

Response ID ANON-B3JU-DSJH-W

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on 2019-04-19 11:20:05

About You

What is your name?

Name:

John Handley

What is your organisation?

Organisation:

John Handley Associates Ltd

On behalf of:

Standard Life Assurance Limited

How can we contact you?

Email:

[REDACTED]

Telephone:

[REDACTED]

Address:

[REDACTED]

1 Introduction

Section 1 provides a context for the Main Issues Report. Do you have any comments in relation to this section?

Do you have any comments in relation to this section?:

3 Aberdeen City Centre and the Network of Centres

Question 5 City Centre Boundary

Do you agree the Local Development Plan should modify its City Centre boundary to match the City Centre boundary shown in the City Centre Masterplan?:

Question 6 City Centre Masterplan Intervention Areas

Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan?:

Question 7 City Centre Retail Core

Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?:

Question 8 Union Street Frontages

Should the Union Street Frontages percentages be reviewed? Do the current target percentages ensure there is a balance between a strong retail focus and allowing for other uses? What other uses should we allow on the retail core area of Union Street?:

Question 9 Out of Town Retailing

Should we direct high footfall uses to existing centres including the City Centre? Should we consider new out of town retail parks? What would the impact of these be on Union Street and the City Centre, and Aberdeen's network of centres?:

We have provided our full comments on this question in the attached Letter of Representation.

As set out in the attached letter, Standard Life Assurance supports the inclusion of the Beach Boulevard Retail Park as an existing Commercial Centre.

Standard Life Assurance also supports the suggested approach to promote a wider range of uses within Commercial Centres, and would encourage the Council to adopt this approach in the replacement LDP.

Standard Life Assurance fully supports the continued safeguarding of existing retail centres and the direction of high footfall uses to these centres, particularly the

Beach Boulevard Retail Park at Links Road. As noted in our accompanying letter, this long established and important retail park is currently identified as a Commercial Centre in the adopted LDP, under Policy NC6, and we support the continued identification and safeguarding of this important retail centre in the new Local Development Plan.

In response to the prospect of new out-of-town retail parks, Standard Life Assurance is very strongly against this prospect and would urge the Council to resist any new out-of-town retail parks, particularly within the Aberdeen Green Belt, and or in locations adjacent to the Aberdeen Western Peripheral Route and its junctions.

As we set out in our submissions at the pre-MIR stage, we would request that the new LDP should protect the junctions of the AWPR from inappropriate speculative development, and particularly large scale out-of-town retailing which should instead be directed to the existing retail centres.

This approach is crucial to safeguard and ensure the continued vitality and viability of Aberdeen's existing retail centres which are already facing significant challenges due to changes in consumer spending and the well-documented pressures being faced by a growing number of well-known retailers.

Question 10 Commercial Leisure Uses

Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:

For the reasons set out in the attached Letter of Representation, we agree that the Council should continue to direct commercial leisure uses towards existing centres, and this should include the Beach Boulevard Retail Park which already provides commercial leisure uses as part of its offer and is a main attraction, and significant employer, at the Beach Area.

We would, however, also suggest that the Council should seek to discourage any further retail development in the Beach Area, other than at the existing retail centres currently allocated as part of the Network of Centres.

Question 11 City Centre Living

How can we encourage more people to live in the City Centre? Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?:

MAIN ISSUE 1 Living in the City Centre

Should we include a policy in the Local Development Plan supporting residential development in the City Centre, including the conversion of upper and basement floors of premises to provide residential accommodation?:

Not Answered

Question 12 Residential Development in the City Centre

Are there any other locations within the City Centre where residential accommodation could be provided?:

MAIN ISSUE 2 A 24-Hour City

Should 24-hour activities in Aberdeen be supported and encouraged to grow, especially in the City Centre? Could this be achieved through policy?:

Not Answered

Question 13 Encouraging the Creative Arts

What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen City Centre is like no other place?:

