

## Proposed Aberdeen Local Development Plan 2015 Representation Form

Please use this form to make comments on the Proposed Aberdeen Local Development Plan, ensuring that your comments relate to a specific issue, site or policy in either the Proposed Plan, Proposed Supplementary Guidance, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

**The consultation period runs between Friday 20<sup>th</sup> March and Monday 1<sup>st</sup> June 2015. Please ensure all representations are with us by 5pm on Monday 1<sup>st</sup> June.**

<b>Name</b>	Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> John Handley
<b>Organisation</b>	John Handley Associates Ltd
<b>On behalf of (if relevant)</b>	Standard Life Assurance Limited
<b>Address</b>	1 St Colme Street Edinburgh
<b>Postcode</b>	EH3 6AA
<b>Telephone</b>	██████████
<b>E-mail</b>	████████████████████

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<b>What document are you commenting on?</b>	Proposed Plan	<input checked="" type="checkbox"/>	
	Proposed Supplementary Guidance	<input checked="" type="checkbox"/>	
	Proposed Action Programme	<input type="checkbox"/>	
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>	
<b>Policy/Site/Issue</b>	Policy NC9 Beach and Leisure	<b>Paragraph(s)</b>	3.30 and 3.31

## What would you like to say about the issue?

This representation is submitted on behalf of Standard Life Assurance Limited, the owners and managers of the Boulevard Retail Park at Links Road, and the Denmore Road Retail Park at Bridge of Don, Aberdeen. It follows on from our client's submissions on the Main Issues Report in March 2014.

On behalf of our client, we welcome the Proposed Plan's recognition of the importance of the Aberdeen beach area as set out under Policy NC9 and described at paragraphs 3.30 and 3.31 on page 31 of the Proposed Plan.

In particular, we support the Proposed Plan's acknowledgement that the Aberdeen beach is one of the major leisure developments in the city, and welcome the suggestion, through the City Centre Masterplan and Delivery Programme to improve and enhance the linkages and connectivity to the beach from the city centre.

We also support the suggested masterplan for the beach area and would welcome the opportunity to comment on this once prepared.

In terms of Policy NC9, we welcome the proposed rezoning of the existing Urban Green Space to the new Beach and Leisure designation, which would encourage leisure uses that are compatible with the beach, and agree with the approach to restrict any further retail development in the beach area, other than the retail locations currently allocated.

**What change would you like to see made?**

No changes to Policy NC9 or paragraphs 3.30 to 3.31

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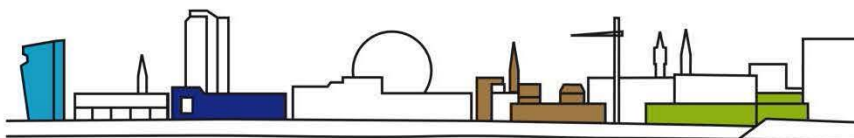
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#### **Data Protection Statement**

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<b>Policy/Site/Issue</b>	Network of Centres (pages 26 to 31) and Supplementary Guidance: Hierarchy of Centres as it relates to the Boulevard Retail Park, Links Road, Aberdeen	<b>Paragraph(s)</b>	

## What would you like to say about the issue?

This representation is submitted on behalf of Standard Life Assurance Limited, the owners and managers of the Denmore Road Retail Park at Bridge of Don, Aberdeen. It follows on from our client's submissions on the Main Issues Report in March 2014.

On behalf of our client, we welcome the Proposed Plan's identification of the Denmore Road Retail Park as an important retail centre and its designation on the Proposals Map and its inclusion within the Supplementary Guidance: Hierarchy of Centres.

However, and as requested at the MIR stage, we would request that the Denmore Road Retail Park is designated as a "District Centre" in the new Local Development Plan. This would acknowledge its existing place in the retail hierarchy and its potential for further improvement and expansion to meet the identified retail needs for a wider catchment area. We provided detailed comments on this matter in our response to the MIR, and these are summarised again below.

The Denmore Road 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, which in turn 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.

The retail units at Denmore Road were originally constructed in the 1980's and have been adapted and extended over time to meet modern retailer and customer requirements. The Denmore Road Retail Park is now a well-established and well-used retail development in an out-of-centre location.

The 2.57 hectare site is currently occupied by two separate retail units totalling over 80,000 sqft (7,500 sqm) with a central car parking area for 233 vehicles. The northern unit extends to 3,753 sqm and is subdivided into four individual retail units, most recently occupied by Allied Carpets and Carpet Right. The southern unit extends to a total of 3,724 sqm and is occupied by B&Q as a DIY store.

In terms of the mix of retail goods within the retail park, it currently comprises predominately bulky comparison goods, but none of the units have any goods restriction and all benefit from an open class 1 retail use. This was confirmed through the granting of two Certificates of Lawfulness of Existing Use in 2009 which establish that the entire site is in unrestricted Class 1 retail use (Application Refs: 09/0333 and 09/0334).

