

Response ID ANON-B3JU-DSAA-D

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

Submitted on **2019-04-30 18:32:23**

About You

What is your name?

Name:

Alistair Watson

What is your organisation?

Organisation:

On behalf of:

How can we contact you?

Email:

[REDACTED]

Telephone:

[REDACTED]

Address:

[REDACTED]

How to Complete

1 Introduction

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

Do you have any comments in relation to this section?:

I have no questions in relation to Section 1.

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?:

I have no challenges to the preferred housing sites provided that public access is maintained and the green space network maintains functional corridors for wildlife at locations where it currently acts as a wildlife corridor. With the exception of sites identified in 2.3 which I do not have an opinion on, I do not support any further sites being considered 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?:

I do not support the identification of further Housing Allowances or sites for the period beyond 2032.

Question 3 Brownfield and other Opportunity Sites

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

I do not have an opinion on the sites identified in 2.3 of the Main Issues Report. I do not support any further brownfield or other opportunity sites for redevelopment being included in the Plan.

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?:

I do not have any opinion on the healthcare facilities locations proposed. I do not have further suggestions.

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?:

I have no opinions on the modification of the Local Development Plan boundary to match the City Centre Masterplan boundary.

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?:

I have no opinions on inclusion of the City Centre Masterplan intervention areas as opportunity sites.

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?:

I have no opinions on the reduction of focus to a more compact area of Union Street and existing shopping centres.

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:

I do not have any opinions regarding Union Street Frontages.

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?:

The Plan should continue to direct high footfall uses to existing centres including the City Centre. The Plan should have presumptions against out of town retail parks in order to continue to support vibrancy, vitality and viability of existing retail centres.

Question 10 Commercial Leisure Uses

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

The plan should continue to direct commercial leisure uses towards existing centres and the beach and leisure area.

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?:

I do not have any opinions on encouraging more people to live 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?:

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?:

I do not have any opinions on other locations where residential accommodation could be provided in the City Centre.

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?:

Option 1 - Current Approach

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?:

I have no opinions on supporting and encouraging the creative sector.

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?:

I have no suggestions for buildings or areas within Aberdeen that could accommodate and support an emerging creative sector.

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?:

I do not feel that all developments with construction costs of over £1 million should 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. This would not meet comparable tests to Planning Circular 3/2012 for City Centre infrastructure projects which may also not have practical locations for display due to their design or purpose.

MAIN ISSUE 3 Support for Visitor Attractions

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

Option 1 - Current Approach

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?:

Option 3 - Alternative 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?:

High quality external amenity space should be more functional and ideally multifunctional green infrastructure than just being cut grass and shrubs.

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?:

This should not have been consulted on as a Main Issues Report question without drafts of the consolidated policies as the proposed consolidation of NE policies is a significant change. In the absence of proposed draft policies to demonstrate otherwise, a precautionary response presumes that the proposed consolidation of nine policies into four devalues the natural environment and would facilitate inappropriate development and development in the wrong places.

In order to capture the principles of the current NE policies adequately it is presumed that consolidations would at best be lengthy and perhaps convoluted in order to capture the spirit, or more concerning become too reduced and diluted to provide weight towards protection and enhancement of the natural environment.

The pairing of 'NE5: Trees and Woodlands' and 'NE8: Natural Heritage' does not make sense due to fundamental differences for which features are designated, protected or prioritised. Trees and woodlands may be protected due to landscape character, local amenity or climate change adaptation and mitigation, but at the same time offer little or no natural heritage (nature conservation value). For example non-native planting will be more functional for certain climate change adaptation and mitigation purposes but not contribute towards (or perhaps have a negative effect upon) biodiversity.

'Policy NE3 - Urban Green Space' can perhaps be deconstructed with its components if not otherwise duplicated, to be consolidated into individual revisions of 'Policy D2 – Landscape', 'Policy NE1 - Green Space Network', 'Policy NE5 - Trees and Woodlands', 'Policy NE6 - Flooding, Drainage and Water Quality', 'Policy NE8 - Natural Heritage' and 'Policy NE9 - Access and Informal Recreation' and 'Policy T3 - Sustainable and Active Travel'.

Protection currently afforded to existing open space through 'Policy NE3 - Urban Green Space' (particularly parks, playing fields, sports pitches, woods and allotments) should be integrated with 'Policy NE4 - Open Space Provision in New Development'.

The NE policies in the new Plan must remain robust enough to support Global Goals for Sustainable Development in Scotland and Scottish Planning Policy without reliance on Supplementary Guidance should SG be abolished.

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?:

I have no opinions as to how the Plan can support the delivery of food growing projects in the City.

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?:

Car parking in the City Centre should not be reduced.

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

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?:

I have no opinions regarding Digital Infrastructure.

Question 21 Developer Obligations and Infrastructure Delivery

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

Developer obligations should continue to be provided but should be more transparent in what is being identified for negotiation. There should be more engagement with key stakeholders such as Aberdeen Local Outdoor Access Forum, Aberdeen Cycle Forum and Community Councils about the most effective outcomes from obligations.

