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

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About You

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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?:

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?:

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, but provided that the sites identified are not overdeveloped. This is likely to happen if the area of development (ft2) allowed is too high, resulting in overly tall buildings.

It is also important to encourage all age groups back into the city centre. Therefore residential opportunities should also include for a range of accommodation that may appeal to all age groups, not just to the young.

All of the potential developments should be mixed use, and a mix being of residential (houses and flats) and commercial (ie retail, offices, leisure, hotels). It is only the inclusion of residential accommodation in any scheme that it becomes mixed use.

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?:

Probably, but the best way of identifying areas of commercial activity should be by an analysis of walkable neighbourhoods. The Chapel St/Thistle Street area should be retained as a premium mixed use area that supports retail uses. Rosemount is similarly a great example of a High Street located as part of a mixed use neighbourhood. This should be encouraged and indeed other areas supported to provide a similar offering.

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:

It is very important to maintain retail frontages in the High Streets that support individual walkable neighbourhoods. Sticking rigidly to figures may not be the best way of ensuring use continues.

An overprovision of night time offerings (pubs and clubs) makes the area unattractive and should be avoided. Union Street is not a pleasant place to be on a Friday and Saturday night due to the over provision of night activities. Indeed I would go as far as saying that it is one of the most unfriendly places to be on a weekend night and is extremely threatening. This is not good.

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 has been much talk recently of pollution in city centres. The solutions proposed by policies and politicians tends to be treating the symptom rather than providing a cure (ie banning traffic in the centre rather than adjusting uses in the centre to stop the pollution from happening in the first place). As a result, the sequential approach to commercial development is wrong. If the centre is full, why not put other commercial uses (including retail) into the centre of mixed use areas (for example at Grandhome - but possibly even trying to introduce a High Street into Bridge of Don or Cove, or Milltimber.

Trying to direct most commercial activity to the centre is not the right policy.

Question 10 Commercial Leisure Uses

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

No. As mentioned already, Union Street on a Friday and Saturday night is a threatening place to be. This should not be the case, and perhaps the way to avoid it is to locate some of this activity in other 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?:

Trying to get most commercial activity and also residential into the centre will lead to overdevelopment of the centre. We support residential uses in the centre, but this should be for everyone, ie old, young, middle aged and families. Do not only encourage the young to be in the centre. Think of Edinburgh New Town as an example of where mixed use properties can support a thriving neighbourhood.

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, but this should encourage all age living opportunities, not just for students or the young.

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?:

Many existing offices in areas like Queens Road, Carden Place etc are now no longer sought after for office use. These should be encouraged to revert to residential use - and all age residential use.

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?:

It is important not to let the centre of Aberdeen become a 24 hour activity zone. This will lead to an even poorer environment and probably even more threatening than it is now. Therefore, whatever the policy that is put in place, it should not encourage over use of the centre as a 24 hour night time pleasure park.

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?:

Provide cheap studio space and offices in a location (The Broadford Works perhaps?). It needs to be in a location that is attractive with lovely granite buildings.

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?:

Broadford Works, Westburn House and others.

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 not required. Developers should be encouraged to develop in a sensitive way that supports the granite heritage without having to provide a percent for 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?:

Probably, but it should be done in a way that protects the existing granite heritage.

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?:

Rather than set a minimum space standard there should be a desire to achieve a range within each development. this should be between 150m2 and 40m2 per dwelling. Every development should have a range of accommodation. If a minimum is set, all development will just comply with the minimum and there will be no range.

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 is wrong to set a policy that makes all development provide a set level of amenity space. For a development in the centre of the city it may well be totally inappropriate. It is better to expect developers to carry out an analysis of all open space in the vicinity and only after this is done, should a level of open space be decided on for provision.

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?:

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?:

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?:

Not Answered

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?:

MAIN ISSUE 7 Heat Networks

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

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?:

Having separate allocated areas for commercial development is wrong - they should be encouraged to locate to mixed use neighbourhoods.

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?:

Residential uses should be encouraged.

Option 3 - Alternative 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?:

Affordable housing should be provided on site. Allowing offsite or commuted payments should not be allowed, or rather it should be set at a level to be totally uneconomic (ie make it an incentive for the developer to provide affordable housing on site). Affordable provision can be provide by a mix of sizes available for private purchase (ie not only through housing associations).

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?:

Private landlords should be encouraged as well as build to rent. Not all private landlords are bad.

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?:

Housing development should be mixed (various sizes and uses for different age groups). This may require a policy that ensures developers consider their development as aprt of a neighbourhood and provide housing that will encourage a healthy mix.

Option 3 - Alternative Option

MAIN ISSUE 10 Residential Care Facilities

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

Not Answered

MAIN ISSUE 11 Student Accommodation

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

Not Answered

MAIN ISSUE 12 Houses in Multiple Occupation

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

Option 3 - Alternative Option

Percentage limit of HMOs in each area:

Option 1 - Preferred Option (15%)

Please explain why you chose your answer:

An overprovison of HMO's is not good for creating a community.

Geographical boundary of each area:

Option 1 - Preferred Option (Ward Boundaries)

Please explain why you chose your answer:

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:

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?:

Question 28 Changing Places Toilets

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

Appendix 1 Proposed Draft New Policies

Policy D2 Amenity

Do you have any comments on the policy?:

A policy may be required for houses that are rebuilt (and modified) in an existing residential area. There have been many houses that have been knocked down and replaced, sometimes inappropriately. A new policy may be needed to control this. Associated to this is the large extension (for example the straightening of a hip into a gable). This type of development is becoming more prevalent in Aberdeen, and a policy should be in place to control it.

Policy D5 Advertisements and Signage

Do you have any comments on the policy?:

Policy D8 Shopfronts

Do you have any comments on the policy?:

Policy D9 Windows and Doors

Do you have any comments on the policy?:

We support the retention of existing materials and style for replacement windows and doors. The design of dormer windows is particularly important in this respect.

Policy H4 Housing Mix and Housing for Particular Needs

Do you have any comments on the policy?:

We support a mix of housing in new development. It should be consistent with a neighbourhood analysis and encourage a mix of property sizes for different age groups and budgets.

Policy H8 Residential Care Facilities

Do you have any comments on the policy?:

Policy H9 Student Accommodation Developments

Do you have any comments on the policy?:

Policy H10 Houses in Multiple Occupation

Do you have any comments on the policy?:

Policy NC9 City Centre Living

Do you have any comments on the policy?:

Encouragement should be given to properties of different sizes, not only small flats.

It may be necessary to revisit the policy on Tall Buildings. The existing policy seems to encourage inappropriate development in the city centre.

Policy NC10 24-hour City

Do you have any comments on the policy?:

Having a 24 hour city is not needed.

Policy NC11 Visitor Attractions and Facilities

Do you have any comments on the policy?:

Policy NC12 Public Art Contribution

Do you have any comments on the policy?:

This is not required. Good design should be encouraged through the planning policies, and this is enough.