

**From:** Smith, Jonathan Aitken [REDACTED]  
**Sent:** 13 May 2019 19:59  
**To:** LDP  
**Subject:** LDP MIR - CPCC & FGSG: Response to Consultation, May 2019  
**Attachments:** LDP Consultation - CPCC Response (Draft V1.0) (May, 2019).doc; MIRresponseFromFGSG-Final (13th May, 2019).docx

Good evening,

As part of the Local Development Plan - Main Issues Report consultation, please find attached responses presented on behalf of:

- Castlehill & Pittodrie Community Council
- and
- The Food-Growing Steering Group

Please note that the second response is presented on behalf of the 'Food Growing Steering Group' as a whole, rather than on behalf or in the name of its individually constituent representative members, as included in the response's introduction.

As always, if there is any further information required or future updates to the LDP over the course of its continued to development and delivery that is helpful for members to consider and consult on with our communities, you are very welcome to get in contact and let us know.

Sincerely,

Jonathan Smith

*Jonathan Aitken McLeod Smith*

*Castlehill and Pittodrie Community Council,*

*Aberdeen Community Council Forum, Chairperson*

*Aberdeen Civic Forum, Chairperson*

[www.cp-cc.org.uk](http://www.cp-cc.org.uk)

[www.cforumaberdeen.com](http://www.cforumaberdeen.com)

[www.civicforumaberdeen.com](http://www.civicforumaberdeen.com)



Castlehill and Pittodrie Community Council

*May, 2019*

Local Development Plan – Main-Issues Report Consultation

**Local Development Plan: Overview of Recommendations**

Heritage & Built Environment (including City Centre)

*Example: Castlegate*

- The Community Council continues to recommend as a priority, the maintenance and upkeep of paving and buildings along and adjacent to Union Street and King Street, including frontages and upper floors. This should include encouraging more use of floors beyond ground level, including as housing, office space and more.

- Maintenance and upkeep of roads, and in particular of pavements along, adjacent to, leading to and from Union Street and Castlegate.

This should include making sure that historic cobbles are retained but while also making sure they are not loose, are not left to crumble and are part of smooth surface.

This is particularly important in adverse weather conditions to reduce injuries and strong concern for those experiencing mobility issues to ensure that the surface is suitable for wheelchairs, prams, zimmer frames, walking sticks and other mobility devices.

Public Transport – Union Square, Station Gateway

- Public transport and pedestrian access for the 'Station Gateway' ensuring that is connectivity between the Union Square and Harbour areas with 'city centre', West End, East End and Castlegate areas.

This should also include accessibility to and amenity in the bus stations and train stations and for the car parking at Union Square, to ensure that there are options for mobility beyond the mall space.

This would ensure that those arriving to the train, bus stations and car parks do not feel confined to Union Square and can use the site as a transport hub for access into the wider city.

This would also mean that there is the opportunity for those visiting the surrounding city to also have access to Union Square as part of their journey, therefore providing a commercial benefit to local businesses, to the mall and strengthening public transport and pedestrian links.

### Management and Sustainable Tourism

- There should be further consideration given to the management of sustainable tourism, to ensure that there is adequate provision in place for those visiting the city and to ensure that this does not result in a detrimental impact to those living in areas of interest such as Fittie / Foot Dee and other areas in the city.

This is especially important as tourism is an identified priority within the City Council's Economic Strategy and the Regional Economic Strategy.

### Air Quality

- Further improvement for air quality throughout the city, particularly in identified 'Hot-Spots' / 'Zones of Concern' such as Union Street, Market Street and other places throughout the city.

These areas continue to have low air quality and have among the lowest air quality in Scotland, UK and Europe.

This should also include stronger and more robust procedures for monitoring areas of likely emissions and *potential excess emissions* such as the Incinerator / Energy from Waste facility.

### Variety of Activities

- Greater variety of activities including entertainment, recreation, leisure and activity which should have the ability to include, but should equally not have to depend upon the consumption of alcohol as the sole or exclusive focus.

This should lead to greater dialogue between planning and licensing, to ensure that the kinds of developments (and development zones) encouraged take this into account and promote a greater variety.

This is particularly important for the health of our city's population and our communities as the consumption of alcohol is identified as a priority in Aberdeen in many of the 'Aberdeen Health and Social Care Partnership' Locality Plans, as well as a national health priority for Scotland.

This would also ensure greater economic success and sustainability as increasingly young people and visitors to the city, whether for business, education or tourism are looking for activities which do not depend on alcohol as the focus.

