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Local Development Plan Team  
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Dear Local Development Plan Team

**ABERDEEN CITY LOCAL DEVELOPMENT PLAN 2019 | MAIN ISSUES REPORT  
RESPONSE ON BEHALF OF LSREF3 TIGER ABERDEEN S.À.R.L. (C/O ELLANDI LLP)**

Williams Gallagher Town Planning Solutions Ltd (Williams Gallagher) act on behalf of LSREF3 Tiger Aberdeen S.à.r.l. (c/o Ellandi LLP) who own and manage the Trinity Shopping Centre in Aberdeen City Centre. This letter provides a series of high-level observations in connection with the Main Issues Report (MIR) which was published for consultation in March 2019. It is submitted further to our representation in respect of the Local Development Plan (LDP) Review Pre-Main Issues Consultation in May 2018 (and prior to this, our input into the City Centre Masterplan (CCMP) and associated Station Gateway Development Framework).

To begin, we would like to make clear that we are keen to meet officers to discuss their aspirations for the Trinity Centre (and the wider Station Gateway Intervention Area) and to start to consider how the opportunities arising from our client's future aspirations can be incorporated into the emerging Local Development Plan 2022.

We are of course aware that the scheme forms part of the CCMP Intervention Area and that both the CCMP and the associated Station Gateway Development Brief include a long-term aspiration for the complete restructuring of the Trinity Centre (allowing for improved linkages between the Station and Union Street). There has however been a significant passing of time since we provided comment on these documents.

In view of this, we hope that an initial fact-finding meeting can take place at your earliest convenience and will be in touch in due course to make the necessary arrangements.

Turning to the MIR itself, we are broadly supportive of the majority of the preferred options for dealing with the main issues identified by the report. In respect of Aberdeen City Centre and the Network of Centres:

- we agree that the LDP should modify the City Centre boundary to match the City Centre boundary shown in the CCMP (**Question 5**);
- we agree that the CCMP Intervention Areas should be identified as Opportunity Sites in the LDP (**Question 6**);
- we agree that it would be beneficial for the retail core in the City Centre to focus on a more compact area of Union Street and the existing shopping centres – this should not however prohibit the potential redevelopment of sites where it can be demonstrated that a loss of existing retail provision in this location would not undermine the main function of the retail core and / or would give rise to transformative regeneration benefits and / or promote the wider objectives of the CCMP (**Question 7**);
- we agree that high footfall uses should be directed to existing centres including the City Centre (**Question 9**);

- we would argue that there is no need to consider new out of centre retail parks – there is no established need for such facilities, moreover and as stated at Page 32 of the MIR, 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 the sequential approach.

We object to the proposal for wholesale modification of the role of Commercial Centres so they support and promote a wider range of uses within them as this is not considered absolutely essential. Indeed, Para 63 of SPP allows required plans to define the function of commercial centres, for example where retail activity may be restricted to the sale of bulky goods as is currently the case. If certain parks are modified in terms of permitted uses, full justification must be provided and officers should be confident that in doing so, it will not have an adverse / harmful impact on the existing and established centres within Aberdeen.

We would also emphasise that Para 71 of the SPP states that where development proposals in commercial centre locations are contrary to the development plan, it is for applicants to demonstrate that more central options have been thoroughly assessed and that the impact on existing town centres is acceptable. It is thus imperative that policies for Commercial Centres state that new floorspace in these locations and / or the relaxation of restrictions on goods sold will only be permitted where they demonstrate compliance with the impact and sequential approach.

In respect of **Question 8**, we refer officers back to our representation dated May 2018, in which we urged the Council to ensure the emerging Plan is flexible enough to ensure that landlords such as LSREF3 Tiger Aberdeen S.À.R.L. are able to respond quickly to changing shopping habits (in particular internet retailing) and structural shifts in the retail market (such as the programmed closure of high street stores) in order to create the right environments to attract people to visit and stay longer. This includes allowing for a wider mix of uses in the City Centre Core which reinforce traditional retail uses.

The retail and leisure industry is going through a period of fundamental change and as such it will be important for the Plan to support the sector particularly in a post-EU economy, and a flexible policy framework will assist this. We will therefore support a Plan which places emphasis on retailing in the City Centre Core, but which also provides a framework which allows for the consideration of other, vibrant non-retail uses that may come forward in this location.

This is particularly relevant in the context of adopted LDP Policy NC2 which currently sets out very strict criteria as to when a proposal for a change of use from Class 1 will be acceptable. As we have asserted in previous consultations, such criteria has the potential to stifle changes of use which are likely to be of benefit to the City Centre (over and above certain retail uses). This includes for example changes of use from to Class 1 (Retail) to Class 3 (Food and Drink) which can positively contribute to the vibrancy and vitality of town centres through enlivenment of the street scene and through increasing shopper dwell time.

In this context, we note that increasingly, retail forms only one part of the experience for visitors to a city / town centre; it is equally about gaining access to people driven services, eating out, meeting with friends and having an opportunity to socialise. Subsequently, we would urge the emerging Plan to incorporate more flexible policies in connection with changes of use in the Core Retail Area in recognition of the fact that customers increasingly expect more from their shopping experiences and there is pressure on shopping centre owners, managers and tenants to respond to this. Percentage targets are far too arbitrary, stifle creativity and innovation and are likely to result in significant voids in the likely event demand for retail space continues to decline.

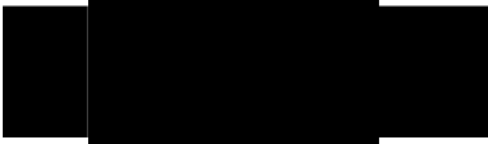
In respect of **Question 12 (Residential Development in the City Centre)**, we are pleased to note that the Council intends to strengthen its position in regard to promoting residential development in the City Centre, which will include support for the conversion of upper floors to residential accommodation. Clarification is however required as to whether major residential development outwith the areas identified by the CCMP would be supported in principle.

As a final point, we note that despite a Bid being submitted in respect of the Prime West site for retail uses, officers have dismissed this site on the basis that, inter alia, a large retail development here would

be contrary to the town centre first principle and may have unacceptable impacts on existing retail and commercial centres, including Aberdeen City Centre. We wholeheartedly support this stance.

We trust that these comments are helpful and look forward to meeting you in due course to discuss our client's aspirations for the Trinity Centre as they develop. In the meantime, on behalf our client, we request that we are kept up to date on the progress of the emerging Local Development Plan.

Yours sincerely,



Heather Arnell (MRTPI)  
**DIRECTOR**  
**WILLIAMS GALLAGHER**