

## Response ID ANON-B3JU-DSJ3-8

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**

Submitted on **2019-04-29 12:08:32**

### About You

**What is your name?**

**Name:**

Robert Frost

**What is your organisation?**

**Organisation:**

Craigiebuckler & Seafield Community Council

**On behalf of:**

**How can we contact you?**

**Email:**

[REDACTED]

**Telephone:**

[REDACTED]

**Address:**

[REDACTED]

[REDACTED]

[REDACTED]

### 1 Introduction

**Section 1 provides a context for the Main Issues Report Do you have any comments in relation to this section?**

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### 2 Settlement Strategy

#### Question 1 New Housing Sites

**Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?:**

Yes we agree with preferred housing sites. We have not identified any other sites that would be suitable for housing.

#### Question 2 Housing Allowances Beyond 2032

**Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:**

No further housing sites should be identified beyond 2032. By that time the city will have grown considerably and green space could be too scarce to be allowed to be developed.

#### Question 3 Brownfield and other Opportunity Sites

**Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:**

We have not identified any further brownfield or other opportunity sites which would be suitable for redevelopment.

#### Question 4 New Healthcare Facilities

**Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:**

Dyce and Stoneywood.

The former Cordyce School: Develop for a new medical centre. Bid reference B01-11

The MIR bid assessment advises that there are constraints to developing the former Cordyce School Site which has, in our opinion, reduced its value as a brownfield development . There is also a belt of mature trees which should be protected from construction activities.

The alternative site, Central park, Dyce – B01/10 – Site adjacent to new medical centre.

Possibly a good central location. However it impedes upon new sports facilities and existing paths used to access Dyce shopping centre.

Conclusion – Cordyce school site, though it is not ideal, seems a better option for the site of a new doctor's surgery/medical centre.

Bucksburn and Bankhead

B01-12 Playing fields, Stoneyton Terrace. This site, in our opinion, should be protected from development. It is zoned as green belt on the present development plan and should receive the same classification in the 2022 LDP.

The former Bucksburn primary school is a much better alternative for siting a medical centre because it is a brownfield site with good access.

Northfield and Mastrick

B0317 – Greenferns, South of Orchard Brae School. The area is zoned for residential development in the current LDP and should remain classified as such in the 2022 LDP

Site at Greenferns, West of Orchard Brae School, B0318 – partly reserved for a neighbourhood centre.

MIR bid assessment advises that the development of a health centre would add to the existing land uses in the area. It should be the preferred site.

### **3 Aberdeen City Centre and the Network of Centres**

#### **Question 5 City Centre Boundary**

**Do you agree the Local Development Plan should modify its City Centre boundary to match the City Centre boundary shown in the City Centre Masterplan?:**

Yes we agree the City Centre boundary should match that of the City Centre Masterplan but we also feel the two current areas should be integrated giving the larger area of the two boundaries.

#### **Question 6 City Centre Masterplan Intervention Areas**

**Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan?:**

Yes agree that the CCMP intervention areas should be identified as opportunity sites within LDP.

#### **Question 7 City Centre Retail Core**

**Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?:**

We are of the opinion that the retail core should be reduced to focus on a more compact area of Union Street and the existing shopping centres. But we also need a plan for the whole of union Street and careful consideration needs to be taken regarding the role of Union Street.

#### **Question 8 Union Street Frontages**

**Should the Union Street Frontages percentages be reviewed? Do the current target percentages ensure there is a balance between a strong retail focus and allowing for other uses? What other uses should we allow on the retail core area of Union Street:**

Yes percentages should be reviewed as we need a more flexible approach and don't want to stick to rigid percentages.

#### **Question 9 Out of Town Retailing**

**Should we direct high footfall uses to existing centres including the City Centre? Should we consider new out of town retail parks? What would the impact of these be on Union Street and the City Centre, and Aberdeen's network of centres?:**

High footfall uses should continue to be directed to existing centres, including the city centre.

