



Doing things digitally is our preference. Tick the box if you are not happy to receive correspondence via email:

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

## Fair processing notice

Please tick to confirm your agreement to the following statements:

By submitting a response to the consultation, I agree that Aberdeenshire Council can use the information provided in this form, including my personal data, as part of the review of the Aberdeenshire Local Development Plan. This will include consultation on the Main Issues Report (including any subsequent Proposed Plan).

I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037

### Your Data, Your Rights

You have got legal rights about the way Aberdeenshire Council handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data.

If you are unhappy with the way that Aberdeenshire Council or the Joint Data Controllers have processed your personal data then you do have the right to complain to the Information Commissioner's Officer, but you should raise the issue with the Data Protection Officers first. The Data Protection Officers can be contacted by writing to:

- Mr Andrew Lawson, Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

If you have difficulty understanding this document and require a translation, or you need help reading this document (for example if you need it in a different format or in another language), please phone us on 01467 536230.

<b>Which document(s) are you commenting on?</b>	Main Issues Report - yes	<input checked="" type="checkbox"/>
	Draft Proposed Aberdeenshire Local Development Plan - yes	<input checked="" type="checkbox"/>
		<input type="checkbox"/>

## Your comments

The Main Issues Report – Marr Settlements Appendix makes reference to site reference MR014 and confirms this as an **Officers Preference** as a Retail Park (Class 1) Proposal (page Marr 18-19). In general we are **supportive** of this potential allocation.

However it is not clear why the MIR seeks to restrict the development to 6000sq.m.

The Proposal

The proposal submitted as a BID site to the Call for Sites is to develop the site for a medium sized retail park extending to approximately 68,000sq.ft (6317sq.m) of retail floorspace and a class 3 café unit.

The Aberdeen City and Aberdeenshire Retail Study (ACARS) was undertaken in 2013. This is a large retail study for the whole Aberdeenshire Area.

In relation to Banchory the study identifies retail capacity for both convenience and comparison goods but does not recommend the allocation of any sites to accommodate this floorspace.

In terms of convenience retailing, the study identifies only limited retail capacity after 2022, ranging from £6M to £22M depending on a number of scenarios.

In terms of comparison retailing, the study identifies the potential for new additional retail floorspace in Banchory. This is based on the fact that only 30% of locally derived expenditure is retained in the catchment, the rest being spent elsewhere, notably Aberdeen City.

In terms of retail capacity and impact, the ACARS study does identify potential capacity for both convenience and comparison retail floorspace in Banchory but stops short of recommending that new retail site be allocated, instead the LDP indicates that the town centre could absorb this expenditure. However, this fails to address the identified deficiencies as it unlikely that the town centre, given its limited scale and lack of medium/large scale opportunities, could absorb any meaningful levels of additional retail expenditure.

An initial review of the ACARS identifies approx. £6 to £22M of potential convenience expenditure in the catchment. This clearly needs to be refreshed and revised as it now a few years old, but it provides a useful benchmark to consider the proposal. As it stands the proposal would have an estimated convenience turnover of approx. £11m, so sits between the range identified and on the lower end of the range. In terms of comparison, the proposal would have an estimated turnover of approx. £6m. The estimated leaked expenditure is around £35M, so there should be sufficient potential capacity to support this level of floorspace.

This indicates (subject to a detailed analysis) that there should be sufficient capacity to support the retail floorspace proposed.

The impact on the town centre will also be a key consideration. However, it is likely that retail diversion is likely to be focused on the two main convenience retailers in the town, namely Tesco and Morrisons, and both

retailers are outwith the town centre. There will also be an opportunity to clawback leaked expenditure, particularly in relation to the comparison retail floorspace, which will minimise trade diversion and therefore impact on the town centre.

The proposal is therefore to develop a mixed convenience and comparison retail development of circa.6000sq.m with some ancillary uses such as restaurant use. The suggested limit to 6000sq.m maximum has not been tested and at this stage could limit the potential occupation and viability of the site. To be clear, the concerns over the 6000sq.m limit are not predicated on any notion that the development could achieve a significantly higher floorspace than 6000sq.m but given the initial proposal is for 6317sq, a 5% variance from 6000sq.m, the restriction at this stage appears unnecessary.

#### Draft Proposed LDP

Whilst it is acknowledged that this Draft Proposed LDP is not subject to this consultation stage, it has nevertheless been published and in regard to the above proposal contains a further restriction that is not supported by the MIR, the current supporting evidence and would potentially nullify the benefit of the proposed allocation.

The Draft Proposed LDP introduces the suggestion that any retail development would be restricted to comparison bulky goods. This type of retail is not proposed via our Call for Sites submission or indeed the commentary in the MIR.

What is proposed for Banchory is a mixed retail park including both convenience and comparison retailing floorspace. Modern retail parks now require a mix of tenants to be successful and viable. Further the scale and location of this proposal would not be viable for bulky goods comparison retailing only.

Most existing retail parks in large towns and cities are currently struggling due to the shifting nature of retail and consumer habits. The challenges facing town centres are also faced in retail parks and commercial centres but for them there is little opportunity to diversify with other uses such as offices, cultural uses, etc. For this reason very few if any retail parks within Scotland are wholly restricted to bulky goods. Most now have a range of retail uses appropriate to the location.

It is also the case that the concept of 'bulky goods' retailing is no longer viable in today's market. The 'bulky goods' concept is now over 20 years old and since that time the number of retailers able to occupy bulky goods retail parks/units has significantly diminished due to mergers and companies going into administration. Recent examples are Homebase and Comet. As a result, on average the number of retailers in the pure 'bulky goods' market has reduced by some 56%, higher in some sectors such as electrical, over the last 20 years.

This has led to a rise in both smaller scale convenience retailing (not superstores) and mixed goods retailers such as Home Bargains and B&M. These mixed goods retailers sell convenience and comparison goods, including bulky goods but typically sell no or little fashion or clothing goods.

However given the context for Banchory, with its limited retail offer on all goods and lack of opportunity in the town centre for larger format stores, any proposed restriction on the range of goods that could be sold from the site would not be justified. Leakage to other centres is not just for bulky goods, its for all goods and in simple terms, whilst the town centre has good levels of vitality and viability it does not fully cater for all the needs of residents. As such they seek better or improvement retail provision elsewhere. This development has the opportunity to stem some of that leakage (which will have both economic and sustainability benefits) and retain the activity locally. This could not be achieved with a 'bulky goods' restriction.

Furthermore, a bulky goods restriction could actually have a greater impact on Banchory Town Centre than no restriction as a number of the retailers in the town centre are furniture and bedding retailers (ie bulky goods retailers).

In summary, whilst we are supportive of the general proposed allocation in the MIR we would object to any 'bulky goods' restriction should that appear in the Proposed LDP when published for consultation.

On that basis the Proposed LDP should not seek to restrict the range of goods that can be sold from the site. A more flexible approach requires to be taken to allow the full benefits of the proposed allocation in the MIR to be realised. The appropriateness of any restrictions would be tested through the planning application process where the specific detail of the proposal can be considered more closely.