Question 14 Proposals for Creative Arts

Are there other buildings or areas within Aberdeen that could accommodate the existing, and support an emerging creative sector for desk-based and studio-based artists?:

Question 15 Percent for Art

To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/ visible place or places within the development?:

MAIN ISSUE 3 Support for Visitor Attractions

To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?:

Not Answered

5 Transport and Infrastructure

Question 19 City Centre Parking

Should we reduce car parking in the City Centre to support the City Centre Masterplan? If so, how?:

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

How best can we encourage the provision of infrastructure to support changes in transport technologies? :

Not Answered

Question 20 Digital Infrastructure

Should high speed broadband be mandatory in all new residential developments with 5 or more units? Do you wish to suggest any other proposed changes to the Digital Infrastructure and Telecommunications Infrastructure policies?:

Question 21 Developer Obligations and Infrastructure Delivery

Do we need to change our approach to securing developer obligations for future development proposals?:

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::

Please see the attached Letter of Representation which provides our full comments on the MIR and associated documents.

Additional Files

If you have further information you would like to provide you may upload it here.:

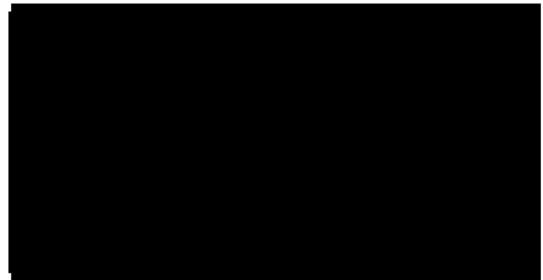
SLI - Beach Boulevard Retail Park, Aberdeen - LDP MIR Consultation - Letter of Representation - 19.04.19.pdf was uploaded

19 April 2019

By email to: ldp@aberdeencity.gov.uk

Local Development Plan Team
Enterprise Planning and Infrastructure
Aberdeen City Council
Business Hub 4
Marischal College
Broad Street
Aberdeen
AB10 1AB

JOHN HANDLEY ASSOCIATES LTD



Dear Sirs,

Aberdeen Local Development Plan Review – Main Issues Report

Submission on behalf of Standard Life Assurance Limited in respect of The Beach Boulevard Retail Park, Aberdeen

MIR Questions 9 – Out of Town Retailing & 10 – Commercial Leisure Uses

We refer to the publication of the Aberdeen Local Development Plan Main Issues Report and the invitation to submit comments to the Council in advance of the publication of the Proposed Plan.

On behalf of our client Standard Life Assurance Limited, the owners and managers of the Beach Boulevard Retail Park at Links Road, Aberdeen, we welcome the opportunity to provide comments at this stage in the preparation of the replacement Local Development Plan, and have completed the on-line MIR Questionnaire with our contact details and summary of our comments.

We would also request that the detailed comments set out below are accepted as part of our submission on the MIR. This submission follows on from our comments made in response to the Pre-MIR Consultation stage.

Whilst we have reviewed the full MIR Questionnaire and related consultation documents, and are aware of the separate questions being posed throughout the report, this submission is essentially restricted to matters relating to retailing and the approach towards existing and new retail centres.

In particular, this submission relates to Section 3 – Aberdeen City Centre and the Network of Centres and Questions 9 and 10 of the MIR Questionnaire.

Prior to setting out our response to the MIR consultation questions, we have provided an overview of Standard Life Assurance Limited and their interests at the Beach Boulevard Retail Park and its important role in the City's retail network.

Standard Life Assurance Limited

Standard Life Assurance Limited has significant property interests in Aberdeen, and is the owner and manager of the Beach Boulevard Retail Park at Links Road which is an established and protected retail destination which plays an important role in the City's retail hierarchy.

The Beach Boulevard Retail Park has been owned, developed and managed by Standard Life Assurance for over 15 years. As such, Standard Life Assurance has a significant investment in Aberdeen's retail sector, which in turns helps to secure and retain a large number of jobs in the City. Standard Life Assurance is therefore a major, long-term investor in Aberdeen's retail sector.