There should be no new out-of-town retail parks because they encourage car use as opposed to sustainable means of travelling.

The out-of-town retail parks are convenient for shopping because they have large free, user friendly car parks. This has had an adverse impact on Union Street, the city centre retailers and Aberdeen's network centres.

#### **Question 10 Commercial Leisure Uses**

**Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:**

Yes, leisure users should continue to be directed towards the historic existing centres and the Beach Leisure Area, but listen to any new proposals as a more flexible approach needs to be taken.

#### **Question 11 City Centre Living**

**How can we encourage more people to live in the City Centre? Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?:**

The main attraction of city centre living should be advertised .

The attraction is the convenience of having so many retail and leisure outlets on one's doorstep.

There is no doubt that a guidance document, which explains the planning principles of converting a building into residential use, would be both essential and invaluable and could increase the quantity and quality of residential accommodation.

The Local Development Plan should include a policy supporting residential development in the city centre.

### **MAIN ISSUE 1 Living in the City Centre**

**Should we include a policy in the Local Development Plan supporting residential development in the City Centre, including the conversion of upper and basement floors of premises to provide residential accommodation?:**

We agree with Option 2, which is the preferred option: "Include in policy the support for residential use in the city centre, and the conversion of upper floors to residential accommodation in the LDP and identify opportunity sites with residential uses."

Though supporting Option 2 – Preferred Option, the conversion of basement floors as part of achieving this aim is not supported. If basement floor living means living below ground level with little or no natural light then that part of this option should be removed or excluded.

Option 2 - Preferred Option

**Question 12 Residential Development in the City Centre**

**Are there any other locations within the City Centre where residential accommodation could be provided?:**

We have not identified any other locations within the City Centre where residential accommodation could be provided.

**MAIN ISSUE 2 A 24-Hour City**

**Should 24-hour activities in Aberdeen be supported and encouraged to grow, especially in the City Centre? Could this be achieved through policy?:**

We agree with Option 2, which is the preferred option - "Establish the requirement to support and encourage the evening and night time economy through policy."

Option 2 - Preferred Option

**Question 13 Encouraging the Creative Arts**

**What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen City Centre is like no other place?:**

Ensure that this question is directed to as many bodies as possible which have expertise in this area. Apart from the expertise that resides within the council including arm's length bodies e.g. Aberdeen Performing Arts, amongst other organisations worthy of consultation include the city's two universities, Aberdeen Civic Society, Aberdeen Artists Society, Peacock Visual Arts and the Friends of Aberdeen Art Gallery and Museums.

Provide grants to the creative sector, conditional upon it locating in the city centre.

**Question 14 Proposals for Creative Arts**

**Are there other buildings or areas within Aberdeen that could accommodate the existing, and support an emerging creative sector for desk-based and studio-based artists?:**

We have not identified any other buildings or areas within Aberdeen that could accommodate the existing and support an emerging creative sector, for desk based and studio based artists.

**Question 15 Percent for Art**

**To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/ visible place or places within the development?:**

Though firm in the belief that attractive buildings (for any purpose) contribute to a public sense of well-being and civic pride, a concern is held that mandating a minimum fixed percentage of construction costs for Art might be restrictive. Money spend is not a measure of artistic merit. Is it not better to have a policy of 'Engagement and Encouragement' as opposed to Enforcement?

**MAIN ISSUE 3 Support for Visitor Attractions**

**To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?:**

We agree with Option 2, which is the preferred option: "Establish a new policy to support and encourage visitor attractions".

A new policy would be very welcome. It is to be hoped that this policy would include in its scope of engagement an examination of how best the very many hidden treasures of Aberdeen (and the Shire) can be freed from confinement to become appreciated not only by visitors but also by local citizens. Will Aberdeen's Reserve Collection fully emerge into the sunlight? It sometimes seems that the Art Gallery though very worthy is our only jewel in the crown. Aberdeen very much needs other new world class flagship developments and access to those hidden museums and their collections that are 'hidden' to the general public and visitors except perhaps on an Open Doors Day. Aberdeen Medico-Chirurgical Society has artefacts relating to the city's worthy place in the history of medical progress. Aberdeen University's museum at Marischal College is rarely heard of. What other treasures do Aberdeen Universities keep in storage? Where is the will to create an Aberdeen Peoples' Museum to display the treasures that many people would gladly donate?