The Denmore Road site also benefits from a planning permission in principle which was granted in June 2011 (Ref No: P101203). This planning permission permits the demolition of the existing retail units on the site and the redevelopment of the site to provide a new open class 1 retail unit of 7,400 sqm, with service and vehicular access maintained from the existing points on Denmore Road, and car parking for a total of 494 vehicles.

Although the Denmore Road Retail Park does not contain the same range and extent of retail and leisure uses as the Boulevard Retail Park (Standard Life's other retail park location in Aberdeen), it is nonetheless an established retail location which enjoys the benefit of an open Class 1 retail consent.

Whilst it is currently located on the northern edge of the City, it is well located in terms of existing public transport and is well placed in terms of the Bridge of Don/Grandholme strategic growth area. More specifically, it will be centrally located within the Dubford and Murcar Masterplan Zone where significant new housing and employment areas are proposed.

The Denmore Road Retail Park therefore has the potential to become a new centrally-located "District Centre" for this proposed major expansion of the City. It is an existing retail centre which has the benefit of unrestricted retail permission for 7,400 square metres of floorspace and is a significant part of the City's retail hierarchy.

The Aberdeen City and Aberdeenshire Retail Study 2013 identified the Denmore Road site as a key retail development opportunity. The Retail Study acknowledged that there are a small number of locations in the study area that have significant concentrations of retail activity and this includes the various retail units along Denmore Road (paragraph 1.2)

The Retail Study also acknowledged the planning permission for the redevelopment of the site, and identified this as a specific retail commitment throughout the Retail Study (Volume 1), including references in Table 4.11 on page 49; Table 5.7 on page 71; and Table 6.2 on page 79. The Council's Retail Study therefore concluded that the Denmore Road retail site is an important part of the City's retail hierarchy and should be identified as a new development opportunity within the LDPs' retail network.

## What change would you like to see made?

Whilst we welcome the Proposed Plan's allocation of the Denmore Road Retail Park as an important part of the City's retail offer, for the reasons set out above, we would also request that the Denmore Road Retail Park is designated as a "District Centre" in the new Local Development Plan. This would acknowledge its existing place in the retail hierarchy and its potential for further improvement and expansion to meet the identified retail needs for a wider catchment area.

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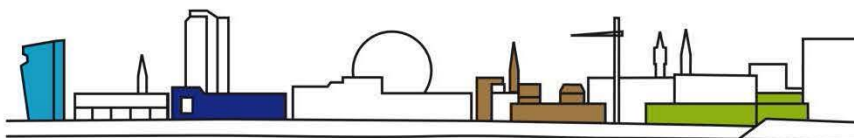
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<b>Policy/Site/Issue</b>	Network of Centres (pages 26 to 31) and Supplementary Guidance: Hierarchy of Centres as it relates to the Denmore Road Retail Park, Bridge of Don, Aberdeen	<b>Paragraph(s)</b>	

## What would you like to say about the issue?

This representation is submitted on behalf of Standard Life Assurance Limited, the owners and managers of the Boulevard Retail Park, Aberdeen. It follows on from our client's submissions on the Main Issues Report in March 2014.

On behalf of our client, we welcome the Proposed Plan's identification of the Boulevard Retail Park as an important retail centre and its designation on the Proposals Map and its inclusion within the Supplementary Guidance: Hierarchy of Centres.

However, and as requested at the MIR stage, we would request that the Boulevard Retail Park is identified as a "District Centre" in the new LDP. This would recognise the existing and established role the Boulevard Retail Park plays in the City's retail hierarchy. We provided detailed comments on this matter in our response to the MIR, and these are summarised again below.

The 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, which in turn 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.

The Boulevard Retail Park was constructed in the early 2000's and is a well-established, well-used retail development in an edge-of-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, Brantano Shoes 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 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 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 Boulevard Retail Park is therefore a highly accessible, well located retail centre which benefits from an open Class 1 retail consent. It is not a bulky goods retail park.

The Aberdeen City and Aberdeenshire Retail Study 2013 which was prepared by the Council to inform the new LDP identifies the 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/household survey information, the Retail Study 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" (paragraph 4.29).

Continued below...

## What change would you like to see made?

The 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 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.

These locational benefits and mix of uses support the case to identify the Boulevard Retail Park as a "District Centre" within the retail network, and we would request that the Retail Park should be designated as a "District Centre" in the new Local Development Plan.

This approach would be entirely consistent with the advice set out in the Scottish Planning Policy (SPP) which recognises the need for town and district centres to be a focus for a mix of uses including retail, leisure, entertainment, recreation, cultural and community facilities with a diverse range of community and commercial activities. The SPP also considers town and district centres to have a diverse mix of uses and attributes, including a high level of accessibility.

The Boulevard Retail Park clearly demonstrates these attributes and provides the range and quality of shopping, wider economic and social activity in both the day and the evening, and integration with residential areas which are considered by the SPP to be the key elements of successful town centres.

For these reasons, we would therefore request that the Boulevard Retail Park is identified as a "District Centre" in the new LDP and the accompanying Supplementary Guidance: Hierarchy of Centres. This would recognise the existing and established role the Boulevard Retail Park plays in the City's retail hierarchy.

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