

Response ID ANON-B3JU-DS5W-Q

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

Submitted on **2019-05-09 11:59:24**

About You

What is your name?

Name:

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What is your organisation?

Organisation:

Historic Environment Scotland

On behalf of:

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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?:

As you will be aware, the new Historic Environment Policy for Scotland (HEPS) was adopted on the 1 May 2019. This policy is for everyone who cares about decisions that affect the historic environment and includes the people who make decisions. In developing your local development plan due consideration should be given to the policies contained within HEPS and how your plan is helping to deliver these. While all 6 of the overarching policies for managing the historic environment will be directly relevant to you we would particularly highlight HEP3 which states that "Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment". While HEPS does not include any policies that conflict with the previous content within Historic Environment Scotland Policy Statement 2016 (HESPS) we encourage any amendments or updates be addressed at the next available opportunity in the plan making cycle. We would therefore welcome the opportunity to discuss the policy content of emerging plan in order to ensure alignment with this new national policy.

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?:

We can confirm that we have no objection to the preferred housing sites identified in the Main Issues Report. In noting the presence of listed buildings within some of these sites we would expect these assets to be considered as a positive opportunity for adaptation and in the wider role of placemaking. We have recently released a new Managing Change in the Historic Environment Guidance Note on the Use and Adaption of Listed Buildings which offers guidance and advice on the subject. A series of five best practice case studies exploring how change can be managed in listed buildings in Scotland have also been published.

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?:

We can confirm that we have no objection to the new healthcare facility sites identified in the Main Issues Report.

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. As you will be aware many of the City Centre Masterplan Intervention Areas contain important historic environment assets and the aims of the masterplan for their retention and use is welcomed. In order to help deliver the masterplan aspirations in these areas we would welcome early pre-application consultation as these plans progress.

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?:

We support the continuation of the Town Centre First approach and the benefits it brings for the vitality of these areas.

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?:

We welcome the Council's aspirations in this area and would be happy to feed into the preparation of any document that would help deliver on this. As we noted earlier, the new Managing Change in the Historic Environment Guidance Note on the Use and Adaption of Listed Buildings will be of use in considering the content of such a document.

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?:

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

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?:

As the background section on Quality Places notes, the built environment plays a key role in placemaking. We therefore welcome the acknowledgment that the understanding of the positive characteristics of the existing built environment should be the starting point for future development. In terms of the options presented in this section relating to Minimum Internal Space Standards for Residential Development we agree with the findings within the environmental report that point to potential challenges for the preferred option in relation to the conversion/adaptation of historic buildings. The mitigation suggested points to a flexible approach through policy wording/guidance and we would welcome the opportunity to offer comments on any policy as it is being developed.

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?:

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?:

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?:

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?:

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

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?:

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?:

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?:

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?:

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 Answered

MAIN ISSUE 10 Residential Care Facilities

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

Not Answered

MAIN ISSUE 11 Student Accommodation

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

Not Answered

MAIN ISSUE 12 Houses in Multiple Occupation

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

Not Answered

Percentage limit of HMOs in each area:

Please explain why you chose your answer:

Geographical boundary of each area:

Please explain why you chose your answer:

Threshold for when planning permission is required for a HMO:

Please explain why you chose your answer:

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?:

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:

Please include comments on other documents below::

Strategic Environmental Assessment Environmental Report

General Comments

We welcome that our comments at the scoping stage have been taken into account in carrying out this assessment. We are generally content to agree with the findings of the assessment at this stage and offer the following detailed comments which we hope will be of use to you as the plan preparation and assessment continues.

