

From: [REDACTED]
Sent: 22 May 2018 08:53
To: Claire McArthur
Subject: FW: Representation to the SDP Main Issues Report Consultation - Hammerson
Attachments: 18 05 21 SDP Consultation Form.pdf; 18 05 21 SDP MIR Rep.pdf
Importance: High

From: Adam Richardson [REDACTED]
Sent: 21 May 2018 10:39
To: [REDACTED]
Subject: Representation to the SDP Main Issues Report Consultation - Hammerson
Importance: High

Dear Sir / Madam

We write to make formal representation to the Aberdeen City and Shire SDP Main Issues Report Consultation on behalf of our client Hammerson with respect to their property interests at Union Square Shopping Centre, Aberdeen.

The representation comprises:

- Form
- Representation Letter

I trust that this is in order and look forward to confirmation of same in early course.

Regards

Adam Richardson MRTPI
Associate Director
Planning



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Strategic Development Plan Review

Main Issues Report Consultation **12th March - 21st May 2018**

The Aberdeen City and Shire Strategic Development Planning Authority are currently reviewing the Strategic Development Plan for the area. Our Development Plan Scheme outlines a timetable for the review of the Plan, and also identifies where there are opportunities to participate. It is available to view at:
<http://www.aberdeencityandshire-sdpa.gov.uk/DevelopmentPlan/DevelopmentPlanSchemes.aspx>

The **Main Issues Report** is the first formal stage in the review process – it describes and invites discussion on options for future policies, as well as employment and housing land targets for the next Plan. No settled view on the content of the next Strategic Development Plan has yet been reached, making the Main Issues Report the key stage for public consultation. Giving us your views will help to shape the future strategy for development and the policies by which future planning applications are determined.

You can view a copy of the Main Issues Report on our website at:
<http://www.aberdeencityandshire-sdpa.gov.uk/CurrentWork/CurrentConsultations.aspx>

Copies are also available to view at all Council Offices and Libraries within the Strategic Development Plan Area.

A series of accompanying documents, including an Interim Environmental Report, Monitoring Statement, Housing Needs and Demand Assessment and Interim Cumulative Transport Appraisal can also be viewed on our website (by following the above link).

How to Respond

The Main Issues Report contains a series of issues and questions on which we would like to hear your views. Please use this form to respond to these, or any other issues raised by the Main Issues Report or any other accompanying documents.

Consultation Responses must be received by 12pm on Monday 21st May 2018

You can make your views heard in a number of ways:

- **By Post - please return a completed version of this form to:**
Aberdeen City and Shire Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB
- **By Email - please return a completed version of this form to:**
team@aberdeencityandshire-sdpa.gov.uk
If you choose to fill out our online Word form, please be aware that you must download the form and save any changes before submission.

Letters and emails which do not make use of this form will also be accepted, however please make sure include your name, address, telephone number and email address (if applicable), as well as the details of anyone you are representing, if you would like us to be able to contact you with any queries on your submission.

Using your Personal Information

Information you supply to the Strategic Development Planning Authority (SDPA) by responding to this consultation will be used to prepare the next Strategic Development Plan for the area. The SDPA will not share the personal information provided in response to this consultation with other parties or organisations. The SDPA 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 SDPA Officers 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 the SDPA maintain the security of your information, and your rights to access information the SDPA holds about you, please contact: Claire McArthur, Acting Team Leader, Strategic Development Planning Authority, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

Contact Details

Name (Mr/Mrs/Miss/Ms)	Adam Richardson	
Organisation (if relevant)	Savills (UK) Ltd	
Address	[REDACTED]	
Postcode		
Telephone		
Email		

Please tick this box if you wish further correspondence to be directed to this address:

If you are completing this form on behalf of an organisation, group or landowner, please provide their details below.

Name (Mr/Mrs/Miss/Ms)	-	
Organisation (if relevant)	Hammerson plc	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone	c/o agent	
Email	c/o agent	

If you wish to be added to the SDPA distribution list to be kept informed of our progress in producing the next SDP, please tick this box and provide the you wish to be added to our database (if different from above):

email

Email :

Your Views

Please use a separate box for each issue/question you wish to respond to. If you wish to continue on a separate sheet, please attach to the paper copy or email.

Main Issue / Question Number:	
<p>Main Issue 3 / Question 3 - see accompanying letter</p>	

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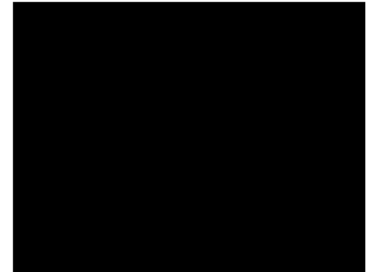
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Aberdeen City and Shire
Strategic Development Planning Authority



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Dear Sir / Madam

Aberdeen City and Shire Strategic Development Plan Review – 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 City and Shire Strategic Development Plan Review – 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. The shopping centre is an integral part of the retailing landscape in Aberdeen.

Union Square is currently subject to a live planning application to extend the shopping centre and provide additional mixed use floorspace, which is now benefits from a resolution to grant status pending conclusion of the corresponding legal agreement.

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

Q3 – Do you agree with the Preferred Option that the new plan should protect the junctions of the Aberdeen Western Peripheral Route from inappropriate speculative development?

We support the **Preferred Option** i.e. for the next Strategic Development Plan to be clear about the need to avoid high footfall-generating uses near the Aberdeen Western Peripheral Route's junctions, and to make it explicit 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 high footfall-generating development at 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.

Scottish Planning Policy (SPP) (Paragraph 58) 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"*. SPP (Paragraph 59) goes on to direct that a town centre first policy should be applied *"when*



planning for uses which attract significant numbers of people, including retail and commercial leisure facilities". The corresponding 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 is required, this is replicated in the current Aberdeen Local Development Plan and will be maintained in the replacement version.

Large scale speculative development 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.

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.

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.

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 on the AWPR.

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 and further improvements / upgrades would be 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).

In conclusion, speculative development at AWPR junctions would be in clear conflict with the aspirations of the Aberdeen City Centre Masterplan and the 'town centre first' approach established throughout the planning policy hierarchy, which seeks to protect the defined network of centres and maintain and enhance their vibrancy, vitality and viability in both the daytime and evening economies. In particular, Aberdeen City Centre has the ability to accommodate a wide variety of retailers and formats, and even modest speculative developments outside the main retail centres in Aberdeen would have profound impacts on investor confidence.

I trust the above will be given full consideration within the Main Issues Report review. Please do not hesitate to contact me should you require clarification on any of the aspects above.

Yours faithfully



Adam Richardson
Associate Director