

From: Maggie [REDACTED]
Sent: 08 May 2019 13:25
To: LDP
Subject: ALDP MIR consultation response
Attachments: MIR response - Silverburn House.pdf

Hi there,

Please find attached a response to the MIR consultation on behalf of our client Parklands View LLP in relation to their site at Silverburn House, Bridge of Don.

I would be grateful if you could please acknowledge receipt.

Thanks.

Maggie

Margaret Bochel
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Aberdeen Local Development Plan Review

Main Issues Report Consultation Response

Question 1 – New Housing Sites

Are there any other sites that would be suitable for housing?

Yes, Silverburn House, Bridge of Don

Executive summary

Our client wishes to promote the site of Silverburn House in the Bridge of Don as an opportunity site for residential development in the next Aberdeen Local Development Plan (ALDP), indicatively for around 100 units.

In considering this, particular regard should be given to provisions of Scottish Planning Policy (SPP) and the Proposed Aberdeen City and Shire Strategic Development Plan (PSDP) which together make it clear that:

- re-allocation of employment sites should be considered where they are underused; and
- brownfield sites should be given priority when bringing land forward for housing, with a target for at least 40% of all new housing to be on brownfield sites (see below).

At the same time, there is clear Scottish Government support for the provision of further housing, details of which provided in Appendix One.

Taking the above into account, as set out in more detail below, the proposed allocation of Silverburn House as an opportunity site for residential development should be supported on the basis that this:

- would allow the site to be brought back into use in a way that meets requirements for additional housing and is supported by both SPP and the PSDP;
- ties in with the redevelopment of the former AECC site to the south; and



- requires to be scored positively when assessed against the specific criteria for proposed new sites.

Background

Silverburn House is a 5-storey office building constructed in the early 1980s, comprising four wings around a central courtyard and ancillary outbuildings. The Bridges Pre-school Nursery and a sports centre are located on the north of the Silverburn House site, with the intention being for these facilities to be retained as part of any redevelopment of the site. The surrounding area is characterised by a mix of uses, including the major proposed new residential led, mixed use, development pursuant to planning application reference 150824, which includes nearly 500 residential units, commercial and business uses, a recycling centre and the park and ride facility.

Silverburn House itself was most recently occupied by oil and gas company Vetco Gray UK Ltd, part of GE Oil & Gas. However, since that lease came to an end, no new occupier has been found and the building has remained empty, with no obvious prospect of it being re-let for employment use in the current economic climate (see below for more details).

At the same time, any potential alternatives to employment use are restricted by the current ALDP, in terms of which the site is identified as forming part of a specialist employment area allocation (part of the Aberdeen Energy Park); here, the ALDP generally only permits uses that fall within Use Class 4 (Business), Use Class 5 (General Industrial) and Use Class 6 (Storage and Distribution), provided always that the respective uses can co-exist without eroding the amenity of the Park.

Against this background, our client is seeking re-allocation of the site in order to allow for its redevelopment and long-term sustainable use, in accordance with both national and regional policy. As shown on the indicative layout plan submitted with this response, it is considered that the site has capacity to accommodate around 100 residential units, comprising a mix of 3 bedroom semi-detached houses, 3 bedroom affordable houses and a number of 1, 2, and 3 bedroom flats, together with landscaping and areas of public green space, as well as private gardens to provide a high quality residential environment.



Policy context

Scottish Planning Policy 2014 (SPP)

SPP states that:

“Previously developed land (also referred to as brownfield land) is a potential source of sites for new development and planning authorities should support and promote proposals to bring vacant or derelict land back into productive use for development or to create more attractive environments.”

It also stresses that development of such sites is preferred to development on greenfield sites.

SPP then also states that the planning system should allocate sites that meet the diverse needs of different sectors in a way that is flexible enough to accommodate changing circumstances and allow the realisation of new opportunities, with Local Development Plans expected to take account of (amongst other considerations) current market demand and the potential for a mix of uses. In this regard, SPP expressly states that:

“New sites should be identified where existing sites no longer meet current needs and market expectations. Where existing business sites are underused, for example where there has been an increase in vacancy rates, reallocation to enable a wider range of viable business or alternative uses should be considered, taking careful account of the potential impacts on existing businesses on the site.” [paragraph 103]

The Silverburn House site is clearly underused, with significant changes to the employment land market having taken place since the current ALDP was adopted (as highlighted above and looked at in more detail in the context of the most recent Employment Land Audit below). As such, re-allocation of the site should be considered in accordance with SPP. At the same time, the proposed residential use would respond to current needs for additional housing as set out in more detail in Appendix One, would not undermine the wider employment land allocation, and would be in keeping with the proposed mix-use development on the AECC site to the south.

