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

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On behalf of:
Kingswells Community Council

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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

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?:
Referring only to Kingswells We believe your choice of preferred housing sites is appropriate for the now mature status of Kingswells.
We wish to emphasise that any future attempt to incorporate any of the large housing developments will be opposed vehemently by this council.

Question 2 Housing Allowances Beyond 2032

Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:
Before further consideration of housing allowances much thought must be given to the inevitable road traffic chaos which will be the Lang Stracht and A944 out to Westhill. There are already major problems arising and the south Kingswells rounndabout is a major problem and currently is deemed to be dangerous by many daily commuters.

Question 3 Brownfield and other Opportunity Sites

Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:
Not in the Kingswells area.

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 comment

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?:
Yes

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?:
The damage has been done with the encouragement of stores on the city perimeter for easy access for cars. Will be difficult to reverse.

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:
We need to address the mainteance and presentation of all the frontages on Union Street and then progressively increase the quality of shop/store being allowed on the 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 should not encourage any more out of townn retail parks.

Question 10 Commercial Leisure Uses

Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:
!00% 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?:
Your question needs to be addressed to the developers and planners. Anny such development must appeal to the c purchaser in terms of layout, appearance and cost.

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

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 comment

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?:
Yes.

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?:
No comment

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?:

Not aware of any.

Question 15 Percent for Art

To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of Â■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?:
Not sure this is a good idea - yet another form of tax.

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?:
Internal floor space is paramount for comfortable and acceptable living standards. We consider that building regulations must be revised to reflect this and therafter a sustained monitoring system to ensure delivery of a suitable product. In our view developers appear to call the tune and there are less building inspector to regularly inspect work in progress.

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?:
It would be extremely difficult to apply this thinking as there are so many imponderables.

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?:
There is no point in having a list of policies when there is evidence all round us of erosion of green space . Green corridors which allowed the migration of wildlife are fast disappearing the result of which is the vast amount of road kill especially in roe deer.

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?:
Food growing projects can be delivered by taking a leaf out of post war Britains approach to gardening. Most homes had an area of garden which could be cultivated mainly for growing vegetables and fruit. In the present economy provision of allotments for individual or communal use should be planned into developments.

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?:
Trains only serve the city centre from two directions. Bus services other than no more than six busy routes are not conducive to easy access to the town centre. Accordingly car parking is required unless there is a vast improvement in the transport hub.

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

How best can we encourage the provision of infrastructure to support changes in transport technologies? :
The government needs to set specific dates for the banning of vehicles over a certain age, diesel engines and finally petrol engines.

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?:
Yes in fairness to all.

Question 21 Developer Obligations and Infrastructure Delivery

Do we need to change our approach to securing developer obligations for future development proposals?:
We need to have the professionalism within the ACC to manage development contributions without loopholes. Roads and services have a finite cost but equally the developer must be liable for the final cost of such services.

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?:
Yes. Surely all authorities are fully aware of the extreme damage being done to our environment. Even now it may be to late to avoid catastrophies. The strongest action needs to be taken now to mitigate further degradation of life as we know it.

Option 3 - Alternative Option

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?:
This is an extremely complex calculation and open to misinterpretation and furthermore very difficult to police.

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. Another form of green energy which helps to reduce the carbon footprint.

MAIN ISSUE 7 Heat Networks

Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?:
We agree option 2 is sustainable and achievable.

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?:

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?:
We think "affordable housing" is a misnomeur. The actual cost is certainly driven by developers who we assume are involved for their own financial well being.

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. By ensuring that potential clients are made fully aware of all costs they will incur. We hear of many instances where families have been unable to meet the monthly management costs.

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?:
Surely the simple answer is to build houses which within reason can be adapted for use by older people or indeed the reverse. We should not allow builders and developers to drive this argument as the availability of good quality tradesmen is at a premium so they are not looking for any complications in construction.

Option 2 - Preferred Option

MAIN ISSUE 10   Residential Care Facilities

How should the Local Development Plan cater for proposals relating to Residential Care Facilities?:
There is no easy solution to this problem however appropriate care homes need to be built to avoid bed blocking in hospitals.

Option 2 - Preferred Option

MAIN ISSUE 11   Student Accommodation

How can the Local Development Plan cater to proposals relating to student accommodation?:
Option 2 is reasonable however surely saturation point will be reached and ACC would be well advised to monitor this closely.

Option 2 - Preferred Option

MAIN ISSUE 12   Houses in Multiple Occupation

How can the Local Development Plan support sustainable mixed communities, with regards to HMOs?:
Option 2 is preferable but great emphases is required to protect the interests of neighbours.

Option 2 - Preferred Option

Percentage limit of HMOs in each area:
Option 1 - Preferred Option (15%)

Please explain why you chose your answer:
We believe many of these properties attract too much unwelcome attention from the police and otther social services.

Geographical boundary of each area:
Option 1 - Preferred Option (Ward Boundaries)

Please explain why you chose your answer:
Seems the most sensible option

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:
No particular reason other than option 1 would lead to much more work to monitor and process.

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?:
Our suggestion is that when the LDP identifies areas where developers have expressed an interest in building houses but are not supported by the planners then that should be the end of the story. No further discussion within the five year period.

Question 28   Changing Places Toilets

Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?:
The answer is simple if ACC are not maintaining a sufficiency of public toilets then tthey must come up with alternative solutions.

Appendix 1 Proposed Draft New Policies

Policy D2   Amenity

Do you have any comments on the policy?:
All tthe main criteria appear to have been covered.

Policy D5   Advertisements and Signage

Do you have any comments on the policy?:
No

Policy D8   Shopfronts

Do you have any comments on the policy?:
Agree with the statements.

Policy D9   Windows and Doors

Do you have any comments on the policy?:
Agree with the statements.

Policy H4 Housing Mix and Housing for Particular Needs

Do you have any comments on the policy?:
No comments

Policy H8 Residential Care Facilities

Do you have any comments on the policy?:
No comment.

Policy H9 Student Accommodation Developments

Do you have any comments on the policy?:
No further comments.

Policy H10 Houses in Multiple Occupation

Do you have any comments on the policy?:
All conditions need to be strictly monitored.

Policy NC9 City Centre Living

Do you have any comments on the policy?:
No comment

Policy NC10 24-hour City

Do you have any comments on the policy?:
No comment.

Policy NC11 Visitor Attractions and Facilities

Do you have any comments on the policy?:
New facilities for the city centre may be thwarted by lack of suitable space.

Policy NC12 Public Art Contribution

Do you have any comments on the policy?:
No comment

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::
No further comments

Additional Files

If you have further information you would like to provide you may upload it here.:
No file was uploaded