

# Response ID ANON-B3JU-DSXS-P

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

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## About You

**What is your name?**

**Name:**

Alexander Sutherland

**What is your organisation?**

**Organisation:**

Concerned Citizen

**On behalf of:**

Myself

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## 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?:**

Judging by the number of houses for sale in Aberdeen there currently housing supply seems surplus to requirements.

### Question 2 Housing Allowances Beyond 2032

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

That will depend on the economic growth of the city. Currently both housing and commercial sites seem to be in oversupply. Education would seem to be the only sector currently prospering.

### Question 3 Brownfield and other Opportunity Sites

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

There are numerous derelict granite buildings in and around the harbor which could be attractively refurbished as offices and retail and hospitality establishments in keeping with the ethos of the city as a traditional fishing and trading port.

### 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?:**

As far as health care is concerned there seem to be enough sites. Staffing would appear to be the problem. Although there are facilities in Aberdeen routine operating procedurers are "Farmed" out to other areas because of the inability of Aberdeen to attract suitably qualified surgeons and staff.

## 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

#### **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?:**

Of course

#### **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:**

More boulevard type street access should be encouraged. Development of underutilized lanes should be encouraged. Areas around "The Green" and the Old market need attention

#### **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?:**

There are quite enough out of town retail parks.

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

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

Not exclusively, but exiting centres need to be upgraded and refreshed and new bid proposals looked at. A case in point being Shepherd's Retreat bid ref. is B0945 which would be an asset to the city providing appropriate tourist accommodation and opportunities for local performers to showcase talent and provide paid entertainment in the nature of cèilidhs. That is why I have taken the trouble to attach my comments on the proposed Shepherd's Retreat bid as an appendix.

#### **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?:**

A document would only help if it offered an attractive workable route forward and was not just a device for kicking the ball down the road.

#### **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?:**

I would advise against basement accommodation on purely practical principals.

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?:**

The derelict warehousing around the harbor could be attractively developed to provide accommodation convenient to the high street and beach.

#### **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?:**

Selectively. Of course policy guidelines need to be in place.

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?:**

An ambition that the city is "like no other" place is a strange one. The whole planning process seems directed at conformity rather than uniqueness. The city need to be clean, welcoming safe and accessible to all classes, cultures and ages. Aberdeen could be above all a tourist destination and it should be refocusing on what it has not competing with every other city which sees itself as a technology hub. That ends up in being a race to the bottom. Every city in Europe is trying to attract the big technology companies to set up a new silicon valley. You cant attract surgeons to do hernia operations. The city needs to be seen as a Florence, Paris or Barcelona to attract the Wiz kids. It needs to be seen as having access to Europe, England and America than they will come by choice not need to be courted by tax incentives.

Aberdeen has a university as old as Oxford and Cambridge. I don't know of a single good restaurant in that beautiful part of the city that I could in good

conscience recommend to a visitor. Ditto the harbour area.

#### **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?:**

The harbour and Old Aberdeen, around the university. The Torry area overlooking the harbor. The banks of the Dee as it enters the harbour.

#### **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?:**

Where appropriate funding comes from should be an Aberdeen council responsibility not a burden placed on contractors and developers.

#### **MAIN ISSUE 3 Support for Visitor Attractions**

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

Yes it should have a policy. It should clearly define what its objectives over the next 10 years are.

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?:**

By understanding the unique needs of people and individuals as they evolve through their life and tailoring what is available to suit their needs. That is why I have taken the trouble to attach my comments on the proposed Blaircara Garden Village development bid.

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?:**

A tailored approach. See my response above.

#### **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?:**

These need to be regarded as guidelines. See my response to question 15 .

#### **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?:**

Definitely. This is precisely what the proposed Blaircara Garden Village development bid addresses.

### **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?:**

Provide a free shuttle service from satellite "Free" car parks on currently derelict sites. Parking should be controlled by ticket and only free for a limited duration encourage commercial activity to limit abuse by commuters.

