

## 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 type="radio"/> Mrs <input type="radio"/> Miss <input checked="" type="radio"/> Ms <input type="radio"/> <b>Samantha Jackson</b>
<b>Organisation</b>	<b>CBRE</b>
<b>On behalf of (if relevant)</b>	<b>John Lewis</b>
<b>Address</b>	c/o CBRE Ltd 7 Castle Street Edinburgh
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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 checked="" type="checkbox"/>
	Proposed Action Programme	<input type="checkbox"/>
	Strategic Environmental Assessment Environmental Report	<input type="checkbox"/>
<b>Policy/Site/Issue</b>	Policy NC1 Policy NC4 Policy NC5 Policy T3	<b>Paragraph(s)</b>

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

Please see separate word document attached.

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

Please see separate word document attached.

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.

Switchboard  
Fax  
Direct Line  
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Aberdeen City Council  
Development Plan Team  
Business Hub 4  
Ground Floor North  
Marischal College  
Broad Street  
Aberdeen  
AB10 1AB

1 June 2015

Policy

By Email

Dear Sir/Madam,

**ABERDEEN CITY COUNCIL  
LOCAL DEVELOPMENT PLAN – PROPOSED PLAN STAGE CONSULTATION  
REPRESENTATIONS ON BEHALF OF JOHN LEWIS**

On behalf of our client John Lewis, we write in response to the Proposed Local Development Plan for Aberdeen, published for consultation in spring 2015.

John Lewis has a significant role in retailing in the city, and we therefore welcome the opportunity to provide comment on this key document.

On behalf our client we wish to support in principle the policies of the proposed Local Development Plan with modifications. Our comments relate specifically to those policies on retail, which seek to protect the vitality and viability of the city centre.

We set out below the grounds of our support and proposed modifications, which we respectfully ask the Council to consider when preparing the next stage of this document.

**Proposals Map**

We note that the Proposed Plan identifies a number of sites within the city centre for retail development including:

- OP102 - Crooked Lane / George Street (0.96ha)

This is a new site in the Proposed Plan. We would be supportive of new retail development on this site where it enhances the public realm and attractiveness of this part of the city centre. John Lewis considers that the current area would benefit from improvements and this development could provide the catalyst for achieving this and enhanced links into the John Lewis store.

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

We support this policy and the Council's strategy to promote development in the city centre. This supports the town centres first principle, which reflects the direction of Scottish Planning Policy.

We support the Council's intention for the city centre to be the preferred location for retail, commercial, leisure and other significant footfall generating development. We would add that the town centre first principle applies as much to leisure, entertainment office and civic uses as retail.

Such uses help to enliven the city centre and create a strong day time working population which will in turn support the retail function of the city centre. Restaurant and leisure uses also help to support a diverse evening economy, attracting visitors and bringing money into the city centre.

### **Policy NC4 Sequential Approach and Impact**

John Lewis supports Policy NC4 in its town centre first approach, which identifies the city centre as the preferred location for retail, commercial, leisure and other significant footfall generating uses serving a city-wide or regional market in the retail hierarchy.

We note, however that the Council are now proposing to update the 'hierarchy of centres' by including a further tier of centre - 'Tier 5: Commercial Centres'. This includes the commercial centres of Garthdee, Kittybrewster, Links Road/Boulevard and Lower Berryden. In the adopted Development Plan and Supplementary Guidance these retail parks, which are outwith town centres, currently have no designation in planning policy terms.

The new Supplementary Guidance 'Topic 5 – City Centre and Business', intends for these commercial centres to be the focus for retail developments comprising of large bulky comparison goods where city centre / town centre sites are not available (i.e. subject to the sequential test).

We would accept the allocation of these sites within the retail hierarchy, on the understanding that there are clear parameters set for new retail and leisure developments in these locations.

This policy and the accompanying supplementary guidance should be strengthened to ensure that any proposal in these commercial centres still has to demonstrate that the proposal will not have significant adverse impact on other city/town centres, or future strategies for enhancing the vitality and viability of the city centre, by providing an impact assessment. We also suggest including criteria that requires the proposal to address a qualitative or quantitative deficiency within the catchment area and a restriction on the type of goods that can be sold in these locations.

In our view, the guidance is not robust enough at present to protect the vision for a healthy city centre. Any guidance or policy which relates to commercial centres should ensure that development in these locations supports, and is complementary to, the role of the city centre and town centres.

