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

What is your name?

Name:

Chris Pattison

What is your organisation?

Organisation:

Turnberry

On behalf of:

The Grandhome Trust

How can we contact you?

Email:

[REDACTED]

Telephone:

[REDACTED]

Address:

[REDACTED]

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?:

By way of introduction, we would like to make Aberdeen City Council aware of The Grandhome Trust's disappointment in the scale of new allocations required by the SDP. We objected to this in our response to their consultation in December 2018. The Trust are aware that the SDP has now been submitted for examination, but remain of the view that the decision to provide 20% generosity atop the Housing Supply Target is excessive in what remains a weak regional housing market, for it will dilute demand and fundamentally undermine the ability of committed sites that are integral to the city's spatial strategy to deliver new homes.

It is recognised that those figures are prescribed to the City and are beyond the remit of this MIR consultation. However, in response to the city's preferred option, we reluctantly object to the proposed housing numbers outlined and therefore the sites proposed for allocation, on the basis that they are excessive and wholly unnecessary to meet either the housing land requirement up to 2032 or provide an effective 5 years effective land supply post-adoption, each of which are already well accommodated.

Looking at the City's supporting text in Section 2, a number of points are worthy of critique:

- 1) The city is proposing to discount the 2449 constrained greenfield sites identified in the 2018 HLA from its 10-year available supply on the basis that most of them are part of larger sites. However, we would contest that the barriers to delivery are not substantive and, in any event, as they relate to sites already under construction, supporting infrastructure is being put in place to support ongoing delivery. In short, the delivery of the larger sites is under-estimated and should be re-examined in consultation with the site developers before new sites are allocated.
- 2) The city's proposed allocations are actually in excess of the 640 units identified. In the Preferred Housing Sites, a total of 504-554 units are proposed plus nearly 10Ha of land. Taking even a conservative density on those remaining sites, of 20 dwellings/Ha, a level lower than would likely be anticipated in urban areas, this contributes a further 200 homes, taking the proposed number beyond the identified shortfall by some 50-150 units.

These points reaffirm our view that the new allocations are not needed, and, in any event, the new allocations propose an excessive level of housing which will not ensure the continued delivery of new housing on strategic sites as required by SPP (Paragraph 122), instead having the opposite effect.

Question 2 Housing Allowances Beyond 2032

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

There is no need for the city to identify further Housing Allowances beyond 2032 per se, but we would suggest that, given the abundance of existing allocations and slowing delivery identified in our answer to question 1, the sites identified by the city's preferred option in the MIR should instead be included as opportunity sites which might contribute to housing land supply beyond the year 2032.

Question 3 Brownfield and other Opportunity Sites

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

In response to 'Section 2.2 Employment Lane Allocations' we would like to expressly support the city's intention to not identify any further employment land in the next LDP and to delay the release of Strategic Reserve Employment Land, identified previously, until 2032-2040. The abundance of available employment sites is well understood and the proposed response in planning policy terms therefore seems wholly proportionate.

The Grandhome Trust would like to make the point that should that abundance remain throughout the plan period, as is anticipated, a pragmatic approach must be taken in policy and development management terms to sites which have been allocated, at least in part, for employment uses; particularly within masterplanned urban extensions that will become sustainable mixed-use communities in time and are delivering homes now. Elsewhere in the MIR the council are seeking comment on whether a more balanced mix of uses might be appropriate on Union Street and the shopping centres than is permitted in policy at present, particularly as the restrictive 'Frontage Percentage' requirements might be leaving retail units empty that could otherwise be in use. During the years of the plan, opportunities to similarly apply flexibility on employment sites will also be necessary to avoid leaving employment sites empty, given the identified abundance. This flexibility will be important in masterplanned sites in particular, where, as individual phases are delivered, their continued delivery relies on the completion and supporting infrastructure offered by previous and neighbouring phases. These sites must not be constrained by hard-line approaches over their use, if that use is simply not in demand or required by new residents in that location at that time.

By way of example, if alternative uses – that are, like employment, likely to induce high-footfall and be town centre appropriate – are preferred to more traditional employment uses as envisioned in masterplans, then these should be supported on those sites to allow continual delivery. Flexibility to meet current and changing market demands, as well as the needs of the new community and the wider city, should be sought in this regard. On this basis, we request that the council make allowances in the next LDP that allow development proposals on parts of large allocated site which were previously earmarked for employment uses to be supported, where those proposals support the aims of the LDP and the overall masterplan, particularly where they are not in demand as employment sites.

This is not to say that the amount of employment space should be reduced – indeed, the need for employment land is integral to the make-up of planned new communities – but rather that their delivery later in the process should be accepted. It may well be the case that those employment phases are deliverable as planned, but should the existing abundance remain, these sites should be looked at afresh to avoid potential sterilisation of important phases in a masterplan which might prevent continuous delivery.

Equally, it should be said that, were proposals for more varied employment opportunities – within masterplanned urban extensions that benefit from Planning Permission in Principle – come forward, these should be supported to allow the continued delivery of sustainable mixed-use communities.

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?:

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?:

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?:

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:

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?:

The Grandhome Trust support the Town Centre First approach and recognises the intention of the hierarchy of centres as identified to support it. We would like to make the point however that developments that attract large volumes of people (e.g. retail, commercial leisure, offices, community and cultural facilities and other public buildings) should also be supported where they have been masterplanned and are necessary to support the continued delivery of planned communities. In effect, the Neighbourhood and District Centres 'to be' should be recognised as such, including Grandhome, which should be identified as a retail centre given its remit as a sustainable community. A flexible approach to development types should be sought to allow Grandhome to become mixed-use and support sustainable communities.

Question 10 Commercial Leisure Uses

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

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?:

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?:

Not Answered

Question 12 Residential Development in the City Centre

Are there any other locations within the City Centre where residential accommodation could be provided?:

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?:

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?:

MAIN ISSUE 3 Support for Visitor Attractions

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

Not Answered

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 Grandhome Trust could support the introduction of standards in principle, and indeed development to date at Grandhome would very likely comply with those standards given that the product at Grandhome across all the housebuilders is high-quality. However, in advance of standards being adopted we would expect sufficient time and resource to be allocated to the development of those standards by the city council, with a drafting and consultation process involving developers, including those responsible for the delivery of long-term urban extensions – the next phases of which will be influenced by their application.

In addition, we would expect new standards to be sufficiently flexible to allow for variety in product, house type and different tenures in response to changing or more varied demands from purchasers.

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?:

In response to this question we would like to echo much of our response to Main Issue 4, as both internal and external spaces contribute to the quality of new developments and the quality of life enjoyed by residents.

The Grandhome Trust could support the introduction of standards in principle, and indeed development to date at Grandhome would very likely comply with those standards given the quality of the product on offer there. However, in advance of standards being adopted we would expect sufficient time and resource to be allocated to the development of those standards by the city council, with a drafting and consultation process involving developers, including those responsible for the delivery of long-term urban extensions – the next phases of which will be influenced by their application.

In addition, we would expect new standards to be sufficiently flexible to allow for variety of product, including catering for those who may not want a garden. The standards should not restrict consumer choice.

In response to the third sub-question within Question 16, we would make the point that high quality space is not always derived from private or even semi-private spaces. Rather than introducing standards, it would be the preference of the Grandhome Trust that the City Council better utilise the mechanisms already at their disposal in their LDP, including Policy D1 - Quality Placemaking by Design and their supplementary guidance, so that poor quality development which does not meet the six essential qualities of place is not permitted.

By way of example, the abundance of public space at Grandhome which is to be high quality and distinctive (Including the recently approved MSC for a Pavilion with landscaping at Davidston Square) is of huge benefit to resident, in addition to the private amenity space offered. Conversely, a poor-quality development in urban design terms – that might be without well designed public open space – could successfully meet new standards but ultimately produce a new development which is much poorer and does not give the same overall offering. This must be considered by the city council in the formulation and application of any future standards.

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?:

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?:

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

The Grandhome Trust are wholly supportive of sustainable urbanism, including a reduced reliance on the private car. In addition, facilitating more electric vehicles and the infrastructure they require is desirable. However, we would like to express concern with the proposed introduction of a fixed requirement for these measures, be this per unit or as a percentage of on-street spaces. Instead, it is our view that the dynamic market should be able to dictate where and how these are implemented to reduce risk of technology becoming implemented before it is well used and consequently becoming outdated and, as a worst case, redundant. When electric vehicle infrastructure is well used, it will become necessary infrastructure – like roads and street lighting – and should be provided accordingly. On this basis we would support 'Option 1 – the current approach' to Electric Vehicle Charging Infrastructure which allows for a phased approach to its provision.

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?:

Question 21 Developer Obligations and Infrastructure Delivery

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

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?:

The Grandhome Trust wholly support the delivery of low carbon alternatives in all industries. New development is considerably more efficient than existing stock, and it is our view that this is where attention and effort should instead be focused. Increasing demands for carbon emissions reduction could prove onerous without producing proportionate benefits, increasing costs for housebuilders and impacting on the price of new homes in turn. These requirements should be left to supplementary guidance where a phased approach can allow the industry to adapt and strike a pragmatic balance between energy efficiency and delivery, and so we support Option 1 – the current approach on Low and Zero Carbon Generating Technologies and Water Efficiency.

Option 1 - Current Approach

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?:

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