

## 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"/> <b>ALASDAIR MORRISON</b>
<b>Organisation</b>	<b>GVA JAMES BARR</b>
<b>On behalf of (if relevant)</b>	<b>F&amp;C REIT Asset Management c/o GVA JAMES BARR</b>
<b>Address</b>	206 ST VINCENT STREET; GLASGOW
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Please tick if you would like to receive all future correspondence by e-mail

<b>What document are you commenting on?</b>	Proposed Plan	<input checked="" type="checkbox"/>
	Proposed Supplementary Guidance	<input type="checkbox"/>
	Proposed Action Programme	<input type="checkbox"/>
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
<b>Policy/Site/Issue</b>	Policy NC1 - City Centre Development – Regional Centre	<b>Paragraph(s)</b>

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

OBJECT TO POLICY - SEE ACCOMPANYING LETTER

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

SEE ACCOMPANYING LETTER

Please return the completed form by:

- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to [ldp@aberdeencity.gov.uk](mailto:ldp@aberdeencity.gov.uk)

The representation form can be filled in, saved, e-mailed and/or printed. You must “save as” to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation form. **Please ensure all representations are with us by 5pm on Monday 1<sup>st</sup> June.**

Thank you. For more information, please visit [www.aberdeencity.gov.uk/aldp2016](http://www.aberdeencity.gov.uk/aldp2016) or to contact the Local Development Plan Team call 01224 523470.

#### **Data Protection Statement**

The comments you make on the Proposed Plan will be used to inform the Local Development Plan process and the Examination into the Local Development Plan by the Scottish Ministers' Reporter. You must provide your name and address for your representation to be considered valid, and this information will be made publicly available. Other personal contact details such as telephone and e-mail will not be made public, although we will share these with the Reporter, who may use them to contact you about the comments you have made. For more information about how Aberdeen City Council maintains the security of your information, and your rights to access information we hold about you, please contact Andrew Brownrigg (Local Development Plan Team Leader) on 01224 523317.



28 May 2015

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Planning & Sustainable Development Enterprise,  
Planning and Infrastructure  
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Business Hub 4,  
Marischal College,  
Broad Street,  
Aberdeen  
AB10 1AB



Dear Sir/Madam,

**ABERDEEN CITY COUNCIL LOCAL DEVELOPMENT PLAN  
PROPOSED PLAN (MARCH 2015)**

We act on behalf of our client F&C REIT Asset Management who is the asset manager of Bon Accord and St Nicholas Shopping Centres in Aberdeen. They also own approximately 20 smaller properties situated on Schoolhill, Upperkirkgate, George Street and St Andrews Street in Aberdeen City Centre.

Our client submitted representations to the Main Issues Report (M.I.R) in March 2014, many of which we acknowledge have been picked up on by the revised Plan. Alongside these representations F&C REIT also provided background information to their substantial investment in Aberdeen City Centre.

**Aberdeen City & Aberdeenshire Retail Study (Oct 2013)**

We wish as part of our representation on the Proposed Plan to once again draw attention to the Council's 2013 Retail Study (we previously raised concerns in our response to the M.I.R). This continues to be relied upon by the local authority in terms of their retail and city centre planning policies.

We continue to have concerns regarding the methodology employed for the Retail Study and some of the assumptions employed. The conclusions reached rely on the above premises and, worryingly, are focused upon a quantitative solution to improving Aberdeen's retail offer. F&C REIT's view is that the solution is as much a qualitative one. They feel that over reliance of achieving an available quantitative capacity (circa 35,000 sq metres) may lead

to pressure to grant permission to retail floorspace in out-of-centre locations, contrary to the current LDP strategy.

As stated previously, this is our main disappointment with the published Retail Study. We would have preferred to see more emphasis placed on the quality of the retail offer for the city-region and its ability to retain as much comparison retail and leisure expenditure within Aberdeen City Centre as possible.

F&C REIT have previously made the point to the City Council (in relation to the City Centre Masterplan) that a spatial balance is required in any response to meeting this large scale retail capacity quantum in order that parts of the city centre are not disadvantaged by over concentration in one location and that the entire city centre strategy is taken into account in such decisions on large scale investment. This is particularly the case in terms of the long term future of Union Street as a retail and visitor location.

After that general point we will now itemise each of our representations below against the relevant policy / section of the Proposed Plan for ease of reference.

### **Policy NC1 - City Centre Development – Regional Centre**

Whilst this policy identifies four specific locations for retail development within Aberdeen City Centre, these allocations are not identified on the Proposals Map. We are of the view that they should be to avoid any doubt as to the Council's priority locations for retail investment. The four sites set out in policy NC1 (paragraph 3.22) should be identified on the City Centre Proposals Map.

Although a number of references are made in policy NC1 (and elsewhere in the LDP) to the significance of the City Centre Masterplan (2015), the policy does not include some of the sites referred to in the Masterplan as having potential for new retail floorspace. F&C REIT therefore object to the omission of the St Nicholas Centre as a potential retail allocation.

The above objections become particularly pertinent when referenced against the Proposed Plan's confirmation of the Retail Study capacity referred to above.

At the same time F&C REIT support the re-allocation of the Woolmanhill Hospital site in the Proposed Plan for residential-led mixed use.

### **Policy NC2 - Retail Core and Union Street**

We support the spatial designation of the "Retail Core" of the City Centre, stretching as it does between John Lewis at George Street and Union Square. We believe that the north-south emphasis is clear to those with knowledge of current retail activity in the city centre and is backed up by the analysis in the Council's recent Masterplan.

### **Policy NC5 - Out of Centre Proposals**

F&C REIT support the fact that the Proposed Plan has decided not to allocate any sites for “very large single retail units” as suggested in the M.I.R. As stated above we do not believe that this will be of benefit to the Council's City Centre Strategy and draft City Centre Masterplan.

We also support that no other out-of-centre retail allocations are made in the Proposed Plan, other than those associated with and ancillary to large scale new residential communities (eg. Grandholme).

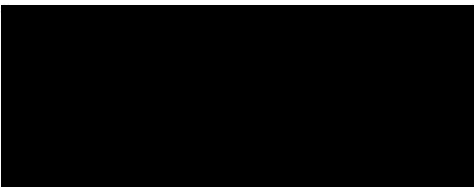
### **Policy NC8 Retail Development Serving New Development Areas**

F&C REIT wish to support Policy NC8 which seeks to ensure that any retail proposals in these new residential areas which serve a wider catchment will be subject to a sequential test and retail impact assessment.

Should you have any queries regarding the content of these representations then please contact GVA James Barr.

We look forward to your early acknowledgement of receipt of these as formally validated representations on the LDP by F&C REIT.

Yours sincerely



**For and behalf of GVA James Barr**

