

Response ID ANON-B3JU-DS71-K

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-05-09 10:55:06**

About You

What is your name?

Name:
Malcolm Campbell

What is your organisation?

Organisation:

On behalf of:
Hermiston Securities Limited

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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?

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These representations have been submitted on behalf of Hermiston Securities Limited as comments on the Aberdeen City 2019 Local Development Plan Main Issues Report. The comments concern Hermiston's allocated site at Loirston, Nigg, Aberdeen (LDP Site OP59) which they are developing in partnership with Aberdeen City Council. The comments include responses to Questions 1 and 9 in the Main Issues Report. Comments are also made on the Loirston Bid Assessment by Council officers and suggestions put forward for what should be included in the new draft Local Development Plan for Loirston, in particular, in relation to the land currently reserved for a football/community stadium and the need for a site for a new supermarket. It is important what is included in the new draft Local Development Plan as this will provide guidance for future updates to the approved Development Framework/Masterplan for Loirston. As it stands the original Loirston Development Framework was adopted as Interim Planning Advice to the Aberdeen Local Development Plan (2012) on 6 November 2012 and subsequently as Supplementary Guidance in May 2013. An updated version of the current document (Development Framework 2019) provides an update to the 2012 version, which reflects any material changes to adjacent or associated developments such as the consent for the South of the City Academy which sits within the Development Framework extents and the revised proposals for Cove Rangers Football Club. The updated 2019 version of the Development Framework is scheduled to be considered by a Council Committee in September 2019. Formal approval of this document will allow further MSC planning applications to come forward for Loirston. The updated document however does not include alternative proposals for the land currently reserved for the football/community stadium. With Aberdeen Football Club now committed to building their new stadium at West Kingsford, Kingswells there will be a need in the near future to consider alternative uses for the land currently reserved for the stadium at Loirston. This will be done through a further review of the Loirston Development Framework/Masterplan. It is appropriate however that the new draft Local Development Plan puts down a marker for a range of potential future uses for the stadium site at Loirston. This is considered further in the representations below.

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?:

In answer to the above question Hermiston Securities believe that consideration should be given to the potential contribution that the land previously reserved for the football/community stadium at Loirston can make to the housing land supply in the City. The site is eminently suitable for residential use and new housing could easily be integrated into the masterplan for Loirston. The site is not Greenfield as such as it is already earmarked for development in the Local Development Plan and Loirston Development Framework. Whilst the site is suitable for a range of different uses, residential use would be particularly suitable for at least part of the site with the potential to accommodate up to 300 houses at a density of 40 houses to the hectare. The use of the site for Class 4, 5 and 6 uses would not be suitable. Class 5 and 6 uses could impact adversely on residential amenity at Loirston. Whilst Class 4 use would be more compatible with residential use there is a considerable over supply of offices in the City and to the south of the City at the present time so there will be no demand for further office use to be identified for the foreseeable future. Class 5 and 6 uses are also well provided for to the south of the City.

Question 2 Housing Allowances Beyond 2032

Is there a need for us to identify 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?:

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?:

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?:

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?:

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:

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 will always be a requirement for an element of out of town retailing to serve new developments on the periphery of the City such as Loirston. In the case of Loirston the current adopted Local Development Plan identifies that land at Loirston has the potential to accommodate a supermarket to meet convenience shopping deficiencies in south Aberdeen. This requirement has not as yet been provided but should be carried forward to the new draft Local Development Plan.

Question 10 Commercial Leisure Uses

Should we 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?:

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?:

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?:

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?:

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?:

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?:

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?:

MAIN ISSUE 3 Support for Visitor Attractions

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

Not Answered

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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Comments on the Council's Assessment of the Loirston Bid

It is disappointing to note that the request made by Hermiston Securities Limited at the Development Bid stage of the LDP Review process for alternative uses to be considered for Loirston and in particular the former stadium site were deemed to be undesirable. In terms of presentation in the Main Issues Report this comes across as very negative for what is not an unreasonable suggestion that alternative uses need to be considered for the now redundant site earmarked for a football/community stadium at Loirston. The Main Issues report identifies all of the allocated land at Loirston as undesirable which is clearly not the case as Loirston is allocated for development in the Local Development Plan, has an approved Development Framework for which an updated version is to go up for approval in June 2019 and also there are planning permission in principle and MSC planning consents pertaining to Loirston. People and groups who may have opposed the original allocation of the site in the past may mistakenly believe that the site is no longer allocated for development as it is shown as undesirable in the Main Issues Report. It is accepted that alternative uses for the former football/community stadium site at Loirston require more detailed consideration in a future review of the Development Framework and Masterplan for Loirston, however it would be appropriate for this to be given some consideration in the new draft Local Development Plan. This is considered further in the comments below.

Comments on what the New Draft Local Development Plan should include for Loirston

It is important that Loirston continues to be identified as an opportunity site in the new draft Local Development Plan. The description of the opportunity site in the plan needs to reflect the allocation of the site for 1500 houses of which 1100 of these have planning permission in principle and MSC planning consents. It is also needs to continue to reference the potential of the site to accommodate a supermarket to meet convenience shopping deficiencies in south Aberdeen. Furthermore reference needs to be made for consideration to be given to alternative uses for the former football/community stadium site at Loirston. Whilst the range of possible uses and capacity of the site have yet to be determined we anticipate a mixture of different uses which could include residential use, Class 1,2 and 3 town centre uses, residential institutions such as a care home, non residential institutions such as a church or a nursery and Class 11 uses (Assembly and Leisure). If a higher density approach of 40 houses per hectare was to be adopted the site could accommodate up to 300 houses, however we would anticipate a lesser number to reflect current housing demand in Aberdeen and the desirability of the introduction of a range of other appropriate mixed uses. It is accepted that the detail of what is acceptable and where it should be located should be dealt with through a future review of the Loirston Development Framework/Masterplan. This review could potentially take place prior to adoption of the new Local Development Plan. The changes will help provide guidance and consistency between the Local Development Plan and the evolving Loirston Development Framework. The changes will also assist in the submission of future planning applications for Loirston and provide greater flexibility for the developer and occupiers to meet ever changing market conditions. This will encourage and stimulate investment and help speed up decision making.

Additional Files

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

Loirston - City LDP Representations to the Main Issues Report on behalf of Hermiston Securities Limited - May 2019.pdf was uploaded

Loirston – Representations to the Aberdeen City 2019 Local Development Plan - Main Issues Report

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Main Issues Report

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8 May 2019