Policies Carried Forward from the Existing LDP

We note the inclusion of the Historic Environment Scotland Policy Statement 2016 in the PPS review but would take this opportunity to highlight the recent changes in the policy framework for the historic environment. The new Historic Environment Policy for Scotland (HEPS) came into effect on the 1st of May 2019, when it replaced the former Historic Environment Scotland Policy Statement 2016. The new HEPS is a strategic policy document for the whole of the historic environment and is underpinned by detailed policy and guidance. It is designed to support and enable good decision-making about changes to the historic environment. HEPS sets out a series of principles and policies for the recognition, care and sustainable management of the historic environment and promotes a way of understanding the value of the historic environment which is inclusive and recognises different views. It encourages consistent, integrated management and decision-making to support positive outcomes for the people of Scotland. It also supports everyone's participation in decisions that affect the historic environment.

HEPS, together with Scottish Planning Policy, should be taken into account during the preparation of development management policies within Local Development Plans. HEPS does not include any policies that conflict with the previous content within HESPS, so any amendments or updates can be addressed at the next available opportunity in the plan making cycle. We would therefore welcome the opportunity to discuss your existing Local Development Plan policies for the historic environment in the context of these changes.

Relationship with other PPS and Environmental Objectives

We would refer you to our comments on policies carried forward in reference to the new Historic Environment Policy for Scotland and would also remind you that Our Place in Time: The Historic Environment Strategy for Scotland is relevant here.

Potential Environmental Changes without the LDP

We particularly welcome the recognition here of the opportunity to enhance the policies on design and cultural heritage as a result of the plan review, particularly in light of the policy framework changes at the national level outlined above.

Alternatives to which the SEA was applied

We are satisfied that the approach taken to the assessment in terms of preferred options and reasonable alternatives of both the Main Issues and spatial strategy has been appropriate.

Framework for Assessing Environmental Effects

The framework utilised for the assessment is sound however, as a general point we notice from the assessment findings that often effects have been scored as neutral (0) whereas as scoring of +/- or uncertain would have been more appropriate with the mitigation attempting to resolve the score.

Environmental Objectives and Questions

The site assessment questions used within the assessment are appropriate. We would also bring to your attention that the provided web address for the Canmore Database is out of date. This should now read <https://canmore.org.uk/>.

Proposed Mitigation Measures

The proposed mitigation suggested for the historic environment in Table 6.2 is high-level in nature and should serve to flow through decision making at all levels. It is beneficial for the successful delivery of mitigation for predicted effects for specific mitigation to be written in to the developer requirements for individual sites where effects are predicted. Such sites within the emerging spatial strategy as Woodend Hospital would be a case in point here.

Monitoring

Monitoring should be driven by the identification of significant effects. In light of this we welcome the recognition of the need to monitor the impact of development on listed buildings and conservation areas. We note that little information is provided at this stage on how this monitoring will be carried out. It would be beneficial to consider how the effects of issues such as residential use in the city centre are performing against historic environment objectives and to find a way of capturing this information. We would also note that the Scottish Civic Trust are no longer responsible for the Buildings at Risk Register for Scotland, rather this is now maintained by Historic Environment Scotland. In terms of using the number of buildings 'at risk' as an indicator we would remind you that such figures can be affected by a number of factors out with the development planning sphere and as such may not be fair reflection of the performance of the plan.

Proposed Consultation Timescale

We can confirm that we are content with the proposed 10 week consultation on the proposed plan and revised environmental report.

Appendix 5 – Desirable Sites

New Housing Sites

B0319 – Woodend Hospital

We welcome the assessment provided here in relation to the listed buildings on this site. As the assessment notes the site has potential for both negative and positive effects on this resource and mitigation should seek to capitalise on the opportunity that these historic environment assets offer in terms of their contribution to placemaking.

B0601 – 152 Don Street, Old Aberdeen

The assessment notes that the development is located within a Conservation Area. As with many of the findings within the assessment the potential for positive or negative effects are identified in the comments section yet scored as neutral. A more appropriate scoring would be +/- or uncertain pre-mitigation with a post mitigation score that reflects the deliverability of identified mitigation. Notwithstanding this the mitigation identified is appropriate.

B0702 – Raeden (eastern part)

We agree with the findings of the assessment and the mitigation provided. As with all mitigation identified for specific allocations it is beneficial for this mitigation to be transposed into developer requirements within the plan itself in order to aid delivery.

