



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 5pm on Monday 1st June.

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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	<input checked="" type="checkbox"/>	
	Proposed Supplementary Guidance	<input type="checkbox"/>	
	Proposed Action Programme	<input type="checkbox"/>	
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>	
Policy/Site/Issue	Opportunity Site OP75, Denmore Road, Bridge of Don and Supporting Text.	Paragraph(s)	Page 80

What would you like to say about the issue?

Please refer to attached Paper Apart.

What change would you like to see made?

Please refer to attached Paper Apart.

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 5pm on Monday 1st June.**

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.

PAPER APART

REPRESENTATIONS TO THE ABERDEEN CITY COUNCIL PROPOSED LOCAL DEVELOPMENT PLAN 2015 ON BEHALF OF EUROPEAN DEVELOPMENT HOLDINGS LIMITED IN RESPECT OF OPPORTUNITY SITE OP75, DENMORE ROAD, BRIDGE OF DON, ABERDEEN

Introduction

European Development Holdings Limited welcome the allocation of land, extending to 4.56 hectares, at Denmore Road, Bridge of Don as an Opportunity Site (OP75) for Bulky Goods Retailing. They further welcome the identification of the site on the Citywide Proposals Map as a Commercial Centre.

They are further supportive of the retail hierarchy set out in the proposed Plan and the recognition of Commercial Centres as falling within that hierarchy.

Concern must be expressed, however, that the stated intention of the proposed Plan is to “**maintain**” the retail offer in Bridge of Don. Given the size of that community and the planned expansion in the period to 2030, the Plan should be seeking to increase the retail offer in the area rather than simply maintain it.

Modifications Required

The descriptive text pertaining to the OP75 allocation should be amended to allow the development of that site as an addition, and complementary to, the existing commercial centre at North Denmore Road.

Background

Following a call for sites to be considered for inclusion in the proposed Local Development Plan (2015) a Development Bid was submitted by European Development Holdings Ltd. This proposed the relocation and enhancement of the existing playing fields on Denmore Road and the redevelopment of the site for Class 1 Retail uses to provide a district centre serving the community to the east of Bridge of Don. The Bid advised that the site was capable of accommodating a range of retail uses anchored by a food superstore. It further advised that should the existing B&Q and other non-food retail units at North Denmore Road be redeveloped for food retailing, the site could accommodate non-food retail uses to replace those facilities at North Denmore Road, for which there was clearly a continuing demand in the area.

The Development Options Assessment undertaken by the Council identified the site as B0201, but the Main Issues Report failed to allocate it as a preferred site for Retail use. The Main Issues Report reasoned that the site at North Denmore Road already benefited from an open Class 1 Retail consent for 7,400 sq m of floorspace. The Aberdeen City and Shire Retail Study 2013, having regard to the committed development at North Denmore Road, concluded that

the provision of a new store in this community was not justified by a quantitative retail deficiency but, identified a qualitative retail deficiency and proposed the provision of a medium sized food store and related floor space to serve local day-to-day and limited main food shopping needs of the new community at Grandholm.

Representations on behalf of European Development Holdings Limited to the MIR emphasised the need to enhance overall retail provision within the Bridge of Don to serve the existing and expanding community. Recognising the unrestricted nature of the retail consent at North Denmore Road and the proposal for a superstore on that site, European Development Holdings Ltd proposed the identification of their Denmore Road site as an Opportunity Site for Non-Food Retail development to replace those non-food retail facilities likely to be displaced by the redevelopment of North Denmore Road for a supermarket use.

Officers, in preparing the proposed Plan, accepted those representations and recommended the allocation of the site as a Commercial Centre, but with the caveat that it was to replace the Bulky Goods uses at North Denmore Road should they be displaced. That recommendation was accepted by Members of the Communities, Housing & Infrastructure Committee and the proposed Plan was approved for Public Consultation at their meeting on 28 October 2014.

Justification

The need for additional retail provision serving the Bridge of Don has long been recognised, particularly by the local community. Although considered a suburb of Aberdeen, the Bridge of Don is larger than many towns with a current population in excess of 22,000. That will increase further with the planned development of 7,600 homes in the period to 2030 taking the population to well over 35,000. This, coupled with the release of over 100 hectares of employment land in the area, indicates a clear requirement for the provision of a non-food retail park to serve the growing community of Bridge of Don. Whilst the proposed Plan recognises this the caveat that the Denmore Road site is simply to accommodate displaced bulky goods uses from the North Denmore Road site should a supermarket use be developed there, is not helpful and fails to enhance the retail offer in the Bridge of Don.

