addressed in this new proposal; and that the site will also provide a location for a replacement primary school (1636).

However, one respondent raised concerns that there will be a loss of recreational benefit of the "Polinor Circuit" if this site is developed and has suggested the developers should compensate the loss of recreational amenity. The respondent also argued that it should be a mixed-use development (1477).

#### **Bid Site Ga036**

One respondent suggested that this site should not be an officer's preference as it is possible to develop it without allocation (as stated in the MIR). It is therefore not a future development site, but a present one and alternative sites should be identified instead (1399). Another noted that the site would have limited access to services and facilities, which may lead to alienation and loss of commercial viability, and raised concern regarding flood risk and potential impact on the adjacent burial site (1477).

#### **Bid Site Ga046**

One respondent suggested that this site should not be an officer's preference as it is possible to develop it without allocation (as stated in the MIR). It is therefore not a future development site, but a present one and alternative sites should be identified instead (1399). However, support was given to the site from another respondent, but it was suggested that parking and employment land should also be given consideration in the development (1477). A further respondent also supported the site, arguing that it is well located and ideal for redevelopment, particularly as it is close to services and amenities (1704).

#### **Bid Site Ga047**

Three respondents objected to the site for the following reasons: safety and access to the A96 and along the single track road on the site; volume of traffic generated; potential pollution of ditches and fresh water wells nearby; potential light and noise

pollution; loss of a safe and secure amenity site used for outdoor and exercise pursuits; and loss of amenity of the open countryside (569, 1470, 1812)

One respondent suggested that the site is well located for further employment development and that linkage to the bypass would enable improved local business links to the wider market (1477).

The site promoter agreed with the officer's comment that the site is a logical expansion to the existing employment land at Thainstone. However, it was argued that the officer's comment that the northern part of the bid site is dependent on another site for access is inaccurate, as alternative access could be gained through the south of the site via SR1. It was also argued that allocation of sites should not be deferred due to the uncertainty the A96 route, including employment allocations (1519).

### **Bid Ga055**

The promoter of this bid site argued that the allocation of this site will help to achieve the settlement objectives and provide funding for large scale infrastructure improvements. They also argued that the site would take advantage of infrastructure delivered as part of the wider Uryside development, and that evidence has already been provided to show that the site will not have the visual prominence suggested in the MIR. In addition it was noted that the already consented development at Uryside incorporates some of the Ga055 site, and that the development is not restricted by any Scottish Government policy regarding loss of agricultural land (1399).

However, one respondent raised concern regarding the potential visual impact of the site and the design of the bid application details (1477). Historic Scotland also supported the decision not to include the site in the LDP, arguing that it would impact on the setting of the nearby A-Listed Bourtie House (1811).

### **Bid Ga059**

The promoter of this development bid argued that the site would be mixed-use, close to amenities, strengthen the existing woodland network, and provide land for community facilities. It was also contended that the site would not be prominent or lead to additional congestion due to enhancements planned for a grade-separated junction on the A96 (1457).

One respondent suggested that the primary school be developed prior to the housing on the site (1477).

Historic Scotland raised concerns about the site, citing that it could impact on the setting of the nearby Bruce's Camp Hillfort, an iron-age hillfort (1811).

### **Bid Ga060**

The promoter of this development bid supported the proposed alterations and extensions of allocated sites H1, E1 and SR1 so as to make a more complete masterplanned development (1339).

However, another respondent raised concerns about the loss of employment land and woodland on the site, and has asked that a suitable EIA be conducted. They also commented that, at least, the loss of employment land should be balanced with additional zoning in a comparable site (1477). SNH also highlighted that there are woodland tree belts on the site which should be maintained as much as possible and included in the green infrastructure of the larger site (1703).

### **Bid Ga077**

The site promoter objected to the decision not to include this bid site as a preferred option. They argued against the points in the MIR for the site, stating that: at 50

dwellings per ha the site will be sufficient to accommodate the proposed houses; that the bid site was reduced in scale from LDP2012 so as to retain community amenities on neighbouring land; that the problem of visual prominence has previously been discussed by the Scottish Government Reporter's report in 2006, where the principle of large scale housing developments causing visual impact was accepted; the visual impact will be minimal from the B993; that it is likely that the A96 dualling will not affect the site; and that it is wrong that the LDP has not proposed any projects to minimise congestion in the town centre (1253, 1381).

