

Response ID ANON-B3JU-DSXQ-M

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-05-11 14:19:31**

About You

What is your name?

Name:

Professor Carole Gray

What is your organisation?

Organisation:

N/A

On behalf of:

How can we contact you?

Email:

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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?:

My comments specifically concern B1308 – Royal Devenick Park Phase 1.

Please see uploaded document in final 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?:

N/A

Question 2 Housing Allowances Beyond 2032

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

N/A

Question 3 Brownfield and other Opportunity Sites

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

N/A

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?:

N/A

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?:

N/A

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?:

N/A

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?:

N/A

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:

N/A

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?:

N/A

Question 10 Commercial Leisure Uses

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

N/A

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?:

N/A

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?:

N/A

Option 1 - Current Approach

Question 12 Residential Development in the City Centre

Are there any other locations within the City Centre where residential accommodation could be provided?:

N/A

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?:

N/A

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?:

N/A

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?:

N/A

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?:

N/A

MAIN ISSUE 3 Support for Visitor Attractions

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

N/A

Option 1 - Current Approach

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?:

N/A

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?:

N/A

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?:

NE1: Green Belt

NE2: Green & Blue Infrastructure

NE3: Protecting Our Natural Assets

NE4: Water Environment

NE5: Landscape

All seem sensible - quality of the natural environment must be maintained, protected and enhanced.

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?:

N/A

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?:

N/A

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

N/A

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?:

N/A

Question 21 Developer Obligations and Infrastructure Delivery

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

N/A

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?:

N/A

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?:

N/A

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?:

N/A

MAIN ISSUE 7 Heat Networks

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

N/A

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?:

N/A

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?:

N/A

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?:

N/A

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?:

N/A

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?:

N/A

Option 1 - Current Approach

MAIN ISSUE 10 Residential Care Facilities

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

N/A

Option 1 - Current Approach

MAIN ISSUE 11 Student Accommodation

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

N/A

Option 1 - Current Approach

MAIN ISSUE 12 Houses in Multiple Occupation

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

N/A

Option 1 - Current Approach

Percentage limit of HMOs in each area:

Option 1 - Preferred Option (15%)

Please explain why you chose your answer:

N/A

Geographical boundary of each area:

Option 1 - Preferred Option (Ward Boundaries)

Please explain why you chose your answer:

N/A

Threshold for when planning permission is required for a HMO:

Option 1 - Preferred Option (6 or more people in a flat, 6 or more people in a house)

Please explain why you chose your answer:

N/A

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?:

N/A

Question 28 Changing Places Toilets

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

N/A

Appendix 1 Proposed Draft New Policies

Policy D2 Amenity

Do you have any comments on the policy?:

N/A

Policy D5 Advertisements and Signage

Do you have any comments on the policy?:

N/A

Policy D8 Shopfronts

Do you have any comments on the policy?:

N/A

Policy D9 Windows and Doors

Do you have any comments on the policy?:

N/A

Policy H4 Housing Mix and Housing for Particular Needs

Do you have any comments on the policy?:

N/A

Policy H8 Residential Care Facilities

Do you have any comments on the policy?:

N/A

Policy H9 Student Accommodation Developments

Do you have any comments on the policy?:

N/A

Policy H10 Houses in Multiple Occupation

Do you have any comments on the policy?:

N/A

Policy NC9 City Centre Living

Do you have any comments on the policy?:

N/A

Policy NC10 24-hour City

Do you have any comments on the policy?:

N/A

Policy NC11 Visitor Attractions and Facilities

Do you have any comments on the policy?:

N/A

Policy NC12 Public Art Contribution

Do you have any comments on the policy?:

N/A

Additional Documents

Please include comments on other documents below:

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Development Bids Assessments

My comments specifically concern B1308 – Royal Devenick Park Phase 1 - please see uploaded PDF

Additional Files

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

C Gray City MIR response.pdf was uploaded

Comments from Professor Carole Gray

Development Bids Assessment

My comments specifically concern **B1308 – Royal Devenick Park Phase 1**.

I very much welcome the Council's recommendation to classify the above development bid as 'undesirable', and this recommendation's consistency with the Aberdeen City and Shire's Strategic Plan, 2018.

It appears also consistent with section of the City MIR **4.4 Natural Environment**:

"Our natural environment, and the ecosystems within it, provide a range of benefits for communities and the local economy. It provides us with the natural resources we depend on; for example, for food, energy and water. It also benefits our health and wellbeing and our overall quality of life. We therefore need to maintain a healthy natural environment so that we – and future generations – can continue to enjoy it and benefit from it."

I welcome the above statement - the existing natural environment must be protected at all costs, to ensure quality of life now and in the future.

"The 'natural environment' expands across many areas and is not just limited to 'green' spaces and 'greenfield' land. It is how these spaces are connected, how accessible they are, and the plants, wildlife, and heritage they provide – as well as 'blue' infrastructure like water bodies, rivers and the coast."

The proposed siting of B1308 – Royal Devenick Park Phase 1 sits within the green belt. The Den of Leggart - a Local Nature Conservation Site and a designated a Prime Landscape (DWP) Area - lies inside the proposed site. The recommendation of 'undesirable' is justified on these issues alone.

