

# Response ID ANON-B3JU-DS68-S

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**  
Submitted on **2019-05-08 21:45:50**

## About You

### What is your name?

**Name:**

Mr Gavin & Mrs Margaret Forrest

### What is your organisation?

**Organisation:**

None

**On behalf of:**

Ourselves

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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?:

## 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?:**

Broadly yes. Particularly for social housing and housing for older people and people with disabilities. Any development must fit in with what is already there and not lead to a diminution of quality of life for the existing residents for example by increased traffic on narrow roads.

We are most affected by site B11/02. Any development must not exceed the height of the surrounding houses, as much green space and trees on the site must be kept and the children's play area kept.

B11/01 we are aware that there is a community garden (Gwen's Garden) on this site and a lot of the community involved with it would be very disappointed if this was lost.

An additional site not listed is Kincorth Academy.

### Question 2 Housing Allowances Beyond 2032

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

Logically yes given the way the city has grown since the 1970s.

### Question 3 Brownfield and other Opportunity Sites

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

Yes. The sites of Kincorth and Torry Academies.

Given the number of empty industrial/commercial units round the city there should be no more developments of this nature. Firms should be encouraged to move into existing premises.

Where commercial sites are vacant adjacent to current housing these could be cleared for housing expansion rather than using more green land.

### 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?:**

#### **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. Anything to try and improve Union Street is to be welcomed!

#### **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. We do not want to see more shopping centres necessitating car transport and car parking provision.

Given that it is planned to see a huge influx of tourists from cruise boats visiting the new harbour. They will have limited time in Aberdeen so a concentration of shops in a smaller area makes sense.

#### **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:**

Probably not. But a degree of flexibility should be exercised to try and ensure that units aren't left vacant. What other uses? You basically want a mix of services people need to access easily, in their lunch hours for example. So a mix of high quality shops, some banks, eating places, dentists/opticians is required. Pretty much as currently exists.

What needs to happen is the 'tat' such as book makers and vaping shops need to be moved elsewhere and more local, independent shops encouraged to move in. Thought should be given to providing workshop/gallery space to artists and craftworkers.

#### **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?:**

Yes.

No! No more out of town retail parks.

You can see the effect Union Square has had on Union Street, and it is a few minutes walk away! More out of town developments will remove people from the city centre, cause more pollution and traffic problems.

The environmental impacts of out of town retailing must be taken into consideration and are really untenable given our need to reduce carbon emissions.

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

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

Broadly yes. You want a degree of separation from residential areas.

#### **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?:**

Provide attractive affordable housing. With all services and facilities they require within walking distance.

Yes setting out what standards are required to be met by developers of such conversions.

### **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?:**

### **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?:**

Within reason. But venues open in the early hours of the morning should be restricted to certain areas largely away from residential areas. Not easy if you want to encourage more people to live in the centre.

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?:**

Don't close the Art Gallery for about 4years! Don't close your main music venue for several years at the same time as the Art Gallery!!

Space in Shore Porters for artists is okay but it is a bit off the beaten track for 'customers'.

Space for these workers should be provided on Union Street so they can display their work.

More publicity about what is on in the city as not everyone is on social media.

### 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?:**

What about the old indoor bowling centre in the Bon Accord Centre which is more central and has a high footfall passing by.

### 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. Given how much development has happened in Aberdeen since the 1970s coupled with how much money has come to the area through North Sea oil the city has nothing to show for it. Basically a few shopping centres full of shops a lot of people can't afford to shop in.

### 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 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?:**

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?:**

We would like to see as much space between buildings to provide a degree of privacy and as much natural light as possible. There should be adequate safe play space for children to encourage them to get exercise and fresh air. As much vegetation should be provided as possible to increase opportunities for biodiversity. Hard standing/surfaces should be minimised to maximise absorption of rain water.

### 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?:**

On paper they seem to make sense. However policies only go so far and need to be adhered to. The main issue report implies that you would like to improve the natural environment and encourage more tourism etc. However the development of the new harbour has destroyed habitat of rare plants and threatens the pod of dolphins, an existing draw of people to the city.

### 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?:**

It shouldn't wait for the next plan but be enacted sooner.

If you want to encourage food growing then building on an existing community garden - Gwen's Garden in Garthdee. (B11/01).

## 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?:**

Probably not by itself. That would just make the centre even more chaotic.

But certainly don't provide any more parking.

### MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

Define transport technologies. Does this include walking and cycling? Everything should be done to encourage these, and discourage car travel in the city. For example separated cycle lanes on all roads, more secure parking for cycles, pedestrian crossings which turn red as soon as the button is pushed rather than waiting until there is no traffic before turning red!

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?:**

**Question 21 Developer Obligations and Infrastructure Delivery**

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

**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?:**

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?:**

**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?:**

**MAIN ISSUE 7 Heat Networks**

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

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?:**

**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?:**

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?:**

**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?:**

Yes. In large developments particularly specify that a percentage of houses are for rent rather than owner occupation.

**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 3 - Alternative Option

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

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

If the aim of the plan is to promote sustainable communities then having lots of HMOs in one area is not the way to go about it. Garthdee's community has been seriously damaged by the number of HMOs full of students from RGU in the past few years.

The students are transient and not interested in maintaining gardens, putting the correct bins out or indeed using their own bins. Too many landlords are also not maintaining their properties and gardens as well as owner occupiers.

So the plan should curtail the number of HMOs and ensure renewal of licences is dependent on the properties being well maintained and not having problem tenants in the HMO.

Option 2 - Preferred Option

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

Option 1 - Preferred Option (15%)

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

Because we live in Garthdee and our community has been damaged by the number of HMOs associated with RGU. Numbers must be restricted to a low level in any one area. HMOs must be spread more uniformly throughout the city. Aberdeen is not a big city and both universities are accessible by walking and public transport.

**Geographical boundary of each area:**

Option 2 - Alternative Option (Intermediate Data Zones)

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

It makes use of existing boundaries which are easy to understand. And have councillors attached to them to complain to if you are unhappy by the number of HMOs on your street!

**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:**

Otherwise you won't get a full picture of what is going on regarding HMOs.

## **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. Shopping centres, larger entertainment venues eg cinemas rather than pubs, new office blocks, sporting venues.

If Aberdeen is serious about having an all-inclusive community then this is a no-brainer.

## **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?: