

## Response ID ANON-B3JU-DSTH-7

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**  
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### About You

#### What is your name?

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#### What is your organisation?

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**On behalf of:**  
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## 2 Settlement Strategy

### Question 1 New Housing Sites

Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?:

### Question 2 Housing Allowances Beyond 2032

Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:

### Question 3 Brownfield and other Opportunity Sites

Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:

### Question 4 New Healthcare Facilities

Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:

## 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?:

It is submitted that the retail core should be subject to modest reduction, focussing on a more compact area of Union Street (Bridge Street to Broad Street) and the existing Shopping Centres at either side of the north-south axis.

The vision to cement the city centre as a major regional centre is fully supported. Notwithstanding, as is now accepted throughout the planning policy hierarchy, various uses combine to make for a successful centre, and cognisance must be had of the changing macro conditions for retailing that are affecting the sector. Retailing conditions have become more challenging in recent years, and accordingly, in order to best facilitate a valuable and vibrant shopping asset, it is essential that the core retail provision is not unnecessarily dispersed at locations across the city or, worse still, in out of centre locations.

Our previous submission to this consultation process (May 2018) identified that the length of Union Street had the potential to dilute the retail core area. Accordingly, while Union Street is an important unifying feature in the urban design of the City, there has been a distinct shift in how it performs and indeed, how the market and users perceive it. The City Centre Masterplan and MIR acknowledgement of the Union Street West Intervention Area is clearly a positive in this regard, providing modern direction and guidance as to how it should evolve. Clearly, retail should not always be the primary or most appropriate town centre use.

The 2015 City Centre Masterplan states that the city centre offer is “bland in both range of shops and shopping environments”. Retailing is a highly dynamic sector and the most successful, vital and viable retail centres in the UK will be those which continue to improve and adapt their floorspace offer to meet operator needs, within areas of sufficiently attractive clusters and critical mass. New, higher end retailers – building on the established retail provision – can still be attracted to Aberdeen City Centre in the right location and with the right context, whereby Union Square and other development sites in the retail core are ideally positioned. As per the provisions of the City Centre Masterplan, concentrating retail provision will only assist with efforts to increase the breadth and depth of the City’s offer, and a “step-change in quality”, as is “critical to delivering the [overall] vision”. (City Centre Masterplan, Page 19)

Moreover, indeed, the aforementioned negative perception needs to be challenged on an ongoing basis through improving the urban realm, and making a visit ‘into town’ an experience that is varied and interesting. Such aspirations are echoed in the City Centre Masterplan which notes that other areas in the city centre have a purpose as “stronger complementary nodes that piece together a higher quality retail circuit”. The Council recognition of the mixed use areas that surround the retail core, and the qualitatively different ambience of the west-end and its range of boutique shops and cafes that lie beyond this is applauded, as it helps ensure that the variety and interest of a visit to the city centre is preserved.

#### **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?:**

In introducing the prospect of out of town retail parks, the Main Issues Report notes that “a further challenge to the town centre first approach and the network of centres is out of town retail parks”. Noting the imminent opening of the Aberdeen Western Peripheral Route (AWPR), (new) “out of town retail parks could risk weakening the existing and established centres within Aberdeen and be counterproductive to the town centre first principle and our sequential approach”. This concern is fully justified in accordance with the following commentary:

As submitted in detail via submission to the pre-Main Issues Report consultation, the planning policy hierarchy is consistent in delivering on the town centre first approach.

The National Planning Framework 3 (NPF3) states the importance town centres have as a key component of the economic and social fabric of Scotland, and explicitly identifies the need to protect town centres. The corresponding policy provision is provided within the long established position within Scottish Planning Policy (SPP), “development plans should adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses” (Paragraph 68). In this regard, the City Centre Retail Core should be supported as the preferred location for all retail, commercial, leisure and other significant footfall generating development serving a city-wide or regional market.

Appropriately, resistance to out of town retail is a fundamental policy provision within the Proposed Aberdeen City and Shire Strategic Development Plan. This document was published in August 2018 after comments had been submitted to the Pre-Main Issue Report consultation. It notes: “Local Development Plans, in line with the sequential test and Town Centre First Principle should expressly avoid new development that would result in a negative impact on the route or any junction. Any new development adjacent to the AWPR, including the fastlink to Stonehaven, will be resisted unless it has been properly considered through the Development plan process, and any proposals which are not identified by a Local Development Plan will generally not be supported”.

We fully endorse this: the LDP must clearly presume against new out-of-town retail parks or high footfall-generating uses near the Aberdeen Western Peripheral Route’s junctions, and explicitly emphasise that development proposals should only come through the full and open development plan process. Large scale development at out-of-centre and indeed, out-of-town locations, whether of a high footfall-generating character or otherwise, should come forward in a strategic way, providing certainty for developers on the issue via a clear policy position on speculative applications.

Permitting new retail / high footfall-generating development at out of centre locations or AWPR junctions would have a material impact on the vitality and viability of Aberdeen City Centre and undermine the planned investment in the City Centre. Even modest or restricted speculative developments outside the main retail centres in Aberdeen would have profound impacts on investor confidence in the City Centre.

Out-of-centre locations are the least favoured in this regard. As directed at National and Strategic levels, this is replicated in the current Aberdeen Local Development Plan and must be maintained in the emerging, replacement version.

In the context of the above, it is essential that Aberdeen City Council Officers continue to regard all of the pre-Main Issues Report Consultation submissions for non-allocated out-of-town retail proposals as 'undesirable' through the LDP preparation stages (and, that the policy provision is in place to ensure effective and strong resistance to be upheld in the face of future speculative planning applications).

