

# Response ID ANON-B3JU-DSTX-Q

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**  
Submitted on **2019-05-13 12:11:11**

## About You

**What is your name?**

**Name:**

Fraser Littlejohn

**What is your organisation?**

**Organisation:**

Montagu Evans

**On behalf of:**

Patrizia

**How can we contact you?**

**Email:**

[REDACTED]

**Telephone:**

[REDACTED]

**Address:**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## 1 Introduction

**Section 1 provides a context for the [REDACTED] ation to this section?**

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

We act on behalf of Patrizia owners of the Aberdeen Market, Aberdeen, and write with reference to the Council's review of the Aberdeen Local Development Plan. Our clients are investing significantly in Aberdeen City Centre and take a keen interest in development planning issues and welcome the opportunity to comment on the Main Issues Report. We would be pleased to be kept advised of the process to prepare the new Local Development Plan.

## 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?:**

N/A

### Question 2 Housing Allowances Beyond 2032

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

N/A

### Question 3 Brownfield and other Opportunity Sites

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

N/A

### 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?:**

N/A

## 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?:**

The MIR notes that there are a number of committed and proposed projects in Aberdeen city centre that will help to create a better place for people to live, work and visit. Many of these projects fall from the City Centre Masterplan (CCMP) which was unanimously approved by the Council in 2015.

The CCMP identifies eight objectives for Aberdeen city centre:

- Changing perceptions and promoting the city as more than just an energy hub
- Growing the city centre employment base by promoting the area as a centre for business, trade, innovation and enterprise
- A metropolitan outlook and recognition of the fact that proposals for the city centre will have a wider metropolitan context across the city region
- Creating a living city for everyone by increasing the amount of housing available in the city centre, and by creating more “liveable” environments to ensure that city centre living is an attractive choice
- Promoting the “Made in Aberdeen” brand by ensuring the city centre retains its distinctiveness and embraces local character
- Revealing waterfronts by reconnecting the city centre with the harbour, beach and rivers
- Striving to become a technologically advanced and environmentally responsible city
- Promoting cultural identity and a culturally distinctive place.

It is acknowledged that the relationship between the CCMP and the LDP could be strengthened. In order to present a coherent approach to the city centre the Council are proposing to modify the city centre boundary within the LDP to match that within the CCMP.

Our clients would agree that the boundaries should match although suggest that consideration be given to the designation of the larger area to encourage more opportunity.

**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?:**

Further to the boundary change proposed, the Council are also considering identifying seven CCMP intervention areas in the LDP. These will be LDP and City Centre Masterplan Boundaries. Aberdeen Market forms part of one of the intervention areas ‘Heart of the City.’

Our clients would be supportive in principle to the identification of the intervention areas as opportunity sites to encourage investment and focus.

**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?:**

Zones within the city centre currently include NC2: The City Centre Retail Core and Union Street. Policy NC2 directs retail uses which serve a regional or city need to the retail core. This promotes a high concentration of retail uses within a short span of Union Street (between the north/ south bookends of Union Square and Bon Accord Centre and the east / west bookends of Broad Street to Huntly Street). Within the Union Street area of the City Centre Retail Core, there is an expectation that ground floor premises will predominantly have a retail use and target percentages are outlined in six zones along the street.

The CCMP states the need to reinstate the central role of Union Street in the life of the city, establishing stronger retail linkages north and south and creating a destination not just for shopping but for many city activities.

With this in mind the Council are questioning whether the retail core should be reduced to focus on a more compact area of Union Street and the existing shopping centres. They state that this would provide a focus on where retail uses should be located, and concentrate uses within the area. It would direct people who are living, working, investing and visiting Aberdeen to the main retail hub. Open frontages at ground floor level would be retained ensuring a welcoming presence.

Our clients would suggest that the nature of retailing is changing such that the identification of a hierarchy could be a beneficial approach. Development proposals should be considered however on their own merits.

**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:**

The current target minimum retail percentages on the Union Street area of the retail core are set out in the table. Presently, planning applications for non-retail uses which would take a sector below the minimum percentage should be refused. The Council state they do this to try and maintain as much retail use on Union Street as possible. However, if there is no demand for retail use in a particular unit, then it sometimes means it can stand empty for some time. Allowing other uses could see empty units filled more quickly, but it could also result in the gradual loss of retail units over time.

The Council are seeking views on whether the Union Street Frontages Percentages should be reviewed, and ask what other uses should they allow on the retail core area of Union Street. Whilst percentage frontages play a role in monitoring activity, a mix of uses including Class 1, 2 and 3 and leisure uses are all encouraged in centres by SPP. Our clients would suggest that the nature of retailing is changing such that proposals should be considered however on their own merits.

**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?:**

The Council intend to modify the role of Commercial Centres so they support and promote a wider range of uses within them.

A further challenge to the town centre first approach and the network of centres is out of town retail parks. Due to the imminent opening of the Aberdeen Western

Peripheral Route (AWPR), in addition to residential and business development allocations in the LDP, Aberdeen will continue to be attractive to retailers. 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.

The Council are seeking views on whether high footfall uses should continue to be directed to existing centres including the city centre, and whether the new LDP should consider new out of town retail parks.

In line with SPP our clients would suggest that the prevailing policy should continue to require the assessment of sites in a sequential manner.

#### **Question 10 Commercial Leisure Uses**

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

N/A

#### **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?:**

N/A

#### **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?:**

N/A

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?:**

N/A

#### **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?:**

N/A

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?:**

N/A

#### **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?:**

N/A

#### **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?:**

N/A

#### **MAIN ISSUE 3 Support for Visitor Attractions**

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

N/A

Not Answered

### **4 Quality Places**

#### **MAIN ISSUE 4 Minimum Internal Space Standards for New Residential Development**

**How can we ensure that new residential development delivers an adequate amount of internal floor space for future occupants?:**

N/A

Not Answered

#### **Question 16 External Space Standards**

**Do you think that the amenity spaces currently delivered are of a sufficient quality? Should we strive for a better quality/ quantity of private/ semi-private residential amenity space across the city and refuse planning permission to proposals which do not meet our high standards? What standards would you like to see set for new dwellings, flats, and conversions in respect of quality and quantity of external amenity space?:**

N/A

#### **Question 17 Natural Environment**

**Do you agree that the proposed list of policies for Natural Environment gives a clearer and more coherent structure than at present?:**

N/A

#### **Question 18 Food Growing**

**How can the Local Development Plan support the delivery of food growing projects in the City? Do you think food growing should be included in the next Plan by way of a new policy, or through existing policy and guidance?:**

N/A

### **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?:**

Our clients support the continued encouragement of the promotion of accessing the City Centre by sustainable means however this should be balanced by the car parking needs associated with different forms of development.

#### **MAIN ISSUE 5 Electric Vehicle Charging Infrastructure**

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

N/A

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?:**

N/A

#### **Question 21 Developer Obligations and Infrastructure Delivery**

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

N/A

### **6 Resource and Business Policy**

#### **MAIN ISSUE 6 Low and Zero Carbon Generating Technologies and Water Efficiency**

**Should the requirement of existing Policy R7 be changed?:**

N/A

Not Answered

#### **Question 22 Low and Zero Carbon Generating Technologies and Water Efficiency**

**What methodology should the Council use in calculating compliance with Policy R7, specifically how should the target of reducing carbon dioxide levels be calculated?:**

N/A

#### **Question 23 Solar Farm Developments**

**Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy developments, and should specific guidance be included within Policy R8?:**

N/A

## **MAIN ISSUE 7 Heat Networks**

**Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?:**

N/A

Not Answered

## **Question 24 Supporting Business and Industrial Development**

**Should we carry forward our current policy approach to safeguarding existing business and industrial areas from other development pressures into the next Local Development Plan?:**

N/A

## **MAIN ISSUE 8 West End Office Area**

**Should the policy support a mix of uses in the West End Office Area? If so, what types?:**

N/A

Not Answered

## **7 Affordable Housing**

### **Question 25 Affordable Housing**

**Do you agree with the Local Development Plan's current affordable housing approach being carried forward? What other measures could the Council consider in order to assist with the delivery of affordable housing units via the Plan? Should the threshold of not applying affordable housing requirements to developments smaller than 5 units remain in place?:**