Option 2 - Preferred Option

**4 Quality Places**

**MAIN ISSUE 4 Minimum Internal Space Standards for New Residential Development**

**How can we ensure that new residential development delivers an adequate amount of internal floor space for future occupants?:**

We agree with Option 2, which is the preferred option: "Set minimum internal space standards for new residential development (including conversions) in line with the 'Nationally Described Space Standard'." But we should actively encourage trying to work towards achieving a higher internal space standard wherever

possible. We would prefer to support Option 3- Alternative Option, provided the word 'better' clearly means 'higher' standards in all contextual expectations than those determined in Option 2.

Option 2 - Preferred Option

#### **Question 16 External Space Standards**

**Do you think that the amenity spaces currently delivered are of a sufficient quality? Should we strive for a better quality/ quantity of private/ semi-private residential amenity space across the city and refuse planning permission to proposals which do not meet our high standards? What standards would you like to see set for new dwellings, flats, and conversions in respect of quality and quantity of external amenity space?:**

We do not think that the amenity spaces currently delivered are of sufficient quality.

You should strive for better quality/quantity of private/semi-private residential amenity space across the city and refuse permission to proposals which do not meet your high standards.

For many years, in our opinion, developers have been allowed to cram in as many houses as they could on their development sites in order to maximise their profits.

Amenity space is of inestimable importance to the residents' quality of life.

#### **Question 17 Natural Environment**

**Do you agree that the proposed list of policies for Natural Environment gives a clearer and more coherent structure than at present?:**

Yes we agree with this as it reduces the number of policies and makes them clearer.

#### **Question 18 Food Growing**

**How can the Local Development Plan support the delivery of food growing projects in the City? Do you think food growing should be included in the next Plan by way of a new policy, or through existing policy and guidance?:**

Aberdeen City Council should encourage self-sufficiency in food production.

The LDP should include land designated exclusively for allotments and horticultural activities.

A new and stringent policy of safeguarding the present areas of land being cultivated for food production as well as designating new areas of land for the production of food should be included in the next LDP.

### **5 Transport and Infrastructure**

#### **Question 19 City Centre Parking**

**Should we reduce car parking in the City Centre to support the City Centre Masterplan? If so, how?:**

Reducing city centre parking will have a negative impact on Aberdeen's urban economy in terms of footfall to retail outlets, restaurants and places of entertainment. People will tend to travel out of town, for these leisure activities, where parking is more available.

However car parking should not be increased in the city centre. Public transport needs to be improved and made more affordable to encourage more people to use public transport.

#### **MAIN ISSUE 5 Electric Vehicle Charging Infrastructure**

**How best can we encourage the provision of infrastructure to support changes in transport technologies? :**

We agree with Option 2, which is the preferred option: "Increase the requirement for electrical vehicle charging infrastructure for all new developments that provide parking.

Investigate fitting electric vehicle charging points using street lights.

Option 2 - Preferred Option

#### **Question 20 Digital Infrastructure**

**Should high speed broadband be mandatory in all new residential developments with 5 or more units? Do you wish to suggest any other proposed changes to the Digital Infrastructure and Telecommunications Infrastructure policies?:**

High speed broadband should be mandatory in all new residential developments with 5 or more units.

It should also be mandatory for the developers of all new residential sites to contribute towards the costs associated with extending the digital infrastructure to facilitate the provision of the extra high speed broadband coverage.

#### **Question 21 Developer Obligations and Infrastructure Delivery**

**Do we need to change our approach to securing developer obligations for future development proposals?:**

We see little need to change our approach to securing obligations to securing developer obligations for future development proposals. But consider other ways to fund infrastructure for new developments if developers are unable to secure funding such as a Government guarantee to help developers to access finance.

### **6 Resource and Business Policy**

#### **MAIN ISSUE 6 Low and Zero Carbon Generating Technologies and Water Efficiency**

**Should the requirement of existing Policy R7 be changed?:**

Our preference is Option 2, which is the preferred option: "Follow the targets set out in the current Supplementary Guidance (Resources for New Development) and transcribe these into the Local Development Plan."

Option 2 - Preferred Option

**Question 22 Low and Zero Carbon Generating Technologies and Water Efficiency**

**What methodology should the Council use in calculating compliance with Policy R7, specifically how should the target of reducing carbon dioxide levels be calculated?:**

We have no response to this question.

**Question 23 Solar Farm Developments**

**Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy developments, and should specific guidance be included within Policy R8?:**

We agree that solar farms should be supported within the Council's policy on renewable and low carbon energy developments. Specific guidance should be included within policy R8.

**MAIN ISSUE 7 Heat Networks**

**Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?:**

We prefer Option 2, which is the preferred option: "Include a policy supporting the development of heat networks across the city. The policy would identify key areas of the city where existing networks exist, or where new networks should be developed."

Option 2 - Preferred Option

**Question 24 Supporting Business and Industrial Development**

**Should we carry forward our current policy approach to safeguarding existing business and industrial areas from other development pressures into the next Local Development Plan?:**

Despite the adverse affects of the downturn in the oil industry, we believe that safeguarding the existing business and industrial areas against other forms of development should continue as a Council policy in the next LDP.

**MAIN ISSUE 8 West End Office Area**

**Should the policy support a mix of uses in the West End Office Area? If so, what types?:**

We prefer Option 2, which is the preferred option: "Relax the current policy and encourage a mix of uses (including housing, offices, small business units, hotels, food and drink premises) in this area."

Option 2 - Preferred Option

**7 Affordable Housing**

**Question 25 Affordable Housing**

**Do you agree with the Local Development Plan's current affordable housing approach being carried forward? What other measures could the Council consider in order to assist with the delivery of affordable housing units via the Plan? Should the threshold of not applying affordable housing requirements to developments smaller than 5 units remain in place?:**

Despite the downturn in the oil industry and the on-going provision of hundreds of new homes, the value of housing in the city remains high.

Consequently house purchase is still unaffordable to many citizens and to workers seeking to relocate to Aberdeen.

The current LDP's approach to affordable housing should be continued, but with a policy variation which departs from the inflexibility of strictly selecting lower value land for affordable housing development.

In addition to selecting low value land on which to site affordable housing developments, proportions of higher value land should be allocated for affordable housing in the next LDP.

The threshold of not applying affordable housing requirements to developments smaller than 5 units should remain in place.

**Question 26 Private Rented Accommodation and Build to Rent**

**Are there ways that the Local Development Plan can facilitate Build to Rent development, through policy?:**

During the downturn in the housing market, one of the city's major developers has advertised their unsold properties for rent. The measure has had some success.

Perhaps, through policy, the LDP could by land allocation, incentivise development proposers to build to rent.

**8 Sustainable Mixed Communities**

## **MAIN ISSUE 9 Inclusive Housing Mix (Housing for the Elderly and Accessible Housing)**

### **How can the Local Development Plan ensure a greater mix of housing types is achieved in new developments?:**

We prefer Option 2, which is the preferred option. "Policy H4 would be updated to set a minimum requirement for a housing mix to be achieved in most new residential developments.

Mix can be agreed with Planning Authority to respond to individual site

context. Units that can be demonstrated as 'adaptable' for varying needs, or designed for lifetime living, would be supported in principle, subject to other policies. Further guidance/ design guide could be prepared to support this.