One respondent expressed support for the site, if it is designed well, as it could potentially give added footfall to the town centre and help to alleviate some of the traffic and parking issues in the town centre (1477).

#### **Bid Site Ga078**

Concerns were raised regarding this site, with the respondent suggesting that: the site will be disconnected from the rest of the town, creating a suburb; it would add to traffic congestion in the town centre with people trying to access the A96; that it has no ameliorating commercial or community functions; and that it is on a flood plain which should not be restricted or contained (1477).

Historic Scotland raised concerns about the potential impact of the site on the Harlaw Inventory Battlefield (which has largely been undeveloped since the time of the battle) and therefore supported the decision not to include the site in the plan (1811).

SEPA commented that the lower third of this site is at high risk of fluvial flooding. They stated that no development would be permitted within the functional floodplain, and that the site boundary should be redrawn, otherwise they would object to the inclusion of this site within the plan (1580).

#### **Bid Site Ga079**

One respondent raised concerns that this site would represent ribbon development and that it is located within a flood plain (1477).

Historic Scotland has raised concerns about the potential impact of the site on the Harlaw Inventory Battlefield (which has largely been undeveloped since the time of the battle) and therefore support the decision not to include the site in the plan (1811).

SEPA commented that most of the northern part of this site is at risk from flooding, although the southern part, between the A96 and Conglass, is likely to be low risk. They stated that they would object to the inclusion of this site within the plan unless the boundary is amended (1580).

#### **Bid Site Ga080**

One respondent offered support for the site as it could add to the environmental and economic viability of the town, but also raised concerns that it could be constrained due to transport and flooding problems (1477).

#### **Bid Site Ga084**

One respondent raised a question as to who would provide remediation of this site if it were to be developed (1477).

As outlined within the Settlement Objectives section above, the owner of considerable land holdings adjacent to this bid site submitted a representation suggesting that a comprehensive approach to employment development on this bid site and the adjoining land be explored (1634, 1688).

## **Bid Site Ga091**

One respondent expressed support for the development of this site for land uses other than housing (1477).

## **New Bids**

A request was made to allocate land near Blackhall as an F Site for future housing development (1510).

A request was also made to allocate land near Dubston Road/ Blackhall Road development (EH4) as an F Site for future development (1512).

Finally, a request was made to allocate land near Thainstone Business Centre for employment use. It was considered that this would help to address any shortfall in employment land provision in the event that the Ga060 is progressed (1525).

## **Infrastructure**

Two respondents provided factual information regarding flood risk and water capacity in relation to the existing allocations and bid sites (1580, 1809).

## **2. Actions**

### **Settlement Objectives**

The support for the settlement objectives is welcomed.

Whilst the concerns regarding the objective to meet housing needs in the Strategic Growth Area (SGA) are noted, there is a need to make provision for new development in order to comply with the SDP, which outlines a clear strategy for growth within SGAs. Nevertheless, transport and other key infrastructure capacity issues have been central to the consideration of the development strategy for Inverurie within the 2012 LDP and the assessment of the new development bids.

The objective to build flood resilience has been proposed in recognition of the fact that parts of Inverurie are located within areas at risk from flooding. It is therefore important that new developments do not add to the risk of flooding within the settlement, and that opportunities for new development to improve resilience to flooding be taken where appropriate, providing that this does not increase the risk of flooding elsewhere.

A number of comments have questioned the overall land supply position, and the deliverability of existing site allocations, within Inverurie. Overall land supply issues are discussed in more detail in Issues and Actions Paper 012 – Land Supply and Distribution, whilst more specific issues relating to the need for future development land within Inverurie are discussed below. Affordable housing issues are also discussed generally in Issues and Actions Paper 015 – Housing for People on Modest Incomes, which identifies the way in which new development proposals will make provision towards the supply of affordable housing. In addition, it should be noted that the existing housing allocations within Inverurie will include an element of affordable housing provision, which will be secured through section 75 legal agreements.

The comments in relation to transport issues within Inverurie are noted. It is acknowledged that traffic congestion within the settlement is reaching acute levels, with impacts onto the A96 trunk road at the Port Elphinstone, Blackhall and Thainstone Roundabouts. Major infrastructure improvements are proposed in association with the existing development allocations in order to accommodate the planned level of development and ameliorate these impacts. These include current works to increase capacity at the Blackhall Roundabout, and a proposed grade

separated interchange (GSI) to replace the Port Elphinstone and Thainstone Roundabouts. Recent developments within the town centre have also resulted in commensurate increases to parking provision, whilst there remain aspirations to increase car parking capacity associated with the rail station. However, it is also acknowledged that there remain issues associated with future development within Inverurie unless and until traffic circulation through the town can be improved. These issues are discussed in more detail below. In response to the comment that the A96 dualling proposals should bypass the town to the east rather than the west, it should be noted that the alignment of the trunk road improvements will ultimately be a matter for Transport Scotland and Scottish Ministers to determine. Again, the impact of the proposed A96 improvements for future development within Inverurie is discussed in more detail below.

The comments regarding the need to support the retail centre through favouring development within walking distance of the town is acknowledged, and connectivity with the town centre has been considered during the assessment of the various development bid proposals.

### **Main Issue 15 – Uncertainty in Inverurie**

There has been a mixed response to Main Issue 15. A number of respondents, including NESTRANS, have stated support for the preferred option of removing the 'F' sites and not re-allocating additional housing land within the Blackburn-Inverurie Strategic Growth Area (SGA). The comments from Historic Scotland, who favour the removal of the 'F' sites on the basis that this will help to preserve the integrity of the Keith Hall inventory garden and designed landscape, as well as a number of other heritage assets, are also significant. Transport Scotland has not indicated specific support for either the preferred option or the reasonable alternative options. Nevertheless, their representation notes that, notwithstanding the A96 issues, the impression given in the MIR is that there is significant doubt over the deliverability of the Inverurie eastern bypass and, irrespective of potential timescales and route corridors for any future works on the A96, the deliverability of the 'F' allocations is doubtful.

However, there has also been significant support for the reasonable alternative options outlined within the MIR. Respondents have particularly cited the need for consideration of the long term development strategy and vision for the town, and the need for development now to maintain the buoyancy of Inverurie. Concerns have also been raised that awaiting a decision from a third party (on the proposals for the A96) will stifle development in the meantime.

It is maintained that the delivery of the 413 dwellings currently identified as 'F' sites in Inverurie is dependent upon the delivery of an eastern bypass for the town. This position was accepted by the Reporter at the last LDP Examination. The Reporter also acknowledged that the proposed eastern bypass has the potential to result in significant adverse impacts on the Keith Hall designed landscape, contrary to SPP guidance. It was therefore acknowledged at the Examination that unless the Keith Hall designed landscape issue is resolved there must be serious doubt as to whether the 'F' sites can contribute to meeting the (then) Structure Plan housing allowances. It was concluded that the current LDP review would provide an opportunity to reassess the contribution that the 'F' sites can make towards the housing requirement for the Blackburn-Inverurie SGA.

Following the previous LDP Examination, Aberdeenshire Council commissioned consultants to undertake a preliminary assessment of possible built heritage impacts on a route corridor for the potential Inverurie eastern bypass. This assessment concluded that the Keith Hall designed landscape could potentially accommodate the bypass, and preserve the setting of Keith Hall and related listed buildings, providing

that appropriate mitigation measures were incorporated into the design of the road. However, it also concluded that “this is likely to be borderline, given the apparently unavoidable intrusion into the core parkland that forms the setting of the house”. Development passing through a designed landscape would be contrary to national policy, and it is maintained that such a course of action could only be contemplated if there was no other option to meet acute social or economic needs.

The situation has now been complicated by the aspiration of The Scottish Government to dual the entire length of the A96 from Aberdeen to Inverness. Whilst a number of options exist for the routing of the dualled A96, and detailed modelling for any options is still to be undertaken, the proposals are likely to have a significant impact on the need for a local eastern bypass at Inverurie. In this context, the case for pursuing an eastern bypass through the Keith Hall designed landscape, contrary to national policy guidance, would not appear to be defensible at this time.

This leaves a number of options as to what course of action would be most appropriate in relation to the ‘F’ sites. It also raises implications for the assessment of a number of the development bid sites, as it would be undesirable to allocate development land in a location that could ultimately prejudice route options for the A96 dualling.