N/A

### **Question 26 Private Rented Accommodation and Build to Rent**

**Are there ways that the Local Development Plan can facilitate Build to Rent development, through policy?:**

N/A

## **8 Sustainable Mixed Communities**

### **MAIN ISSUE 9 Inclusive Housing Mix (Housing for the Elderly and Accessible Housing)**

**How can the Local Development Plan ensure a greater mix of housing types is achieved in new developments?:**

N/A

Not Answered

### **MAIN ISSUE 10 Residential Care Facilities**

**How should the Local Development Plan cater for proposals relating to Residential Care Facilities?:**

N/A

Not Answered

### **MAIN ISSUE 11 Student Accommodation**

**How can the Local Development Plan cater to proposals relating to student accommodation?:**

N/A

Not Answered

### **MAIN ISSUE 12 Houses in Multiple Occupation**

**How can the Local Development Plan support sustainable mixed communities, with regards to HMOs?:**

N/A

Not Answered

**Percentage limit of HMOs in each area:**

**Please explain why you chose your answer:**

**Geographical boundary of each area:**

**Please explain why you chose your answer:**

**Threshold for when planning permission is required for a HMO:**

**Please explain why you chose your answer:**

**Question 27 Community Planning**

**Is there anything else that the Local Development Plan can do to support the objectives of the LOIP or the aims of Community Planning?:**

N/A

**Question 28 Changing Places Toilets**

**Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?:**

N/A

**Appendix 1 Proposed Draft New Policies**

**Policy D2 Amenity**

**Do you have any comments on the policy?:**

N/A

**Policy D5 Advertisements and Signage**

**Do you have any comments on the policy?:**

N/A

**Policy D8 Shopfronts**

**Do you have any comments on the policy?:**

We note the references at Policy D8 to the fact that historic shopfronts and their features will be retained, repaired, and restored and that proposals will be required to be designed for their context. It further states that replacement requires thorough consideration. It continues that when replacement is proposed, it may be possible to restore elements of the original or historic design on the basis of sound evidence; alternatively, a modern shopfront within a traditional surround or a contemporary design which reinterprets the proportions and form of a traditional shopfront may be acceptable.

Our clients would suggest that the nature of retailing is changing such that development proposals should be considered however on their own merits.

**Policy D9 Windows and Doors**

**Do you have any comments on the policy?:**

N/A

**Policy H4 Housing Mix and Housing for Particular Needs**

**Do you have any comments on the policy?:**

N/A

**Policy H8 Residential Care Facilities**

**Do you have any comments on the policy?:**

N/A

**Policy H9 Student Accommodation Developments**

**Do you have any comments on the policy?:**

N/A

**Policy H10 Houses in Multiple Occupation**

**Do you have any comments on the policy?:**

N/A

**Policy NC9 City Centre Living**

**Do you have any comments on the policy?:**

N/A

**Policy NC10 24-hour City**

**Do you have any comments on the policy?:**

N/A

**Policy NC11 Visitor Attractions and Facilities**

**Do you have any comments on the policy?:**

N/A

**Policy NC12 Public Art Contribution**

**Do you have any comments on the policy?:**

N/A

**Additional Documents**

**Please include comments on other documents below:**

**Please include comments on other documents below::**

N/A

**Additional Files**

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

100519 MIR Representations.pdf was uploaded

# BRIEFING NOTE

**Site or property:**  
Aberdeen Market

**Job number:**  
SV10327

**Client:**  
PATRIZIA

**Completed by:**  
Lisa Proudfoot / Fraser Littlejohn

**Date:**  
Friday, 3 May 2019

**Subject:**  
Aberdeen Main Issues Report Consultation  
2019

## About You

Fraser Littlejohn  
Montagu Evans on behalf of Patrizia

## Introduction

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

We act on behalf of Patrizia owners of the Aberdeen Market, Aberdeen, and write with reference to the Council's review of the Aberdeen Local Development Plan. Our clients are investing significantly in Aberdeen City Centre and take a keen interest in development planning issues and welcome the opportunity to comment on the Main Issues Report. We would be pleased to be kept advised of the process to prepare the new Local Development Plan.

## 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?*

The MIR notes that there are a number of committed and proposed projects in Aberdeen city centre that will help to create a better place for people to live, work and visit. Many of these projects fall from the City Centre Masterplan (CCMP) which was unanimously approved by the Council in 2015.

The CCMP identifies eight objectives for Aberdeen city centre:

- Changing perceptions and promoting the city as more than just an energy hub
- Growing the city centre employment base by promoting the area as a centre for business, trade, innovation and enterprise



# BRIEFING NOTE

- A metropolitan outlook and recognition of the fact that proposals for the city centre will have a wider metropolitan context across the city region
- Creating a living city for everyone by increasing the amount of housing available in the city centre, and by creating more “liveable” environments to ensure that city centre living is an attractive choice
- Promoting the “Made in Aberdeen” brand by ensuring the city centre retains its distinctiveness and embraces local character
- Revealing waterfronts by reconnecting the city centre with the harbour, beach and rivers
- Striving to become a technologically advanced and environmentally responsible city
- Promoting cultural identity and a culturally distinctive place.