Contd./

The Beach Boulevard Retail Park

The Beach Boulevard Retail Park was constructed in the early 2000's and is a well-established, well-used retail development in an edge-of-city-centre location. It is a modern, purpose-built retail park which provides a range of retail and leisure units centred around a large car parking area.

The retail park provides almost 250,000 sqft (22,644 sqm) of modern retail floorspace in 11 large floorplate retail units. It is anchored by a major food superstore with two other food retailers, eight general comparison retailers, and a health and fitness centre.

The goods range in the retail park is not restricted and it benefits from an open class 1 retail use. In terms of the current mix of retail goods, it currently comprises: 50% convenience goods, 33% mixed comparison goods and 17% bulky comparison goods.

Since its opening, the retail park has been well-let, and has been occupied by a wide range of retailers. The current occupiers include: a large ASDA superstore, an Aldi foodstore, Iceland frozen food store, and a range of general comparison retail units, including: Home Bargains, Dunelm Mill, Pagazzi Lightning, Smyths, Poundworld and Pets at Home. The retail park also benefits from on-site leisure facilities at the DW Sports Gym in unit 2, which provides a health and fitness centre and swimming pool.

The Beach Boulevard Retail Park is accessible by walking, cycling and public transport and has a bus stop and shelter within the park. This bus route links the retail park with Footdee and the Beach Area with the City Centre. This bus link was initially funded by Standard Life to ensure enhanced public transport accessibility between Links Road and the adjacent residential areas and city centre, but is now self-financing.

In addition to its accessibility to the city centre, the Beach Boulevard Retail Park is located directly opposite the Queen's Link Leisure Park which contains a wide range of commercial leisure, entertainment and restaurant facilities. It also benefits from its proximity to Aberdeen Beach; existing residential areas; hotels and conference facilities; and a range of recreation and cultural facilities in the wider area.

The Beach Boulevard Retail Park is therefore a highly accessible, well located retail centre which benefits from an open Class 1 retail consent.

The Aberdeen City and Aberdeenshire Retail Study 2013 which was prepared by the Council to inform the currently adopted LDP identified the Beach Boulevard Retail Park as a key retail centre serving the City. The Retail Study acknowledged that it is the third largest retail location in Aberdeen outwith the City Centre, and has an estimated turnover of around £75M per annum (Table 4.2). It also noted that the turnover of the retail park had increased by 150% in real terms since 2004 (paragraph 4.32) and there is a wide choice of retail goods on sale (paragraph 4.29).

In terms of the shopper survey information, the Retail Study (para 4.29) advised that the Retail Park performs well, with *"above average levels of satisfaction for food shopping and average satisfaction for comparison goods. It also notes high levels of satisfaction for ease of access to the centre, with overall above average levels of satisfaction for Boulevard Retail Park as an attractive place to shop"*.

The Beach Boulevard Retail Park is therefore a highly accessible, well-located retail centre which contains a wide range of retail units, and a mix of convenience and comparison shopping and leisure uses. It scored highly in the survey of shoppers, and is seen as a high quality retail location. In addition to its accessibility to the city centre, the Beach Boulevard Retail Park is located directly opposite the Queen's Link Leisure Park which provides further commercial leisure, entertainment and restaurant facilities. The retail park also benefits from its proximity to Aberdeen Beach; existing residential areas; hotels and conference facilities; and a range of recreation and cultural facilities in the wider Beach Area.

The important role of the Beach Boulevard Retail Park as a key part of Aberdeen's Network of Retail Centres is acknowledged in the currently adopted LDP and it is identified as a *Commercial Centre* under Policy NC6.

Standard Life Assurance supports the identification and safeguarding of this important retail centre in the current LDP and would request that this designation of the Beach Boulevard Retail Park is carried forward and maintained in the replacement LDP.

