

# Response ID ANON-B3JU-DSQB-X

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**  
Submitted on **2019-05-12 19:33:57**

## About You

**What is your name?**

**Name:**  
Malcolm Ellice

**What is your organisation?**

**Organisation:**  
Private citizen

**On behalf of:**  
Self

**How can we contact you?**

**Email:**  
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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 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?:**  
Yes - agree with preferred housing sites. I have no awareness of any other suitable sites.

#### Question 2 Housing Allowances Beyond 2032

**Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:**  
Not that I am aware of.

#### Question 3 Brownfield and other Opportunity Sites

**Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:**  
Possibly but I am not aware of them.

#### 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?:**  
The listed sites appear to be logical. I am not aware of any other or alternative sites for consideration.

### 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 , I have no issues with that.

## 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?:**

I would be in favour of that strategy in order to establish redevelopment more quickly and be able to gauge the effectiveness of the redevelopments undertaken before moving on to other sections.

## 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:**

Perhaps given the very significant impacts of internet trading on traditional retail now being fully seen the percentages should be subject to ongoing review so that changes can be made in a more "on-the-hoof" manner as habits & culture continue to change.

## 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?:**

Meantime continue to direct to existing centres until the future of retail is more clear. There is no sense in creating new out of town retail parks while there remains a question over their long term viability.

## Question 10 Commercial Leisure Uses

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

Yes - and focus upgrades on those existing areas.

## 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?:**

Yes - there must be scope to create & develop "loft" style living accommodation as in many other older city centres globally. A marketing campaign to kick-start a new generation of city centre living should be considered important.

## 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 - along with suggestions for traffic-free & green zones within the city centre.

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?:**

If not 24 hour activities then perhaps 18 hour activities encouraging cafe style businesses to flourish.

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?:**

Would need to create a new artistic style culture around the city centre to encourage artistic types from other places to come and live in Aberdeen and spread the culture. Not an easy task - Aberdeen currently does not enjoy a comparative artistic reputation - partly due to geography. Further collaboration with the Scandinavian countries perhaps?

## 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 knowledge on this subject.

### 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?:

Perhaps yes but would require flexibility - certain industrial estate locations around the city will never provide a good backdrop for artistic endeavours.

### 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?:

Develop & implement a sensible policy.

Option 2 - Preferred 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?:

Every developer should be required to include a contemporary version of good quality amenity space & places ( perhaps a building) in every development proposal. Survey other cities for ideas.

### 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?:

Yes.

### 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?:

Include food growing in the amenity policy (question 16 External Space Standards) as a requirement for all new development proposals. Allotment & greenhouse spaces should be encouraged.

## 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?:

NO - do not reduce car parking - but establish a policy which strongly favours non-polluting vehicles.

### MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

While encouraging city centre living developments, establish a policy whereby the developer proposal includes facilities for non-polluting vehicles.

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.

### Question 21 Developer Obligations and Infrastructure Delivery

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

no comment.

## 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?:**

no comment.

Option 2 - Preferred 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?:**

Not certain but do not make the mistake of formulating a quick hard & fast method which might be obsolete 24 months later. This is still a moving target and which will require flexibility to change as time moves ahead. e.g. diesel vehicles are more air polluting than petrol vehicles but produce less CO2 than petrol vehicles.

## **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 with caution. Future climate in NDE Scotland might be more amenable to increasing wind power generation than solar.

## **MAIN ISSUE 7 Heat Networks**

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

Yes.

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?:**

Yes - a good area for incorporating & growing artistic culture businesses & schools.

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?:**

Yes - agree with current LDP approach. Yes - maintain 5 unit threshold.

### **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?:**

With caution and depending on development location, encourage developers to provide build-to-rent accommodation - not necessarily incorporated into their build-to-sell development - perhaps separately elsewhere. And in every case implement policy which bars short-term Airbnb style rents.

## **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?:**

Maintain current approach.

Option 1 - Current Approach

### **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?:**

no comment.

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?:**

no comment.