Aberdeen City and Shire Strategic Development Plan (SDP)

The current SDP reiterates the preference highlighted in SPP for new development to take place on brownfield sites. As stated above, the PSDP now explicitly targets at least 40% of new development being on brownfield land. The re-allocation of Silverburn House would contribute to achieving that target.



The SDP also sets out an employment land allowance of 105ha for the period to 2026, against which the current ALDP allocates a total of 143ha for the same period (over one third more than required by the SDP). The allowance of 105ha is now also carried forward into the PSDP but, while the MIR accordingly recognises that additional employment land allocations are not required, the extent to which current and proposed allocations exceed the PSDP allowances is not addressed. This surplus of allowances does however suggest that better use could be made of underused employment sites, such as Silverburn House. The reallocation of the site would then address that issue.

In this regard, it should also be noted that the MIR for the PSDP expressly stated that Aberdeen City Council should examine current employment areas to assess how much regeneration they need to make sure they are fit for the future economic needs of the area, and that a concerted effort is needed to improve some of the existing employment areas. The proposed re-allocation of the Silverburn House site is in line with that approach.

At the same time, the PSDP proposes the making of additional housing allocations over the period 2020 to 2032, with a Strategic Reserve of housing land that may be identified for the period 2033 to 2040, in order to safeguard against the risk of any current strategic allocations not coming forward and to ensure that the housing land supply is maintained. Again, the proposed re-allocation of the Silverburn House site is in line with that approach.

Aberdeen City and Shire Employment Land Audit 2017/2018 (ELA)

The ELA provides up to date and accurate information on the supply and availability of employment land in the North-East of Scotland and identifies 223ha of marketable supply in Aberdeen City. As expressly recognised in the ELA, this significantly exceeds the targets set out in the SDP, both in general and in terms of the amount of land considered suitable for high quality business use and/or company headquarters.

At the same time, the ELA recognises the impact that the change in the oil price since the end of 2014 has had on market activity and notes that, even with some confidence now returning to the oil and gas industry, supply of both office and industrial premises outstrips demand. The most recent statistics show that, as at Q3 2018, there was approximately 2.67m square feet of offices available in Aberdeen with an annual take up of 301,054 square feet.

This is particularly so for older stock as occupiers continue to upgrade to modern, high quality accommodation. This trend also looks set to continue, with the ELA not predicting any marked increase in the take up of employment land for some time. In terms of the ELA, there accordingly seems to be little or no prospect of the site being taken up for employment use



in the current market, such that alternatives should be considered in accordance with the provisions of SPP outlined above.

Proposed allocation

It should be emphasised that the principle of development on this site has been established by both the existing building and the site's inclusion in the current employment land allocation, confirming that the site is suitable for development in terms of exposure, aspect and topography.

At the same time, the site's current allocation confirms there are no physical issues (including drainage or flood risk) or other constraints which would restrict its development, and no built or natural heritage or landscape features which would be affected by development here.

In terms then of the proposed re-allocation, this directly responds to the Council's express aspirations in the original call for sites for the current review of the ALDP; in this, it was stated that the Council would particularly welcome proposals for sites up to 100 units, and are keen to identify new brownfield sites for housing. As a brownfield site that is being promoted for up to 100 units, the principle of the proposed re-allocation of Silverburn house should be welcomed and supported accordingly.

With regards then to other criteria against which the proposed re-allocation requires to be assessed, it is submitted that:

- **Relationship to existing settlement** – as a brownfield site, it clearly already forms part of the existing settlement. It is though also well related to the significant mixed-use development on the former AECC site pursuant to planning application 150824, as well as wider development in the Bridge of Don area.
- **Land use mix/balance/service thresholds** – the proposed re-allocation of the site would address the current over-provision of employment land in Aberdeen overall, with the location of the site vis a vis the rest of the employment land allocation here (the two being separated by Claymore Drive) meaning that a high quality residential environment could be provided without any restrictions being imposed on the retained employment use.
- **Accessibility** – the site is well served by public transport providing access to the city centre, as well as settlements (and associated services and employment opportunities) to the north - the closest bus stop is just 230m from the farthest away point of the site, from which First Bus service 1B provides a regular service between Dubford and the city centre, in addition to which the Bridge of Don Park and Ride is within 600m of all parts of the site..



- **Proximity to facilities (shopping/health/recreation)** – the redevelopment of the former AECC site is expected to provide a range of facilities which will be readily accessible to residents of development on the Silverburn House site. In addition, as stated above, the site is well located for public transport services providing access to services and facilities in the city centre. The existing pre-school nursery and sports centre will be retained, providing on-site facilities for residents.
- **Direct footpath/cycle connection to community and recreation facilities and resources** – as shown on the indicative layout plans submitted with this response, it is envisaged that direct footpath and cycle connections could be provided through to development on the former AECC site to the south.
- **Proximity to employment facilities** – the site is clearly well located in terms of proximity to employment opportunities, both within the Aberdeen Energy Park itself and elsewhere in the Bridge of Don area, including the Bridge of Don Industrial Estate.
- **Land use conflict** – as identified above, the Silverburn House site is separated from the remainder of the Aberdeen Energy Park by Claymore Drive, such that there would be no conflict between residential development here and continued specialist employment use of the rest of the Park. A landscape buffer (shown on the indicative layout plan) will also ensure no conflict between the A92 and residential use.
- **Service infrastructure capacity** – pupils from the site would be zoned to Scotstown Primary and Bridge of Don Academy. Bridge of Don Academy does not reach capacity until 2025, while Scotstown Primary is currently forecast to be at only 78% capacity by that time. There is also scope for any capacity issues at the time a planning application is made to be addressed through developer contributions if required.

In addition to the above, it should be emphasised that the site can be delivered for the development proposed in terms of this bid during the lifespan of the emerging ALDP.

Conclusion

As outlined above, there is clear local and national policy support for:

- the re-allocation of employment sites where these no longer meet current market needs;
- the allocation of additional land for housing; and



- for previously developed sites to be given priority when bringing land forward for housing.

Given that the site comprises brownfield land, with little or no prospect of this being taken up for employment use, priority should now be given to finding a new use for this in accordance with both SPP and the PSDP. Re-allocation for residential development as proposed in this response to the MIR would allow the site to be brought back into use in a way that both meets requirements for additional housing and ties in with the redevelopment of the former AECC site to the south, with the site also requiring to be scored positively when assessed against the specific criteria for proposed new sites. It is therefore submitted that the site should be re-allocated for residential development accordingly.



Appendix One - Housing demand

Scottish Government policy accords priority to the delivery of more new housing through:

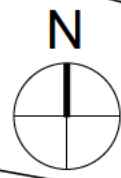
- **Scotland's Economic Strategy**, published in 2015, which identifies four priorities for sustainable growth, one of which, investment, specifically highlights housing.
- The **Joint Housing Delivery Plan for Scotland** (2015) which identifies a number of themes with regards to housing, including a lack of housing supply in both public and private sectors.
- Related to that, the Government launched its **More Homes Scotland** approach in 2016 to deliver more homes across all tenures.
- Recognising the centrality of housing in its overall ambitions for Scotland, the Government also made supplying more homes a national strategic "*social infrastructure*" priority in the **2015 Infrastructure Investment Plan**.

It is therefore clear that the Government is seeking to increase the supply of housing throughout Scotland, placing the impetus on local authorities to allocate more housing land accordingly, and lending significant support for the allocation of this site as proposed in terms of this bid.





Site Area 3.73 Hectares
 100 residential Units
 Density 26.8 units / hectare



- Proposed Road
- Proposed Parking
- Proposed Footpath
- Proposed Connectivity Footpath
- Proposed SUDS ponds + Silverburn
- Proposed Landscaping

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client
Parklands View LLP
 address
 Silverburn House, Bridge of Don
 title
 Proposed Layout Plan for Residential Development

date
 May 2019
 drawn
 MJ
 checked
 JAG
 scale
 1:750@ A3

rev	description	date	by	checked
A	First Issue	03/05/19	JAG	JAG

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PLANNING

