



Aberdeen Local Development Plan Review

Pre- Main Issues Report Questionnaire 2018

Aberdeen City Council is currently in the early stages of reviewing the Aberdeen Local Development Plan 2017(ALDP). The 2018 Development Plan Scheme provides a timetable for the review of the ALDP and the opportunities to participate throughout the process.

It is available to view online at: www.aberdeencity.gov.uk/localdevelopmentplan

This questionnaire forms part of the pre-Main Issues Report consultation activities we are undertaking. It is designed to gather views on the main planning issues in Aberdeen to be considered by the next ALDP.

Using your Personal Information

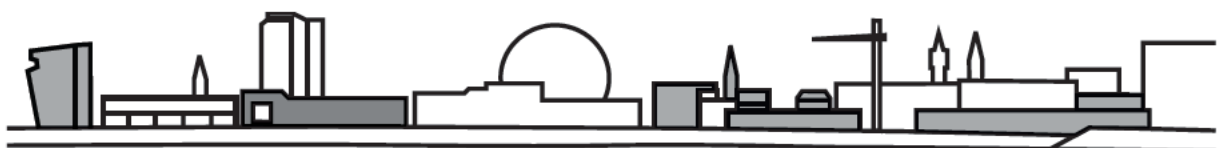
Information you supply to Aberdeen City Council (ACC) in this questionnaire will be used to prepare the Local Development Plan. ACC will not share the personal information provided in this questionnaire with other parties or organisations. ACC will not disclose any contact information about you to any organisation or person unless it is authorised or required to do so by law.

The Local Development Plan team may use your contact details to contact you about the comments you have made. Your name and organisation may be published alongside your comments but contact details will not be made public. If you chose not to provide a name or contact details, your comments will still be valid but we will not be able to contact you in the future.

For further information on how your information is used, how ACC maintain the security of your information, and your rights to access information ACC holds about you, please contact Andrew Brownrigg, Team Leader, Local Development Plan Team, Strategic Place Planning, Aberdeen City Council, Business Hub 4 Marischal College, Broad Street, Aberdeen AB10 1AB.

A separate form for submitting development sites for consideration can be found on our website at: www.aberdeencity.gov.uk/localdevelopmentplan

**Our consultation runs from the 19th March to the 8th of May 2018.
Please note the deadline has been extended to Monday 28th May 2018.**



1. YOUR DETAILS

1.1 Please let us know the capacity in which you are completing this questionnaire. Are you...

- A member of the public
- A community representative e.g Community Council

If yes, which area do you represent?

- A developer/ their agent
- A landowner/ their agent
- From a Key Agency
- Other

1.2 Please provide your name and contact details:

Name and Organisation:

Address:

Postcode:

Telephone:

Email:

1.3 If you are acting as an agent or completing this on behalf of an organisation, group or landowner, please provide their details:

Organisation/group/landowner:

Address:

Postcode:

Telephone:

Email:

2. ABERDEEN'S MAIN PLANNING ISSUES

Feel free to continue on separate sheets if necessary and attach to the questionnaire. You do not have to answer every question.

Vision

2.1 What do you think are the most important things that make Aberdeen a good place to live, visit and/or work?

2.2 What do you think should be the Council's top priorities for the next Aberdeen Local Development Plan?

2.3 Do you have any particular aspirations for your community or Aberdeen as a whole that you think should be taken forward through the ALDP? For example, what are your views on recycling of waste, affordable housing, access to green space or ways to reduce CO₂ emissions?

Policy Topic Areas

What do you think should be our main planning priorities for...

2.4 ...the City Centre? (For example, what should the role of Union Street be? Does the City Centre have all the uses we want, or should there be more uses there - and if so where could they go?)

Please see submitted Representation letter

2.5 ...providing infrastructure? (For example, how should new infrastructure be provided and how might it be paid for?)

