

# **Aberdeen Local Development Plan**

## Pre-Main Issues Report Response from Aberdeen & Grampian Chamber of Commerce

#### 1.0 Introduction

Aberdeen & Grampian Chamber of Commerce (AGCC) is North-east Scotland's leading private sector, member-focused business organisation. The Chamber represents more than 1,200 businesses with 90,000 employees in the region.

Chamber members have welcome the opportunity to submit their comments in relation to the review of the Local Development Plan (LDP) as this plan will influence development across the city for the next 20 years.

The Chamber has sought the views of property members and other interested members in relation to the plan. In addition, we have also consulted the sector surveys published by the Chamber to identify key themes that should be covered in the finalised plan.

Members view this consultation as an opportunity to ensure that the LDP delivers the right type of development on the right scale. They are ambitious about the future development of this region, and wish to see the finalised plan reflect that ambition.

The Chamber has already participated in the review of the Aberdeen City and Shire Strategic Development Plan earlier this year. In addition, we also intend to submit a response to the Scottish Government consultation on the draft National Planning Framework 3, and the proposed updated Scottish Planning Policy. We welcome the approach taken by Aberdeen City Council to review its LDP now, so that the finalised plan reflects any changes brought forward in the new Scottish Planning Policy and National Planning Framework 3.

#### 2.0 AGCC views

## 2.1 Supporting Economic Growth

This region is unusual in that the impact of the economic downturn over recent years has not been as significant as in the rest of the UK. Unemployment in Aberdeen continues to be at a lower rate than most other local authority areas in Scotland, there is record investment in the oil and gas industry, and the housing market continues to be buoyant.

This unique picture is also reflected in the growth aspirations of Chamber members. According to research published by the Chamber earlier this year, over 70% of businesses in this region expect to grow over the next three years.

However, this success brings its own unique set of challenges and barriers to growth, which the updated LDP should look to address. If the growth outlined above is to be realised it is imperative that the plan supports the continued economic growth of the city (and in turn the wider region) by addressing the areas that businesses have identified as constraints to growth. These constraints include poor transport links, availability of suitable housing, the skills shortage and the city centre

Nevertheless, it is important to recognise that business have also identified many benefits to locating in the city and wider region. These selling points include the quality of life, the sense of community, high salaries and availability of suitable working space.

The updated local plan must be clear that development in the city should be focused on removing, so far as possible, constraints to growth, while also looking to build on the city's



strengths.

#### 2.2 Policy Topic Areas

## City centre

The city centre plays an important role in the economic growth of Aberdeen, and it should be a central focus of the new plan. Members are clear that the city centre must be preserved as a destination for leisure and business activities.

To make these activities viable for inward investors there must be a focus on increasing footfall in the city centre. This means that development should be focused on improving retail space, increasing the provision of business space and allowing additional opportunities for leisure (cafés and restaurants). There should also be a focus on the public realm and spaces / activities which support the generation of increased footfall.

AGCC members highlighted that there is a particularly acute shortage in the availability of high quality business space in the city centre. Therefore, they have suggested that the updated LDP should identify potential sites for new business development in this area.

Increasing footfall in the city centre is also one of the main aims of the Business Improvement District, and the Chamber is supportive of the initiatives being delivered by Aberdeen Inspired. The role of Aberdeen Inspired in encouraging development and regeneration should be recognised in the updated plan.

Chamber members are of the view that the city centre in its current state does not reflect the regions status as energy capital of Europe. This view is also reflected in the North-east retail survey published by AGCC and Aberdeen Inspired at the beginning of May. The research showed that 43% of businesses felt the quality of public space around retail areas in the city centre act as a constraint to growth, so the LDP should identify that there is an urgent need to improve the quality of public space throughout the city centre.

Chamber members believe that the proposals for Broad Street currently being pursued by Aberdeen City Council will not resolve the issues facing the city centre in isolation. While members recognise that this scheme will probably be identified in the updated plan, it should also state that there is a need for coordinated action across the entire city centre area to address the problem of empty units and the poor perception of the area by visitors. This should also include the resolution of the debate on pedestrianisation by 2018.

#### Transport & accessibility

Transport constraints are one of the issues most raised by AGCC members. A Chamber survey conducted as part of North East Business Week in 2012 showed that road connections and rail connections were two of the biggest constraints to growth. The updated plan should therefore address the measures needed to deliver improvements in these areas.

The delivery of the Aberdeen Western Peripheral Route (AWPR) is key to the unlocking of many other infrastructure projects in the city that will ease congestion and associated journey times. The LDP should identify each infrastructure project that has been confirmed for delivery between now and 2020. In addition, the plan should also begin to explore the additional infrastructure requirements the city will need beyond 2020 if it is to continue to grow. We would suggest that in this respect the plan closely links to the Regional Transport Strategy which is currently being refreshed by Nestrans.