B0802 – Fredrick Street

We welcome the recognition of the historic environment resource and the potential effects on these. Again we do not consider the scoring (0) reflects the commentary and should be more appropriately scored +/- or uncertain.

B0804 – Urquhart Building, City Hospital

We agree with the findings of the assessment and the mitigation provided. As with all mitigation identified for specific allocations it is beneficial for this mitigation to be transposed into developer requirements within the plan itself in order to aid delivery.

B1101 – Garthdee Road

To note that the bid assessment notes the presence of listed buildings in the vicinity of the proposal. The site also lies within the Pitfodels Conservation Area. It would have been beneficial for the assessment to note this and ensure mitigation was identified.

Appendix 5.2 – Bids: Other Proposals

City Centre Masterplan Intervention Area 1: Denburn

We are generally content to agree with the high level assessment findings for this intervention area. However, the assessment should note that the site lies wholly within the Union Street conservation area.

City Centre Masterplan Intervention Area 2: Heart of the City

We are generally content to agree with the high level assessment findings for this intervention area. However, the assessment should note that the site lies partly within the Union Street conservation area.

City Centre Masterplan Intervention Area 3: Queens Street

We are generally content to agree with the high level assessment findings for this intervention area. However, the assessment should note that the site lies wholly within the Union Street conservation area. Furthermore, it is unclear which element of the masterplan is being referred to when the assessment notes "Proposal includes demolition and redevelopment of an extension to part of a listed building" and how this has been factored into the assessment.

City Centre Masterplan Intervention Area 4: Union Street West

While the assessment notes that one Category A listed building (presumably the Music Hall) will be refurbished as part of the proposal effects on the large number of other listed buildings within the masterplan intervention area and the conservation area designation that covers the site are not outlined. However, we note the consideration given to the wider historic environment under access to the historic environment.

City Centre Masterplan Intervention Area 5: Station Gateway

We are content to agree with the high-level assessment provided here.

City Centre Masterplan Intervention Area 6: Castlegate/Castlehill

We are content to agree with the high-level assessment provided here.

City Centre Masterplan Intervention Area 7: North Dee/Torry Waterfront

While we are content to agree with the high-level assessment provided here we would note that we consider the retention and refurbishment of the listed smokehouses referred to within the assessment findings to be a positive outcome for the historic environment.

Appendix 5.3 – Bids: Existing Opportunity Sites submitted as Bids

We can confirm we are content to agree with the assessment findings in relation to these sites.

Appendix 5.4 – Existing Opportunity Sites Rolled Forward

OP42: Kennerty Mill

As the assessment notes, development could have a positive or negative impact on the Category B Listed Kennerty Mill (LB 15717) depending on the detail of proposals. We would therefore have expected the assessment to be scored either uncertain or +/-.

OP88: Shore Porters Warehouse

As the assessment notes, development could have a positive or negative impact on the Category B Listed Shore Porters Society (LB 50960) depending on the detail of proposals. We would therefore have expected the assessment to be scored either uncertain or +/-.

OP96: Upper/Basement Floors, 73-149 Union St.

To note that the various listed buildings here are Category C listed, not A as reported in the assessment.

OP63: Prime Four Phase 5 Expansion

To note that the consumption dyke referred to as Category B listed was delisted on 09/08/2016 as part of our dual designation review project. The consumption dyke remains a scheduled monument (SM 108).

OP64: Former Ness Tip

The assessment here should be updated to consider the potential effects on the scheduled monuments immediately to the south and west of the site. These are Crab's Cairn (SM 4060) and Tullos Cairn (SM 4055).

Appendix 6 – Undesirable Sites

B0107 – Mains of Dyce

The bid assessment notes that the Category C listed Mains of Dyce (LB 2232) lies adjacent to the site however there is no consideration of this in the environmental assessment. The presence of the listed building should be noted and the assessment updated with appropriate mitigation identified in the event the site is brought forward.