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

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

Follow the national strategy <https://www.environment.gov.au/climate-change/government/national-vehicle-strategy>

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?:**

No. This would stifle all future development. this would be unworkable. The broadband requirement needs to follow the development.

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

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

No. Str ke a balance and make development contingent of the developer complying with reasonable requests .

## **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?:**

No. These policies are set at a national level. Local authorities should not impose additional red tape.

Option 1 - Current Approach

### **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?:**

In accordance with the legally enforceable 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?:**

The use of solar power to augment domestic requirements is acceptable. Solar farms, feeding into the national grid would need to be part of a much more embracing national initiative.

### **MAIN ISSUE 7 Heat Networks**

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

The implementation of shared heat networks is a wonderful concept for new developments. Particularly ground-source heat storage .The expense can only be justified if life cycle cost are an overriding consideration. |These schemes would be very difficult to impose on areas retrospectively.

Option 1 - Current Approach

### **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?:**

These need to be looked at on a case by case basis. Protecting the interests of existing businesses as far as reasonably practical must surely be the council's duty.

### **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?:**

Restaurants, Night Clubs, Pubs would seem a good idea. Activity focusing on evening utilization of the access infrastructure. would seem to offer synergy. I am sure Aberdeen already has a master plan addressing this.

Option 1 - Current Approach

## **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?:**

Yes. Again each proposal needs to be looked at on a case by case basis. Clearly unit of 5 or less houses, directed at the top end of the market ,would struggle to include an affordable housing element.

### **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?:**

There might be, but currently there is a glut of housing on sale in the Aberdeen market. I don't believe this is where the council should be focusing its energy.

## **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?:**

As proposed in the Blaircala Garden Village Development Bid ALDP 2022. Also see my comments on this bid attached as an appendix

Option 3 - Alternative Option

**MAIN ISSUE 10 Residential Care Facilities**

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

On a case by case basis.

Option 3 - Alternative Option

**MAIN ISSUE 11 Student Accommodation**

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

To reduce costs to students who do not have the funds to meet the cost of rented accommodation by integrating it into Residential Care Facilities as proposed by the Blaircala Garden Village Development Bid ALDP 2022.

Option 3 - Alternative Option

**MAIN ISSUE 12 Houses in Multiple Occupation**

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

Making sure that appropriate welfare oversight is applied where appropriate. These can units can be beneficial to all concerned if appropriately integrated.

Option 3 - Alternative Option

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

Option 2 - Alternative Option (20%)

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

This seems to me an appropriate level which would prevent the dominance of any single faction.

**Geographical boundary of each area:**

Option 3 - Alternative Option (Small Data Zones)

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

This seems to me an appropriate level which would prevent the dominance of any single faction.

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

Option 3 - Alternative Option (All applications regardless of number of residents)

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

There would appear to be a case to consider all applications on their merits.

**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?:**

This is not a problem unique to Aberdeen. Take on board lesson from other cities in the U.K and internationally.

**Question 28 Changing Places Toilets**

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

I am sure there are existing statutory guidelines on this!

**Appendix 1 Proposed Draft New Policies**

**Policy D2 Amenity**

**Do you have any comments on the policy?:**

No except as qualified in previous sections of this document.

**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 except as qualified in previous sections of this document.

**Policy H8 Residential Care Facilities**

**Do you have any comments on the policy?:**

No except as qualified in previous sections of this document.

**Policy H9 Student Accommodation Developments**

**Do you have any comments on the policy?:**

No except as qualified in previous sections of this document.

**Policy H10 Houses in Multiple Occupation**

**Do you have any comments on the policy?:**

No except as qualified in previous sections of this document.

**Policy NC9 City Centre Living**

**Do you have any comments on the policy?:**

No except as qualified in previous sections of this document.

**Policy NC10 24-hour City**

**Do you have any comments on the policy?:**

No except as qualified in previous sections of this document.

**Policy NC11 Visitor Attractions and Facilities**

**Do you have any comments on the policy?:**

No except as qualified in previous sections of this document and my comments on the Shepherd's Retreat bid ref. is B0945, attached as an appendix.

