



09 November 2016

KNIGHT PROPERTY GROUP

Planning and Sustainable Development
Aberdeen City Council
Business Hub 4
Marischal College
Broad Street
Aberdeen
AB10 1AB

By Email: pi@aberdeencity.gov.uk

Dear Sirs

Proposal: Major Development mixed use commercial (up to 30,000m²) including retail (class 1), food and drink (class 3), other ancillary uses (such as offices) and associated landscaping, infrastructure and access works
Address: Site OP40 Prime Four Business Park Kingswells Aberdeen
Application Ref: 161429/PPP

We write in objection to the above proposals for at site OP40 Prime Four Business Park Kingswells Aberdeen. Knight Property Group have significant assets throughout Aberdeen city centre, including the recently completed refurbishment of the former art deco Capitol theatre at the west end of Union Street to provide 75,000sqft of grade-A commercial floorspace over 9 levels.

Alongside other prominent city centre developments currently underway, this is a significant development for both Knight Property Group and the for the regeneration of the city centre as a whole. Investment in the Capitol redevelopment alone totals £30 million. As such, and as a local company, Knight Property Group are firmly committed to enhancement of the vitality and viability of the city centre and its development as a regional hub for commercial, retail, leisure and residential activity.

Spatial Strategy

The Spatial Strategy in the Proposed Aberdeen Local Development Plan (2015)(Proposed Plan)¹ echoes that of the current Aberdeen Local Development Plan (2012)(LDP) and the approved Strategic Development Plan (2014)(SDP) for the region:

Our strategy promotes the city centre as the commercial, economic, social, civic and cultural heart of Aberdeen. The maintenance of a vibrant city centre and the enhancement of its fine buildings and open spaces is vital to Aberdeen's future prosperity and to sustaining its attractiveness as a place to live and visit. A strong and thriving city centre is a key attribute in delivering the wider strategic aims of the Strategic Development Plan and our policies and proposals seek to enhance its role as a key commercial centre.

¹ Reference throughout this letter is made to policies and allocations in the Proposed Aberdeen Local Development Plan (2015) (Proposed Plan), as amended by the recent Report of Examination, where necessary. This emerging Local Development Plan (LDP) will be approved for adoption on 14th December 2016 and will form part of the extant Development Plan at the time of determination of this application.

The applicants, Prime Four Ltd. claim that there will be a 'benign' impact on the city centre, however despite the fact that the supporting documents claim that the *retail impact of this development on city centre retail is estimated to be relatively small – just 4.31%*, the reality is that the development of circa 30,000sqm retail space to the west of the city, with easy access from the AWPR and unrestricted surface car parking will cause significant harm to the Council's efforts to encourage modal shift towards more sustainable methods of transport.

Proposed Plan Policy **NC1 City Centre Development – Regional Centre** cites the city centre as the *preferred location for significant footfall-generating development serving a city-wide or regional market*, such as the proposed development, as acknowledged in its supporting planning statement.

Similarly policy **NC2 City Centre Retail Core and Union Street** defines the *City Centre Retail Core* as the *preferred location for major retail developments*; and *where sites are not available in the City Centre Retail Core, then sites elsewhere in the city centre may be appropriate*.

Aberdeen City Centre Masterplan

Aberdeen City Centre Masterplan (CCM) was approved in June 2015 and as a 20-year development strategy for the city centre it is in its infancy. Commitment to implementation of the Masterplan and the 49 projects identified within that *'will support future economic growth and will secure more benefits and opportunities for the communities of Aberdeen City and Shire'* has been strong; with the appointment of a City Centre Director and delivery team and establishment of a reference group in quick succession demonstrate the Council's ambition to see the strategy delivered.

The Masterplan acknowledges that:

In more recent times investment in the city centre has not kept pace with the periphery of the city. There is now a renewed appreciation of the social, cultural and economic value of city centres, Aberdeen city centre needs to reassert itself with a clear vision that establishes future priorities. However, this should be achieved in a way which reflects the unique history of the city so that Aberdeen remains distinctive and rooted in place and culture.

However it also highlights the complacency of recent years in the lack of investment, due to the high oil price and ease of Greenfield development to cater to the industry:

As the metropolitan centre of a globally significant economic region, Aberdeen city centre's importance to the economy of the region and the nation should not be underestimated. The city centre should be the heart of the Aberdeen and Aberdeenshire economy; a hub where people come together to work, learn, collaborate, trade, invent and promote – this is clearly not currently the case and the city centre needs (for the good of the region as a whole) to reinvent itself as the metropolitan and commercial heart of the wider Aberdeen economic region.

The CCM recognises that the city centre requires transformation to fulfil its role as a regional hub, attracting office and residential activity back from the periphery and reintroducing a more sustainable access strategy. Clearly the approval of such a significant attraction on the periphery of Kingswells, let alone the periphery of the city centre is significantly damaging to the regeneration of the city centre.

Land Use

Prime Four Business Park and the allocated development land to its west are designated as **Specialist Employment Areas** in the Proposed Plan. The site forms part of site OP29, allocated to provide 50ha employment land under the terms of **policy B2** between 2017 and 2026, as a continuation of the Masterplanned development of phases 1-3 of the park.

In areas that are identified as Specialist Employment Areas on the Proposals Map, only Class 4 (Business) uses shall be permitted in order to maintain a high quality environment. Activities associated with research, design and development, knowledge-driven industries and related education and training will be encouraged in these areas.

Facilities that directly support business uses may be permitted where they enhance the attraction and sustainability of the Specialist Employment Area for investment. Such facilities should be aimed primarily at meeting the needs of businesses and employees within the Specialist Employment Area.

At 30,000 sqm the proposed development is not of a complimentary nature to directly support the businesses, such as the community hub that is currently proposed in the approved Masterplan and Development Framework; and in direct conflict with this policy.

Retail Use

The application site lies within allocation OP40 in the current LDP. Drum Kingswells Business Park Ltd. sought the change of use of the application site to accommodate retail, leisure and commercial uses through the Council's *Call for Sites* (2013) and *Main Issues Report* (2014) (MIR) consultations, simultaneously seeking an extension to the Prime Four Business Park to accommodate overwhelming commercial requirements and to maintain a supply of developable commercial land to meet these requirements as there were (unspecified) access constraints to the immediate development of OP40.

The *Aberdeen City and Aberdeenshire Retail Capacity Study* (2013)(ACARS) identified capacity for 5,500sqm convenience retail floorspace in zone 29N, to the west of Aberdeen. Whilst the ACARS suggested that some of this floorspace *should be located in the Countesswells development to serve local day-to-day and limited main food shopping needs*; in their MIR consultation response Drum sought that the full amount be provided at Prime Four.

This was on the basis that as no site had been specifically identified within the zone for this floorspace, its allocation within OP40 would *add to spectrum of uses being offered to occupiers, who seek to maximise the benefits they can offer to their employees*. It was also argued that *given the sites proximity to both the AWPR junction and the Kingswells Park and Ride, there is a strong argument to say that locating the acknowledged retail requirement at Prime Four is the most sustainable option. It is clear that working and shopping in the same Park reduces car journeys on the network*. This justification did not focus on local retail provision, pedestrian or cycle access to local convenience retail – it was suggested purely to cater to the residents of the business park and car-borne trips.

The Council did not accept these arguments and the Proposed Plan continued the allocation for employment development at Prime Four, adding in its supporting text for Kingswells and Greenferns that:

Around 50 hectares of employment land allocations have been made to the west of the city at Prime Four Business Park, Kingswells, which provides employment opportunities in a part of the city where there is little employment land.

In their response to the Proposed Plan consultation (2015), Drum supported this allocation and the inclusion of further commercial land as OP63.

Summary

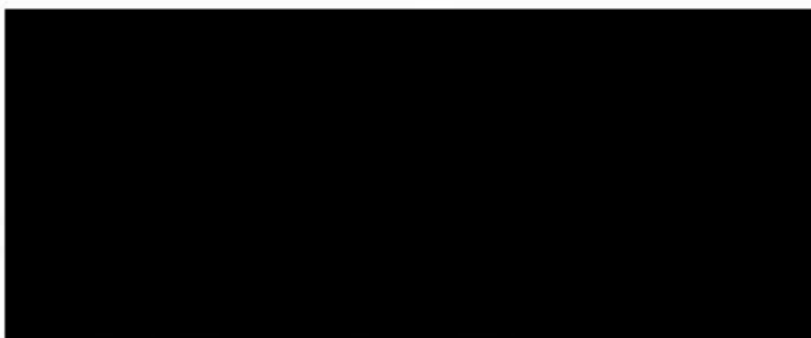
In conclusion the above development is highly speculative and does not cater for an identified need. It runs counter to national, regional and local planning policy, which seeks to locate such developments with a regional catchment in the city centre. Approval of the above development would have a damaging impact on the economy of the city centre and undermine the primacy of the Development Plan, which is particularly up-to-date.

Drum promoted retail development on the application site through the recent LDP review and after consideration the employment designation was upheld. The proposed development is of a regional scale and significance and should be located in the city centre, in accordance with national, regional and local planning policy and where such retail capacity exists.

The Council has invested considerable time and money in creating a City Centre Masterplan to drive transformation and investment, which relies heavily on public and private sector investment in delivering the vision for the city centre. The approval of a significant retail development that would be such a direct threat to the success of the transformation of the city centre, the Council's proposals for city centre access and significant mode shift would be reckless and combative to attempts to secure buy-in to its proposals.

We would be happy to discuss any of the above with the Council or the applicants, should you wish to do so please do not hesitate to contact me.

Yours sincerely



JAMES BARRACK
Managing Director