2.7 ...ensuring we have high quality buildings and places? (For example, how can we better protect our built heritage and ensure high quality and sympathetic architecture and landscape design?)

2.8 ...meeting the needs of business and industry? (For example, what can be done to retain existing businesses and attract new employment opportunities to Aberdeen?)

2.6 ...transport and accessibility? (For example, how can we make it easier to travel in and around Aberdeen? Should we look at pedestrianisation in the City Centre?)

Please see submitted Representation letter

2.9 ...meeting Aberdeen's housing and community needs? (For example, how can we meet the needs of people who cannot afford mainstream housing?)

2.10 ...supporting retail centres across Aberdeen? (For example, should we be safeguarding existing centres, and what are your thoughts on new out-of-town retail parks?)

Please see submitted Representation letter

2.12 ...ensuring that resources and waste are managed sustainably? (For example, can we make more innovative use of waste as a resource? Should we encourage renewable energy use? How could we do these things?)

2.11 ...protecting and enhancing the natural environment and preventing flooding? (For example, what areas or features should we be safeguarding?)

2.13 If you have any views on topics not covered above, please write them below.

Thank you for taking the time to complete this questionnaire. Please return completed questionnaires to:

Local Development Plan Team

Strategic Place Planning
Aberdeen City Council
Business Hub 4
Ground Floor North
Marischal College
Broad Street
Aberdeen
AB10 1AB

Twitter: [@AberdeenLDP](https://twitter.com/AberdeenLDP)

You can also visit the Aberdeen Local Development Plan Facebook page.

COMPLETED QUESTIONNAIRES SHOULD BE WITH US BY NO LATER THAN 28 MAY 2018.

If you wish to be added to the LDP E-Mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here.

If yes, please provide an email address

28 May 2018

Local Development Plan Team
Strategic Place Planning
Aberdeen City Council
Business Hub 4
Ground Floor North
Marischal College
Broad Street
Aberdeen
AB10 1AB



Adam Richardson
E: arichardson@savills.com
DL: +44 (0) 131 247 3805

Wemyss House
8 Wemyss Place
Edinburgh EH3 6DH
T: +44 (0) 131 247 3700
F: +44 (0) 131 247 3724
savills.com

Dear Sir / Madam

Aberdeen Local Development Plan Review – Pre-Main Issues Report Consultation

On behalf of our client **Union Square Developments Ltd (Hammerson plc)**, we hereby write to make formal representation to the Aberdeen Local Development Plan Review – Pre-Main Issues Report Consultation with specific regard to their asset at Union Square, Aberdeen.

Background

Union Square Shopping Centre is located adjacent to Aberdeen Rail Station in the City Centre. The Shopping Centre opened in 2009 and extends to 52,490 sq.m (565,000 sq.ft) (excluding Jury's Inn Hotel) of retail and leisure floorspace.

Union Square is already the primary retail destination within Aberdeen, though is in need of extension and improvement in its critical mass to allow top new retailers to be attracted to Aberdeen and expenditure leakage to higher order centres to be reduced.

Proposals for the growth at Union Square – via the redevelopment of the existing retail park and surface level car parking to the south, rationalising space within the rear servicing area to extend the shopping centre and provide additional mixed use floorspace – are now at an advanced stage, with the corresponding planning application now benefitting from a resolution to grant status, pending conclusion of the corresponding legal agreement.

Union Square can therefore provide for a considerable proportion of the acknowledged retail capacity in Aberdeen, alongside *inter alia* additional catering and leisure facilities.

Redevelopment at Union Square is fully in accordance with the sequential approach set out within the prevailing planning policy hierarchy, and scores extremely highly against Aberdeen City Council's sustainability checklist, improving the City Centre built form and north-south linkages.

Representation

In commenting on the relevant question in the published Main Issues Report:

2.4 What do you think should be our main planning priorities for the City Centre? (For example, what should the role of Union Street be? Does the City Centre have all the uses we want, or should there be more uses there - and if so where could they go?)