Response to MIR Question 9 – Out of Town Retailing

Question 9 is concerned with out of town retailing and asks:

- *Should we direct high footfall uses to existing centres including the city centre?*
- *Should we consider new out of town retail parks?*
- *What would the impact of these be on Union Street and the city centre, and Aberdeen's network of centres?*

Section 3.5 of the MIR sets out the pre-ambles to Question 9 and confirms Aberdeen's existing network of centres. This identifies the Beach Boulevard Retail Park at Links Road as a Commercial Centre.

Standard Life Assurance supports the inclusion of the Beach Boulevard Retail Park as an existing Commercial Centre.

The MIR also confirms that within Commercial Centres: *"Current policy supports bulky goods only. However, SPP paragraph 63 states that commercial centres have a more specific focus on retailing and/or leisure uses, such as shopping centres, commercial leisure developments, mixed retail and leisure developments, retail parks and factory outlet centres."* It is therefore the intention of the emerging LDP to modify the role of Commercial Centres so they support and promote a wider range of uses within them.

Standard Life Assurance fully supports this approach to promote a wider range of uses within Commercial Centres, and would encourage the Council to adopt this approach in the replacement LDP.

In direct response to MIR Question 9 – *Out of Town Retailing*, Standard Life Assurance fully supports the continued safeguarding of existing retail centres and the direction of high footfall uses to these centres, particularly the Beach Boulevard Retail Park at Links Road.

As noted above, this long established and important retail park is currently identified as a Commercial Centre in the adopted LDP, under Policy NC6, and we support the continued identification and safeguarding of this important retail centre in the new Local Development Plan.

In response to the related question about the prospect of new out-of-town retail parks, Standard Life Assurance is very strongly against this prospect and would urge the Council to resist any new out-of-town retail parks, particularly within the Aberdeen Green Belt, and or in locations adjacent to the Aberdeen Western Peripheral Route and its junctions.

As we set out in our submissions at the pre-MIR stage, we would request that the new LDP should protect the junctions of the AWPR from inappropriate speculative development, and particularly large scale out-of-town retailing which should instead be directed to the existing retail centres.

Contd./

This approach is crucial to safeguard and ensure the continued vitality and viability of Aberdeen's exiting retail centres which are already facing significant challenges due to changes in consumer spending and the well-documented pressures being faced by a growing number of well-known retailers.

Response to MIR Question 10 – Commercial Leisure Uses

Question 10 is concerned with Commercial Leisure Uses and asks:

- *Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?*

For the reasons set out above, we agree that the Council should continue to direct commercial leisure uses towards existing centres, and this should include the Beach Boulevard Retail Park which already provides commercial leisure uses as part of its offer and is a main attraction, and significant employer, at the Beach Area.

We would, however, also suggest that the Council should seek to discourage any further retail development in the Beach Area, other than at the existing retail centres currently allocated as part of the Network of Centres.

Summary & Recommendations

Standard Life Assurance Limited continues to have significant property interest in Aberdeen, and is a major, long-term investor in Aberdeen's retail sector.

For these reasons, Standard Life Assurance urges the Council in preparing its review of the Local Development Plan to continue to safeguard existing retail centres and resist allocating any new out-of-town retail parks, particularly within the Aberdeen Green Belt and at the junctions of the Aberdeen Western Peripheral Route


Standard Life Assurance also supports and requests the continued designation of the Beach Boulevard Retail Park at Links Road as an important retail centre within the Aberdeen Network of Centres. Its identification as a Commercial Centre should be carried forward and maintained in the replacement LDP.

We trust these comments will be of interest and assistance, and will be afforded due consideration in the preparation of the Proposed LDP.

We would be grateful if you would acknowledge safe receipt of this submission, and advise us when the Proposed Plan is published.

We would also welcome the opportunity to discuss these points with you in further detail should this be required.

Yours faithfully


John Handley
Director
John Handley Associates Ltd
On behalf of Standard Life Assurance Limited

cc: 