The MIR outlined a preferred approach to remove the ‘F’ sites from the Proposed Plan in order to remove unrealistic expectations of development potential for these sites. This would result in the removal of some 413 houses from the land supply within Inverurie and the Blackburn-Inverurie SGA. However, the MIR identifies that the land supply within Inverurie is particularly healthy at the current time, and that there is no indication that a lack of supply specifically within Inverurie would lead to any overall deficit in the housing land supply within the Aberdeen Housing Market Area (AHMA). This position is supported by the findings of the recent SDP Examination, where it was concluded that the SDP housing allowances provide a significant degree of generosity over the housing requirement, such that a decision to not allocate the full housing allowance in the Blackburn-Inverurie SGA is unlikely to prejudice the ability to meet the AHMA housing requirement during the plan period. It is also supported by the 2013 Housing Land Audit (HLA) and the draft 2014 HLA, which both show in excess of 5 years effective housing land within the AHMA. In addition, it should be noted that a number of opportunity sites within the existing Inverurie settlement boundary are proposed for allocation within the Proposed Plan (see bid sites Ga036 and Ga046, and comments on the current Health Centre site below). These sites will help to augment the housing supply within the town.

The reasonable alternative options outlined in the MIR included either: maintaining the ‘F’ sites but identifying them for potential development within a later plan period (the period from 2027-2035, based on the now approved SDP plan periods); or reallocating the 413 dwellings elsewhere within the SGA). It is maintained that the value of the former option is limited, as the ‘F’ sites may remain constrained due to uncertainties regarding the A96 proposals by the time of a subsequent LDP review. The latter option might be feasible through extending the capacity of the current M1 site at Kintore, and the Reporter at the last LDP Examination provided an indication that this site has additional capacity for future development (beyond the level of development that is currently allocated) which could be brought forward in the event that other allocations within the SGA do not progress as expected (see page 255 of the 2012 LDP Examination Report). The developer of the M1 site at Kintore has submitted a bid for an additional 600 dwellings at the M1 site (which would increase the total capacity of the M1 site to 1,200 houses including the existing allocation). Nevertheless, owing to the level of development already allocated at the M1 site at Kintore, and the infrastructure requirements that are necessary to deliver this site, there remain uncertainties over whether this option would result in the earlier delivery

of the 413 dwellings. Transport Scotland have also stated that a Transport Appraisal that considers the entire M1 site, along with all other development proposals likely to impact on the A96 in this location (particularly at Inverurie), would be required to support such an extension to the M1 site.

A further alternative might be to confirm a limited part of the land that is currently subject to an 'F' designation as a new housing allocation in the Proposed Plan. The promoters of the Conglass (Ga079), Balhalgardy (Ga078), Souterford (Ga007) and Lofthillock (Ga010) sites (which are all currently subject to an 'F' designation) argue that their sites could come forward either wholly or in part without the need for an eastern bypass. The promoter of the Conglass and Balhalgardy sites has indicated that the sites could deliver some 100 and 200 houses respectively before there is a requirement for an eastern bypass, whilst the promoter of the Souterford and Lofthillock proposals argues that these sites are not dependent on the delivery of the eastern bypass. The promoter of the Conglass and Balhalgardy sites also argues that these sites would be unlikely to have any prejudicial impact on the potential route options for the A96 dualling. However, it should be noted that Historic Scotland has concerns regarding the potential impact of the Souterford and Lofthillock sites on the Keith Hall designed landscape, and regarding the potential impact of the Conglass and Balhalgardy sites on the Harlaw Inventory Battlefield. SEPA has also raised concerns over flood risk in respect of the Conglass and Balhalgardy sites, although they have also accepted that the southernmost part of the Conglass site (between the A96 and Conglass) is likely to be at low risk. There may also be issues regarding school capacity in the event that this option is pursued.