### Public Transport, Community Links

- Greater connectivity between communities, as well as through central transport hubs, such as the routes recently commissioned to Stagecoach and First Bus by the City Council.

This is particularly important when certain routes and transport links have faced reduction of frequency, times of operation or even being withdrawn altogether. In ongoing consultation and engagement with our community, we hear often how relied upon these public transport links are to many within our communities and particularly for those who have little to no other option of alternative travel.

- It is good to see that there is the recommendation of connecting Regional Centres, Town Centres,

District Centres, Neighbourhood Centres and Commercial Centres with public transport and other transport.

This should also include connections to pockets of communities and rural location where required.

- Consideration given to rail links throughout Aberdeen and branching further into North and North-East, to secure Aberdeen's place as a 'Gateway' destination, as well as a place to visit, learn and do business in, in its own right.

As this proceeds, there must be account taken to ensure that there is not a detrimental impact on the environment, on ecosystems or on those living and travelling near the potential rail lines.

### Local Business Support

- Further support for local businesses, such as cafes, restaurants, artisans, crafts and more which are unique to Aberdeen and unique in the world.

In the context of planning and scope of the LDP (Local Development Plan), we must ensure that we are supporting the development of an environment which enables these opportunities to thrive.

This is important for our economic success as the absence of unique places leaves only franchise and international brands which can be found anywhere else in the world.

It is the local and unique places which give a unique sense of place, character and communities for those visiting but also living in the city.

This would also ensure a shared success, reaching more levels of wealth and income and would enable and encourage an environment of entrepreneurship, in addition to finding employment in already existing larger companies.

### Heritage (including Granite and Materials)

- It is excellent to see and we fully support the original LDP (Local Development Plan) recommendation of the Re-Use of Construction Materials, particularly in consideration of heritage such as granite and other historically significant materials.

This should also include a concerted effort to preserve the upkeep and preservation rather than demolition of granite buildings, cobbled streets which are part of the distinct character and heritage of the city.

### Vertical Development (Big Buildings)

- In the place-setting and positioning of termed 'Big Buildings', there should be consideration given that they do not overshadow or overcrowd but instead compliment iconic landmarks and sought after views and lines of sight and light.

### Water Quality

- We welcome the City Council's proposed commitment to the 'EU Water Framework Directive' to ensure good population health, preservation of aquatic ecosystems and economic benefits through clean water, and we very much support this commitment being adhered to in the future.

### Public Health Standards

- If and when the UK withdraws from the EU, we propose that the standards of Water Quality, Air Quality, Hazardous Materials, Noise Levels and all other Public Health priorities remain at least as strong in their standards as they are currently, and are not reduced in their aims for improving and protecting our city's population's health.

#### Public Health (Wi-Fi / EMF)

- There must be continued dialogue with NHS, WHO and other health organisations in the design and development of 'Mobile Broadcast' (EMF) infrastructure throughout the city. Mobile Phone Towers, Wi-Fi, Wireless Broadcasting, Electro-Magnetic Fields are currently classified by the World Health Organisations as 'Possibly carcinogenic to humans (Group 2B), a category used when causal association is considered credible, but when chance, bias or confounding cannot be ruled out with reasonable confidence'.

While we recognise the importance of the city's digital infrastructure, there should also be consideration given to protecting public health when we consider where this infrastructure is placed in relation to our resident communities, as an ongoing field of research and assessment.

#### Innovation and Research Support

- It is excellent to see that there is the recommendation of the Aberdeen Energy Park and Aberdeen Innovation Park as areas which support Aberdeen continuing to lead globally on research and development in the Energy (including Oil & Gas and Renewables) and other industries.

However, we must also look beyond these industries to look at supporting emerging fields and industries of city-wide, regional and national importance to ensure that we build on our heritage of Oil & Gas and ensure that the benefit translates into other industries.

In addition to, or potentially as part of these Innovation & Research Hubs, there should also be consideration given to more locally based areas to ensure that the benefits of this priority makes a difference to all of our communities and citizens.

#### Affordable and Social Housing

- We very much welcome and strongly support the identified priority of 'Affordable Housing' and 'Social Housing', led by the City Council and in dialogue with Developers and Housing Associations.

A significant number of applications of this type have recently come forward in the Castlehill & Pittodrie area, based in our estimation upon and supported by:

- i) Developer identification of economic opportunity
- ii) Encouragement from the City Council to consider affordable housing, and reassurance that this is welcomed
- iii) Recommendations put forward by the Community Council in consultation with the community

We would like to thank the City Council for its promotion and encouragement of this increase in the provision of Affordable Housing and we look forward to expanding on this positive dialogue and engagement into the next and forthcoming cycle of the Development Plan.

### Green Spaces, and Activities

- We also welcome and strongly support the retention and promotion of green spaces, outdoors physical and sport and leisure activity spaces.

It is important that a selection of these spaces are locally located to communities to ensure that people are able to access them, rather than to be faced with potential barriers of travel cost, travel time or physical mobility.

This should also include the priority of 'sensory experiences' in our green spaces, for example as has been proposed in the current plans for Union Terrace Gardens.

This could include scent and touch of flowers, smooth surfaces for walking, benches for sitting etc.

This sensory interaction can be very stimulating and positive health impact for those experiencing conditions such as Alzheimers, Dementia, Autism, Learning Disabilities and many other physical and neurological conditions.

### Local Place Plans

- The Planning (Scotland) Bill that is currently being considered by the Scottish Government and Scottish Parliament makes reference to 'Local Place Plans' which would secure the right of communities to develop plans that identify issues to be improved and priorities for future development.

Based on engagement and dialogue with a number of colleagues and Officers from the City Council's Planning Department, there has been a very constructive and positive reception to how these plans could feature more prominently toward informing and guiding the development of future Local Development Plans and Strategic Development Plans and Masterplans in particular with the Local Authority.

This could also include a more inclusive dialogue with Developers and other Community Planning and Public Service Partners.

It is our recommendation that we continue to explore how this process can be supported for communities throughout the city, with Community Councils serving as a key link and partner in the formation of the plans, as Statutory Consultees to the Planning Process.

### Aberdeen Beach (Beach Strategy)

- It is important that Aberdeen's Beach is protected and looked after as treasured asset to the city for generations.

This should include a Beach Masterplan, independent of the City Centre Masterplan which consults with local communities to the beach and who have their homes nearby, to ensure that their needs and priorities are taken fully and thoroughly into account as well as the what the wider city may wish to see.

A recent proposal which has come forward in dialogue with local businesses owners is a desire for the Beach Esplanade to feature 'Electrical Charging Points', as it is believes that this would increase the appeal of venturing to the Beach Esplanade area, while also encouraging moving toward air quality and environmental impact improvements of the city's roads network and vehicle emissions.

The Community Council recommend that the availability and spreading of 'Electrical Charging Points' be further explored, including a feasibility study on whether an outlet(s) at the Beach Esplanade / Boulevard area could positively contribute to both economic, leisure and environmental outcomes.

Similarly, part of this should include ongoing engagement with cafes, restaurants and other stores and outlets on, along and around the Beach / Beach Boulevard.

It is vital that the Safety Strategy, such as that developed by the Water Safety Group is given further promotion and prominence to ensure a safe experience for any and all visiting the beach, particularly in relation to the water.

This should also include a robust Litter / Waste Disposal and Recycling Strategy as part of this to preserve and protect this treasured natural asset.

### **Local Development Plan: Main-Issues Report - Specific Questions**

#### **Q.5 - City Centre - Masterplan & Boundary**

##### **Response:**

There have been concerns brought forward from those in the community and in particular from owners and operators of local businesses within the Castlehill & Pittodrie area of the proposal to reduce the scope / boundary of what is defined as the 'City Centre' for the purposes of the Local Development Plan over the future 5+ Years Development Cycle.

There was a consultation exercise conducted in preparation for the most recent Community Councils Elections of November, 2018 to assess where communities throughout Aberdeen defined themselves as being within, rather than following only the geographical map lines, as had previously been the case in much of Scotland.

During this exercise, many residents who live in and around the Castlegate and 'Lemon Street / Beach Front' housing areas reported that they felt to be strongly connected to the 'Castlegate / Castlehill' and 'King Street' communities, as compared to more of an urban business-focused environment of the City Centre.

The concern brought forward however related to the fact that for the Local Development Plan to exclude these areas in its classification of the 'City Centre' could lead to an albeit unintended consequence of reduced investment, support, focus and promotion of which a large number of local small and medium-sized businesses active in these areas feel they are in need of and could benefit from.

It is excellent to see the examples of what can be achieved in supporting both local business alongside surrounding communities in the initiatives brought forward by organisations such as Aberdeen Inspired (Business Improvement District), Greater George Street Traders Association, Traders and Market Stalls, Belmont Street Traders' Faire, etc

The Community Council therefore recommends that either:

**Option 1:** King Street & Justice Lane / Harbour Areas remain within the LDP classification of ‘City Centre’.

**or**

**Option 2:** King Street & Justice Lane / Harbour Areas receive specific, geographically focused support in a similar way as the above listed initiatives.

The Community Council has a significant concern that for neither of these options to be implemented could, again albeit unintended lead to decreased foot-fall, revenue, business activity and ultimately declining quality of experience in and around these areas for those in the community.

#### Q.7

‘Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?’

#### Response:

It is welcome to see continued success of Aberdeen’s shopping centres, particularly in the currently challenging climate facing retail and traditionally structured shopping premises throughout Scotland, UK and wider world.

The Community Council however believes that opportunities for retail should be made available at every possible opportunity, and should be open to and encouraged to as broad a variety of retail outlets as possible, rather than being limited to only existing premises or shopping centres.

Potential Impacts of this proposed policy would include:

- If retail space is limited only to refurbished / developed sites, there would likely be an increase in rates which would lead to the current shop-owners and stall-holders based in the city having to either substantially increase their prices or even having to move out if this likely increase in rent becomes unaffordable.

- This is of concern to us, as it is important that a broad variety of local small and medium sized businesses and independent traders are supported in Aberdeen, and in particular in and around the city centre rather than becoming prohibitively expensive to operate in the area.

- Although it is welcome to see an interest in good upkeep and renovation of a number of premises in and around the city centre, including those which have been in less good state of repair or have been vacant for some time, we believe that in practice this should be possible and able to be achieved without having to become prohibitively expensive or limited in scope for the current or future businesses.

- This could include space within the city centre dedicated to unique, locally significant market spaces, or potentially a rent-freeze deal extended to the current stall holders and operators, to ensure that they can afford to continue to operate in the areas.

*Examples of application of this model, in limited but focused capacities include NYC, where there is*



*currently being experienced the **ninth consecutive year of visitor & tourism related economic growth, attributed in important part to the offering of unique, locally relevant businesses, operators, outlets, food & drink, activity and retail - in contrast to previously tested models of dependence upon exclusively chain and brand stores.***

- Particularly at a time of financial difficulty for many in Aberdeen, throughout the city but also for those in particularly vulnerable circumstances have access to locally based affordable goods and services, as provided by those currently operating in the area.

- Similarly, at this time of economic challenge facing the retail sector we believe that the most sustainable, and similarly, most financially and economically viable solution is in **encouraging and facilitating an environment where local business, including retail can thrive and succeed**, rather than enforcing an artificial limitation on its ability or areas to function.

#### Q. 8, 9, 10, 11 - City Centre & City

Response:

The Community Council fully supports encouraging greater numbers of people to visit and live in the city centre and city as a whole, and as indicated above recommends that policy / framework is designed with communities to ensure this can happen while taking account of the needs and quality of experience of those living in and visiting the area.

#### Q. 13, 14, 15 - Creativity & Culture

Response:

The Community Council fully supports encouragement of creativity, culture and artistic expression throughout the city and welcomes that consideration is being given to how the physical environment, both built and natural and facilitate and support this.

We fully support the proposals included and further exploration described.

In addition, we also recommend that in line with the 'Aberdeen City Cultural Strategy' 'Making All the City a Stage' Key Outcome, there is further consideration given to how performers and practitioners can be better and more fully supported and enabled to perform in open community spaces, in addition to individual buildings and premises.

#### Q. 21 - Developer Contributions

Response:

The Community Council believes that more efficient, more effective and more informed use, allocated, investment and expenditure of Developer Obligations should be developed by engaging more fully and thoroughly with the communities included in and surrounding the corresponding development.

As part of this process, communities should be invited to co-design plans for the use of these Developer Obligations with Planning Officers and any other relevant City Council and / or Community Planning colleagues to compliment and bring together the needs, wants and aspirations of the community with available information and data.

This could also be used to compliment the 'Community Benefits' initiatives currently being taken forward by members of the Civic Forum, Community Council Forum and Community Planning

Aberdeen colleagues.

Q. 27 - Community Planning

Response:

The Community Council fully supports and welcomes initiatives to further strengthen connections and collaborative working between Planning Officers and communities throughout the city.

In parallel to this, we are also beginning to see the benefits that can be brought by Planning Department strengthening links with Community Planning Aberdeen and Aberdeen City Health & Social Care Partnership to more fully inform, better support and more cohesively shape, the future of the city.

Although the focus of Planning may be on the built environment and land-use, it is also essential that we take into account many of the areas highlighted in the LDP (Local Development Plan) such as Health, Economy, Transport, Quality of Experience, Culture and Wellbeing when making these decisions over building and land-use, rather than being perceived as separate entities.

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*- prepared by Jonathan Smith, as Chairperson on behalf of Castlehill and Pittodrie Community Council*