



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 20th March and Monday 1st June 2015. Please ensure all representations are with us by 5pm on Monday 1st June.

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|----------------------------|---|
| Name | Mr <input checked="" type="radio"/> Mrs <input type="radio"/> Miss <input type="radio"/> Ms <input type="radio"/> Fraser Littlejohn |
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Please tick if you would like to receive all future correspondence by e-mail

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| What document are you commenting on? | 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"/> |
| Policy/Site/Issue | Policy NC4 Sequential Approach and Impact | Paragraph(s) Policy NC4 Sequential Approach and Impact; 3.25 - 3.28 |

What would you like to say about the issue?

We act on behalf of Zurich Assurance Limited c/o Threadneedle Property Investments Limited and write with reference to the preparation of the new Local Development Plan. On behalf of our clients we submit the following representations to the Local Development Plan.

Our clients own Kittybrewster Retail Park, Bedford Road, Aderdeen, AB24 3LJ. We welcome the identification of Kittybrewster Retail Park as a Commercial Centre in the Proposed Plan. We note that Kittybrewster forms the role of a commercial centre; part of a wider network of centres across the plan area.

Our clients are of the view that the approach in the Proposed Plan is inconsistent with the approach required by SPP. Commercial Centres such as Kittybrewster play an important role in the retail hierarchy where a range of investment and development opportunity may be appropriate.

It is accepted that, as is stated in policy NC4, that "All significant footfall generating development appropriate to town centres should be located in accordance with the hierarchy and sequential approach.."

Paragraph 24. of SPP states that "the Scottish Government's central purpose is to focus government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth." Further it states at paragraph 27. that "the Government Economic Strategy indicates that sustainable economic growth is the key to unlocking Scotland's potential and outlines the multiple benefits of delivering the Government's purpose, including creating a supportive business environment, achieving a low carbon economy, tackling health and social problems, maintaining a high-quality environment and passing on sustainable legacy for future generations."

In this respect it is stated that "this SPP introduces a presumption in favour of development that contributes to sustainable development."

Paragraph 68. of SPP states that "Development plans should adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities.

It continues at paragraph 69. that "planning authorities, developers, owners and occupiers should be flexible and realistic in applying the sequential approach, to ensure that different uses are developed in the most appropriate locations. It is important that community, education and healthcare facilities are located where they are easily accessible to the communities that they are intended to serve."

Clearly SPP does not preclude uses which generate significant footfall within commercial centres, but that development plans should adopt a sequential town centre first approach. The preference within Scottish Planning Policy is to develop allocated sites over isolated out-of-centre sites. As a 'commercial centre' in the context of SPP, there is support for investment and improvement where such investment will not undermine town centres.

The current wording of policy NC4 suggests that certain proposals are precluded in certain locations, where it should instead be a preference in accordance with the sequential approach to site selection outlined in SPP. It is considered that Policy NC4 is inconsistent with SPP.

What change would you like to see made?

Briefly stated, it is submitted that the Local Development Plan should refine policy NC4 to better and more straightforwardly reflect the requirements of SPP.

We trust that the above and attached will be given due regard in the process to prepare the Proposed Plan.

Our clients take a keen interest in development planning issues and would be keen to be kept advised of the progress of the process to prepare the new Local Development Plan.

We would of course be pleased to discuss matters further with the Council if that would assist. Should you require any further information at this stage, however, please do not hesitate to contact Fraser Littlejohn of this office direct.

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

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 1st June.**

Thank you. For more information, please visit 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.