As drafted, the proposed Plan fails to enhance the retail offer in the Bridge of Don. The retail Strategy for Bridge of Don is based on the assumption that the supermarket consent will be implemented on the North Denmore Road site. If that is not implemented, as appears likely, it leaves a significant retail deficiency in the Bridge of Don area. The community may retain the benefit of the existing Bulky Goods units at North Denmore Road, but lose 7,400 sq m of convenience floor space. It is contended that the Plan should be flexible enough to accommodate, both the consented convenience floor space at North Denmore Road and the existing Bulky Goods uses. It would be logical for both sites to be allocated through the Local Development Plan to accommodate a mix of Convenience and Bulky Goods retailing. Only by that means can the retail offer in the Bridge of Don be improved.

A Retail Capacity Assessment undertaken in September 2012 in respect of the Denmore Road site primarily considered the scope for Convenience use on the proposal site, but also considered the potential for the sale of comparison goods. The Assessment, a copy of which was submitted with the Development Bid, highlighted that the Bridge of Don catchment was poorly served by comparison shops. Catchment Zones 23 and 25 combined would generate £79.28m comparison goods expenditure at 2016, yet only retain £9.31m in the area. That expenditure leakage would increase further with the loss of the Bulky Goods units at North Denmore Road.

Given the scale of expenditure leakage, the allocation of the Denmore Road site for Retail use would have minimum impact on existing Retail Parks. The Boulevard Retail Park, Kittybrewster and Berryden are all performing strongly with few vacant units. As a consequence, the provision of additional Food and Non-Food Retail facilities serving the Bridge of Don area, potentially clawing back some expenditure leakage, will not have an adverse impact on existing facilities.

The development of the proposed site at Denmore Road for Retail purposes would also consolidate the existing Non-Food Retail provision on the Denmore Industrial Estate. This was a requirement highlighted by the 2004 Aberdeen & Aberdeenshire Shopping Study. Its allocation could encourage the relocation of the more remote retail units dispersed throughout the Estate and encourage single trip shopping rather than the current multi-trips generated as a consequence of the dispersed nature of the retail units.

There are no technical impediments to the development of Site OP75, Denmore Road for Retail use. The site is capable of taking access directly from the A90 at a point midway between the Aberdeen Exhibition & Conference Centre roundabout and the Murcar roundabout to the north. The formation of a new junction would also facilitate access to the currently allocated employment land lying to the east of the A90, as well as the proposed retail development. A Technical Note, prepared by Fairhurst Transportation Consultants, assessed the potential traffic impacts arising from the development of the site and a copy of that Note accompanied the MIR representations.

Proposals are also in place to relocate the existing playing fields currently occupying part of the site. New, significantly enhanced facilities, will be provided elsewhere in the Bridge of Don area serving the same community as the existing playing fields.

The proposed replacement site will accommodate two football pitches with their own covered stands, two multi-purpose floodlit training pitches with associated changing facilities and car parking. Notwithstanding the fact that the current facilities are not accessible to the general public, an indoor sports facility is also proposed that will be available for use by the general public. This re-provision would also address extant Local Development Policy relative to Urban Greenspace.

The development would not result in any significant loss to the landscape, character and amenity of the site or of the adjoining areas. The site has no significant wildlife value as it is, in effect, an isolated pocket of open space bound by a dual carriageway to the east. This is compounded by the removal of the land to the east of the A90 from the Greenbelt and its designation for Business and Industrial development. The remainder of the site is entirely surrounded by Business, Industrial and Residential uses. As a consequence, it currently makes no contribution to the Greenspace Network, which the extant Local Development Plan also considers it to form part.

Significantly greater benefit will accrue to the local residential and business community through the identification of the site for retail development, thereby satisfying a demand in the Bridge of Don area. The site is also accessible by cycle and pedestrian links to the main residential and business and industrial areas within Bridge of Don making it readily accessible by means other than a private car.

The identification of the site for Retail purposes would not conflict with the adjoining land uses. Indeed, it would be complementary to the existing Non-Food Retail uses immediately to the south and, as highlighted above, would encourage the consolidation of the Non-Food Retail uses into a recognised Commercial Park for the benefit of the wider community.

Summary

European Development Holdings Limited welcome the allocation of the site at Denmore Road as an opportunity for the provision of a Commercial Park. Enhanced retail facilities are much needed to serve the growing population of Bridge of Don. These should go beyond simply maintaining the existing retail offer.

The site should be allowed to be developed in addition to the existing site at North Denmore Road and between them, accommodate the consented Convenience Retail use and the full extent of the existing Bulky Goods floorspace at North Denmore Road.

There is no impediment to the development of the Denmore Road site for Retail use. Also, provision has been made for the relocation of the existing playing fields from the site to a new enhanced facility serving the entire Bridge of Don area.

Accordingly, it is respectfully requested that the Opportunity Site allocation be maintained, but that sufficient flexibility is introduced to allow it to be developed in addition to the North Denmore Road site.