At this stage it is recommended that consideration be given to confirming a limited part of the land that is currently subject to an 'F' designation as a new housing allocation within the Proposed Plan. Whilst SEPA has raised flood risk concerns in respect of the Conglass (Ga079) and Balhalgardy (Ga078) sites, they have also indicated that the southernmost part of the Conglass site (between the A96 and Conglass) is likely to be at low risk. Development within this part of the Ga079 site is therefore unlikely to be constrained on flooding grounds. Although it would continue the elongation of the settlement alongside the A96, the argument that this site is unlikely to prejudice the consideration of route options for the A96 dualling appears reasonable, given that it is contained between the existing and former A96 roads. This containment would also provide a clearly defensible boundary and ultimately restrict any further elongation of the settlement in this location. In addition, this particular part of the Conglass (Ga079) site is located outside of the Harlaw Inventory Battlefield, and is therefore likely to raise less significant issues in respect of the historic environment than the remainder of the current 'F' sites at Balhalgardy (which lies within the Harlaw Inventory Battlefield) and Lofthillock and Souterford (which both lie within the Keith Hall designed landscape). The site promoter has indicated that there is capacity to deliver approximately 100 dwellings on the Ga079 site prior to the requirement for an eastern bypass. However, this has not been agreed by Transport Scotland, who have suggested that a Transport Assessment would be required before the confirmation of any of the 'F' sites could be supported. Subject to this information being supplied by the developer, and agreed by Transport Scotland, it is proposed that the southern part of the Conglass site, between the A96 and Conglass be allocated for 100 dwellings in the Proposed Plan. In order to allow education impacts to be mitigated, it is recommended that the site be specifically allocated for delivery within the second part of the LDP period (between 2022 and 2026). It is considered that this strategy, along with the proposed allocation of opportunity sites within the existing Inverurie settlement boundary (see bid sites Ga036 and Ga046, and comments on the existing Health Centre site below), will help to augment the housing supply within the town in order to mitigate the removal of the remaining 'F' sites.

## **Existing Allocations**

The proposals relating to the comprehensive planning of the former Inverurie Paper Mill and adjoining land (including bid site Ga084) are noted. Further comments in relation to bid site Ga084 are provided below. The current LDP also identifies that a Development Framework will be required for the Thainstone/Crichie area (including sites BUS5 to BUS 10). However, it is not considered appropriate to remove or re-appraise the existing P14 designation at this time. The P14 designation has been applied to conserve the historic setting and no appropriate evidence has been provided to justify the removal of this designation. Moreover, any such proposals would need to be subject to further public consultation and strategic environmental assessment, and it would therefore be inappropriate to consider the removal of the designation at this time.

### **Bids Ga007 and Ga010**

The comments in support of these bid sites are noted. It is acknowledged that the sites are located in close proximity to the town centre and rail station (the Ga007 site being nearer to both facilities) and would relate well to the existing Uryside housing allocations. However, the potential adverse impact of development in these locations on the Keith Hall designed landscape remains a significant concern. Having taken these factors into account, alongside the recommendations regarding the future role of the 'F' sites above, it is not considered appropriate to allocate these sites for housing development within the Proposed Plan.

### **Bid Ga015**

The comments and concerns regarding the suitability of this development bid are noted. The particular concerns raised by SEPA in respect of flood risk at this site are acknowledged and, for this reason, it is not considered appropriate to allocate this site for housing development within the Proposed Plan.

### **Bid Ga019**

Whilst the comments from the promoter of this site are acknowledged, it is maintained that this site would be unsuitable for development due to the lack of a clear strategic resolution to the additional congestion that development, even at the smaller scale now promoted, could cause on the A96 and within Inverurie town centre. It is also maintained that if a western bypass is proposed by Transport Scotland as part of the A96 upgrade this could impact directly on the development of this site. In addition, it is considered that sufficient land has been allocated to satisfy the housing requirement within the AHMA (see the comments in respect of Main Issue 15 above). On this basis, it is not considered appropriate to allocate this site for development within the Proposed Plan.

### **Bid Ga036**

Although concerns have been raised regarding the accessibility to services and facilities from this site, it is maintained that the site forms a logical extension to the existing H1 allocation and that access could be gained to the town centre via the proposed underpass associated with the H1 development. The site is also located within the existing settlement boundary, such that it could come forward for development under the existing LDP's infill policy, and is of a scale that would have a limited additional impact on the road network. As such, the site is considered appropriate for inclusion within the Proposed Plan, and it is recommended that the site be allocated for the development of up to 25 houses. This will augment the current housing land supply within Inverurie and thus help to mitigate the removal of some of the current 'F' sites (as recommended in relation to Main Issue 15 above).

### **Bid Ga046**

The comments both in support of and against the allocation of this site are noted. For the reasons outlined within the MIR, it is considered that this site presents an appropriate redevelopment opportunity for a range of uses. The development bid envisages a range of uses, including up to 80 dwellings. The site is located within the existing settlement boundary, such that it could come forward for development under the existing LDP's infill policy. As a consequence, the site is considered appropriate for inclusion within the Proposed Plan, and it is recommended that the site be identified as an opportunity site for a mix of developments including up to 80 dwellings. This will augment the current housing land supply within Inverurie and thus help to mitigate the removal of some of the current 'F' sites (as recommended in relation to Main Issue 15 above).

