

Proposed Aberdeen Local Development Plan 2015 Representation Form

Please use this form to make comments on the Proposed Aberdeen Local Development Plan, ensuring that your comments relate to a specific issue, site or policy in either the Proposed Plan, Proposed Supplementary Guidance, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

The consultation period runs between Friday 20th March and Monday 1st June 2015. Please ensure all representations are with us by <u>5pm on Monday</u> 1st June.

| Name | Mr Mrs Miss Ms Gary Purves |
|----------------------------|-----------------------------|
| Organisation | Knight Frank LLP |
| On behalf of (if relevant) | Avant Homes |
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Please tick if you would like to receive all future correspondence by e-mail

| What document are you commenting on? | Proposed Plan | | \checkmark |
|--------------------------------------|------------------------------------|------------------|--------------|
| Commenting on: | Proposed Supplementary Guidance | | |
| | Proposed Action Programme | | |
| | Strategic Environmental Assessment | Environmental Re | eport |
| | | | |
| Policy/Site/Issue | Greenfield housing allocations | Paragraph(s) | |
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What would you like to say about the issue?

| Additional greenfield housing allocations should be made (see attached document). | | | | |
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What change would you like to see made?

| Land adjacent to the Mill of Mundurno should be removed from the green belt and green space network and identified as a greenfield housing allocation post 2017. |
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Please return the completed form by:

- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to ldp@aberdeencity.gov.uk

The representation form can be filled in, saved, e-mailed and/or printed. You must "save as" to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation form. Please ensure all representations are with us by <u>5pm on Monday 1st June.</u>

Thank you. For more information, please visit www.aberdeencity.gov.uk/aldp2016 or to contact the Local Development Plan Team call 01224 523470.

Data Protection Statement

The comments you make on the Proposed Plan will be used to inform the Local Development Plan process and the Examination into the Local Development Plan by the Scottish Ministers' Reporter. You must provide your name and address for your representation to be considered valid, and this information will be made publicly available. Other personal contact details such as telephone and e-mail will not be made public, although we will share these with the Reporter, who may use them to contact you about the comments you have made. For more information about how Aberdeen City Council maintains the security of your information, and your rights to access information we hold about you, please contact Andrew Brownrigg (Local Development Plan Team Leader) on 01224 523317.

Land at the Mill of Mundurno, Bridge of Don

Objection to the Proposed Plan

Avant Homes

May 2015



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1.0 Modification that you wish to see

- 1.1 Knight Frank LLP write on behalf of Avant Homes to object to the Proposed Aberdeen Local Development Plan 2016.
- 1.2 Avant Homes wish to see additional greenfield housing allocations made for the period 2017-2026.
- 1.3 Avant Homes also wish to see their land at the Mill of Mundurno allocated for residential development post 2017.

2.0 Reason for change

- 2.1 Avant Homes believe that additional housing land should be identified in Aberdeen to meet local need and comply with the requirements of the Strategic Development Plan (SDP). Table 1 of the Proposed Plan shows that 12,000 units are required on greenfield sites up to 2016 and a further 5,000 units are required on greenfield sites between 2017-2026.
- 2.2 A large percentage of these allowances comprises large scale allocations contained within the 2012 Local Development Plan (LDP) such as the following sites:
 - 2,600 units at OP12 Grandhome.
 - 750 units at OP29 Craibstone South.
 - 1,000 units at OP30 Rowett South.
 - 750 units at OP31 Greenferns Landward.
 - 2,150 units at OP58 Countesswells.
 - 400 units at OP62 Oldfold.
 - 1,100 units at OP77 Loirston.
- 2.3 It is evident from the Housing Land Audit that no units have yet been completed on any of the above sites. This is likely to result in a significant shortfall of effective housing land. This should be addressed in the Proposed Plan by allocating relatively small-scale and readily deliverable sites to augment the greenfield housing land allocations during the time it takes for the above allocations to come forward for development.
- 2.4 Avant Homes submit that failure to allocation additional greenfield housing land will mean the Proposed Plan does not comply with the SDP where the latter aims to "provide enough people, homes and services..." to meet the region's needs.
- 2.5 Avant Homes also believe that their land at the Mill of Mundurno is ideally suited to providing new housing development post 2017. The land in question is free from constraints and is immediately available to provide new housing to supplement the existing LDP allocations.
- 2.6 The site will effectively form a logical and compact expansion of the existing OP10 allocation at Dubford. The site is also consistent with the SDP's objectives of reducing people's need to travel by virtue of its close proximity to major sources of employment and accessible public transport routes to local services.