**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::**

See my comments on the following which are attached as files:

Shepherd's Retreat - Development Bid B0945

Blaircala Garden Village - Development Bid ALDP 2022.

**Additional Files**

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

Comments on Blaircala Garden Village Ref ALDP 2022 and Shepherds Retreat Ref B0945.pdf was uploaded

# Comments on Blaircala Garden Village Ref ALDP 2022 and Shepherds Retreat Ref B0945

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## Blaircara Garden Village. - (bid ref ALDP 2022) - My comments

As a resident of Aberdeen, approaching 74, contemplating my dotage with some trepidation, this local development bid application is of more than passing interest to me. I am in the fortunate position of still being reasonably lucid and so have taken the trouble to study it and comment as follows.

Beginning with the era on North Sea Oil, Aberdeen has rebranded itself as a technology hub, but its foundation hark back to industries based on fishing, ship building and agriculture, all grounded in hands-on skills and crafts. So, while the city has recently nurtured 21<sup>st</sup> century technology, many older folk feel an increasing sense of alienation. In this North East corner of Scotland, once proud breadwinners, valued in their prime as labourers or artisans, now feel useless, unless they can program a CNC machine or a sold-works printer. A situation not helped by creeping globalisation. For our aging population the sequence, too often is: redundancy, retirement, resentment, depression, lethargy and dementia, frequently aggravated by poor financial planning. These shifts in circumstances are often digital steps, involving dramatic deterioration in both circumstances and environment. The support of an extended family is no longer a reality in our postmodern age. Partners and homes, and the ability to maintain them are lost, and the aged become dependent on benefits, and end up in underfunded care facilities, alienated and at best patronised by minimum wage health-care workers.

These problems abound in Scotland, where, apart from the central belt, the industrial revolution was stalled. Small fishing and market type towns abounded, and have been obliged to evolve, in a single generation, from semi-rural communities to urban modernity, Aberdeen being a prime example. The Blaircara Garden Village development bid appears to have taken the trouble to address a variety of pressing problems endemic in this environment:

1. Undertaking to provide appropriate care to aging couples, and individuals, calibrated to their evolving circumstances.
2. Blending young and old in a complex where they can socialise and complement each other's strength and weaknesses.
3. Addressing the need for realistically priced student accommodation in a city where tertiary education is offered on an almost industrial scale.
4. Addressing a welfare refuge need for abused venerable partners and spouses.
5. Provide a development which is sympathetic to the traditional local "steading" style building approach rather than, " 'Little Boxes' – (All made out of ticky-tacky and they all look just the same.)", immortalised in Pete Seeger's 1963 ballade of that name.
6. A development which sympathetically address the ecological need to maintain the integrity of the Culter Burn water course and wildlife habitat, in this time of global warming.
7. Locating a community in a beautiful rural environment which is immediately adjacent to the public transport networks which serve the Cults/Peterculter area of Aberdeen. The development is also not exactly remote from the extensive ARI teaching hospital facilities.
8. Offering the infirm and elderly a facility to connect with nature both passively and through active cultivation, rather than being cooped up in stuffy care facilities, would will have clear beneficial outcomes, as research shows.

The above is a brief precis featuring aspects which I consider important. The benefits of the development are extensively detailed and referenced in the development bid itself.

So, staring into the abys of advance senility, I would urge planners to look with favour on this local development bid. I am sure they will need to add recommendations based on their experience in these



matters, but please approve it as quickly as practical. It is precisely the type of facility my wife and I will be considering as we age. In years to come neither of us want to be remembered as pathetic shuffling invalids, featured in some hart-rending BBC panorama care-home exposé.