### **Bid Ga047**

The comments both in support of and against this bid site (which is made up of a series of separate land parcels) are noted.

Whilst this development bid would constitute a logical extension to the Thainstone Business Park and the employment land at Crichton, it is maintained that the most substantial part of the bid (the parcel of land to the west of the current Thainstone Business Park) may prejudice route options for the dualling of the A96 to the west of Inverurie. As a consequence, this parcel of land is not considered appropriate for inclusion within the Proposed Plan.

It is recognised that the northern part of the bid may not be directly reliant on bid Ga059 for access, and that there do not appear to be any physical constraints to development on this part of the overall bid. However, it is not considered that this parcel of land would represent an appropriate extension of the settlement unless bid site Ga059 is also pursued. For the reasons outlined below, bid Ga059 is not considered suitable for development at this time. As such, the northern part of bid Ga047 is also not considered appropriate for inclusion within the Proposed Plan.

The MIR identifies that the two small parcels of land in the southern part of bid Ga047 could be considered reasonable development options, as they are unlikely to impact on the A96 upgrade. These sites formed part of two different development bids at the previous MIR (sites G75 and G100). At the previous MIR, there was a general acceptance that site G100 would be suitable for employment development, and part of the G100 site was subsequently designated as SR2 within the current LDP. There was also some general acceptance of site G75 at the last MIR, although this site was not included in the LDP on the grounds that there was a sufficient supply of employment land in the Blackburn-Inverurie SGA and that there is a local gas transmission pipeline running along the northern boundary of the site which would need to be avoided by new development.

There is a need to give consideration to the allocation of additional strategic reserve employment land within the Blackburn-Inverurie SGA at this stage on the grounds that approximately 5 hectares of existing strategic reserve land will be lost if the recommendations in respect of bid Ga060 are agreed (see below). The southern two parcels of bid Ga047 therefore could represent potential options for the reallocation of such strategic reserve employment land.

However, it should be noted that the western land parcel (which formed part of the G100 site at the last MIR) falls almost entirely within a local gas transmission pipeline corridor. As noted above, this pipeline also extends across the northern part of the eastern site (which formed part of the G75 site at the last MIR). Whilst the promoter of the bid considers that this does not represent an absolute constraint to development it is general practice within the LDP to demonstrate the avoidance of

risk by carefully considering sites that are within pipeline consultation zones and favouring alternative sites where available. The eastern land parcel is also likely to be prominent, being located at the top of a significant slope up from the A96. Moreover, both sites would breach the defensible boundary of mature trees to the south of the existing Thainstone Centre, which currently forms the boundary to the settlement in this location. For these reasons it is not considered appropriate to allocate either of the southern parcels of bid Ga047 within the Proposed Plan.

#### **Bid Ga055**

The comments in support of and against this bid site are noted. Whilst it is accepted that the proposal could take advantage of the infrastructure delivered as part of earlier phases of the Uryside development, and that part of the consented Uryside development is located within the southern part of the bid site, it is maintained that the prominence of the site, and the likely traffic implications upon the town centre and trunk road network, mean that development in this location is not appropriate at this time. The comments from Historic Scotland, insofar as the potential impact on the setting of the nearby A-Listed Bourtie House, are also acknowledged. In addition, it is considered that sufficient land has been allocated to satisfy the housing requirement within the AHMA (see the comments in respect of Main Issue 15 above). Having taken these factors into account, it is recommended that this site should not be included within the Proposed Plan.

#### **Bid Ga059**

Again, the comments both in support of and against this development bid are acknowledged. It is accepted that there are some merits to this proposal, in that it could make use of infrastructure delivered as part of earlier phases of the Crichton development. However, it is maintained that the site is likely to exacerbate congestion problems within the town centre and that issues of prominence remain significant. In this respect, the comments from Historic Scotland, insofar as the potential impact on the setting of the nearby Bruce's Camp Hillfort, are also acknowledged. In addition, it is considered that sufficient land has been allocated to satisfy the housing requirement within the AHMA (see the comments in respect of Main Issue 15 above). For these reasons, it is recommended that this site should not be included within the Proposed Plan.