It is acknowledged that the relationship between the CCMP and the LDP could be strengthened. In order to present a coherent approach to the city centre the Council are proposing to modify the city centre boundary within the LDP to match that within the CCMP.

Our clients would agree that the boundaries should match although suggest that consideration be given to the designation of the larger area to encourage more opportunity.

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?

Further to the boundary change proposed, the Council are also considering identifying seven CCMP intervention areas in the LDP. These will be LDP and City Centre Masterplan Boundaries. Aberdeen Market forms part of one of the intervention areas ‘Heart of the City.’

Our clients would be supportive in principle to the identification of the intervention areas as opportunity sites to encourage investment and focus.

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?

Zones within the city centre currently include NC2: The City Centre Retail Core and Union Street. Policy NC2 directs retail uses which serve a regional or city need to the retail core. This promotes a high concentration of retail uses within a short span of Union Street (between the north/ south bookends of Union Square and Bon Accord Centre and the east / west bookends of Broad Street to Huntly Street). Within the Union Street area of the City Centre Retail Core, there is an expectation that ground floor premises will predominantly have a retail use and target percentages are outlined in six zones along the street.

The CCMP states the need to reinstate the central role of Union Street in the life of the city, establishing stronger retail linkages north and south and creating a destination not just for shopping but for many city activities.

With this in mind the Council are questioning whether the retail core should be reduced to focus on a more compact area of Union Street and the existing shopping centres. They state that this would provide a focus on where retail uses should be located, and concentrate uses within the area. It would direct people who are living, working, investing and visiting Aberdeen to the main retail hub. Open frontages at ground floor level would be retained ensuring a welcoming presence.

Our clients would suggest that the nature of retailing is changing such that the identification of a hierarchy could be a beneficial approach. Development proposals should be considered however on their own merits.

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?

# BRIEFING NOTE

The current target minimum retail percentages on the Union Street area of the retail core are set out below. Presently, planning applications for non-retail uses which would take a sector below the minimum percentage should be refused. The Council state they do this to try and maintain as much retail use on Union Street as possible. However, if there is no demand for retail use in a particular unit, then it sometimes means it can stand empty for some time. Allowing other uses could see empty units filled more quickly, but it could also result in the gradual loss of retail units over time.

Sector	Minimum required retail %
A (North side of Union Street between Broad Street & St Nicholas Street)	40
B (North side of Union Street between St Nicholas Street & Union Terrace)	70
C (North side of Union Street between Union Terrace & Huntly Street)	45
D (South side of Union Street between Bon Accord Street & Bridge Street)	65
E (South side of Union Street between Bridge Street & Market Street)	80
F (South side of Union Street between Market Street & Marischal Street)	65

The Council are seeking views on whether the Union Street Frontages Percentages should be reviewed, and ask what other uses should they allow on the retail core area of Union Street.

Whilst percentage frontages play a role in monitoring activity, a mix of uses including Class 1, 2 and 3 and leisure uses are all encouraged in centres by SPP. Our clients would suggest that the nature of retailing is changing such that proposals should be considered however on their own merits.

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?

The Council intend to modify the role of Commercial Centres so they support and promote a wider range of uses within them.

A further challenge to the town centre first approach and the network of centres is out of town retail parks. Due to the imminent opening of the Aberdeen Western Peripheral Route (AWPR), in addition to residential and business development allocations in the LDP, Aberdeen will continue to be attractive to retailers. 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.

The Council are seeking views on whether high footfall uses should continue to be directed to existing centres including the city centre, and whether the new LDP should consider new out of town retail parks.

In line with SPP our clients would suggest that the prevailing policy should continue to require the assessment of sites in a sequential manner.

## 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?

Our clients support the continued encouragement of the promotion of accessing the City Centre by sustainable means however this should be balanced by the car parking needs associated with different forms of development.

# BRIEFING NOTE

## **Appendix 1 Proposed Draft New Policies**

### Policy D8. Shopfronts – Do you have any comments on the policy?

We note the references at Policy D8 to the fact that historic shopfronts and their features will be retained, repaired, and restored and that proposals will be required to be designed for their context. It further states that replacement requires thorough consideration. It continues that when replacement is proposed, it may be possible to restore elements of the original or historic design on the basis of sound evidence; alternatively, a modern shopfront within a traditional surround or a contemporary design which reinterprets the proportions and form of a traditional shopfront may be acceptable.

Our clients would suggest that the nature of retailing is changing such that development proposals should be considered however on their own merits.