3.0 Site Description

- 3.1 The Mill of Mundurno is located to the north of Aberdeen immediately adjacent to the existing suburb of Bridge of Don, to the west of the A90 trunk road and directly adjacent to the B999 road as illustrated in Appendix 1.
- 3.2 The site is designated as part of the Green Belt and Green Space Network, immediately opposite Opportunity Site OP10 as illustrated in Appendix 2. In addition to the residential suburb of Bridge of Don, the site is also adjacent to a major employment centre at the Murcar and Denmore industrial estates as illustrated in Appendix 3.
- 3.3 The low-lying site measures around 1.8ha and is bounded to the south-west by the B999 road, to the south-east by a track leading to the Mill of Mundurno, and to the north by the Mill of Mundurno lade and pond as illustrated in Appendix 4. The pond is just to the north-west of the motel complex at the Mill of Mundurno and includes the free standing mill to the east which is a listed building.
- 3.4 On the other side of the B999 from the site is the on-going Dubford development which adjoins the northern edge to the suburb of Bridge of Don (North Denmore) as illustrated in Appendix 5. The B999 meets the A90 at the Murcar roundabout a short distance south of the Mill of Mundurno.
- 3.5 The land is generally flat and below 40m AOD around the Burn of Mundurno. The adjacent housing development at Dubford is now well underway and will front onto the B999 immediately adjacent to Avant Homes' land at the Mill of Mundurno as illustrated in Appendix 6.
- 3.6 The nearest bus stops linking Bridge of Don with Aberdeen City Centre and a wider network of areas including Ellon, Peterhead and Fraserburgh, are on the A90 south of the Murcar roundabout. The southern tip of the site is immediately adjacent to the Murcar Industrial Estate.