Option 2 - Preferred Option

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

Option 1 - Preferred Option (15%)

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

Owner-occupation provided for best upkeep & maintenance of local standards therefore lowest possible value is best.

**Geographical boundary of each area:**

Option 1 - Preferred Option (Ward Boundaries)

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

Best understood.

**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:**

Every HMO application should be subject to scrutiny & explanation of why it is required.

## **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?:**

no comment

## **Question 28 Changing Places Toilets**

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

Yes - retail "malls", sports facilities, community & town halls.

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

### **Policy D2 Amenity**

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

none other than in previous sections of this response.

### **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?:**

no

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

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

no

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

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

none other than in previous sections of this response.

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

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

none other than in previous sections of this response.

## **Policy H9 Student Accommodation Developments**

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

none other than in previous sections of this response.

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

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

none other than in previous sections of this response.

## **Policy NC9 City Centre Living**

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

none other than in previous sections of this response.

## **Policy NC10 24-hour City**

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

none other than in previous sections of this response.

## **Policy NC11 Visitor Attractions and Facilities**

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

none other than in previous sections of this response.

## **Policy NC12 Public Art Contribution**

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

none other than in previous sections of this response.

## **Additional Documents**

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

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

Development Bid B0942 Milltimber South:

I strongly submit that this proposed development site should be re-allocated back to green-belt status and no development approvals be issued for this site at any time in the foreseeable future. I note that the submitted development proposal is considered "undesirable" by the City Council and strongly support this view on several points:

\* The site provides an unparalleled panoramic view across the Dee valley which defines the established quality and standard of residential living in Milltimber - it is critical to maintaining the ethos which Milltimber residents stand for and is key to Milltimber's brand as a highly desirable community in which to live.

\* Several other existing and approved developments in the Milltimber area including Oldfold Farm will very soon stretch schooling & transportation beyond comfortable limits which will be required to be addressed. The B0942 Milltimber South site is situated on a stretch of the A93 North Deeside Road already heavily impacted by recently placed traffic lights for new housing development and AWPR junctions. The site would require at least 1 if not 2 additional sets of traffic lights leading to traffic light concentration of 200-300 yards between sets of lights along an approximate 1 mile stretch.

\* The B09423 site is on the south side of the A93 meaning school children would require to cross the A93 to go to school - either local primary or Cults Academy. Both existing Milltimber Primary and Cults Academy are already at or approaching 100% capacity and the position regarding the new Milltimber Primary school has not been made clear.

\* Region economics mainly driven by the Oil & Gas sector downturn are now such that take up of new developments is very much slower than during the past 30-40 years and this slower pace is most likely to be maintained going forward. Certainly the Oil & Gas industry will never return to previous activity levels due to post-maturity of the North Sea sector and also due to increasing environmental pressures on fossil fuel consumption & activities globally. Accordingly (and using the Oldfold Farm development as an example), it is highly likely that the Milltimber South site would take many years to reach close out due to competition with alternative developments in the area including the large Countesswells development which is better placed to compete for affordable housing especially.

\* In summary, there appears to be absolutely no particular housing pressure or good reason to develop the Milltimber South site given the plethora of alternative developments in the area which are moving along at a pace much slower than we have become used to in the Aberdeen area. The site has an attractive appearance which no doubt is a magnet for developers who would develop it for no other reason than it is there! Unnecessarily developing unspoilt green-field sites in the current climate crisis debate surely cannot be supported within the Aberdeen City Council LDP!! Any development on the site would significantly bespoil Milltimbers unique identity and negatively impact its brand & attraction as a highly desirable community in which to live - and in which to pay top band rates in contribution to City Council service activities!

\* 60/90 new houses would be a pathetically poor return for permanently ruining the identity and attraction of Milltimber as a prized community which people aspire to making their home. That relatively small number of houses whenever deemed necessary to fulfil local housing needs could so easily be located amongst the many other already approved developments under construction in the general area. There is simply no requirement in the prevailing climate to develop the site and the City Council should do all in its power to ensure that it is not.

**Additional Files**

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

No file was uploaded