

## Response ID ANON-B3JU-DSBW-4

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

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### About You

#### What is your name?

**Name:**

Dewi Morgan

#### What is your organisation?

**Organisation:**

Old Aberdeen Community Council

**On behalf of:**

Old Aberdeen

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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?:**

No comments

## 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 suggest that non-brownfield sites could be set aside for the present and developers encouraged to use up the brownfield opportunities. Use of green space is never desirable.

### Question 2 Housing Allowances Beyond 2032

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

Unless the local economy undergoes a remarkable recovery, there is unlikely to be any significant increase of Aberdeen's population over the next 5 years. We suggest additional sites are not presently required and that existing sites should be 'used up' first.

### Question 3 Brownfield and other Opportunity Sites

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

Aberdeen now has a huge number of empty business premises, both industrial and office type. These are going to become a blot on Aberdeen's landscape – owners could be encouraged to re-purpose those sites for accommodation where the location meets the relevant criteria for residential use. Further, why not negotiate for these empty sites to be offered to travellers on a temporary basis?

### 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?:**

We consider it would be logical for the two boundaries to be the same. However, surely there should first be a clear definition of 'City Centre'. If this defines the core retail and administrative centre of the town, then both outlines, as shown in para. 3.2, would appear to extend well beyond this definition.

**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?:**

We are concerned that the redevelopment of the Indoor Market (page 22) could see all the resident micro-traders evicted with no place to go. This would destroy livelihoods, result in the loss of a small but important element of local retail and thus be damaging to ACC reputation. To replace the stalls after the market has been redeveloped is not a solution; the businesses will already have been destroyed. The glut of closed shops could surely provide an opportunity for these businesses – provided the business rates issue can be resolved.

It should be born in mind that small niche shops are historically the starting point for regeneration.

**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?:**

This is considered a sensible policy, but should this not encompass Castlegate, not just "Broad Street to Huntly Street"? (ref. page 29).

**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:**

This should be a discussion between property owners and the relevant community and historic groups.

**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?:**

Should we direct high footfall uses to existing centres including the city centre? - Absolutely. Creating any new retail centre will damage the existing ones.

We note that the neighbourhood centre of Old Aberdeen is not included in the table on page 32. Does this locality around the High Street & King Street roundabout not warrant inclusion and support?

Out of town retail parks? Definitely not.

Out of town retail would be disastrous to the town centre – and has been demonstrated time and again in town and cities throughout the UK. It is notable that the revitalised Bridge of Don Retail Park on Denmore Road and the arrival of Pets at Home and Marks & Spencer food shop at Bridge of Don attracts huge numbers of customers – who would otherwise have used the town centre.

**Question 10 Commercial Leisure Uses**

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

No comment

**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?:**

ACC can encourage more people to live in the city centre by providing good quality accommodation in a location that is not detracted by bad behaviour at night, plus local stores within easy walking distance.

**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?:**

We agree that city centre living should be encouraged, particularly the bringing back into use of unused upper floor levels but to attract a varied class of resident, the attractiveness of the area needs to be appropriate – doorways should not need to be used as a urinal, streets should feel safe at night, convenience store nearby.

The presence of temporary (male only) urinals in the evening hardly gives an impression of quality city living.

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?:**

There are quite a lot of offices formed from converted domestic properties now on the market – providing an opportunity for re-conversion to domestic use.

See also question 3, opportunities available from re-purposing unused offices.

**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?:**

No comment

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?:**

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?:**

No comment

### **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?:**

The concept of compulsory public art sounds awful and could well result in committee approved 'art'.

## **MAIN ISSUE 3 Support for Visitor Attractions**

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

A policy to support and encourage tourism would be beneficial, but suggest it should extend beyond the core town centre elements. We get the impression that Old Aberdeen is little considered by ACC as an important tourist venue.

The creation of 'attractions' should be carefully considered if financial support from the Council is to be considered.

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?:**

The current approach is not supported.

Option 2 would seem to be the minimum requirement. The same space requirements should be reflected in HMO applications with the at least the minimum floor areas as defined in Scottish Government document: 'HMO - Statutory Guidance for Scottish Local Authorities 2011 - updated 2012'.

Option 3 appears to be a positive move. Again, we feel these should also be matched within the relevant HMO controls and management.

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 approve the proposal to develop a set of consistent expectations regarding the minimum standard for external space. This should incorporate the existing restrictions on building within the curtilage of an existing property (ref. SG: The Sub-Division and Redevelopment of Residential Curtilages).

We recommend that proposals submitted with less than the minimum standard for external space should be refused.