## Shepherd's Retreat. (bid ref B0945) – My Comments

Visiting Sky last year with my family from South Africa I was hugely impressed with the Rubha Phoil site at Armadale, where we stayed for several nights. It is an Earth Ways project. A beautiful abundant nature-based permaculture initiative, incorporating a variety of camping amenities, including a bothy, with rudimentary cooking facilities, in which five of us slept. The day and evening were spent in glorious outdoor activity. And I use the adverb activity advisedly. I have attached a photo of the facility. At the time I did not really know how exactly to characterise that mode of accommodation, but found it ideally crafted to facilitate our family reunion. It reminded me of many similar weekend soirees in other parts of the world. It also occurred to me that it was a pity I had to travel so far from home in order to find such a spot, as, to my knowledge, there was nothing of that nature in or around Aberdeen. Coming across this Shepherd's Retreat development bid has provided me with two revelations. Firstly I am now able to categorise facilities like Rubha Phoil. They are "Glamping" resorts. Secondly there will now be a glamping facility a lot closer to home when my family next visit.

I am inclined to the view that Aberdeen's development has suffered from the conviction that the oil and gas industry would provide prosperity in perpetuity. Certainly in terms hotel and hospitality infrastructure the target market for many years was the "business class" passenger, whose spending potential is calibrated by the largess of a company expense account. Following the collapse of the oil price, Aberdeen needs to see itself in a different, and perhaps healthier light. The vast number of tourist traveling to Scotland each year make for a flourishing tourist industry elsewhere in the region. The city needs to rebrand, welcoming this manna of opportunity with enthusiasm. It needs to provide a variety of appropriate activities and facilities to encourage them to linger in the city, instead of regarding it as a stop-of hub from the airport to the Highlands or the Orkney and Shetland ferries. A legacy of the oil and gas bonanza are the established air links from Europe and America. They need to be leveraged by a tourist focused dynamic.

We are after all at the centre of the Doric dialect heartland. The stuff from which Burns crafted his ploughman's poetry. Poetry which resonates throughout the world with the far-flung Scots diasporas; scattered to the colonies and beyond by the clearances, now prosperous and hungry to connect with the mythology of their ancestry. Where better to host these pilgrimages than in Aberdeen. It's all already here; castles, blending fiddle playing, piping, folk dancing, cèilidh traditions; waiting to be marketed, in the right environment, spiced with the derring-do and intrigue of the warring clans, the exploits of the Duke of Montrose and the Marquess of Argyll, which raged across the area, tales of intrigue, bravery, betrayal, ghouls and witches. In the long summer evenings dance a strip-the-willow jig, thrill to the rousing cadences of Burn's battle-anthem for the oppressed "A Man's A Man For A' That." or exerts of Scott's the "The Lay of the Last Minstrel", around a campfire fire in Aberdeenshire's own glamping resort, a stones-throw from Culter Burn, which Rob Roy leapt perused by Montrose's troops.

And it's not only the Scots diaspora who are Aberdeen's potential target tourists. Hollywood has done the advance publicity with films like Brave Heart and The Highlander. From all over Europe tourists flock here to enjoy a smorgasbord of romance, castles, whisky, folklore and mysticism. They are seeking something other than luxury accommodation and cloned hotel-lobby boutiques offering franchised "label" gifts. They are after a different authentic Celtic experience. With a morsel of imagination this is a market glumping could address.

There is an objection that the proposed site, 8 miles from the city centre, is remote. Around the corner from where I live, on the outside of a house is a plaque, proclaiming that, "Captain William Penny 1809 – 1892 Arctic Explorer and Navigator - lived here". He writes of himself, "I am perfectly acquainted with the arctic regions, my knowledge having been acquired by thirty-three voyages to these regions, and by spending three winters there. I have become intimately associated with the Esquimaux and their habits and manners". The North East of Scotland has a proud history of polar exploration. In 1903 Harry McKay piloted S.S. Terra Nova to the Mcurdo Sound in Antarctica, where he laboured for over seven weeks blasting through 18 miles of ice, to free Scott's icebound vessel the Discovery. I am sure Penny and McKay had an excellent grasp of what remote meant. It is pity they are long dead. I would really like to have asked them whether a site just beyond Perterculter could be characterised as remote.