While the AWPR plays a crucial role in unlocking development across the city and wider region, members have raised concern of a "doughnut-effect" following delivery of the AWPR, where



development could focus on narrow corridors at either side of the route. The updated LDP should look to mitigate this risk, and identify the key linkages between the city centre and the AWPR where development could also be supported.

Chamber members also highlighted that improving transport movement and enhancing accessibility was also a key consideration for improving the city centre. The recent Retail survey showed that almost 50% of respondents support the pedestrianisation of Union Street, with more than half favouring the area between Union Terrace and Market Street. It should be noted, however, that the proposals for Broad Street, which would also result in pedestrianising Broad Street, would have an additional bearing on transport movement should the pedestrianisation of Union Street be pursued.

It should also be recognised that the City continues to have a high propensity of car usage to access the city centre. While, the LDP needs to find ways to encourage more active methods of travel, until the AWPR is delivered there should be flexibility in the traffic policies promoted in the finalised plan. For example, the updated plan should identify that the provision and cost of parking is a major consideration in increasing footfall for the city centre. The provision of parking is an important issue for retailers in the city centre, as local parking was felt to be the biggest factor which would constrain growth for local businesses in the recent retail survey.

If we are to attract and retain major companies, particularly oil and gas companies, in the City Centre it also needs to be acknowledged that higher levels of parking provision are required to meet occupier demand. Oil and gas companies operate in a highly competitive employee market and car parking provision for employees is an essential part of their employee attraction and retention initiatives.

### Providing infrastructure

Chamber members recognise that new infrastructure requires investment. However, the business community are concerned that they may be subject to even more financial contribution requests to pay for development / investment. This is worrying for businesses who are repeatedly reporting difficulties in managing the increasing costs of doing business.

Any requirement for businesses in the city to contribute to infrastructure investment must be balanced with the need for the City to remain competitive with Aberdeenshire, other cities in Scotland, and around competitors around the globe.

# Meeting housing needs

As outlined above, the North East Business Week survey for 2013 identified that the availability of suitable housing in this region was having a negative impact on growth. Over 40% of businesses considered the availability of suitable housing stock was having a negative impact on attracting new people to the area with 50% having a neutral rather than positive impact. This means less than 1 in ten businesses think the availability of housing stock is having a positive impact on their growth aspirations.

The additional people needed in this region to work in the oil and gas industry, amongst others, means that there is a pressing need for housing to be delivered quickly and on a large scale. It is essential that the plan identifies accurately how many people are needed to meet the employment needs of the city, and sets an appropriate number of homes to be built based on that people forecasting.

The current local plan focuses approximately 64% of the housing development needed between now and 2030 on just 4 sites, and Chamber members have highlighted that if one of these sites does not deliver the housing on the scale identified in the local plan, there will be a



significant shortfall in housing for Aberdeen. As such, members have requested that the updated plan identifies additional, smaller-scale sites for housing development.

AGCC members also believe that the updated plan should allocate new housing close to the major employment areas in order to provide choice and reduce the need to travel.

#### 2.3 Transparency

Members have highlighted that they would like to see the development plan process more transparent on how it is delivered and how success is measured. It is important that all stakeholders know the current picture in relation to development in the City so that the acceptable priorities for future growth and development can be set. Therefore, the Chamber suggests that some time is spent prior to the publication of the Main Issues Report conducting a baseline study.

This baseline study could include information on the policy priorities the Council wish to focus on in the updated LDP, such as housing, economic growth and the city centre. Information included could be analysis of the housing stock, rental prices for commercial and residential property and average travel times across the city.

This analysis would enable realistic targets to be set in the updated plan which meet the economic needs of the city. The updated plan should also include timescales for delivery on each of the targets set.

It is also important that the plan be regularly monitored to assess how and if its targets are being achieved and whether key developments are progressing as expected. We would support an annual report being produced which assesses what has been delivered and explains why other things have not been delivered. This point is of particular importance on the delivery of housing as early indications of housing targets not being met will mean that interventions can be planned at an early opportunity.

### 3.0 Improving the proposals

AGCC believe that any policy or legislative change should be assessed against four main principles:

- 1. Are the proposals simple?
- 2. Is the proposal transparent?
- 3. Will the proposals support economic growth?

We believe that the points we have made in this submission will result in a stronger plan which matches the principles outlined above. Chamber members would welcome the opportunity to discuss the views in relation to the Local Development Plan in more detail prior to the Main Issues report being published. To arrange such a meeting, please contact the Chamber's policy team.

James Bream Research & Policy Director Rachel Elliott
Policy Executive