

## Response ID ANON-B3JU-DSZS-R

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

#### What is your name?

**Name:**

Chris Miller

#### What is your organisation?

**Organisation:**

Avison Young

**On behalf of:**

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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?:**

No comments.

#### 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?:**

No comments.

##### 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 comments.

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

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

B08/03 (Resource Centre City Hospital): Any proposed retail development on the site should be of a limited scale so as to protect the primacy, vitality and viability of Aberdeen city centre.

City Centre Masterplan (The 7 City Centre Masterplan intervention areas will be identified as Opportunity Sites): See comments within page3 'Aberdeen City Centre and the Network of Centres'.

##### 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 comments.

### 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?:**

Whilst we do not object in principle to modifying the city centre boundaries, sufficient safeguards should be put in place in order to protect and prioritise the City Centre Retail Core as the most sequentially preferable location for town centre related uses. Sites currently outwith the boundary of the city centre which would subsequently be included within its boundaries as a result of the modification (e.g. North Dee, Torry Waterfront and Castlegate /Castlehill) should be appropriately controlled in terms of use, scale and density to ensure the continued primacy of the City Centre Retail Core and to prevent dilution of its status by permitting significant retail/leisure destinations in outlying areas of the city centre boundary.

#### 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. Proposals which would contribute to delivering the aims and objectives of the City Centre Masterplan should continue to be supported. However, uses and forms of development that Aberdeen City Council expect to be brought forward within such areas should continue to be defined within the LDP.

Projects such as the Bon Accord Centre (CM07), St Nicholas Centre (CM09) and reinstating the central role and enhancing the attractiveness and connectivity of Union Street, as well as improvements to St. Nicholas Street and Market Street are essential for the future of Aberdeen city centre as a destination and should therefore remain as some of the key priorities for the city centre.

As set out in our previous pre-MIR submissions - the emerging LDP should prioritise working with relevant stakeholders and owners of city centre development opportunity sites to explore partnerships and funding mechanisms (such as a Growth Accelerator Model) which could help to bring forward development proposals and assist in the delivery of LDP objectives to improve quality and diversity and enhance the vitality and retail attractiveness of the city centre.

#### 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 are supportive of proposals that would reinstate Union Street and establish stronger retail linkages north and south between the existing shopping centres at Bon Accord and Union Square.

#### 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:**

No comments

#### 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?:**

Development proposals which generate significant levels of footfall should continue to follow the sequential approach, and the primacy of Aberdeen City Centre as the regional centre should continue to be protected. Proposals which could in any way negatively impact upon the vitality and viability of Aberdeen City Centre should continue to be resisted.

One of the key objectives of the Aberdeen and Shire Strategic Development Plan is for 'Aberdeen city centre to remain one of the top-20 retail areas in the UK'. We are of the view that quality and not necessarily quantity is what makes the top retail destinations in the UK stand out from the rest. Whilst retail provision in Aberdeen city centre is strong, the offer is a little fragmented and lacks quality in some areas, particularly on Union Street, and that the shopper experience could be greatly improved. Recent planning approvals within the city centre and identified 'Intervention Areas' included within the 2015 City Centre Masterplan (CCMP) seek to tackle this, and are broadly welcomed within the proposed LDP.

Given the structural changes in retail and the on-going impact of digital shopping platforms, it is even more essential to maintain focus retail spend within the city centre. A new out of town retail park would inevitably be in direct competition with Aberdeen city centre as a shopping destination and would certainly have significant direct and indirect impacts on consumer expenditure to the city centre through shopping and other associated linked trips.

Furthermore, it would go some way to undermine the ability of Aberdeen City Council to continue to attract investment and the implementation of strategically important allocations within the city centre and would be massively detrimental to the vitality and viability of the city centre as a whole.

An out of town retail park would also undoubtedly lead to further pressure on city centre rental rates and more attractive terms outwith centres. Furthermore, Aberdeen city centre would be afforded no protection to prevent existing retailers within the city centre seeking to relocate to such areas, and would undoubtedly lead to the closure of units currently occupied by operators with existing dual representation within the city centre.

It is essential that investor confidence for the delivery of investment in Aberdeen city centre is maintained. Whilst it might be easier for a developer to deliver development (for example an out of town retail park) on a greenfield site; the more challenging development proposals, such as those within the city centre, require a greater level of confidence in the certainty of development plan policy in order to deliver them. For example, town centres can require considerable investment to upgrade existing spaces and improve public realms. Such sites are also often within multiple ownership, subject to heritage constraints, or are hindered by servicing and access challenges. These factors can impact on viability, overly complicate and ultimately derail development aspirations, even with the support of local planning authorities. Such issues make the prioritisation of town-centre-first development even more important.

We therefore strongly advocate that the City Centre should remain the focus for accommodating any identified capacity for additional comparison retail floorspace within the city-region and that the council continues to resist pressure to allocate additional sites outwith 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?:**

Yes. Commercial leisure uses can generate significant levels of footfall. In the first instance, these types of developments should therefore follow the sequential approach and be directed to existing centres.

#### **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?:**

No comments.

#### **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. The LDP should include specific policy support for residential use/development in the city centre. However, providing support for residential development should not compromise the ability of commercial premises to operate uses associated with the evening and night time economy (e.g. music, entertainment, restaurants, pubs, clubs, cinema, etc).

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?:**

No comments.

#### **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?:**

Yes. High footfall generating developments should continue to be supported within the City Centre. Emerging City Development Plan policy could possibly look to identify areas within the city centre which are considered most suitable to accommodate 24 hour activities, although with caveats of protecting reasonable levels the amenity for existing and planned residential and/or otherwise sensitive occupiers. The promotion of 24 hour activities in Aberdeen City Centre Retail Core such as the Bon Accord Centre would be an obvious area of consideration.

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?:**

No comments.

#### **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?:**

No comment.

#### **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?:**

No comments.

#### **MAIN ISSUE 3 Support for Visitor Attractions**

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

No comments.

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 comments.

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 comments.

#### **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 comments.

#### **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 comments.

### **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 comments.

#### **MAIN ISSUE 5 Electric Vehicle Charging Infrastructure**

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

No comments.

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?:**

No comments.

#### **Question 21 Developer Obligations and Infrastructure Delivery**

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

No comments.

### **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 comments.

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 comments.

#### **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 comments.

#### **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 comments.

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?:**

Yes. Existing business and industrial areas should be safeguarded against development pressures for alternative forms of development, particularly against pressures relating to retail and leisure related developments in areas outwith defined city centre boundaries.

## **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 comments.

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?:**

No comments.

### **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?:**

No comments.

## **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?:**

No comments.

Not Answered

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

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

No comments.

Not Answered

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

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

No comments.

Not Answered

### **MAIN ISSUE 12 Houses in Multiple Occupation**

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

No comments.

Not Answered

**Percentage limit of HMOs in each area:**

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

No comments.

**Geographical boundary of each area:**

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

No comments.

**Threshold for when planning permission is required for a HMO:**

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

No comments.

### **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 comments.

### **Question 28 Changing Places Toilets**

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

No comments.

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

### **Policy D2 Amenity**

**Do you have any comments on the policy?:**

No comments.

### **Policy D5 Advertisements and Signage**

**Do you have any comments on the policy?:**

No comments.

### **Policy D8 Shopfronts**

**Do you have any comments on the policy?:**

No comments.

### **Policy D9 Windows and Doors**

**Do you have any comments on the policy?:**

No comments.

### **Policy H4 Housing Mix and Housing for Particular Needs**

**Do you have any comments on the policy?:**

No comments.

### **Policy H8 Residential Care Facilities**

**Do you have any comments on the policy?:**

No comments.

### **Policy H9 Student Accommodation Developments**

**Do you have any comments on the policy?:**

No comments.

### **Policy H10 Houses in Multiple Occupation**

**Do you have any comments on the policy?:**

No comments.

### **Policy NC9 City Centre Living**

**Do you have any comments on the policy?:**

No comments.

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

**Do you have any comments on the policy?:**

No comments.

### **Policy NC11 Visitor Attractions and Facilities**

**Do you have any comments on the policy?:**

No comments.

**Policy NC12 Public Art Contribution**

**Do you have any comments on the policy?:**

No comments.

**Additional Documents**

**Please include comments on other documents below:**

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No comments.

**Additional Files**

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

No file was uploaded