# Response ID ANON-B3JU-DSTK-A

Submitted to Local Development Plan Main Issues Report 2019 Consultation Submitted on 2019-05-13 16:19:41

# About You

What is your name?

Name: Bill Harrison

What is your organisation?

Organisation: none

On behalf of:

How can we contact you?

Email:

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## Address:



# **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?:** I disagree with the allocation of site B01/06 (Cordyce School). Reason: it is zoned as green belt and is valuable public amenity land.

## 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 comment

## **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 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?:

Yes. Reason: to ensure that a coherent and 'joined-up' development policy is applied.

## **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. Reason: these OPs should be governed by masterplans to ensure coherent and sustainable development.

#### **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?: Yes. Reason: the present retail core is unsustainably big.

# **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 comment

#### **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?: High-footfall uses should be directed to the city centre and network of centres and out-of-town retail parks should be not permitted. Reason: to support the economic vitality of 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.

#### **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?:

Pedestrianisation of streets and control of antisocial behaviour.

## 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 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 comment

#### 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. Presumably '24-hour activities' refers to alcohol sales and gambling. These may generate revenue for the city but the costs in terms of loss of amenity, crime and disorder and short- and long-term health effects are far too high.

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?:

No comment (but Aberdeen will never be Edinburgh)

#### **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 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?: Yes. This has the potential to really enhance public spaces.

#### MAIN ISSUE 3 Support for Visitor Attractions

To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?: A new focused policy is needed.

Option 2 - Preferred Option

# **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 preferred option should improve the quality of residential developments but it is hardly consistent with the recent approval of the re-designation of the Triple Kirks student flats.

Option 2 - Preferred 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?: The highest standard of external amenity space should be a requirement.

## **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?:** Yes although I don't much I ke the work 'infrastructure' for descr bing green space.

#### **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 comment

## MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

How best can we encourage the provision of infrastructure to support changes in transport technologies? : This will help to maintain Aberdeen as a leader in sustainable transport technology

Option 2 - Preferred Option

# **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. This is absolutely essential in new developments and as fundamental as indoor plumbing...

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

Do we need to change our approach to securing developer obligations for future development proposals?: No

## 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?:

Yes, to must effectively combat climate change

Option 2 - Preferred Option

# 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?:

Yes, these are an important 'clean' energy source

#### MAIN ISSUE 7 Heat Networks

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

Option 2 - Preferred Option

#### **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, but the environmental costs of flying should be explicitly stated

## 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?: To help revitalise the area

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?:

Yes. There should be a developer contr bution for all developments (from one unit upwards).

#### 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 comment

## 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?: There should be a 'housing mix' policy

Option 2 - Preferred Option

### MAIN ISSUE 10 Residential Care Facilities

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

Not Answered

No comment

#### MAIN ISSUE 11 Student Accommodation

## How can the Local Development Plan cater to proposals relating to student accommodation?: The preferred option will lead to more 'Triple Kirks' scenarios

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?: HMOs are a blight on amenity in some areas of the city and need to be controlled

#### Option 2 - Preferred Option

## Percentage limit of HMOs in each area:

Option 1 - Preferred Option (15%)

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

# Geographical boundary of each area:

Option 1 - Preferred Option (Ward Boundaries)

Please explain why you chose your answer:

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:

## **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?: No comment

# **Appendix 1 Proposed Draft New Policies**

#### Policy D2 Amenity

**Do you have any comments on the policy?:** Good to see that air quality is mentioned.

# Policy D5 Advertisements and Signage

Do you have any comments on the policy?: 'sensitively sited' is pretty vague...

# **Policy D8 Shopfronts**

Do you have any comments on the policy?: No comment

## **Policy D9 Windows and Doors**

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

# Policy H4 Housing Mix and Housing for Particular Needs

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

## **Policy H8 Residential Care Facilities**

Do you have any comments on the policy?: No comment

# **Policy H9 Student Accommodation Developments**

## **Do you have any comments on the policy?:** This policy makes it too easy for a developer to re-designate student flats as general accommodation

# Policy H10 Houses in Multiple Occupation

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

Policy NC9 City Centre Living

# Do you have any comments on the policy?: No comment

# Policy NC10 24-hour City

# Do you have any comments on the policy?:

Aim (5) is not realistic and this policy does not properly consider the costs of crime and disorder and the short- and long-term effects of 24-hour alcohol on-sales and gambling.

# Policy NC11 Visitor Attractions and Facilities

Do you have any comments on the policy?: This is very vague...

# Policy NC12 Public Art Contribution

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

# **Additional Documents**

# Please include comments on other documents below:

Please include comments on other documents below:: No comments

# **Additional Files**

If you have further information you would like to provide you may upload it here.: No file was uploaded