

## Response ID ANON-B3JU-DSTJ-9

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**  
Submitted on **2019-05-13 11:46:16**

### About You

**What is your name?**

**Name:**

Ann Townsley

**What is your organisation?**

**Organisation:**

Private Individual

**On behalf of:**

**How can we contact you?**

**Email:**

[REDACTED]

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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?:**

Broadly agree with predominance of brownfield 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?:**

No, the population in Aberdeen is falling and we currently have an over supply of housing. Forecasts of population growth used by both Aberdeen and Aberdeenshire councils over the last decade have been proved to excessive. Thus, we are unlikely to need any significant increase in supply and hence should not put communitites under planning blight.

##### Question 3 Brownfield and other Opportunity Sites

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

No, we currently have multiple unoccupied sites.

##### 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?:**

No comment

#### 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 comment

#### **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?:**

We should avoid new out of town developments with the exception of small "corner shop" and pub type developments which provide walkable services for local residents.

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

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

Yes

#### **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?:**

Add bus routes that avoid the city centre, e.g. by routing along Anderson drive. This will reduce both traffic and footfall in the town centre making it a more pleasant place 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?:**

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?:**

No

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?:

No comment

Not Answered

### 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?:

No comment

### 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?:

No comment

### 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?:

No comment

## 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, reducing car parking causes greater traffic in the city centre as driver hunt around for spaces. Good quality parking should be provided both in the centre and on approaches.

### MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

No comment

Not Answered

### 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?:

Probably, but first ensure all existing houses in the area around aberdeen have access to a decent broadband signal. I live 2 miles from Bridge of Dee and have and cannot obtain high speed broadband.

### 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

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?:**

No comment

### **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?:**

No comment

### **MAIN ISSUE 7 Heat Networks**

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

No comment

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?:**

No comment

### **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?:**

No comment

Not Answered

## **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 sites should be chosen with care to site residents in areas with extremely good public transport links. For this reason it does not make sense to include affordable housing in all developments - particularly those on the borders of the city.

### **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?:**

We should not be supporting build to rent development

## **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?:**

The key issue is to provide good frequent public transport to both new developments and existing communities. The cancellation of council funded buses is isolating the elderly.

Not Answered

### **MAIN ISSUE 10 Residential Care Facilities**

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

No comment

Option 3 - Alternative Option

### **MAIN ISSUE 11 Student Accommodation**

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

Option 3 - Alternative Option

### **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 3 - Alternative Option (25%)

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

I would rather HMOs are restricted to areas for which they are suitable, i.e. good transport links, rather than being scattered over a wider area.

**Geographical boundary of each area:**

Option 2 - Alternative Option (Intermediate Data Zones)

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

Seems the most practical

**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:**

I would have said 4 or more unrelated people, but that option wasn't available.

## **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 - but a greater priority should be to provide more frequent ordinary disabled (or indeed non-disabled) toilets. People with many of the issues cited and elderly people can need to visit toilets with greater frequency and less warning than other people. The current sparcity of toilets in Aberdeen means that any outing has to be planned with great care.

## **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?:**

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

**Do you have any comments on the 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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B1308 Royal Devenick Park Phase 1

I strongly object to this development for the reasons listed below:

- This is a green belt site which is clearly visible from many parts of Aberdeen. Its destruction would have a significant detrimental effect on the landscape setting of Aberdeen. It is used by numerous people for recreation (walking, cycling, etc), thus, this development would remove a valuable amenity from the population.
- The development would represent unnecessary urban sprawl pushing housing into the countryside rather than making use of brownfield sites within the city. Whilst it is next to the recent small Deeside Brae development, whereas that development was tucked between existing housing and the A90, this development would cover a large area of farm land and be surrounded on 3 sides by fields and open countryside. This is against the council's policies. Further this is a large proposal and represents simply the first stage of an even more massive development.
- The site has no public transport links. (The buses that used to serve the area have been recently discontinued). It is too far from the city centre, and on too steep a slope to favour walking. Indeed the development would sever existing footpaths. There are no cycle paths or footpaths. Thus, the development would increase car usage and, in particular, increase congestion at the bridge of Dee pinchpoint.
- The development would result in the destruction of the historic Causey Mouth road. Assumedly substantial road upgrades would be required.
- The site is too far from shops and recreation opportunities at Garthdee (>1mile) to encourage residents to use walking or cycling to access these. It is a greater distance (>2miles) to any major employment centres. Thus, residents in such a new development would be reliant on city infrastructure which they would have to access by car.
- The area has a substantial slope to the North. This will make much of it unsuitable as building land. (The assessment on the MIR report that it is "relatively flat" is incorrect). The slope will also lead to significant water runoff if the site is developed.
- An increase in water runoff from the site will increase the existing problem of flooding on the South Deeside road. In addition, runoff is likely to cause contamination of the River Dee.
- Waste water systems in the area are overloaded. It is likely that waste water would have to be routed across the Dee causing a substantial environmental concern.
- The Den of Leggart, nature conservation site lies within the site. This has been designated a Prime Landscape area to preserve ancient woodlands and several protected species.
- The type of development proposed is completely inappropriate to a countryside location. The developers propose ten six story blocks of flats. This image provided by the developers looks more like an Eastern European town in the communist era than a Scottish village development. (Note that the angle of the image hides the slope of the site. In reality these sky scrapers would be visible from the whole of Garthdee).
- As the development would be on a North facing slope it will derive little benefit from solar gain and will be subject to high winds common in the area. Hence, residences are unlikely to be energy efficient.

## **Additional Files**

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

C:\Users\le2k\OneDrive - Marathon Oil Company\Personal Work\Home\branchoryleggart\B1308 Royal Devenick Park Phase 1.docx was uploaded

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