Furthermore, the proposed site would adversely affect the landscape vistas of Banchory Devenick, Tollochill Wood, the Dee Valley and Aberdeen west, particularly from Kincorth and the A92, significantly impacting on the green belt and landscape setting of Aberdeen.

Road upgrades would be necessary for site entry - presumably from Deeside Braes (constrained by the Den of Leggart), the A92 and from the Causey Mounth itself - an ancient drovers' road constructed in the 12th century, which is a designated 'Heritage Path' - see <http://www.heritagepaths.co.uk/pathdetails.php?path=24>

"Green areas can promote sustainable development, help to mitigate the impacts of climate change such as flooding and air pollution and provide green networks by linking various habitats benefiting bio-diversity."

The Den of Leggart comprises semi-natural and ancient woodland, and provides a habitat for a number of protected species. Designated species identified in the NESBReC 'Notable species search' (survey undertaken in July 2018) identifies the following: bats, badgers, red squirrel, pine marten, otter, hedgehog; numerous birds including osprey, kingfisher, kestrel, barn owl, and over 30 other species, including family groups of roe deer.

The Burn of Leggart would likely be contaminated through construction activities for Royal Devenick Park Phase 1. The Burn flows into the River Dee - an internationally designated SAC.

"The planning system therefore has an integral role to play in protecting and enhancing our natural environment. We also need to consider opportunities for 'new' natural environments."

I welcome the above statement - keeping consistency with strategy enables planning with integrity, giving the public trust in the Council's processes.

"There are no significant changes proposed in relation to Natural Environment policies. The position for the next LDP is to continue the promotion and conservation of the city's natural environment. The current LDP contains a number of natural environment policies (Policy NE1 through to NE9). The principle of these policies will be retained..."

It is good to know that the City Council will commit to maintaining current policies on the natural environment, especially in relation to bids for new housing developments. *Royal Devenick Park Phase 1* City is just a small part of the overall proposed developments (ref. KN 069 - 072, Land at Tollohill Wood). If the City Phase is eventually approved it would constitute 'the thin end of the wedge', paving the way for further unwanted developments, that would be contrary to the City's natural environment policies.

Well done for recommending B1308 – *Royal Devenick Park Phase 1* as 'undesirable'.

Strategic Environmental Assessment of Bid Site

This is a thorough assessment of the key environmental factors likely to be affected by the proposed development **B1308 – *Royal Devenick Park Phase 1***. The overall and cumulative 'adverse' and 'significantly adverse' effects (even post-mitigation) cannot be ignored. The SEA table states objective reasons for the bid to be deemed 'undesirable'.

B1308 – Royal Devenick Park Phase 1

- Residential (major; 235 units)

Constraints:

Green Belt

Recommendation:

Undesirable

Justification:

The proposal is for a residential development of 235 units and is part of a much larger new settlement proposal, most of which lies in Aberdeenshire. The site is located in an area of Green Belt and Green Space Network which acts as a gateway into Aberdeen. This allows an impressive view of Aberdeen on the approach from the A90, providing a distinct sense of place. Its development would therefore have a significant impact on the green belt and landscape setting of Aberdeen. The site is not well-related to any settlement; it is poorly located to public transport and community facilities, and therefore would be car dependent.

The Proposed Strategic Development Plan asks the Local Development Plan to allocate a limited amount of housing land. These allocations should take place on brownfield sites and utilise the current “constrained” supply in the first instance. Reducing travel distances and making walking, cycling and public transport more attractive to people will be important considerations, particularly for any new greenfield development sites that are proposed. In addition allocations should be small scale in nature – this is part of a much larger proposal. Because of this, the allocation of this site is likely to be contrary to the Proposed Strategic Development Plan.

Natural Conservation

2

Site is currently zoned as Green Belt/ GS in LDP 2017. Den of Leggart LNCS lies inside site area which is also formed of Semi-Natural and Ancient Woodland.

Protected Species may be an issue.

Landscape Features

2

Woodland and burn intersecting site area. Footpath connection to existing residential development to the north (Deeside Brae)

Landscape Fit

1

Den of Leggart is Prime Landscape (DWP) Area. Site is located within Leggart Landscape Character Area. The site is located in an area of Green Belt and Green Space Network which acts as a gateway into Aberdeen. This allows an impressive view of Aberdeen on the approach from the A90, providing a distinct sense of place. Its development would therefore have a significant impact on the green belt and landscape setting of Aberdeen.

Relationship to existing settlement

1

Site lies on south side of the River Dee; Kincorth is a large settlement area of the city, located across the A90 Stonehaven Rd. Deeside Brae located close by.

Land Use Mix / Balance / Service Thresholds

1

Land use limited; only residential north of site.

Accessibility

1

Footpath connection from Deeside Brae. Road access by unnamed road off S Deeside Rd on west side of site (Aberdeenshire administrative area). No pavement or cycle space.

Land Use Conflict

2

Site currently zoned as Green Belt/ GSN, LNCS and Ancient Woodland located within site.