#### **Bid Ga060**

For the reasons outlined in the MIR, it is considered appropriate to modify the extent of the current LDP allocations within the Crichton area (H1, E1 and SR1) in accordance with this development bid. The proposal is supported by a Masterplan which sets out a logical and considered layout that will set the framework for a high quality development. The current planning application for the site (APP/2013/0267) accords with this development bid. No additional employment land or residential units are proposed.

However, as recognised by respondents, this bid would result in the overall loss of strategic reserve employment land. This would affect the western SR1 designation and would result in the loss of approximately 5 hectares of strategic reserve employment land in this location. This bid would also result in the current E1 boundary being extended to the south, such that part of the remaining SR1 designation would move out of the strategic reserve supply into the employment land provision for the period to 2026.

Options for re-allocating the lost strategic reserve employment land associated with this bid have been considered in relation to bid Ga047. However, for the reasons outlined above, it is not considered appropriate to allocate any of the land parcels associated with bid Ga047. Other options have been put forward by respondents for

the allocation of replacement strategic reserve employment land at Blackburn. However, for the reasons outlined in the Blackburn Issues and Actions Paper, these options are also not considered appropriate for allocation.

This will therefore leave a position whereby the full SDP allowance for strategic reserve employment land within the Huntly-Laurencekirk SGA has not been allocated. The purpose of strategic reserve employment land is to provide a supply of reserve land that can be drawn down to augment supply in the event that other existing employment sites do not come forward as envisaged. However, as noted previously, the Ga060 bid will also result in part of the remaining SR1 designation moving out of the strategic reserve supply into the employment land provision for the period to 2026. This will significantly augment the current employment land supply within the Blackburn-Inverurie SGA. As such, it is unlikely that a decision not to allocate the SDP's full strategic reserve employment land allowance will fundamentally undermine the provision of an adequate supply of employment land within the SGA.

#### **Bid Ga077**

The comments in support of this site are noted. However, it is maintained that this sloping site remains highly prominent, particularly on the approach to Inverurie from Kemnay on the B993. Whilst the general principle that some visual impact will occur with large scale development is acknowledged, it is considered that sufficient land has been allocated to satisfy the housing requirement within the AHMA (see the comments in respect of Main Issue 15 above). As such, there is not considered to be any strategic justification for releasing this scale of development land at the present time. Having taken these factors into account, it is recommended that this site should not be included within the Proposed Plan.

#### **Bid Ga078**

The comments and concerns in respect of this site are noted. The comments from Historic Scotland in relation to the potential impact of this site on the Harlaw Inventory Battlefield, and the concerns of SEPA in respect of flood risk, are acknowledged. Having taken these factors into account, alongside the recommendations regarding the future role of the 'F' sites above, it is not considered appropriate to allocate this site for housing development within the Proposed Plan.

#### **Bid Ga079**

Again, the comments and concerns in respect of this site are noted. The comments from Historic Scotland in relation to the potential impact of this site on the Harlaw Inventory Battlefield, and the concerns of SEPA in respect of flood risk, are acknowledged. However, as outlined in relation to Main Issue 15 above, it is considered that these issues would largely be overcome if development were to be restricted to the southern part of the site (between the A96 and Conglass). Having taken these factors into account, alongside the recommendations regarding the future role of the 'F' sites above, it is recommended that this site be allocated for up to 100 dwellings within the Proposed Plan. However, this would be dependent upon the developer being able to provide evidence to the satisfaction of Transport Scotland that these dwellings can be accommodated without significant adverse impacts on the trunk road network.

#### **Bid Ga080**

The comments in support of this site are noted. However, it is maintained that there has been no significant change in circumstances since this site was deemed to be inappropriate for development at the last LDP examination. As such, it is not

considered that this site should be allocated for employment purposes within the Proposed Plan.

#### **Bid Ga084**

The comments in relation to this bid site are noted. As outlined in the MIR, it is maintained that this small site would provide a logical extension to existing business sites BUS6 and BUS7. The site covers an area of approximately 2 hectares, and is located within the existing settlement boundary. The site could therefore come forward for development under the 2012 LDP's infill policy. However, as also outlined within the MIR, part of this land may be required to accommodate a grade separated junction associated with the Crichtie development to the western side of the A96. As such, and as there is not considered to be any strategic requirement to release additional land for employment development during the period to 2026, it is not considered appropriate to allocate this site within the Proposed Plan.

