#### Response ID ANON-B3JU-DSTU-M

Submitted to Local Development Plan Main Issues Report 2019 Consultation Submitted on 2019-05-13 11:25:45

What is your name?

Name:

Tom Clarke MRTPI

What is your organisation?

Organisation:

Theatres Trust

On behalf of:

Theatres Trust

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?:

## 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?:

Question 2 Housing Allowances Beyond 2032

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

**Question 3 Brownfield and other Opportunity Sites** 

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

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?:

We agree with the proposed extension

**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 supportive of this proposal, which would add greater weight to proposals within the City Centre Masterplan which we consider could positively enhance the city centre. In particular from our perspective this includes interventions which will positively enhance the role and function of Aberdeen's valued arts and cultural venues such as the Arts Centre and Lemon Tree within the Queen's Square intervention area and the Music Hall within Union Street West.

Theatres Trust is the national advisory public body for theatres, established through the Theatres Trust Act 1978 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in Scotland through The Town and Country Planning (Development Management Procedure) (Scotland) Regulation 2013. This requires the Trust to be consulted by local authorities on 'development involving any land on which there is a theatre'. We are therefore keen to work with the Council regarding any proposals impacting theatres and arts centres within Aberdeen, and would welcome engagement as a stakeholder in the preparation of this and future documents.

#### **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?:

We would have no objection to the shrinking and targeting of the retail core; greater flexibility for a wider mix of uses may benefit the overall vitality and viability of Aberdeen's wider city centre and help minimise vacancies and prolonged periods of vacancy.

#### **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:

Further to Question 7, we would also support the review of frontage percentages. Greater diversification of town centre uses, which could include increased flexibility for cultural and leisure uses, should help strengthen the ongoing role and attractiveness of Aberdeen's city centre.

#### **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?:

For the reasons outlined above, we would recommend directing high footfall uses to the City Centre.

#### **Question 10 Commercial Leisure Uses**

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

We would agree with this continued direction.

#### **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?:

In principle we are supportive of encouraging more people to live within the City Centre, which can help to enhance the overall sustainability and viability of the area. However, residential uses must be sensitively located so as not to undermine existing uses and to particularly protect the interests of noise-generating and/or night-time uses. This includes Aberdeen's theatres, cinemas, music venues, nightclubs, pubs and bars. Unreasonable restrictions placed on such venues as a result of complaints from new neighbours or to protect residential amenity can lead to closure, which in turn compromises the role and function of the city centre. The 'Agent of Change' principle, for which there is a commitment by the Scottish Government to include within national planning policy, protects venues from such conflict.

Arts and cultural uses are particularly vulnerable, but at the same time are also key attractors of visitors to Aberdeen and footfall within the city centre. As well as direct employment they also help support other businesses, contribute to the social and cultural well-being of local people and help attract and retain talent within the local area. As the retail market is becoming more challenging, it is ever more important that other town centre uses are retained and protected.

Therefore specific guidance and policies for such conversions would be beneficial.

#### 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 would support such a policy, although this would be on the basis of the concerns outlined above being incorporated. We would also strongly encourage such a position to ensure there is robust evidence and justification outlining that the space is surplus to requirements for non-residential use and that it will not undermine the future viability of either the host unit or its surroundings.

Option 1 - Current Approach

#### **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?: Such activities should be supported (and protected) through policy, as they help support the overall vitality of Aberdeen and as discussed above help attract and

retain people within the local area.

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?:

**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 Â■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

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

Policy D2 Amenity

Do you have any comments on the policy?:

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?:

Policy H4 Housing Mix and Housing for Particular Needs

Do you have any comments on the policy?:

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?:

We support this policy which goes some way to addressing our concerns outlined previously, although we would recommend the policy is extended to reference 'noise-generating' cultural uses. We would also recommend that it includes neighbouring and adjacent development, not just development within the same built structure.

Policy NC10 24-hour City

Do you have any comments on the policy?:

We are supportive of this policy.

# 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?:

#### **Additional Documents**

Please include comments on other documents below:

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We would suggest the inclusion of an additional policy which would protect Aberdeen's valued community, cultural and social facilities from unnecessary loss. This would include a requirement for robust evidence that a facility is surplus to requirements by the local community.

## **Additional Files**

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

No file was uploaded