

## Response ID ANON-B3JU-DST9-R

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**  
Submitted on **2019-05-13 15:19:30**

### About You

What is your name?

Name:

P

What is your organisation?

Organisation:

None

On behalf of:

Me

How can we contact you?

Email:

[REDACTED]

Telephone:

Address:

### 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

#### 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 comment other than the fact that there is already too much development for a city in decline

##### 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. Not until actual plans are developed to show a requirement. Oil is in decline and the requirement for homes is declining.

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

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

no comment

##### 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?:

##### 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?:

If so what are plans to deal with what used to be core like west end of union street?

#### 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?:

#### 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?:

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?:

Option 1 - Current Approach

#### 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?:

Option 1 - Current Approach

### 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 market will decide.

Option 1 - Current Approach

### **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?:**

### **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?:**

No. The current restrictions are exacerbating the city centre retail decline.

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

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

Take care. Who says electric cars will be the next technology? A lot of infrastructure is required and the state cannot afford to provide all. The petrol distribution companies will move - when it is economic to do so. Besides what about hydrogen?

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?:**

Yes but how do you check?

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

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

Yes because the current uncontrolled development of the city is creating an inner of derelict buildings. There are thousands of inner houses for sale and they are not selling. New developments need to be constrained. What is the point of building a new house at countreswells only to have the inner city 'exchange' unable to sell? You should look at the library photos of Aberdeen pre oil - ie 1960-69.

## **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?:**

Green sustainable ideas are all well and good. However even if the UK were to cease all CO2 emissions Global warming would continue. The UK is only responsible for 1% of emissions. If you want to make progress then impose restrictions on China and US and India.

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?:**

No. You need to prove they are economic without subsidy.

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

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

If economic on an unsubsidised basis.

Option 1 - Current Approach

#### **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. Aberdeen needs to support all possible economic development to replace oil.

#### **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?:**

The decline will continue. Residential development should be supported where viable but not to the exclusion of all office development.

Option 2 - Preferred 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?:**

You should be careful with your use of statistics. To say that average prices of houses in Aberdeen is higher than the average in Scotland is like saying a strawberry is more expensive than a blackberry. What is the average house in Aberdeen - 4 bed? What is it elsewhere- 3 bed? It is a fact that house prices in aberdeen (old stock) are now cheaper than the cost of building a new house on the same site. If the council wants to provide affordable housing then buy up all the inner city stock which is now selling below rebuild cost!

##### **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?:**

Do nothing. The massive surplus of property in the city resulting from the exodus of oil employees should be allowed to disipate before any action is taken.

#### **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?:**

None of the LDP plans are appropriate. Most 'senior citizen' accommodation needs to be near support facilities such as doctors, dentists, shops. Placing requirement on builders in the suburbs may not provide this.

Not Answered

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

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

economics drives development when there is a proven need.

Option 1 - Current Approach

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

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

Policy H9 appears on the first look to be reasonable but it ignores the cause of the problem. The over expansion of student accommodation blocks without checking with the University on likely student numbers and the Universities own plans for its own accommodation. This has resulted in very expensive accommodation units (Â£1200pa!!) being developed by unscrupulous developers/investors advertising 10% net returns on investment.

This will ultimately result in redevelopment proposals in a city flooded with empty accommodation - in the wrong place.

Unfortunately the new proposals are not suitable. Only the current approach is workable IF common sense is applied: Is there a need supported by the Universities/Colleges? So there should be SUPPORT from the universities for development.

Option 1 - Current Approach

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

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

I am totally against any planning restrictions or involvement on HMOs. Firstly the original introduction of HMO legislation was to protect vulnerable persons by ensuring they had a proper standard of housing. A later modification of the legislation was based upon a false premise that such vulnerable persons located in HMOs were anti social. There was no equivalent legislation on any householder. Therefore it was discriminatory. Aberdeen University has been in existence for 500 years and throughout this period students have lived without hassle in the community. Since 2011 the local, unrepresentative, community council been

pursuing an anti student policy. This is evidenced in their newsheet: The auld toon news. Because their claims have been shown to be false they are now pursuing a planning policy under mixed communities. There is a simple reason why HMOs exist - there is a demand. There is a simple reason why 'families' are not locating to inner city areas: Councils are providing more attractive houses in the suburbs. The inner city houses are old and need to be refurbished. Natural market forces. There are currently many houses on sale for 3 or more years so there are plenty of opportunities for families to move into the area. Restricting the use of a house will not help the housing crisis. Examples over the last 2 years: House which was an HMO housing 4 students purchased by a refugee family. House which was housing 5 students now purchased by an unmarried couple of research students. Two houses on sale for 3 years at prices below rebuild costs. 2 bed flat converted by self employed plumber into a 4 bed flat bought by student to house 4 students. Local residents object to students when HMO application made! The market is the only way to manage the market. Natural supply and demand. If there is no demand for student housing then a HMO will not exist. However there has been demand in the area for 500 years. On the basis of fact putting unwanted restrictions on who can or cannot live in a house will distort the market. Is the Council going to compensate owners who are unable to sell their houses because of a council imposed restriction?

Option 1 - Current Approach

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

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

There should be no restriction. This is discrimination. How would you like it if you were told you could not live in an area because there were too many of your sort? Read the definition of discrimination. It includes a restriction on age. Students are young. Hence this is discrimination by age.

**Geographical boundary of each area:**

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

There should be no discrimination. See above.

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

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

There should be no restriction. Proposals by the council which have been put out for consultation have been rejected each time. These proposals are intended to avoid consultation because few members of public will be aware.

**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?:**

Yes. Do not try to manage where people can or cannot live. Tampering with freedom of choice will have unintended consequences.

**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?:

**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?:**

There should be no policy. This proposal is aimed at deciding who can or cannot live in a house. That is discrimination. How would you feel if this were applied to YOU. Market forces should be used as is the case in any free country. There are sound reasons why change takes place. Putting restrictions in place does not solve the issue. The issue is that families want to live in the nice house in the suburbs and students want to live next to their work. What is wrong with that?

**Policy NC9 City Centre Living**

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

No

**Policy NC10 24-hour City**

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

Do those living in the city want a 24 hour city. Is there any co-ordination in this LDP?

**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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**Additional Files**

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

No file was uploaded