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?:

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?:

I have no opinion on what methodology the Council should use in calculating compliance with Policy R7.

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?:

I support the inclusion of Solar Farms within the Council's policy on Renewable and Low Carbon Energy developments and specific guidance should be included in Policy R8 subject to meeting similar tests to those in R8 for other Renewable and Low Carbon Energy developments.

MAIN ISSUE 7 Heat Networks

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

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?:

The next Plan should carry forward the current policy approach to safeguard existing business and industrial areas from other development pressures.

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?:

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?:

The current affordable housing approach should be being carried forward. The threshold of not applying affordable housing requirements to developments smaller than 5 units could remain.

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?:

I have no opinions on facilitating Build to Rent through policy.

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?:

Option 2 - Preferred Option

MAIN ISSUE 10 Residential Care Facilities

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

Option 2 - Preferred Option

MAIN ISSUE 11 Student Accommodation

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

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?:

Option 2 - Preferred Option

Percentage limit of HMOs in each area:

Option 1 - Preferred Option (15%)

Please explain why you chose your answer:

To maintain community function over the longer term.

Geographical boundary of each area:

Option 1 - Preferred Option (Ward Boundaries)

Please explain why you chose your answer:

No strong preference. Ward Boundaries are already recognised boundaries.

Threshold for when planning permission is required for a HMO:

Option 1 - Preferred Option (6 or more people in a flat, 6 or more people in a house)

Please explain why you chose your answer:

No strong preference.

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?:

I have no opinions on how the Plan can support of the objections 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?:

Large new development that require public access should provide Changing Places toilets. This should include offices of public bodies, shopping centres, performance venues and transport hubs.

Appendix 1 Proposed Draft New Policies

Policy D2 Amenity

Do you have any comments on the policy?:

Proposed Policy D2 – Amenity should be supported by clear guidance on "adequate levels of amenity and will avoid adverse impacts on the amenity of neighbouring property" in order to be applied meaningfully.

Policy D5 Advertisements and Signage

Do you have any comments on the policy?:

I have no comments on the proposed Policy D5 – Advertisements and Signage.

Policy D8 Shopfronts

Do you have any comments on the policy?:

I have no comments on the proposed Policy D8 – Shopfronts.

Policy D9 Windows and Doors

Do you have any comments on the policy?:

I have no comments on the proposed Policy D9 - Windows and Doors.

Policy H4 Housing Mix and Housing for Particular Needs

Do you have any comments on the policy?:

I have no comments on the proposed Policy H4 - Housing Mix and Housing for Particular Needs.

Policy H8 Residential Care Facilities

Do you have any comments on the policy?:

I have no comments on the proposed Policy H8 - Residential Care Facilities.

Policy H9 Student Accommodation Developments

Do you have any comments on the policy?:

I have no comments on the proposed Policy H9 - Student Accommodation Developments.

Policy H10 Houses in Multiple Occupation

Do you have any comments on the policy?:

I have no comments on the proposed Policy H10 - Houses in Multiple Occupation.

Policy NC9 City Centre Living

Do you have any comments on the policy?:

I have no comments on the proposed Policy NC9 - City Centre Living.

Policy NC10 24-hour City

Do you have any comments on the policy?:

I have no comments on the proposed Policy NC10 - 24-hour City.

Policy NC11 Visitor Attractions and Facilities

Do you have any comments on the policy?:

I have no comments on the proposed Policy NC11 - Visitor Attractions and Facilities.

Policy NC12 Public Art Contribution

Do you have any comments on the policy?:

I do not feel that all developments with construction costs of over £1 million should 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. This would not meet comparable tests to Planning Circular 3/2012 for City Centre infrastructure projects which may also not have practical locations for display due to their design or purpose.

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::

B0917 LAND EAST OF INCHGARTH MEWS

Red fox and roe deer are frequently seen at this site. These species are likely to be increasingly reliant on the land in the B9017 bid site if the land to the north of Inchgarth Road is also to be developed (in accordance with 181224/PPP).

Red squirrels have also been recorded more recently in the general area. Recent local records are held by Saving Scotland's Red Squirrels.

This bid would have adverse impacts on the character and function of the Green Space Network through impacts on wildlife habitats and connections.

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

B1003 - LAND AT PHASE 1 NE COUNTESSWELLS

Squirrel dreys occur in the woodland which would be removed by Phase 1 and red squirrels have been specifically recorded in recent years in the vicinity of this proposal.

B1308 ROYAL DEVENICK PARK PHASE 1

The Burn of Leggart provides connectivity for otter (a qualifying feature of the River Dee SAC) between the River Dee and other local features such as Loirston Loch. KN069 (Phase 1) and KN070 (Phase 2) could create result in a reduction of otter use of different parts of connected territory.

Additional Files

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

No file was uploaded