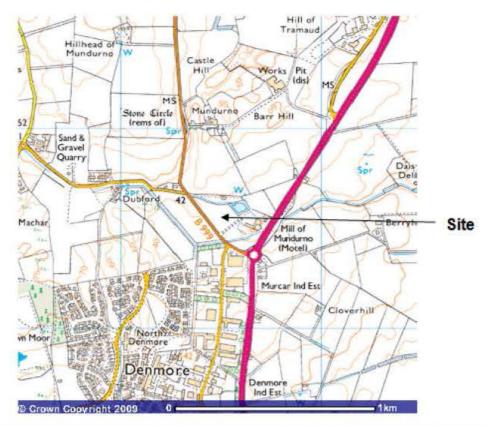
4.0 Suitability for Future Development

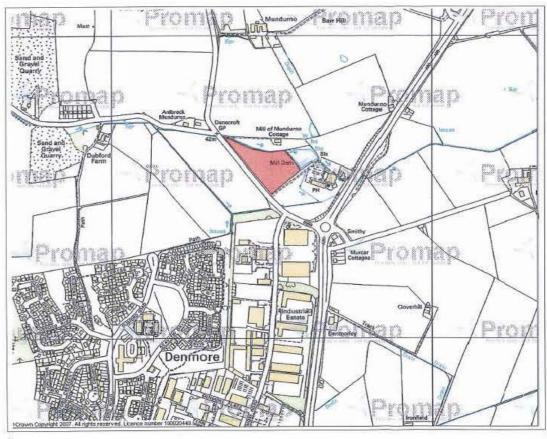
- 4.1 The site can be seen as a logical and compact peripheral expansion to the larger development at Dubford to the north of Bridge of Don. An expansion of the Dubford development into Avant Homes' site would be well contained within the landscape and existing physical features such as the A90 trunk road and the Mill of Mundurno to the east.
- 4.2 The expansion of the Dubford development into Avant Homes' site would seem a natural progression and will incorporate strategic landscaping to repair and improve the appearance of the urban edge of Aberdeen when travelling from the north. The development will also help to keep a green wedge between Bridge of Don and the A90 main road as there is good containment with the existing natural and physical features.
- 4.3 The site is within close proximity to a main transport corridor into Aberdeen with frequent bus services to sources of employment. In addition, the site is within walking distance of the Aberdeen Science Park, The Core Business Park and the Denmore Industrial Estate allowing opportunities for walking and cycling. This would make a residential development on the site highly sustainable in transport terms and will reduce people's dependency on the private car as required by the Strategic Development Plan. The area to the north of Bridge of Don also benefits from being within close proximity to the Aberdeen Exhibition and Conference Centre and the northern terminus of the AWPR making it an attractive place to live.
- 4.4 The allocation of Avant Homes' land for future residential development would also accord with the Energetica strategy as illustrated in Appendix 8. This document identifies land to the north of Bridge of Don as being suitable for new housing to create a 30-mile coastal strip of economic development.
- 4.5 Avant Homes' are also committed to delivering 25% of the total units as affordable housing which will help to meet local needs early in the development cycle.
- 4.6 The latest school roll forecasts show that both Scotstown and Braehead Primary Schools have a declining roll of pupils. Similarly, both Bridge of Don Academy and Oldmachar Academy are forecasted to be operating at 72% and 70% of their total capacities respectively by 2018.

5.0 Conclusion

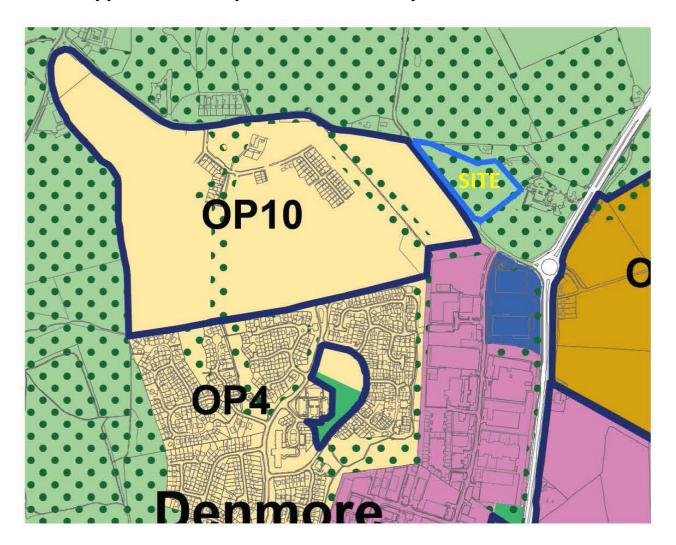
- 5.1 Avant Homes submit that inadequate housing land allocations have been made within the Proposed Plan in terms of their deliverability and complying with the SDP's target for 12,000 units by 2016.
- 5.2 Avant Homes also submit that their land at the Mill of Mundurno fails to perform functions of the green belt. Specifically, the land is a gap site between the on-going Dubford development and the A90 trunk road. Therefore development on the site will not lead to coalescence between any communities as the site is well contained by its existing natural and physical boundaries.
- 5.3 The location is highly accessible by a variety of modes of transport given its proximity to the urban edge of Bridge of Don including convenient access to major sources of employment, public transport routes and local services.
- 5.4 The development of Avant Homes' land at the Mill of Mundurno can be integrated within the Dubford development with the provision of strategic landscaping to improve the northern approach to Aberdeen.
- 5.5 The 2012 LDP concluded that the development at Mill of Mundurno would be isolated; however, this does not apply now given the closeness of the adjacent residential development opposite the B999. Issues relating to linear cropmarks and poorly draining parts of the site are not considered to be impediments to the development by Avant Homes and can be easily addressed at a planning application stage.

Appendix 1 - Location Plan





Appendix 2 – Proposed Local Development Plan 2016



Appendix 3 – Nearby Sources of Employment



Denmore Industrial Estate



Mill of Mundurno (motel)



The Core (business park)



Aberdeen Science & Energy Park

Appendix 4 – Aerial Photograph



Appendix 5 – Dubford Housing Development



















Appendix 6 - Dubford Masterplan





Appendix 7 - Energetica Masterplan