### **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?:**

Natural environment policy needs to be a priority with the current state of emergency facing global and local biodiversity. Aspirations described in section 4.4 are all valid – particularly with respect to connectivity. These must find their way into high level policy.

Perhaps a policy of temporary rewilding of unused sites could be considered to promote biodiversity.

### **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?:**

Allotments can be a target for vandalism which quickly destroys interest in food growing. Consider offering to install CCTV at ACC cost for troubled allotments such as Sunnybank Park.

## **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?:

Without a high quality bus service, affordable city centre parking will continue to be essential and should not be reduced. One of the successes of Union Square is the availability of integrated car parking.

Renowned urban designer Peter Calthorpe talks of 'transit-oriented development' where residents prefer to use the local transit over the car because it is quick, easy, and goes where one wants. While Aberdeen along with the Shire have attempted to provide housing only where access routes are good, there does not appear to have been any planning of the transport system - that's been up to private organisation like FirstBus to provide whatever they deem profitable. You cannot sort the car problem by making parking a nightmare. Instead, you make public transport the preferred choice.

Another issue is the inadequacy of support for cycling, with cycle routes which are inconsistent and often unsafe. Paragraph 5.2 (page 42) mentions "... build more cycle and walking friendly pavements..." – these combined pavements are disastrous for pedestrian safety and security, as cyclists have extrapolated this permission onto all pavements. Cyclists and pedestrians should always be segregated use.

## MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

ACC should be cautious regarding spending large sums on infrastructure the specification of which may still change markedly in the next few years.

Option 1 - Current Approach

## 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?:

This seems a good idea as long as the minimum standard is not set unrealistically high

All newbuild flatted developments and tenements should be required to install communal television and satellite aerials to prevent the eyesore of frontages covered with dishes etc..

## Question 21 Developer Obligations and Infrastructure Delivery

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

Additional developer obligations could be considered as follows:

- Green infrastructure associated with new developments
- Carbon footprint during construction and use
- Use of sustainable materials / locally sourced materials

## 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?:

These proposals appear to ignore all the thousands of good stone-built buildings in Aberdeen which cannot make the grade as low energy homes without investment. Shouldn't there be encouragement to retain and upgrade these properties which form the backbone of the 'look' of Aberdeen?

What about discouraging the destruction of non-domestic buildings to create a clear brownfield site?

The re-use and upgrade of existing buildings would, in most instances, significantly reduce the overall carbon cost. Just as traditional windows should only be replaced when all other options have been discounted, why not expect provide equivalent guidance for buildings?

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?:

We believe established frameworks exist and ACC could develop a methodology with the help of a suitable consultancy.

## 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, solar farms should be supported but not if it leads to the loss of productive farm land.

## MAIN ISSUE 7 Heat Networks

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

While a heat network can provide useful benefits in terms of energy efficiency, a system controlled by the developer or other profit driven private company can create a mechanism for exorbitant charges to be levied as residents are a captured market and have no opportunity to choose an alternative energy provider. A means to oversee and control the cost of energy needs to be in place before any new policy is introduced .

Option 1 - Current Approach

**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?:**

See our response to question 3. We see no advantage to protect 'business and industrial areas from other development pressures' when there is a huge glut of such facilities.

**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?:**

Encouraging the return of residential use along with the small retail properties to support housing and office workers would seem to be a good option. There is surely little demand for more hotel accommodation at this time?

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 fully support a robust drive towards an increase in social housing and also affordable housing

**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?:**

No comment

**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?:**

The encouragement of accommodation that can be readily adapted to maximise the chance of 'lifetime living' is an extremely good idea.

Option 2 - Preferred Option

**MAIN ISSUE 10 Residential Care Facilities**

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

No comment

Option 2 - Preferred Option

**MAIN ISSUE 11 Student Accommodation**

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

We see no merit in limiting student accommodation development to H1 areas only, but agree that ready availability to public transport is important. Proximity to their place of work if obviously a bonus, but not at the expense of family accommodation – from where the breadwinner(s) must also access her or his work.

What now appears to be a significant glut in student accommodation could have been minimised if ACC, along with RGU, UoA and NESC worked together and with support from their student unions to develop an appropriate forecast of future demand. Even now, it would still be beneficial if such developments were approved on the basis of identified need rather than developers jumping on the latest band-wagon.

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?:**

The key issue is to limit localised density. Overall numbers of HMOs is not an issue and never has been.

The current approach damages communities local to universities

A minimum standard of design for HMO accommodation would be desirable and should match the space requirements for new housing stock.

If indeed 'safeguarding for existing communities' is indeed a priority, which we do hope is now the case, then a limit to the localised density of HMOs should be a minimum requirement of the policy.

An over provision policy – defined as excess local density - is urgently required. There is no reason why the planning system and HMO management system should not work together as it does for Dundee. The community councils close to universities in Aberdeen all wish this to be in place, yet the ACC has repeatedly refused to support this clearly identified need.

The Old Aberdeen Community Council wishes to place on record our strong objection to the profoundly unbalanced wording which puts us, the local communities, at a significant disadvantage by creating spurious categories for selection as though these are valid options for consideration.

- How could a knowledgeable officer propose electoral ward areas as potentially appropriate for management of localised HMO density?
- How could a density of 25% HMOs be considered to be within the bounds of a 'sustainable mixed community'?

Option 3 - Alternative Option

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

Option 1 - Preferred Option (15%)

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

This is not in fact our preferred option. To start at 15% already places excessive stress on locations.

The OACC asks for a 12% limit as best reflecting the limit that allows a good mix of residents. It should be born in mind that an HMO property will typically be more densely populated than the average family home, thus a 12% limit will account for perhaps 20% of the residents for that area.

The option of a 20% limit is unrealistic, even for the smallest area being considered, the Census Output Area. A 20% limit on around 100 – 150 properties will be at least 20 properties. This could easily equate to half the street or more. They will not be spread out evenly over the area

The 25% limit would appear to have been offered as a joke?

**Geographical boundary of each area:**

Option 3 - Alternative Option (Small Data Zones)

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

Ward boundaries are completely unacceptable as a boundary area.

The Aberdeen wards likely to see high concentration of HMO properties are wards 5, 6, 7, 8, 11. These hold an average of 12,722 electorate per ward.

At 2.15 average persons /household, that equates to around 6000 residences

The provision of a percentage density limit on a zone of this size is effectively meaningless and would be a complete waste of council time. Even the suggested 15% limit equates to around 900 residences, which will, inevitably be congregated together. Such an option would effectively encourage grouping of HMOs and so destroy, not 'safeguard communities'.

While the 'Small Data Zones' have not been identified, we shall assume the writer is indicating the Census Output Area that is already part of the ACC mapping systems.

This, while not ideal, is the only worthwhile zone to consider if ACC intends to limit HMO localised density. As a COA will hold around 100-150 properties, this will still equate to permitting some 15 properties in close proximity; enough to destabilise a residential area.

The Old Aberdeen Community Council wishes to place on record our strong objection to the profoundly unbalanced wording of these questions which puts us, the local communities, at a significant disadvantage by creating spurious categories for selection as though these are valid options for consideration.

- How could a knowledgeable officer propose 'electoral ward areas' as potentially appropriate for management of localised HMO density?
- How could a density of 25% HMOs be considered to be within the bounds of a 'sustainable mixed community'?

**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:**

Once again, the choices provided do not match what might be considered reasonable options.

Irrespective of flat or house, a property with a large number of non-related persons is likely to exacerbate various issues, such as parking, rubbish bin management, noise and unkempt gardens so we do not see any meaningful difference between a house and a flat.

We do not see any justification for extending beyond the current '5 or more' limit.

We would like to see a planning permission requirement set at 3 or more people in a flat, 3 or more people in a house.

We would like to see integration between planning and HMO officers on this issue following the same process that works in Dundee. This ridiculous refusal to countenance working together makes ACC look foolish.

**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?:**

Community Planning should start out on the basis of taking the wishes of the community into consideration. For Old Aberdeen, the primary issue is the excessive number of HMOs and other let properties.

The Scottish Government has recently published a consultation on short term lets. This flags up another process by which family homes are lost to landlords and it might be well worth considering imposing a combined localised density limit on HMOs and the short term let of entire residences (as opposed to spare room

letting).

## **Question 28 Changing Places Toilets**

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

What about the provision of toilets for the general public? The provision of male urinals (and nothing for females) on the late night streets of Aberdeen is a terrible indictment of ACC.

## **Appendix 1 Proposed Draft New Policies**

### **Policy D2 Amenity**

**Do you have any comments on the policy?:**

No comment

### **Policy D5 Advertisements and Signage**

**Do you have any comments on the policy?:**

We agree with the creation of this Policy. There should be some clarification as to how the phrase "character or amenity of the area" must be interpreted.

### **Policy D8 Shopfronts**

**Do you have any comments on the policy?:**

We agree with the creation of this Policy. We note that the current TAN is very much focused on Union Street. We consider the next revision of the TAN should make it clear that this refers to shopfronts in all Conservation Areas.

### **Policy D9 Windows and Doors**

**Do you have any comments on the policy?:**

We agree with the creation of this Policy.

### **Policy H4 Housing Mix and Housing for Particular Needs**

**Do you have any comments on the policy?:**

We agree with the creation of this Policy. Recent housing developments seem to avoid these features. Design for 'Lifetime Living' is strongly supported.

### **Policy H8 Residential Care Facilities**

**Do you have any comments on the policy?:**

No comments

### **Policy H9 Student Accommodation Developments**

**Do you have any comments on the policy?:**

We understand that applications to build student accommodation do not attract developer contributions, so we agree that any application for change of use should require retrospective developer contribution to be fully addressed along with the other normal planning requirements.

What now appears to be a significant glut in student accommodation could have been minimised if ACC, along with RGU, UoA and NESC worked together and with support from their student unions to develop an appropriate forecast of future demand. Even now, it would still be beneficial if such developments were approved on the basis of identified need rather than developers jumping on the latest band-wagon.

### **Policy H10 Houses in Multiple Occupation**

**Do you have any comments on the policy?:**

OACC fully support a robust policy regarding restricting localised density of HMO properties and have been asking for this for many years. The line item regarding 'excessive concentration' can only be meaningful if the smallest possible locality area is used to determine density.

While the Census Output Area may be acceptable as a practical and simple to operate measurement, the gold standard will always be to limit the number of properties within a small radius based on the centre of any property, - as that is how residents are impacted.

A robust HMO policy (12% limit within each Census Output Area - or an equivalent highly localised area) is essential for Old Aberdeen.

If ACC once more choose not to impose such a restriction, we can only assume that the Council has no interest in maintaining a 'Sustainable Mixed Community' in Old Aberdeen.

### **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?:**

A 24 hour city may be a good idea, but not if this means simply more of the kind of behaviour that can be seen in the Belmont Street area on a Friday night.

## Policy NC11 Visitor Attractions and Facilities

### Do you have any comments on the policy?:

No comment

## Policy NC12 Public Art Contribution

### Do you have any comments on the policy?:

While this is raised with good intentions, it does not seem an appropriate way to commission art work.

## Additional Documents

### Please include comments on other documents below:

#### Please include comments on other documents below::

The Old Aberdeen Community Council would also like to raise the following issues that we consider should form part of the next Local Development Plan:

1/

While reviewing the 'Proposals Map 2017' (A component of the Local Development Plan 2017), we noted an anomaly in that the core of Old Aberdeen is designated as CF1 'Existing community sites and facilities'.

It is our understanding that this CF1 designation is intended to indicate an area with facilities focussed on the public use (schools, sports facilities, hospitals etc.) and excluding domestic residences. The other sites designated CF1 within Aberdeen (according to this map) are:

- Aberdeen Royal Infirmary site; no domestic housing.
- Site west of Berryden Road. Includes OP77; no domestic housing.
- Aberdeen Sport Village; no domestic housing.
- Site on SE corner of Urquhart Rd / Park Rd. Former City Hospital, now converted into flats – surely this requires re-designation?
- North East Scotland College OP68; no domestic housing.
- Former hospital building to the immediate east of Woolmanhill roundabout – now the Sandman Signature hotel ; no domestic housing (requires re-designation?).
- Ex RGU building running along west side of Harriet St; no domestic housing.
- Woodend hospital OP26; no domestic housing.
- South side of Lang Stracht – location of curling club; no domestic housing.
- Hazlehead Household Waste Recycling Centre; no domestic housing.
- Seafield; James Hutton Centre and Bright Horizons Nursery; no domestic housing.
- Garthdee; RGU; This appears to have captured 3(?) domestic properties?

The outline for Old Aberdeen CF1 includes dozens of domestic residences on High Street, College Bounds Spital, St Machar Drive, King Street, Dunbar St., Sunnybank Rd, Orchard St, Orchard Wa k, The Orchard, Spital Wa k, Firhill Place.

We consider this designation is fundamentally incorrect and negates the presence of this ancient community. We ask that the CF1 boundary is adjusted to include only the dedicated university educational properties and the remainder of Old Aberdeen to be re-designated as H1.

2/

Since the MIR was published, there have been some significant developments around the issue of environmental damage and climate change. With this comes the dawning realisation that if we wish to minimise the extent of climate change then we all must change our lifestyles and working practices as soon as possible; we can no longer push this out for another year, then another year.

In this context, surely Aberdeen City Council should make climate change a Main Issue for which the council will progressively introduce formal controls relating to activities and processes that involve release of significant greenhouse gases and carbon, along with encouragement for activities and processes that reduce the release of greenhouse gases and carbon. This would be an important declaration of intent by ACC that the future of Aberdeen extends beyond the 5 years of the next LDP.

## Additional Files

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

No file was uploaded