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

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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?:

None

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?:

I do not agree with the councils preferred housing sites.

Savills reported in late 2017 that there was a record level of 2.1m sq ft of office space available in Aberdeen. Rather than build more new houses, and eat in to the valuable, irreplaceable land bank the Council should first enable developers to re-purpose existing buildings. Aberdeen City Council should grant permitted development rights to developers wanting to repurpose office accommodation to fulfil the annual housing requirements. This would also benefit climate change, as refurbishment of existing vacant office buildings, it is possible to reduce energy consumption by 20-30% in existing buildings. Deep refurbishment can cut building-related energy consumption by up to 80%, saving the EU over 30% of its total energy use annually.

It should be a requirement of the permitted development that the size of the accommodations better the minimum internal space standard sept out in main issue 4, and be zero carbon homes.

Any sites which have already been re-purposed such as in to community gardens or open space should be removed from the housing bank.

Question 2 Housing Allowances Beyond 2032

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

No, if the council re-used existing vacant office buildings by granting permitted development rights, and used vacant and derelict land, then the existing housing allowances sites identified herein would see Aberdeen city into and beyond 2032

Question 3 Brownfield and other Opportunity Sites

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

Savills reported in late 2017 that there was a record level of 2.1m sq ft of office space available in Aberdeen. Rather than build more new houses, and eat in to the valuable, irreplaceable land bank the Council should first enable developers to re-purpose existing buildings. Aberdeen City Council should grant permitted development rights to developers wanting to repurpose office accommodation to fulfil the annual housing requirements.

The council should require that developers re-purpose vacant & brown field sites, allowing developers a free hand at cheaply developing green field sites rather than regenerating areas of the city which have been left rotting is appalling. This could be done by setting a target of 75% of all homes must be use of brownfield urban sites and thereby reduce the need to build on green-field land. This target could refer to the percentage of homes built on all recycled or brownfield land and also conversions of existing vacant space such as offices.

The 35ha of vacant and derelict land should be repurposed, derelict land is linked to health inequality and deprivation. Communities close to these areas should be supported rather than developing green field sites outwit the city, centre which have no transport, health or travel infrastructure.

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?:

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?:

No, as it is not made clear what the benefit of the new boundary would be.

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?:

North Dee, Denburn Valley, Heart of the City Queens Square, Union Street West, Station Gateway are all areas of the city which require attention. Identifying them as such in the LDP would be beneficial. However, caution must be taken. There is currently a high level of un-occupied office space in Aberdeen. There is also a known that high street retail is in decline. Aberdeen should ensure that it isn't redeveloping its city spaces based on an outdated model of shops, offices and eateries. Again, priority should be given to

- 1) derelict and vacant land,
- 2) renovating and repurposing existing buildings
- 3) new builds

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?:

Poor travel access to Union Street is one of the reasons I dont travel to union street to shop. Keeping retail areas small & distinct rather than a cookie cutter of every other UK town centre will breed diversity in shopping experience - as long as public transport, access, b ke access & parking are improved.

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:

The frontage percentages are fine. The frontages themselves need some work. Effort should be made to clean window and gutters, and make the city look likes its not in a depression.

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?:

There is already a mixture of retail in Aberdeen. No further out of town retail parks should granted.

Question 10 Commercial Leisure Uses

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

There is already a mixture of leisure areas in Aberdeen, if the opportunity arises for leisure outwith these areas it should be considered on a case by case basis - but protecting green open spaces.

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?:

Providing such a document would be very useful. However it must set high standards of what is expected of developers: energy efficient, carbon zero, with good access to transport, good outdoor space & indoor space. Make Aberdeen the choice of places in the uK to live

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, encourage reuse of spaces, but ensure that it isn't just basements and roof spaces or people will be pushed in to unsavory living spaces. Aberdeen has a lot of vacant space. However it must set high standards of what is expected of developers: energy efficient, carbon zero, with good access to transport, good outdoor space & indoor space. Make Aberdeen the choice of places in the UK to live

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?:

Yes, use some of the 2msq feet of vacant offices in whole building such as the Riverside House on Riverside Drive which has stood vacant for 2 years.

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?:

A 24hour city means that those living in the city are disturbed by all night by those activities. Many people move out of the city to get away from the noise & traffic.

Caution must be taken to ensure that in striving to chase the growth promised by a 24hour city, that you don't make it an undesirable place to live. Growth isn't the only indicator of a prosperous city, life work balance & pleasant places to live and raise families are more important

The people of need to work late/ early to provide 24hr city will usually be low paid & such hours are very detrimental to health and well being.

Therefore I do not support a 24 hour city.

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?:

This is a great idea.

MAIN ISSUE 3 Support for Visitor Attractions

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

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?:

I would support option 3, but not including flexibility for city centre conversions. City centre living should provide quality housing rather than substandard.

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?:

Yes, strive for better and reject those that do not comply. Aberdeen needs to market itself as a great place to live and providing 'first class accommodation for all' is a great marketing tool. Standards should be equal across all developments.

Standards should include internal and outdoor space, access to allotments & roof top gardens. Houses should be built to high energy efficiency standards with renewable energy as standard. All homes should have access to good public transport, walking and cycling links.

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?:

It gives a more coherent structure. However, there seems to be a lack of policy covering biodiversity being trees and woodlands. The biodiversity in verges, parkland, and water bodies are key too to keeping the ecosystems healthy. Reducing light pollution should also be a policy of the council as it has a detrimental effect on human health as well as that of pollinators.

All developments should be required to have a net positive gain with regards to 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?:

The council should include this as a new policy, access to green spaces (allotments / green roofs etc) 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?:

The council should instigate a charging zone similar to that implemented across large numbers of cities in the UK.

This charging zones will encourage people too move away from the car, and onto foot, cycles and public transport. This should be done in parallel with removing parking from major roads in order to provide space for dedicated, segregated cycle lanes i.e. with a kerb rather than paint.

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

The council could also provide more on street charging points via plug in points in lamp-posts as is being rolled out in Bristol.

The council should also require that any existing business with car parking provide charging points.

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, as it will prevent unnecessary costs later to retrofit.

Question 21 Developer Obligations and Infrastructure Delivery

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

Yes, if the amounts currently required of developers are no high enough to cover the wider infrastructure obligations then there should be an increase in the amount required.

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?:

Aberdeen has the option through the improved standards for size of houses and increasing the energy efficacy to be come a leader in the UK . A large proportion of Aberdeens CO2 emissions come from residential sources, it is currently unlike to meet its current obligation under the climate change Act. To meet climate change head on, action must be taken now rather than waiting for the next round of planning. Other councils across the UK will be taking a tough stand, the risk of new developments coming forward due to tough targets is lower than it once was.

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?:

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.

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. Aberdeen has the option through the improved standards for size of houses and increasing the energy efficacy to be come a leader in the UK . A large proportion of Aberdeens CO2 emissions come from residential sources, it is currently unlikely to meet its current obligation under the climate change Act. To meet climate change head on, action must be taken now rather than waiting for the next round of planning. Other councils across the UK will be taking a tough stand, the risk of new developments coming forward due to tough targets is lower than it once was.

Option 3 - Alternative 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?:

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?:

Not Answered