

Response ID ANON-B3JU-DSSJ-8

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-05-03 18:38:38**

About You

What is your name?

Name:

Steve Horton

What is your organisation?

Organisation:

Council Tax Payer and Voter

On behalf of:

N/A

How can we contact you?

Email:

[REDACTED]

Telephone:

[REDACTED]

Address:

[REDACTED]
[REDACTED]
[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?

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

No.

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?:

Following Aberdeen City Council approval of the previous Local Development Plan, the Scottish Reporter made changes to the 2017 LDP without consultation with the Council, the community council, or the wider community. The changes made by the Reporter included the re-classification of B09-42 Milltimber South from Green Belt land into a development site. The Reporter clearly did not consider the huge number of formal written objections which had been made local and city people during the preparation of the 2017 LDP, and over decades whenever attempts had been made by developers to reclassify the area into development land, nor the clear and unwavering position of Aberdeen City Council on the matter.

Though the proposed developer Bancon of B09-42 Milltimber South has engaged with the Council and with local residents since the Reporter made changes to the approved 2017 LDP, Bancon has failed to submit a planning application for the B09-42 Milltimber South fields, perhaps due to the unanimous and total lack of support from interested parties for any development whatsoever, as well as the clear and obvious consequences of any development whatsoever on this green space for the City and its residents. I therefore request that Aberdeen City Council use the opportunity of updating the LDP to take steps to rezone the site known as B09-42 Milltimber South to once again become Green Belt.

I have reviewed the bid assessments in the Main Issues Report and the development bid documents contained within the Aberdeen Development Plan Review. A very large number of new development bids have been made by developers and landowners, including a proposal to increase the number of units on B09-42 Milltimber South. The B09-42 Milltimber South bid document prepared by the developer and/or landowner which seeks to change the outline arrangements forced upon Aberdeen City Council and local residents by the Scottish Reporters decision, contains a number of errors and inaccuracies. My summary comments on the bid document for B09-42 Milltimber South are:

1. With respect to legal and planning history (6.5), the site has actually been the subject of extensive discussions with the Council.
2. With respect to engagement and delivery (8.1), the local community has been given the opportunity to discuss the earlier proposals with the developer in detail and has consistently and loudly condemned those proposals to the developer, elected representative and Planning.

3. Local residents have advised the developer, and its own assessments should have confirmed, that significant parts of the west boundary of B09-42 Milltimber South have a gradient significantly in excess of 1 in 12, seriously compromising sustainable development and design considerations (9.4); any development on the western boundary of the site will overlook and block light from existing local properties and materially effect the quality of life of the residents.
4. The development bid will have serious consequences with respect to sustainable development and design, in particular with respect to landscape fit (9.14) and landscape features (9.13); the open fields at Milltimber South are the only place that local, City and Shire residents can easily see the Dee River and its valley from the main road for 20 miles out on the A93 out from Aberdeen to beyond Banchory.
5. The proposal would also have extremely serious consequences with respect to the green space network (9.36) and the open spaces (9.35) which have made the western extremities of Aberdeen famous; would the local economy benefit from maintaining glimpses of the compelling tourist attraction of the historic Royal Deeside views from Aberdeen all the way to Balmoral, or does the City want an 8 mile plus suburb all the way to Banchory?
6. Existing approved developments in the area will have already completely exhausted the primary and secondary education capacity (10.2) during the time frame of the proposed development for 10 years plus; proposed new developments will easily compensate for the loss of the 60 units forced into the 2017 LDP by the Reporters decision.
7. The suggestion that the public consultation has (simply) revealed opposition to commercial and retail elements of the proposed development is disingenuous in the extreme. The public consultation carried out by the developer has very clearly established that the public do not want the 60 unit proposed development allocated by the Scottish Reporter, and the public will clearly not support increasing that number to 90; the public very clearly want to preserve the Green Belt with no development of B09-42 Milltimber South fields whatsoever, and I believe that is also the view of elected representatives and Aberdeen City Council Planning.

I have personally spoken to 50 local residents with properties adjacent to or overlooking the area, and without exception everyone agreed that this development is not in the interests of them as Council Tax payers or the community. Many of the local residents have objected to similar proposals for the development of the B09-42 Milltimber South site during previous planning process iterations and Aberdeen City Council have consistently rejected any proposed development, preferring to maintain the Green Belt open space.

I am pleased to see that the Main Issues Report suggests that Aberdeen City Council view is that the proposal to increase the number of units on B09-42 Milltimber South is undesirable. The Council clearly does not support increasing the allocation of residential units from 60 to 90. Though the report suggests that the current allocation of 60 houses might be configured in a way that maintains the historic views, everyone including elected representatives and Aberdeen City Planning representatives agree that is unlikely. I have no doubt that the all parties other than the developer and the landowner would prefer that the site be re-zoned as Green Belt. I therefore request that Aberdeen City Council take immediate steps to rezone the site known as B09-42 Milltimber South as Green Belt.

Thanks you for your consideration.

Sincerely,

Steve Horton.

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. Economy will reduce in size as oil industry becomes sub-economic.

Question 3 Brownfield and other Opportunity Sites

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

Yes. All over the place. Check with Planning.

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?:

No.

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?:

No.

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?:

No.

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?:

Yes.

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:

Stop building new shopping centres and reinvigorate Union Street.

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?:

Probably too late, but for goodness sake, stop authorising new developments and focus on Union Street.

Question 10 Commercial Leisure Uses

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

Yes.

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?:

Deal with crime and late night behaviour. Improve and reduce costs for parking. Document not required - just fix it.

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?:

No.

Not Answered

Question 12 Residential Development in the City Centre

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

Yes, but stop planning for increasing numbers of people.

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?:

No.

Not Answered

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?:

Clean up the city and reinvigorate Union Street.

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?:

No idea what a desk-based artist is.

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?:

No.

MAIN ISSUE 3 Support for Visitor Attractions

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

No. Cities are not about "visitor attractions", they are about shops and restaurants.

Not Answered

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?:
Policy.

Not Answered

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?:

No. Stop filling all the gaps with new house and flats. If new housing is required, build new towns away from Aberdeen.

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.

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?:

Don't be ridiculous. Don't need to grow food 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?:

No. Increase it.

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

Build charging stations and new car parks.

Not Answered

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?:

Yes. No.

Question 21 Developer Obligations and Infrastructure Delivery

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

No. Stop negotiating statutory obligations away and make them deliver.

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?:

Don't know.

Not Answered

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?:

Use globally accepted standards.

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?:

No.

MAIN ISSUE 7 Heat Networks

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

No.

Not Answered

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?:

Yes.

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?:

No. It is good as it is.

Not Answered

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?:

No. Build housing estates on greenfield sites and new towns and provide easy and cheap transport access.

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?:

Not required.

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?:

Not required.

Not Answered

MAIN ISSUE 10 Residential Care Facilities

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

Ensure Council pays its way so private users do not subsidise.

Not Answered

MAIN ISSUE 11 Student Accommodation

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

There is already too much. Stop doing deals with developers who have received preferential deals to increase their profits.

Not Answered

MAIN ISSUE 12 Houses in Multiple Occupation

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

No comment.

Not Answered

Percentage limit of HMOs in each area:

Please explain why you chose your answer:

No knowledge of this.

Geographical boundary of each area:

Please explain why you chose your answer:

Do not understand question.

Threshold for when planning permission is required for a HMO:

Please explain why you chose your answer:

Again, noa comprehendo.

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?:

No.

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. All shops and restaurants toilets should be access ble to all members of the public.

Appendix 1 Proposed Draft New Policies

Policy D2 Amenity

Do you have any comments on the policy?:

No.

Policy D5 Advertisements and Signage

Do you have any comments on the policy?:

No.

Policy D8 Shopfronts

Do you have any comments on the policy?:

No.

Policy D9 Windows and Doors

Do you have any comments on the policy?:

No.

Policy H4 Housing Mix and Housing for Particular Needs

Do you have any comments on the policy?:

No.

Policy H8 Residential Care Facilities

Do you have any comments on the policy?:

No.

Policy H9 Student Accommodation Developments

Do you have any comments on the policy?:

No.

Policy H10 Houses in Multiple Occupation

Do you have any comments on the policy?:

No.

Policy NC9 City Centre Living

Do you have any comments on the policy?:

No.

Policy NC10 24-hour City

Do you have any comments on the policy?:

No.

Policy NC11 Visitor Attractions and Facilities

Do you have any comments on the policy?:

No.

Policy NC12 Public Art Contribution

Do you have any comments on the policy?:

No.

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::

Onshore Windfarm Spatial Framework: Please stop building wind farms, they are destroying our environment.

Development Bids Assessments: See detailed comments below:

I refer to and hereby provide comments on the Main Issues Report on the Local Development Plan recently issued by Aberdeen City Council, and in particular the proposals in the Development Bids section relating to B09-42 Milltimber South.

Following Aberdeen City Council approval of the previous Local Development Plan, the Scottish Reporter made changes to the 2017 LDP without consultation with the Council, the community council, or the wider community. The changes made by the Reporter included the re-classification of B09-42 Milltimber South from Green Belt land into a development site. The Reporter clearly did not consider the huge number of formal written objections which had been made local and city people during the preparation of the 2017 LDP, and over decades whenever attempts had been made by developers to reclassify the area into development land, nor the clear and unwavering position of Aberdeen City Council on the matter.

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Thanks you for your consideration.

Additional Files

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

No file was uploaded