Option 2 - Preferred Option

## **MAIN ISSUE 10 Residential Care Facilities**

### **How should the Local Development Plan cater for proposals relating to Residential Care Facilities?:**

We prefer Option 2, which is the preferred option. "A new policy dedicated to Residential Care Facilities. Such development should be fully accessible by most transport modes and satisfy all other relevant policies that apply to residential development, principally with regards to design and amenity.

There would be a presumption in favour of retaining such facilities in terms of redevelopment/ Change of Use proposals. Where a proposal is justified to the satisfaction of the Planning Authority, all other relevant policies would apply to the proposed development."

Option 2 - Preferred Option

## **MAIN ISSUE 11 Student Accommodation**

### **How can the Local Development Plan cater to proposals relating to student accommodation?:**

We prefer Option 2, which is the preferred option: "A new policy dedicated to Student accommodation. Such development should be fully accessible by most transport modes and satisfy all other relevant policies that apply to residential development, principally with regards to design and amenity.

There would be a presumption in favour of retaining such facilities in terms of redevelopment/ Change of Use proposals. Where a proposal is justified to the satisfaction of the Planning Authority, all other relevant policies would apply to the proposed development.

Option 2 - Preferred Option

## **MAIN ISSUE 12 Houses in Multiple Occupation**

### **How can the Local Development Plan support sustainable mixed communities, with regards to HMOs?:**

We prefer Option 2, which is the preferred option: "A new policy dedicated to HMOs. A policy would seek a certain standard of design and amenity for proposed development or change of use to HMO use.

Safeguarding for existing communities to protect neighbours from any adverse impact of HMO overprovision would be a priority. There would need to be reference to the HMO licensing process, which is separate to the planning process.

Option 2 - Preferred Option

### **Percentage limit of HMOs in each area:**

**Please explain why you chose your answer:**

### **Geographical boundary of each area:**

**Please explain why you chose your answer:**

### **Threshold for when planning permission is required for a HMO:**

**Please explain why you chose your answer:**

## **Question 27 Community Planning**

**Is there anything else that the Local Development Plan can do to support the objectives of the LOIP or the aims of Community Planning?:**

## **Question 28 Changing Places Toilets**

### **Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?:**

Yes large new developments that require public access should provide Changing Places toilets. Hospitals, large shopping centres, and bus/train stations should provide them.

## **Appendix 1 Proposed Draft New Policies**

### **Policy D2 Amenity**

Do you have any comments on the policy?:

**Policy D5 Advertisements and Signage**

Do you have any comments on the policy?:

**Policy D8 Shopfronts**

Do you have any comments on the policy?:

**Policy D9 Windows and Doors**

Do you have any comments on the policy?:

**Policy H4 Housing Mix and Housing for Particular Needs**

Do you have any comments on the policy?:

**Policy H8 Residential Care Facilities**

Do you have any comments on the policy?:

**Policy H9 Student Accommodation Developments**

Do you have any comments on the policy?:

**Policy H10 Houses in Multiple Occupation**

Do you have any comments on the policy?:

**Policy NC9 City Centre Living**

Do you have any comments on the policy?:

**Policy NC10 24-hour City**

Do you have any comments on the policy?:

**Policy NC11 Visitor Attractions and Facilities**

Do you have any comments on the policy?:

**Policy NC12 Public Art Contribution**

Do you have any comments on the policy?:

**Additional Documents**

Please include comments on other documents below:

Please include comments on other documents below::

**Additional Files**

If you have further information you would like to provide you may upload it here.:

No file was uploaded

**From:** [REDACTED]  
**To:** [LDP](#)  
**Subject:** Development Options Assessment Report on the Pre-Main Issues Submissions 2018.  
**Date:** 28 May 2019 22:41:55

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Dear Sir/Madam,

During our Community Council meeting on 7th May we unanimously agreed with the "undesirable" assessment where you have applied it to developer bids.

Yours sincerely,  
William Sell,  
Chair,  
Craigiebuckler and Seafield Community Council

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