Policy NC4 also states that, *“A restriction may be imposed on the amount of comparison goods floor space allowed within convenience shopping developments outside the city centre or other town centres”*. John Lewis would support a restriction on the floor space for comparison goods out with the city centre or other town centres. All new investment in this type of retail development should primarily be focused in the city centre in order to meet the Council’s ambitions for a strong regional centre that supports the future prosperity of Aberdeen. Diversion of footfall or investment to out of town locations will have a significant impact on achieving this.

Policy NC4 also states that this policy applies to proposals for new development and to proposals to extend existing development. In our view, this policy should also apply to proposals for change of use.

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

Whilst Policy NC4 (Sequential Approach and Impact), refers to the need for an impact assessment for developments over 2,500sqm which are not in accordance with the development plan. This however, is not repeated in Policy NC5, which in our view it should be.

As Policy NC5 refers to development which is likely to have the most adverse impact on city centre developments, the need to carry out an impact assessment should be made reiterated. Whilst, bullet point two in Policy NC5, implicitly refers to a need to ensure that there will be no adverse effect of the vitality and viability of any centre. We consider that explicit reference could be made to the need for an impact assessment to ensure that the proposal, either individually or cumulatively, will have no impact.

We suggest that the following text may be added to the second bullet point in Policy NC5, *“An impact assessment has been undertaken...which demonstrates that there will be no adverse effect on the vitality or viability of any centre listed in the Hierarchy of Centres...either individually or cumulatively”*.

### **Policy T3 Sustainable and Active Travel**

John Lewis strongly supports measures which will improve the city’s transport networks and make movement around the city and to the city centre, easier for shoppers. They therefore support the increased emphasis placed on the links between residential, employment, recreation and other facilities for non-motorised transport users in Policy T3.

At present, the city centre is fragmented in retail terms, and connectivity between the retail centres of Bon Accord, Union Square and the Trinity Shopping Centre is poor. Policy T3 needs to act as the catalyst for improving the connectivity between these shopping centres and streets, within the city centre.

Policy T3 should ensure that this is an important policy consideration for all new developments coming forward in the city centre. We consider that proposed developments in the city centre should be expected to promote or provide links with other facilities in the centre, to ensure convenient and safe access for people to travel between them. Whilst the forthcoming city centre Masterplan will assist with this, accessibility, pedestrianisation and public realm will play a large part in this and should be promoted through Policy T3.

In addition to enhancing links between the shopping areas, the forthcoming Masterplan and proposed Policy T3 should ensure that new retail developments are fully integrated with the existing

transport networks and different modes of transport. In our view, the current relationships between the shopping areas and the various transport hubs in Aberdeen (rail and bus) are weak and measures should be introduced to strength these significantly.

Notwithstanding the above, improvements to links in the centre for non-motorised users, should be considered as part of a holistic package of transport improvements. In encouraging the use of other modes of transport, we would urge caution towards any restrictions on car parking or car access to a significant level. This could deter future shoppers from visiting the city centre and in turn impact upon its vitality and viability, particularly in the face of out of town developments with free car parking.

### Summary

John Lewis welcomes the opportunity to comment on the Proposed Local Development Plan and supports those aspirations to promote a town centre first approach in Aberdeen. However, as outlined above we consider that the document needs to present an overarching and robust strategy to protect the on-going investment and regeneration schemes in Aberdeen City Centre.

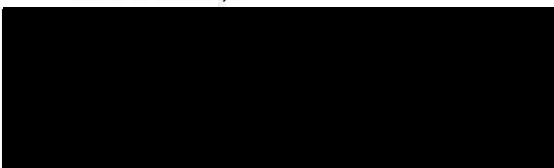
Aberdeen City Centre should remain the focus for the region's retail and leisure offer, with potential developments encouraged to invest in sites that will accelerate the regeneration of the city centre and broaden the choice on offer. The Council should continue to champion a strong town centre first approach when dealing with out of centre development. This is vital if the right conditions for city centre investment are to be established.

Permitting new development in out of centre locations will have a significant impact on investor confidence and the Council needs strong policies in place to ensure that Aberdeen becomes the vision of a regional retail and leisure destination. Any trade diversion away from the city centre could have a potential impact achieving the wider regeneration objectives.

We trust that you find these comments helpful to the review of the Proposed Local Development Plan and that they will be taken into account in the on-going preparation of this document. We would be grateful if you could confirm that these representations have been received and that we are kept informed on the progress.

If you have any queries, or would like to discuss the above comments further then please do not hesitate to get in touch with Samantha Jackson – [samantha.jackson@cbre.com](mailto:samantha.jackson@cbre.com).

Yours faithfully,



**SAMANTHA JACKSON  
ON BEHALF OF CBRE LTD**