



# Aberdeen Local Development Plan Review

## Main Issues Report Response Form 2019

Aberdeen City Council has published a Main Issues Report (MIR) which is part of the process of preparing a new Local Development Plan. It is designed to gather views on specific proposals and sets out options for dealing with the key planning matters facing Aberdeen over the next 20 years such as the location of new housing and employment development, the future of retailing and the City Centre, housing needs and tackling climate change. It also includes a number of potential new policies which would be used in the determination of planning applications.

The MIR has been published alongside a Monitoring Statement and Environmental Report. Copies are available to view at Marischal College, Broad Street, Aberdeen. These, and other supporting documents, are available at: - [www.aberdeencity.gov.uk/aldp2022](http://www.aberdeencity.gov.uk/aldp2022)

Everyone now has the chance to comment on the report and associated documents. All comments received will be considered and used to inform the preparation of the Proposed Aberdeen City Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in early 2020.

**The consultation runs from 4 March 2019 to 13 May 2019.**

Responses to the published documents can be:

- made online at:- <http://consultation.aberdeencity.gov.uk/planning/mir2019>;
- emailed to:- [ldp@aberdeencity.gov.uk](mailto:ldp@aberdeencity.gov.uk); or
- by post to:- Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen, AB10 1AB.

**Completed response forms should be with us no later than 13 May 2019.**



## YOUR DETAILS

Name	Michael Lorimer
Organisation (if relevant)	Ryden LLP
On behalf of (if relevant)	
Address	
Postcode	
Telephone	
E-mail	

Thank you for taking the time to complete this response form. If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here



If yes, please provide an e-mail address

### PRIVACY STATEMENT

As part of the review of the Local Development Plan, Aberdeen City Council (ACC) will offer you several opportunities to submit your views and comments. These opportunities will range from the current consultation stage, the Main Issues Report, where we will ask you to comment on specific proposals and alternatives to the Proposed Plan stage where the set view of ACC has been established.

ACC are legally required to consult at this stage and at Proposed Plan stage. This is set out in the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations. The Environmental Assessment (Scotland) Act 2005 also requires us to consult on a Strategic Environmental Assessment Environmental Report.

By submitting a response to the consultation, you understand that ACC can use the information provided in this form, including personal data, as part of the review of the Aberdeen City Local Development Plan. ACC will not share or disclose any personal data about you to any organization or person unless it is authorized or required to do so by law.

The data controller for this information is ACC. We understand our legal basis for processing this information as Article 6(1)(c) of the General Data Protection Regulation as this is an activity we are legally required to carry out under the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations and The Environmental Assessment (Scotland) Act 2005. The data on the form will be used to inform the preparation of the Proposed Aberdeen City Local Development Plan 2022. At the end of the consultation, where contact details have been provided, the Local Development Plan team will provide you with a respondent number. You may also be contacted about the comments you have made and, as obliged by the Town and Country Planning (Scotland) Act 1997 (as amended) and supporting regulations, the Local Development Plan team will contact you to inform you of the publication of the proposed Aberdeen Local Development Plan in early 2020. If you chose not to provide your contact details, your comments will still be valid but we will not be able to contact you in the future.

Responses will be collated, redacted, summarised and stored electronically or in locked cabinets in Marischal College. All redacted responses will be published, alongside the respondents name (if provided), on the Aberdeen City Local Development Plan website. Contact details will not be made public, but your name and respondent number will be published.

Aberdeen City Council will only keep your personal data for as long as is needed. Data will be kept until the emerging Local Development Plan is itself replaced – this is likely to be around 5 years following its adoption in 2022 – so 2027. Following this, data will be disposed of in a secure manner.

### YOUR DATA, YOUR RIGHTS

You've got legal rights about the way ACC handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data. Please contact the Council's Data Protection Officer by e-mailing [DataProtectionOfficer@aberdeencity.gov.uk](mailto:DataProtectionOfficer@aberdeencity.gov.uk) or writing to Data Protection Officer, Aberdeen City Council, Governance, Level 1 South, Marischal College, Broad Street, Aberdeen, AB10 1AB. More information is available at: - <https://www.aberdeencity.gov.uk/your-data>

## YOUR COMMENTS

<p>Which document(s) are you commenting on?</p>	<ul style="list-style-type: none"><li>• Main Issues Report</li><li>• Strategic Environmental Assessment Environmental Report</li><li>• Monitoring Statement</li></ul>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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Please indicate the document and the specific Issue, Question, Site, Policy, Map or Table you are commenting on. Please provide your comments below and explain your reason for supporting, opposing or commenting on this specific part of the document.

Please see attached Paper Apart.

## **PAPER APART**

### **Representations to the Aberdeen City Local Development Plan 2019 Main Issues Report on behalf of the University of Aberdeen in relation to Site No. B01/04, Gateway Site, OP19 Rowett North**

#### **Introduction**

On behalf of the University of Aberdeen, objection is made to Aberdeen City Council's recommendation to identify bid site B01/04, which lies within OP19 Rowett North, as undesirable. The entire OP19 site is identified as a Specialist Employment Area, with the new Aberdeen Exhibition and Conference Centre (now named The Event Complex Aberdeen or TECA) lying to the east, which is due to open in Summer 2019.

TECA is a state of the art events venue with world-class conference and exhibition facilities, all sustainably powered by local, renewable energy sources. It comprises 48,000 sq metres of multi-purpose space, large conference halls and suites, a superior arena, spacious hospitality boxes and high-end restaurant. This is supported by three on-site hotels including an adjoining 4-star Hilton with 200 bedrooms, the Aloft Hotel with 150 bedrooms and a third budget hotel to be confirmed with a further 150 bedrooms.

Bid site B01/04 lies within the 'Gateway' area to the west of the wider Opportunity Site and is identified within the approved Masterplan for Business (Class 4) and Leisure Uses (Class 11). The University of Aberdeen is keen to secure additional flexibility in the range of employment uses which are identified on the site. The new TECA complex will become a considerable new attraction for Aberdeen and it is argued that a wider range of suitable complementary uses should be identified on bid site B01/04 to ensure that the site remains a vibrant and viable addition to the surrounding area, catering for both daytime and evening activity. In recognition of market conditions, which continues to attract more limited demand for speculative office development across the city, the Specialist Employment Area zoning should therefore be relaxed to enable a broader range of employment uses on the site, to include retail provision.

This representation should be read in conjunction with the detailed Development Bid submitted by the University of Aberdeen at the pre-MIR stage, which demonstrates that the site is suitable to accommodate retail use on the site.

The Development Options Assessment Report, which accompanied the publication of the MIR, provides a scoring matrix for each Bid site and provides a summary justification for the Officers' recommendation as to whether the site should, or should not, be included in the proposed Plan. It is welcomed that the site scores relatively highly overall, however there are a number of issues raised within the Council's assessment of the site which The University of Aberdeen would wish to respond to. These are summarised below.

#### **Natural Conservation**

It is noted by Aberdeen City Council that the corridor which follows the burn is designated as Green Space Network. However, the site is already identified for development and this will already have been considered in the designation of the site. Any relaxation of the Specialist Employment Area zoning

would similarly have no impact on this designation and would respect the established layouts contained in the Rowett North Masterplan, which have been designed to protect this corridor through the creation of a Burn Parkland.

The Council's assessment also states that there is potential for bat habitat on the site and recordings of roe deer on the site. Again, it should be reiterated that the principle of development is already accepted on the site and these habitats would be considered prior to any development on the site. These are not an impediment to the provision of the proposed retail uses on the site.

### **Landscape Fit**

The Council's assessment states that, although some screening exists along the site boundary, it is still likely to be visible from the A96 which is a busy road. As such, it is considered that the site is likely to be intrusive into the surrounding landscape as it will detract from the stature of the new AECC. The Council again, fail to acknowledge in the assessment that the principle of development is already accepted on this site, through its designation as OP19 as a Specialist Employment Area. As such, any development will be seen from the A96 and in the context of the substantial TECA building, which is also clearly visible from the A96 and remain the dominant built feature within the surrounding landscape. Additionally, proposed landscaping on the site will ensure any retail development is contained in an appropriate landscape setting. As such, the visibility of the site is not considered to be a significant issue in this instance. The issue is the University's desire for flexibility in the type of employment uses on the site to support the current zoning, with retail considered to be a suitable use of the site.

In any case, the visibility of the site is one of the key reasons why it is considered suitable for proposed retail use. This site benefits from a strategic position, forming a key gateway into Aberdeen and would ensure a high profile location to attract the suggested supermarket, or bulky goods retail operator. Such uses would maintain activity on the site throughout the day and evening and at times when TECA may not have an event. It would also provide uses which would benefit those working within the proposed business areas, as well as visitors attending TECA and the adjacent hotels.

### **Relationship to Existing Settlement**

The Council acknowledge that the development is part of the Rowett North Masterplan and state that, as a result, it has been designed to fit within the wider concept of the Masterplan that will surround the site. They go onto state that the development of a retail unit could detract from the stature and impact the new AECC would have. This is refuted, and as stated above, it is considered that relaxing the employment uses on the site will support a more diverse and viable development adjacent to TECA. This will ensure activity is maintained on the site at all times and provide complementary uses that will benefit the users of the area. As such, it is not accepted that a retail unit would detract from TECA.

It is welcomed that the Council score the bid proposals highly in terms of land use mix/balance and recognise that as there is no retail currently in the area and such provision would create a balance of uses in the area. The Scoring Matrix suggests that Aberdeen City would encourage such a mix, therefore the proposed retail uses on the bid site should be looked upon favourably.

### **Proximity to Facilities**

The Council's Assessment scores the site poorly on its proximity to facilities. However, it is argued that the proximity to services is not critical to this site. The proposals are intended to support the new TECA site as part of the wider employment area. Accordingly, proximity to the medical practice, schools and neighbourhood centre would not affect the viability of the proposals.

### **Land Use Conflict**

In addition to the Council's argument that retail uses on the site could potentially detract from the new AECC, they also consider that it could detract from proposed retail centres at Rowett South. As highlighted in the development bid submitted for the site, the Aberdeen and Aberdeenshire Retail Study 2013 identified a number of retail deficiencies, including Newhills. Although there are proposals included within Rowett South (OP21) for retail provision, it is argued that this proposed site may not have the profile to attract a supermarket operator. Retail development on bid site B0104 would meet the deficiencies highlighted in the Retail Study whilst supporting the adjacent uses at OP19 Rowett North.

### **Conclusion**

To conclude, it is argued that the existing Specialist Employment Area designation on the Gateway site should be relaxed to improve the range of uses appropriate on the site and the land suitably identified for retail uses. Such uses would complement the TECA facility, increase daytime and evening activity on the site to the benefit of those working in, or visiting TECA. Diversifying the range of uses on the site to include retail will help create a vibrant and attractive business area, within a strategic location, which is accessible and well served by transport links.

It is therefore respectfully requested that the current Specialist Employment Area zoning is relaxed within the Proposed Aberdeen Local Development Plan, to allow for retail provision on the site.