Such conclusions were applied to speculative pre-MIR bid sites at the following locations around the city: Prime West Kingswells; Maidencraig North West; Smiddybrae Kingswells; Contlaw Milltimber; Wellington Road East; Rowett North; Mundurno; Newton of Mundurno; the former Aberdeen Exhibition and Conference Centre; and, Perwinnes.

The current bid at Prime West is particularly worthy of note. The Council's analysis of this site in its bid assessment notes that "development of the site for retail would not directly support the existing uses on site and would erode the nature of the allocation of which the aim is to maintain a high-quality environment". Further, "development of retail uses is likely to result in additional traffic onto the A944. This is likely to be compounded with the site being located within close proximity to an AWPR intersection".

The extensive submissions by Union Square Developments Limited and others on the previous formal Prime Four proposals (Ref: P161429/PPP) demonstrated that such proposals wholly failed to comply with the sequential approach and would have a material and significant impact on the protected hierarchy of centres. New out-of-centre retail developments would (a) rely on existing town centre retailers opening new stores, with no guarantee that their City and District Centre stores would continue in the same extent or scale, with an inevitable loss of trade from the retail hierarchy; and, (b) compete with the City Centre (as exists and is proposed) for new retailers looking to open their first stores in Aberdeen. The applicant argued that there was an under provision of retail park provision within Aberdeen in comparison with other cities. Leaving aside the merits of such an approach, it is clear from the evidence presented that Aberdeen actually has more out-of-centre floorspace than other cities (see Hargest 'Initial Report', January 2017, Page 11)

Even with a restriction on fashion and clothing – as is now proposed at Prime Four – the location is simply not appropriate as a retail destination and an unnecessary addition to the local established retail hierarchy. New out of town retail facilities and/or speculative development on a large scale along the AWPR junctions would draw footfall away from the City Centre and undermine attempts to attract new retailers to the City and occupy/deliver existing City Centre developments/proposals, creating uncertainty and impacting investor confidence. The corresponding improved quality of the retail and leisure offer would be lost to out-of-centre facilities which would in part replicate and diffuse the retail spend and City Centre vitality, as would spin off trade normally spent in the City Centre.

Locations such as Prime Four also fail to meet sustainability aspirations, being unequivocally car-focussed. Indeed, increased trip generation from high footfall generating developments such as retail and leisure parks may have a notable impact on the operation of the AWPR and the associated junctions along the route, potentially leading to capacity issues along the route, with further improvements / upgrades potentially necessary in relation to speculative developments. For an out of centre site to be acceptable, SPP at Paragraph 68 states that it must be accessible by a range of transport modes (and not reliant on the private car).

The Council's position on the Prime West site and others assessed through the Bid process reflects well-established best practice that a town-centre-first approach is the best way to preserve vitality in the City Centre, especially given the geographical peculiarities of the Aberdeen retail catchment; prevailing macro retailing trends, reducing the representation requirements of existing national multiples; and, the aspirations as set out in the Council's City Centre Masterplan. As such, it is more important than ever that new out of town retail proposals are resisted. Adopting this approach is the only way that the City can realistically be expected to create the 'higher quality retail circuit' with its range of supporting service nodes that the City Centre Masterplan aspires to deliver.

## **Question 10 Commercial Leisure Uses**

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

As has already been rehearsed in terms of retail proposals, the SPP supports a town centre first approach when planning for uses which attract significant numbers of people, including retail and commercial leisure, as well as community and cultural facilities. The narrative that supports the policy explains the rationale behind its adoption, which is relevant across the country at a variety of scales:

"Town centres are at the heart of their communities and can be hubs for a range of activities. It is important that planning supports the role of town centres to thrive and meet the needs of their residents, businesses and visitors for the 21st century". (SPP paragraph 58)

The sentiment expressed through the SPP is echoed in the Proposed Aberdeen City and Shire Strategic Development Plan (PSDP) where it states:

"The Town Centre First Principle should be applied when considering significant proposals for retail, commercial leisure, offices and for community and cultural facilities... It is particularly important that we continue to support the transformation of Aberdeen City Centre, and make sure that this key regional asset fulfils its potential". (PSDP page 35)

The PSDP is clear that commercial leisure uses should be directed toward the City Centre, and this is a sentiment supported by the City Centre Masterplan that more generally frames the importance of the city centre as being:

"...where investment impact can often be maximised, where returns in terms of economic impact and community benefit are the greatest and where momentum is built. A more attractive, prosperous and resilient Aberdeen city centre can provide the basis for a more successful City, Shire and North East Scotland region".

There is an acknowledgment that within Aberdeen, leisure uses have historically grown in two poles within the City; the City Centre and the beach. This heritage can be seen at the beach through historic facilities like Codona's funfair and the beach ballroom, and in the City Centre through the Tivoli and His Majesty's Theatres. Today, there is acceptance that the beach provides an alternative space and ambience for commercial leisure activities, and that the presence of alternative nodes to fulfil such functions may be mutually beneficial by attracting users to the City in the first place.

Notwithstanding, as acknowledged by the MIR, proposals for commercial leisure uses are required to follow the network of centres and sequential approach i.e.

new development proposals serving a catchment area that is city-wide or larger shall be located in the city centre if possible. While there is support for leisure uses within the zoning 'Beach and Leisure', this must be subject to assessment against the sequential approach.

As such, the current Policy NC9 should be updated to require that any such new development proposals in this location are demonstrated by the applicant to not be capable of being readily accommodated within the City Centre.

It is important that the presumption against retail development in this area should be upheld in the new Policy NC9.

With the above in place, new 'attractions' will remain commensurate with the beach area's appropriate function as a leisure and recreation destination which complements and supplements the City Centre, safeguarding the latter's importance as the principal regional destination for high footfall uses.

### **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