#### **Bid Ga091**

One respondent has expressed support for the development of this site for land uses other than housing. However, no other comments have been received and it is maintained that this small site is unsuitable owing to its proximity to the trunk road and the fact that it has not been considered as part of the masterplan for the allocated Crichtie development. As such, it is not considered appropriate to include this site as a development allocation within the Proposed Plan.

#### **New Bids**

A number of requests for new site allocations have been submitted. These include proposals for the designation of further 'F' sites at Upper Davah (respondent 1510) and Dubstone Farm (respondent 1512), and for employment development at Thainstone House Hotel (respondent 1525).

For the reasons already outlined above, there is not considered to be any overriding justification for identifying additional 'F' sites or employment land at this stage. Moreover, all of these proposals are located outwith the existing settlement boundary and none of these development bids were submitted at the call for sites stage. The sites have therefore not been included in the MIR, and there has not been any formal opportunity for public comment on these proposals. Similarly, the proposals have not been subject to Strategic Environmental Assessment. Planning Circular 6/2013 makes it clear that if a particular issue or site arises that was not consulted on in the MIR, the planning authority may need to carry out further consultation on that particular issue before publishing its Proposed Plan, if it wants to include it in the plan. There is therefore considered to be limited scope for including these site proposals in the Proposed Plan unless further consultation is first undertaken.

Whilst not the subject of a specific development bid, it should be noted that the current Health Centre site, which is located within the existing M2 allocation, is expected to become vacant during the plan period. This site represents a significant redevelopment opportunity within the existing settlement boundary that has not previously been specifically identified. Whilst this site could come forward for redevelopment under the provisions of the existing plan, it is considered appropriate to identify general expectations for this significant town centre site within the LDP as this will help to provide certainty for the subsequent development management process. Owing to its strategic location within the town centre boundary, it is expected that the redevelopment of this site will incorporate retail provision at ground floor level. However, it is also likely that a relatively high density development will be acceptable at this location, and it is therefore considered that a residential element is also likely to be appropriate as part of any redevelopment scheme. Based on the site size and the density of adjoining developments, there is considered to be capacity to

accommodate some 30 residential units within the Health Centre site. It is therefore recommended that the capacity of the current M2 allocation be increased from 'up to 150 houses' to 'up to 180 houses', and that additional text be included within the Inverurie Settlement Statement to outline an expectation that any redevelopment of the Health Centre site should incorporate retail provision at ground floor level.

### **Infrastructure**

The technical matters raised by consultees are noted. These issues have been taken into account during the determination of the planning applications that have already come forward for the existing site allocations, and will be considered as and when further planning applications are determined for the remaining sites. No further action is required in response to these detailed comments at this stage.

### **3. Committee Recommendations**

1. Subject to recommendations 2 and 3 below, and with the exception of the 'F' sites, the existing LDP allocations should be carried forward into the Proposed Plan
2. The current boundaries of allocations H1, E1 and SR1 should be amended in line with bid Ga060
3. The capacity of the current M2 allocation should be increased from 'up to 150 houses' to 'up to 180 houses' in order to reflect the likely capacity of the Health Centre redevelopment opportunity. Additional text should also be included within the Inverurie Settlement Statement to outline an expectation that any redevelopment of the Health Centre site should incorporate retail provision at ground floor level.
4. The area of bid Ga079 that lies between the A96 and Conglass should be identified within the Proposed Plan as a housing allocation for up to 100 dwellings, subject to the developer providing evidence to the satisfaction of Transport Scotland that the dwellings can be accommodated without significant adverse impacts on the trunk road network
5. The remainder of the current 'F' sites should be removed from the Proposed Plan
6. Site Ga036 should be identified within the Proposed Plan as a housing allocation for up to 25 dwellings
7. Site Ga046 should be allocated within the Proposed Plan as an opportunity site for a mix of uses including up to 80 dwellings



#### **4. Committee Decisions**

1. Garioch Area Committee agreed the above recommendations at their meeting on 27 May 2014.
2. Infrastructure Services Committee noted the recommendation of the Area Committee and agreed with the decisions of the Garioch Area Committee to: amended the boundaries of sites H1, E1 and SR1; increase the capacity of site M2 to 180 houses; identify site Ga079 for up to 100 dwellings; remove the "F" sites; identify site Ga036 as a housing allocation for up to 25 dwellings; and allocated Site Ga04 as an opportunity site for a mix of uses including up to 80 dwellings