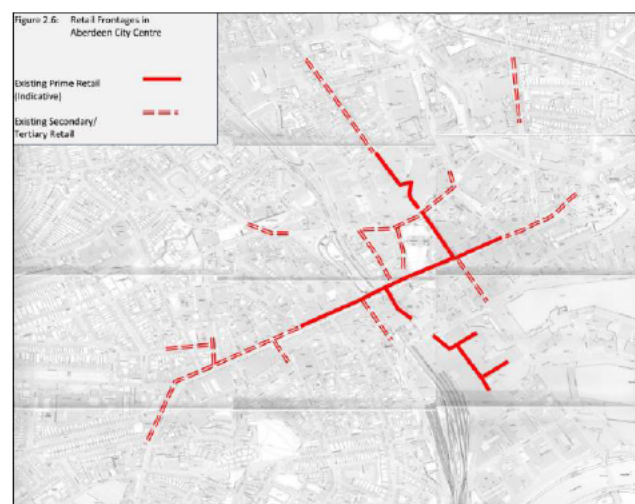
Scottish Planning Policy (SPP) states that the planning system should support the role that town centres play and enable them to “*thrive and meet the needs of their residents, business and visitors for the 21st century*”. (Paragraph 58)



While retailing is an important part of the mix, the *National Review of Town Centres* (2013), as commissioned by the Scottish Government, *inter alia* concluded that town centres “are places of creativity and enterprise ... bustling cities are a nation’s economic powerhouses, where social and cultural interaction drives innovation and wealth-creation. Scotland would benefit from more big-city-bustle.” In discussing access to resources and services for all, the Review went on to identify the desirability of achieving a rich mix of shops, workplaces, leisure, culture and public services, alongside city centre living.

Within this context, and that of macro changes in retailing nationally, clearly there is a need to ensure that Centres are dynamic and responsive to change in order for them to remain vital and viable.

In assessing Aberdeen City Centre, it is established that a clear north-south retail axis now exists, from John Lewis / Bon Accord Centre in the north to Union Square and the rail / bus stations in the south, taking in the St Nicholas Centre, The Academy, Union Street, Aberdeen Market and Trinity Centre. This is demonstrated by the mapping below:



CCM Baseline Paper, Townscape Review (June 2015) (Page 33)

ACARS, Volume 2 (2013) Page 15)

By way of comparison, Union Street is almost twice the length of Buchanan Street in Glasgow, the busiest and most successful shopping thoroughfare in the UK outwith London. Union Street is also longer than Princes Street, which is single sided in terms of retail frontage.

The west end of Union Street is now less retail focussed. The City Masterplan identifies a distinct office quarter in the West End, while also making provision for redevelopment initiatives including a hotel (former Bruce Miller’s, Project EC08) and new residential opportunities on upper floors (e.g. Project CM11).

Given the foregoing, there should be greater policy flexibility to encourage a greater mix of uses in this area, including cafes and restaurants, in line with the existing ‘mixed use area’ designation.

The continued identification of a City Centre Retail Core within the new LDP proposals map is supported.

2.6 What do you think should be our main planning priorities for transport and accessibility? (For example, how can we make it easier to travel in and around Aberdeen? Should we look at pedestrianisation in the City Centre?)

In general terms, in line with the entirety of the planning policy hierarchy, it is crucial that future development makes most efficient use of the transport network. Utilisation of the existing network is fully supported.

The City Centre Masterplan promotes the removal of private vehicular traffic (bus, taxi and access only) from the section of Union Street between Bridge Street and the Castlegate, prioritising people with wider pavements, improved air quality and fewer obstacles to movement (Project EN05). **It is agreed that implementation will create a much improved environment within this core retail area.**

Our client would be open to the principle of pedestrianisation of part of Union Street, though clearly, any such interventions should be widely consulted upon and subject to appropriate impact assessment. Practical provisions may be necessary to ensure that the function of Union Square Shopping Centre is not compromised.

