

# Response ID ANON-B3JU-DS7Z-V

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**  
Submitted on **2019-05-08 19:37:38**

## About You

**What is your name?**

**Name:**  
M Smith

**What is your organisation?**

**Organisation:**

**On behalf of:**

**How can we contact you?**

**Email:**

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## 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?:**  
No comments

### 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 strongly disagree with the proposal of the site at former Cordyce School ( ref B01/06) being designated for housing. There is already an overprovision of housing at nearby Stoneywood and along Mugiemoss Road ( with many properties unsold or not rented). Furthermore there is the proposal to build blocks of flats opposite the BP headquarters.

The land at Cordyce School should therefore be used to provide amenities that the existing residents of Dyce / Stoneywood etc can utilise ; be that sports / retail/ cafes / community centre etc . The fact that there has already been bids for this land to provide such facilities , and support for such, demonstrates that would be better use of the land.

I also strongly disagree with housing at the site 152 Don Street, Old Aberdeen ( ref B06/01). Old Aberdeen is supposedly a conservation area, but the attitude by ACC over the last decade or so seems not to care at all about preserving the area. The area already suffers from incongruous overdevelopment, over provision of HMO and student accommodation accompanied by increased anti social behaviour, litter and unkempt properties. The infrastructure around Old Aberdeen is already creaking and unable to cope with traffic etc and yet more housing is the last thing the area needs.

#### 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, there is not. Aberdeen city and suburbs are already awash with new housing developments all at a time when the economy in the area is declining. The identity of Aberdeen as the Granite City has also long since become meaningless due to the design and appearance of the swathes of " Monopoly" housing that has been allowed to be built.

Aberdeen City Council needs to stop and take a long hard look at whether the history and character of Aberdeen is going to continue to be destroyed at the current rate.

#### Question 3 Brownfield and other Opportunity Sites

**Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:**  
No comment.

#### 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?:**

Proposal : Cordyce School (B01-11). Use of this site as new Healthcare facilities would be a much more beneficial use of the site than housing. As in question 1 the large numbers of new housing already built or about to be built around Dyce and Stoneywood means there is a real need for health, school, nursery facilities. Adding more houses without the provision of facilities is negligent. I would also suggest that the house builders should be required to fund these facilities given how much cash they'll be raking in from the Governments help to buy schemes.

### **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?:**

If the modification will lead to less administrative burden and more efficient and cohesive planning / development decisions then I agree.

This isn't really a question that the lay person can really answer except in theory as we have no knowledge of what impact / inefficiencies the current situation brings about.

#### **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.

#### **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, the retail core should be reduced to focus on a more compact area. Walking down Union Street nowadays is the most depressing experience for anyone who remembers how it used to be. Today it is filthy, the buildings are unkempt.

The plethora of " pound" shops, vaping shops, pawnshops, betting shops does not present a good image of the city. George Street is even more depressing.

The harbour extension aims to bring more tourists in but the city centre in its present decrepit state is likely to have tourists turn around and get straight back on their cruise ship. Certainly the tourists who asked me for directions yesterday were very disappointed with their experience if the city centre.

#### **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:**

The current percentages seem ok to me as a lay person. The most important focus should be on the type of retail. As note in question 7 the retail must be focussed on independent shops and quality national retailers to bring residents and tourists into the centre and more importantly want to spend time and money there.

Get rid of the the pawnshops, vape ships, pound shops and fast food outlets that make the city look like a absolute tip in a run down, deprived backwater.

Furthermore there should be a focus on ensuring that building owners / retailers adhere to strictly enforced standard of upkeep of the buildingd.

#### **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?:**

We don't need anymore out of town retail parks and we certainly don't need anymore "Union Square" type developments .

The focus should be on improving the appearance and quality of those streets that used to be the retail areas ie Union Street, George Street, King Street etc.

Consideration of pedestrianisation of these areas should be an option. Bringing these areas back to a mix of quality retail, other business and housing is paramount.

As snobbish as it sounds

#### **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?:**

We should be encouraging more people to live in the City Centre but must be very careful to ensure that HMOs are very, very limited.

A document would be useful, but as mentioned the conversions must adhere to strict and high standards to ensure that residential properties are maintained .

### **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?:**

Yes, with the provisos mentioned in question 11. Quality developments and very limited numbers of HMO.

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?:**

No.