B0311 – Prime Four North

We are content to agree with the significant adverse effect predicted for the historic environment in relation to this proposal. The proposed allocation for housing would be located just north of the western section of the scheduled monument known as Kingswells, consumption dykes 415m N and 685m NNE of Home Farm (SM 108). This is a large and well preserved example of a type of monument which were once a common feature of the Eastern Strathdon landscape by the late 19th century, and help us to better understand the agricultural improvements of this time and their influence on the landscape. It is situated within agricultural fields, and this relationship with its surrounding landscape is an important part of the setting of the monument. Given the importance of the relationship between the monument and the agricultural fields which surround it and the potential for this allocation to adversely impact on this, we are therefore content to agree that allocation B0311 – Prime Four North is undesirable.

B0701 – Land adjacent to Cornhill Road

The assessment should note that the site lies within the Rosemount and Westburn Conservation Area and consider appropriate mitigation in the event the site is brought forward.

B0917 – Land East of Inchgarth Mews

The bid assessment notes that the Category C listed Inchgarth House (LB15711) lies directly to the east of the site however there is no consideration of this in the environmental assessment. The presence of the listed building adjacent to the site should be noted as well as the recognition that the site lies within the Pitfodels conservation area. The assessment should therefore be updated and appropriate mitigation identified in the event the site is brought forward.

B0944 – Inchgarth Road

The bid assessment notes that the site lies within the Pitfodels conservation area. The environmental assessment should therefore be updated and appropriate mitigation identified in the event the site is brought forward.

Appendix 7 – Possible Sites

We can confirm that we have no comments to offer on the assessment of these sites.

Appendix 8 – Main Issues

MI1 Residential use in City Centre

We welcome the recognition of the potential effects of this policy on the historic environment resource. As the assessment notes use and adaptation of the built environment play an important role in the condition, maintenance and securing the future of historic environment assets. However, in noting that the commentary states that works would be carried out sensitively we would suggest that this should be considered the mitigation to the effect. For example, the effect of conversion of upper floors to residential accommodation is unknown at the policy stage (either uncertain or +/-) with the delivery of sensitive proposals being the mitigation of that effect.

M13 Visitor Attractions and Facilities

The Main Issues Report notes the role that the historic environment plays in the wider visitor attraction offer. We note that the assessment does not consider that the policy would not have any effect on cultural heritage we would highlight the positive and negative effects that tourism can have on the historic environment, through increased understanding and appreciation as well as pressure on the fabric of the historic environment resource through increased usage.

MI4 Minimum Internal Space Standards for New Residential Development

We welcome the consideration given here to the implications of minimum internal space standards and conversions within the context of the historic environment. We would welcome the flexible approach that has been put forward as mitigation and would be happy to offer comments on policy wording/guidance as it is being developed. We would also point you to our recently released new Managing Change Guidance Note on the Use and Adaptation of Listed Buildings which has further advice in this area.

MI8 West End Office Area

We are content to agree with the findings here in terms of the potential positive outcomes for the historic environment through use and adaptation of vacant historic environment assets. Again positive effects on the historic environment will be dependent on the successful delivery of the mitigation.

Appendix 9 – Policies

DX: Windows and Doors

We agree that this policy is likely to have a significant positive effect on the historic environment. We would understand that the policy wording will be finalised for the proposed plan and would be happy to offer comment on this as it is being prepared.

BX The West End

We agree that the policy has the potential to bring positive outcomes for the historic environment. The emphasis on the protection of the conservation area is welcomed.

Appendix 10 – Cumulative, Synergistic and Secondary Environmental Effects

We are content to agree with the summary assessment provided in this section as it relates to the historic environment.

None of the comments contained in this letter constitute a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of our commitment to capacity building in SEA.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Andrew Stevenson who can be contacted by phone on [REDACTED] or by email on [REDACTED]

Additional Files

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

No file was uploaded