The existing Policy T2 requires that new developments must demonstrate that sufficient measures have been taken to minimise traffic generated and to maximise opportunities for sustainable and active travel. However, what is absolutely fundamental to this is in practical terms allowing for easy access to the City Centre Retail Core. **As such, a priority generally for the Council must be to facilitate improvements to the frequency, cost and quality of the public transport services.**

As a southern gateway to the City Centre, Union Square already acts as a strategic City Centre car park and has done since its opening. Therefore, it is maintained that it is entirely logical that Union Square should provide additional strategic parking to help reduce private cars crossing the City Centre, in line with the City Centre Masterplan's philosophy, and encourage walking through the improved City Centre environment (that the Council is seeking to promote).

Historical data shows that a proportion of existing capacity at Union Square is taken up by long-term parking associated with surrounding businesses and harbour activity. Union Square is ideally placed to fulfil the role identified in the Masterplan i.e. for City Centre visitors to arrive, many of them parking, and travel to Union Square or through it and the improved wider pedestrian environment, to destinations throughout the City Centre. The application of parking standards to gateway destinations, identified in principle in the Masterplan, must acknowledge the needs of all visitors, and the wider City Centre role that destinations such as Union Square increasingly will perform.

Union Square already acts as a major transport hub and strategic car park for the City Centre, and additional car parking capacity will be provided at this location: (1) to help to better meet this function, and (2) to facilitate Union Square's growth in floorspace. Additional car parking spaces are wholly required as part of the Shopping Centre's (and by extension, Aberdeen City Centre's) proposed floorspace growth, **alongside improved public transport provision.**

In conclusion, strategic City Centre parking at Union Square supplements the centre's existing strategic parking provision and function, helping to support multi-destination, multi-purpose, multi-modal trips, managed and encouraged through a Union Square Travel Plan. Such a strategy is entirely consistent with the aims of the Council and the City Centre Masterplan, and with Union Square's role as a destination for shopping, leisure and transport interchange.

2.10 What do you think should be our main planning priorities for supporting retail centres across Aberdeen? (For example, should we be safeguarding existing centres, and what are your thoughts on new out-of-town retail parks?)

Hierarchy of Centres

In line with the long established position within Scottish Planning Policy (SPP), *"development plans should adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses"* (Paragraph 68). In this regard, the City Centre Retail Core should be supported as the preferred location for all retail, commercial, leisure and other significant footfall generating development serving a city-wide or regional market.

The LDP must clearly presume against new out-of-town retail parks or high footfall-generating uses near the Aberdeen Western Peripheral Route's junctions, and explicitly emphasise that development proposals should only come through the full and open development plan process.

Clearly, large scale development at out-of-centre and indeed, out-of-town locations, whether of a high footfall-generating character or otherwise, should come forward in a strategic way, providing certainty for developers on the issue via a clear policy position on speculative applications.

Permitting speculative new retail / high footfall-generating development at out of centre locations or AWPR junctions would have a material impact on the vitality and viability of Aberdeen City Centre and undermine the planned investment in the City Centre. Even modest speculative developments outside the main retail centres in Aberdeen would have profound impacts on investor confidence in the City Centre who focus on quality and top performing retail centres.

The National Planning Framework 3 (NPF3) states the importance town centres have as a key component of the economic and social fabric of Scotland, and explicitly identifies the need to protect town centres.

SPP states that the planning system should support the role that town centres play and enable them to *“thrive and meet the needs of their residents, business and visitors for the 21st century”*. (Paragraph 58) Complementing the aforementioned SPP town centre first policy, the sequential approach is outlined at Paragraph 68, whereby it is established 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”*. Out-of-centre locations are the least favoured in this regard. As directed, this is replicated in the current Aberdeen Local Development Plan and must be maintained in the emerging, replacement version.

Large scale speculative development in out of centre locations or along the AWPR would clearly undermine this fundamental policy provision. By way of recent example, the extensive submissions by Hammerson on the Prime Four proposals (Ref: P161429/PPP) have demonstrated that such proposals fail to comply with the sequential approach and would have a material and significant impact on the protected hierarchy of centres. The applicant argued that there was an under provision of retail park provision within Aberdeen in comparison with other cities. Leaving aside the merits of such an approach, it is clear from the evidence presented that Aberdeen actually has more out-of-centre floorspace than other cities (see Hargest 'Initial Report', January 2017, Page 11)

Indeed, it is clear that new out-of-centre retail developments would (a) rely on existing town centre retailers opening new stores, with no guarantee that their City and District Centre stores would continue in the same extent or scale, with an inevitable loss of trade from the retail hierarchy; and, (b) compete with the City Centre (as exists and is proposed) for new retailers looking to open their first stores in Aberdeen.

New out of town retail facilities and/or speculative development on a large scale along the AWPR junctions would draw footfall away from the City Centre and undermine attempts to attract new retailers to the City, which would ordinarily lead to an improvement in the quality of the retail offer (and not simply aiming to replicate it and diffuse the retail spend and City Centre vitality). Moreover, spin off trade normally spent in the City Centre will then also be diverted away and lost from town centres.

New out of town retail facilities and/or speculative development along the AWPR would seriously undermine the ability of City Centre redevelopment to come forward, creating uncertainty. There are active City Centre proposals which are already the subject of formal planning applications/permissions (i.e. at the two main shopping centres in Aberdeen, Bon Accord and Union Square), whilst new retail floorspace is being delivered at Marischal Square. Beyond this immediate pipeline, there are other available sites (e.g. Denmore Road and those in the Aberdeen City Centre Masterplan) which would be undermined if inappropriate out of centre speculative development was permitted at out of centre locations.

Increased trip generation from high footfall generating developments such as retail and leisure parks may have a notable impact on the operation of the AWPR and the associated junctions along the route, potentially leading to capacity issues along the route, with further improvements / upgrades potentially necessary in relation to speculative developments. For an out of centre site to be acceptable, SPP (Paragraph 68) outlines, it must be accessible by a range of transport modes (and not reliant on the private car).

City Centre Policy

It is submitted that the current Policy NC2, which identifies the City Centre Retail Core as “*the preferred location for major retail developments as defined in Policy NC1*”, should be carried over to the new LDP. In line with the prevailing planning policy hierarchy and national sequential requirements, Hammerson fully supports the policy provision of directing major retail developments to the defined Retail Core, which must be protected as the primary location for retail development in the city and wider north east.

In considering the City Centre more widely, clearly a range of footfall generating uses which contribute to vitality and viability are generally considered to be acceptable. In this regard, proposals for a change of use from retail (Class 1 of the Use Classes Order) to other uses within the City Centre Retail Core are acceptable *inter alia* where it can be demonstrated that (a) the new use contributes to the wider aims of the City Centre Masterplan and Delivery Programme; (b) the proposed alternative use makes a positive contribution to the vitality and viability of the city centre and creates or maintains an active street frontage. In recognition of the evolving macro trends in the industry, it is however considered necessary for the new LDP to more tightly define where retail will remain the principal retail function.

In supplementing the above, existing provisions (2017 LDP, Paragraph 3.30) requires applications for a change of use of the premises to provide evidence that the property has been actively marketed for six months or more; and, a statement(s) from prospective occupiers explaining their reasons for the property being unsuitable for retail use. This is considered to be an excessive time period which will ultimately work to undermine ongoing vitality of the centre.

I trust the above will be given full consideration within at the current stage of LDP preparation.

Please do not hesitate to contact me should you require clarification on any of the aspects above.

Yours faithfully



Adam Richardson
Associate Director

Encl. LDP Submission Forms