#### **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, 24 hour activities should not be encouraged or supported. The current licensing hours are already too generous. Until such time as unfortunately significant percentage of our society can drink without getting drunk and spewing and pissing in the streets we should limit the opportunity for them to do so.

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?:**

Investigate more sponsorship opportunities with business in Aberdeen and push for more funding from government which currently favours Edinburgh and Glasgow over and above the rest of Scotland.

#### **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 would suggest that rather than convert Woolmanhill Hospital to housing or hotels that it should be converted into an artists quarter with workshop and gallery facilities.

#### **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?:**

Yes.

#### **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.

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?:**

Set requirements in excess of the current standard. There should also be a requirement that external space isn't sacrificed for internal space.

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?:**

No current amenity spaces are not sufficient and neither is the space between dwellings sufficient.

Developers currently get away with squeezing in the maximum number of dwellings that they can with the result being you can put your arm out a window and touch your neighbours' house and then you can go out into your postage stamp garden and barely swing a cat.

Planning permission should be refused for proposals not meeting very high standards. This comes back to the point that current developments are turning the city into a "Toytown" with identikit houses with zero character and absolutely no reference to the architectural heritage of the city.

#### **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, it seems more coherent and hopefully will lead to a less bureaucratic policy.

## 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?:**

There should be more space allocated for allotments whether for individuals or communities.

I would suggest that this would be most beneficial in the more deprived areas of our city where community groups, with support of organisations such as CFINE, could encourage the growing and consumption of fresh food by residents. Involving current food banks ( which brings some stigma) might also shift the focus to these being " community producers & retailers" .

## 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?:**

Yes, we should.

We should introduce an Aberdeen City publicly owned bus service again which operates at times and prices that will encourage people to give up their car.

### MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

There shouldn't be too much emphasis yet on charging points for electric vehicles because the uptake by drivers doesn't yet justify large infrastructure changes. Hybrid self charging vehicles are much more likely to grow than electric.

If you set up an Aberdeen city owned bus service then make the buses electric.

Option 1 - Current Approach

### 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 comment.

### 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 be increased and most importantly they should be required to put up and ring fence the necessary funds before any development is allowed to proceed. Furthermore the legal agreements ( which must be watertight) should include provision for substantial contingencies.

As evidenced by Persimmon there is no shortage of cash within development companies and it should be there to provide for obligations rather than pay the CEO of the company.

## 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

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?:**

No comment

### 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?:**

Yes.

### 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?:**

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?:**

Offices, retail and housing.

The West End shouldn't be considered as any different to any other area of the city centre.

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 threshold of smaller than 5 units should be scrapped - developers should be required to offer all as affordable.

### **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 shouldn't be any additional private rented new builds. All rented accommodation in the city should be affordable.

## **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?:**

With the increase in older people there should be a focus on providing an increase in property suitable for older and less able bodied people. There should also be a high standard set for the property type and less focus for these to be blocks of flats. Smaller houses with decent outside space would probably encourage more older people to downsize thus freeing up larger houses for families.

Being old or less able bodied doesn't equal being happy to live in a tiny flat in a huge block.

Option 3 - Alternative Option

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

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

Option 3 - Alternative Option

### **MAIN ISSUE 11 Student Accommodation**

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

There should be less student accommodation being built. The city is already full of student accommodation architectural monstrosities that concentrate large numbers of temporary residents who care little for their surroundings resulting in mess and antisocial behaviour.

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?:**

There are already too many HMOs within the city and not enough effort put into ensuring that planning applications are vetted. Where I live planning extensions have been allowed for several properties which claim to be for family use, but were straightaway set up as HMOs. They are a scourge on the city which allows non-resident developers to make stacks of money and contribute nothing to the city while their residents make excessive use of the council services ie water, waste etc.

Option 3 - Alternative Option

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

Option 1 - Preferred Option (15%)

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

My answer is based on experience of living in an area surrounded by HMOs and suffering the noise, mess and anti social behaviour they bring. This experience is made worse by being powerless to do anything about the detrimental effects because complaints to the council bring no action.

**Geographical boundary of each area:**

Option 1 - Preferred Option (Ward Boundaries)

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

Because my understanding is that these would match areas covered by councillors and community councils who would have knowledge of HMO impact in the ward. This being the case residents would have somewhere to go to raise concerns.

**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:**

Because HMO have such an impact on communities they should all be scrutinised.

**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. All types of venue should provide.

**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:**

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**Additional Files**

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

No file was uploaded