

## Response ID ANON-B3JU-DST7-P

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**  
Submitted on **2019-05-13 16:42:55**

### About You

**What is your name?**

**Name:**

Frank Whitaker

**What is your organisation?**

**Organisation:**

Park Inn by Radisson

**On behalf of:**

**How can we contact you?**

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### 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 thank you

### 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?:**

Yes, it makes sense for them to be aligned.

#### 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?:**

6 of the Intervention areas mention use class 7, Hotels and Hostels, but are not specific about size or quality grading. This should be addressed. Aberdeen's

under-supply of hotel bed stock to service the demand generated in the Region is a thing of the past. With circa 3,000 additional hotel rooms open, the impact on the Region's hospitality sector is potentially negative unless stricter planning guidelines are implemented.

In 2014, at the height of the market, STR reported the following for Aberdeen:

- 76.9% Occupancy
- £97.40 Average Rate
- £74.87 Revenue per Available Room (RevPAR)

in 2018, the reported STR figures were:

- 64.2% Occupancy
- £56.16 Average Rate
- £36.03 RevPAR

RevPAR is the true measure of the sector's profitability so, whilst Occupancy levels have flattened and recently shown modest growth, market conditions mean that the Average Rate is unlikely to regain the same level. The concern for hospitality is the reputation of the destination and in this respect there are two points:

1. Such a reduction in profitability potential puts real pressure on investment in the quality of existing product and people
2. More low star, or Hostels, opening, depresses customers' price expectations and attracts a customer with lower disposable income. Lower prices also drive lower RevPAR, which further reduces investment capability

The LDP must recognise this and specify the quality grading required to meet the demand considered from the Region's investment strategy.

### **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?:**

Out of town retail parks will result in footfall leaving the city centre and delivering fewer reasons for weekend leisure customers from Aberdeenshire to stay in 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?:**

### **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?:**

Support for city centre living should recognise the growing number of residential premises now operating in the Air B'nB style business. Licensing requirements should be considered to entertain a level playing field with the hospitality sector, and to avoid the residential areas becoming transient areas rather than communities. Main Issue 12 should also refer to this.

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?:**

### **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?:**

The policy should encourage pedestrian areas of the city centre, promote cycling as a priority over cars, and look at lighting and social spaces.

Policy should also include the quality grading and positioning of new hotel/hostels. Lower quality grading placed in the city centre will downgrade the price point expectation, leading to a lower quality night time experience.

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 £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?:

Yes, absolutely.

However, does planning policy support an environment designed to complement the tourism vision for the region? The LDP has several references to use class 7, Hotels and Hostels, but no reference to hotel accommodation and how the LDP will specifically support sustainable accommodation provision.

The headline mission of VisitAberdeenshire is to deliver a sustainable contribution to the prosperity of the North-east through growth in tourism, with a target of £1bn in visitor spend by 2023. Core target markets, such as business events, returning cruise visitors, and golf visitors, imply a focus on premium, high value visitors – with accompanying requirements in terms of accommodation.

Sustainable growth is a core principle of this vision, and key performance indicators for the strategy include weekend RevPAR. As highlighted in the Aberdeen Economic Policy Panel report, average room rates for Aberdeen city hotels have declined and RevPAR levels for both weekday and weekend occupancy have also declined substantially from 2013/2014 peaks.

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The Destination Strategy outlines the requirement for investment from hotels, for example, in their business events infrastructure and capability. Investment in our hospitality and tourism premises will be critical to secure sustained interest from the target markets.

A clearer focus on the quality levels of accommodation desired for the City will be essential to deliver a sustainable tourism vision. Equally, overprovision of bedroom stock in the city centre, particularly in low star bandings, will act to put further pressure on room rates, which will impact profitability. Flat occupancy rates and substantially reduced RevPAR will limit the ability of hotel providers to invest and provide the quality of accommodation for the focus audiences outlined in the tourism strategy.

Local Development Plans for other Scottish cities, such as Dundee, have a presumption against additional visitor accommodation in certain areas of the City, concentrating investment into core areas and consolidating bedroom stock in development areas such as the Waterfront. Edinburgh's current Local Development Plan also outlines a specific policy on Hotel Development, which contextualises objectives in terms of predicted bedroom stock and core development areas.

Fundamentally, without further consideration, the MIR and subsequent LDP may not address this challenge for accommodation providers in the region, and its interaction with VisitAberdeenshire's objectives and shared our regional economic strategy. The proposed Strategic Development Plan for Aberdeen City and Shire outlines that: "Local Development Plans should consider opportunities to ensure the importance of sustainable tourism to the regional economy is properly recognised and safeguarded. The importance that the historic and natural environment makes to sustainable tourism must also, however, be properly recognised."

Within this current consultation, it's challenging to see a route to ensure this is appropriately recognised. Any future Local Development Plan should attempt to set a clearer framework in terms of hotel provision. Specifically, this should take a more active role in specifying quality standards for future provision, which is cognisant of the sustainable growth element of both the tourism strategy, and the strategic development plan for the region. The LDP should consider, as with Edinburgh and Dundee, a more defined framework for the types of accommodation specified within certain districts / zones of the City.

Tourism is already one of Aberdeen's key growth sectors. To support its long-term sustainability, the Local Development Plan for the City should prioritise high quality, distinctive or niche accommodation opportunities which work in concert with the region's destination marketing strategy to generate growth and investment. The LDP should specify the type of bedroom stock which the Aberdeen City Region needs to augment its current capacity, while presuming against uses which may act to drive down RevPAR and room rates for existing providers, impacting on investment intentions.

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?:

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?:

#### 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?:

The introduction of cycling and pedestrianisation will reduce the number of cars coming into the city centre. Copenhagen have a great model where the hierarchy of importance (and right of way on the roads) is

1. pedestrians
2. cyclists
3. vehicles

### MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

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

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?:

#### Question 21 Developer Obligations and Infrastructure Delivery

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

## 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?:

Option 3 - Alternative 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?:

#### 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?:

### 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 3 - Alternative 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?:**

#### **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?:**

Provided consideration is given to specifying the quality grading requirements of the Hotels and Hostels

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?:**

##### **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?:**

#### **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?:**

Not Answered

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

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

Not Answered

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

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

Not Answered

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

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

HMO licensing should also consider Air B'nB style business licensing to avoid an area becoming transient residential as opposed to creating a genuine community.

Option 2 - Preferred Option

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

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

**Geographical boundary of each area:**

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

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

Option 2 - Alternative Option (3 or more people in a flat, 6 or more people in a house)

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

Supports licensing requirements for Air B'nB businesses

##### **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?:**

**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?:

**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?: