



Aberdeen Local Development Plan Review

Pre- Main Issues Report Questionnaire 2018

Aberdeen City Council is currently in the early stages of reviewing the Aberdeen Local Development Plan 2017(ALDP). The 2018 Development Plan Scheme provides a timetable for the review of the ALDP and the opportunities to participate throughout the process.

It is available to view online at: www.aberdeencity.gov.uk/localdevelopmentplan

This questionnaire forms part of the pre-Main Issues Report consultation activities we are undertaking. It is designed to gather views on the main planning issues in Aberdeen to be considered by the next ALDP.

Using your Personal Information

Information you supply to Aberdeen City Council (ACC) in this questionnaire will be used to prepare the Local Development Plan. ACC will not share the personal information provided in this questionnaire with other parties or organisations. ACC will not disclose any contact information about you to any organisation or person unless it is authorised or required to do so by law.

The Local Development Plan team may use your contact details to contact you about the comments you have made. Your name and organisation may be published alongside your comments but contact details will not be made public. If you chose not to provide a name or contact details, your comments will still be valid but we will not be able to contact you in the future.

For further information on how your information is used, how ACC maintain the security of your information, and your rights to access information ACC holds about you, please contact Andrew Brownrigg, Team Leader, Local Development Plan Team, Enterprise Planning and Infrastructure, Aberdeen City Council, Business Hub 4 Marischal College, Broad Street, Aberdeen AB10 1AB.

A separate form for submitting development sites for consideration can be found on our website at: www.aberdeencity.gov.uk/localdevelopmentplan

Our consultation runs from the 19th March to the 8th of May 2018



1. YOUR DETAILS

1.1 Please let us know the capacity in which you are completing this questionnaire. Are you...

- A member of the public
- A community representative e.g Community Council

If yes, which area do you represent?

OLD ABERDEEN

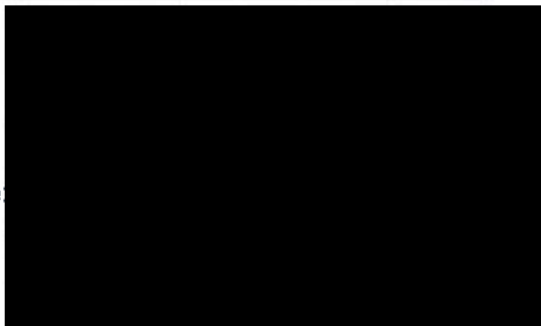
- A developer/ their agent
- A landowner/ their agent
- From a Key Agency
- Other

1.2 Please provide your name and contact details:

Name and Organisation:

OLD ABERDEEN HERITAGE SOCIETY

Address:



Postcode:

Telephone:

Email:

1.3 If you are acting as an agent or completing this on behalf of an organisation, group or landowner, please provide their details:

Organisation/group/landowner:

Address:

Postcode:

Telephone:

Email:

2. ABERDEEN'S MAIN PLANNING ISSUES

Feel free to continue on separate sheets if necessary and attach to the questionnaire. You do not have to answer every question.

Vision

2.1 What do you think are the most important things that make Aberdeen a good place to live, visit and/or work?

SEE ATTACHED SHEETS

2.2 What do you think should be the Council's top priorities for the next Aberdeen Local Development Plan?

SEE ATTACHED SHEETS

2.3 Do you have any particular aspirations for your community or Aberdeen as a whole that you think should be taken forward through the ALDP? For example, what are your views on recycling of waste, affordable housing, access to green space or ways to reduce CO₂ emissions?

SEE ATTACHED SHEETS

Policy Topic Areas

What do you think should be our main planning priorities for...

2.4 ...the City Centre? (For example, what should the role of Union Street be? Does the City Centre have all the uses we want, or should there be more uses there - and if so where could they go?)

SEE ATTACHED SHEETS

2.5 ...providing infrastructure? (For example, how should new infrastructure be provided and how might it be paid for?)

—

2.6 ...transport and accessibility? (For example, how can we make it easier to travel in and around Aberdeen? Should we look at pedestrianisation in the City Centre?)

SEE ATTACHED SHEETS

2.7 ...ensuring we have high quality buildings and places? (For example, how can we better protect our built heritage and ensure high quality and sympathetic architecture and landscape design?)

SEE ATTACHED SHEETS

2.8 ...meeting the needs of business and industry? (For example, what can be done to retain existing businesses and attract new employment opportunities to Aberdeen?)

—

2.9 ...meeting Aberdeen's housing and community needs? (For example, how can we meet the needs of people who cannot afford mainstream housing?)

SEE ATTACHED SHEETS

2.10 ...supporting retail centres across Aberdeen? (For example, should we be safeguarding existing centres, and what are your thoughts on new out-of-town retail parks?)

SEE ATTACHED
SHEETS

2.12 ...ensuring that resources and waste are managed sustainably? (For example, can we make more innovative use of waste as a resource? Should we encourage renewable energy use? How could we do these things?)

—

2.11 ...protecting and enhancing the natural environment and preventing flooding? (For example, what areas or features should we be safeguarding?)

SEE ATTACHED
SHEETS

2.13 If you have any views on topics not covered above, please write them below.

SEE ATTACHED
SHEETS

Thank you for taking the time to complete this questionnaire. Please return completed questionnaires to:

Local Development Plan Team
Enterprise, Planning and Infrastructure
Aberdeen City Council
Business Hub 4
Ground Floor North
Marischal College
Broad Street
Aberdeen
AB10 1AB

Twitter: @AberdeenLDP

You can also visit the Aberdeen Local Development Plan Facebook page.

COMPLETED QUESTIONNAIRES SHOULD BE WITH US BY NO LATER THAN 8 MAY 2018.

If you wish to be added to the LDP E-Mailing list to be kept informed of our progress in producing the next Local Development Plan, please tick here.

If yes, please provide an email address

[REDACTED]



Pre-Main Issues Report
- Consultation Response to Questionnaire

2.1 - The most important things that make Aberdeen a good place to live, visit and/or work

Aberdeen has the great advantage of being both close to sea and countryside, and with two rivers, providing ample rambling and leisure opportunities, to enjoy the natural environment. It is relatively easy to access all these either on foot or by public transport. There is, however, a problem of access by public transport to many of the National Trust / Historic Scotland properties and other heritage attractions. Could there be specific services laid on for these, in the holidays?

The Beach and all the parks are a huge asset, and should be maintained to the highest standard. So also should the City's museums, art galleries and other cultural buildings, such as concert halls.

The many historic areas of Aberdeen are something to be proud of and actively support. Visits to both Old Aberdeen and Footdee are important to many residents' enjoyment of the City, and area a huge draw for tourists. It is vital that the main element of their character - that of being a distinct, historic living community - is rigorously supported and promoted in Policy. Otherwise, the true character of Old Aberdeen, for instance, could well be lost for ever. The proposed Heritage Centre at Rubislaw Quarry will be another quality attraction.

2.2 - Top Priorities for the next LDP

"Balanced Sustainable Communities"

By far the biggest challenge and urgent necessity in this regard is the need to maintain and promote balance and sustainability in existing communities.

There are already provisions in the LDP for ensuring a balanced mix of uses in new communities, but the balance and sustainability of existing communities seems to be more or less ignored in Planning Policy. New applications for change of use seem to be assessed mainly on narrow benchmarks of effect on neighbouring amenity or suchlike. The effect of the change of use on the community as a whole, and, importantly, the cumulative effect of more and more changes of use on the balance, character and sustainability of the wider community is barely taken into account.

In almost all cases, the impact of a proposed Change of Use is assessed as a change of use to another use, and the advantages and disadvantages of that new use are assessed with consideration given to such factors as residential amenity.

This does not address the crucial issue of what is lost by the proposed Change of U

se. The only policies which appear to tackle this issue are (a) those on protecting retail units in communities, and (b) a vague reference in Policy CF1 to maintaining vitality in a community, (without detailing what, exactly 'vitality' means. Does it include residential vitality? Year round permanent residency keeping a community alive? It certainly should, but it does not detail this).

There is thus a yawning gap in local Policy where there should be robust protection for sustainability of communities in the context of applications for Change of Use.

LDP Policy currently recognises the value of, say, retail units and small shops in a community, and seeks to protect these for service to the community. It is, however, recognised that they are not always commercially viable, and so in certain circumstances a change to some other use will be allowed.

The case of dwelling houses, however, is different. It is well-known that there is a shortage of housing, and in some communities a serious shortage of housing for year-round, permanent residents. An application for Change of Use from dwelling house cannot really be justified on grounds of it being not commercially viable, when there is such a demand.

Yet the assessment of applications for changes of use from dwelling-house to another use rarely makes any reference to the impact on a community of the loss of a home; they focus instead on the impact of the proposed use on the adjacent properties or the surrounding area. The hugely important issue of the impact of the loss of a dwelling-house is simply not addressed.

There are, however, as is well-known, parts of Aberdeen where the loss of family homes and homes for permanent, year-round residents is a massive problem, threatening the sustainability, and (in the case of Old Aberdeen), the very future of the community.

The areas most affected are beside the City's two Universities, but the problem is more pronounced in Old Aberdeen for, we believe, two reasons. First, RGU seems to be managing to expand at Garthdee without turning family homes into offices or University facilities, and secondly, there is not a historically distinct ancient township at risk of being obliterated. This is not to downplay the serious effect of the proliferation of HMOs in the area, but the spread of the institution itself does not seem to be taking over family homes. The main threat to sustainability is the increase in HMOs and other short-term lets.

The sustainability of Old Aberdeen, in contrast, is under threat from all sides. The proliferation of HMOs and other short-term lets (those with fewer than three bedrooms) is increasingly depleting the settled community character and viability, and could eventually destroy it, in the absence of a firm HMO Overprovision Policy, and the absence of robust protection against changes of use from dwelling-house to other uses (including quasi-residential short-term accommodation).

The priorities in the LDP should be for:-

- 1) A robust HMO Overprovision Policy formed in conjunction with the Housing Dept., as advised by National Guidance, which would apply across the whole City, and limit the percentage of HMO licences in any one area to 10%.

This would go some way to controlling the proliferation of HMOs and the concomitant loss of much needed family homes, but it would not, of course, control in any way those short-term lets with fewer than three occupants, which account for the loss of a good number of permanent homes. The 10% limit would not therefore, actually limit all short-term lets, but would be a help.

- 2) A clear Policy protecting use as a dwelling-house in the assessment of an application for change of use. There should have to be overwhelming justification on planning grounds, that residential use should not continue.

There must be a presumption in favour of retaining residential use (viz. use as a permanent home), especially in communities such as Old Aberdeen where its very viability is threatened by the continuing loss of homes for families and others who want to settle long-term in the area. Without such a presumption, and in the absence of an HMO Overprovision Policy, and also in the light of the University's past history of turning homes into offices or departments, and their stated intention to buy up properties in the High Street for student facilities (cf. their Estates Strategy), more and more homes will be lost and depopulation will continue.

- 3) There should be a much stricter policy on Purpose Built Student Accommodation. The current TAN is not prescriptive, but merely advises applicants to consider various points - e.g. whether there is an unmet need for the accommodation being proposed. At present, therefore, it is not possible for the Council to refuse such an application on the grounds of overprovision. That can only be done through a Policy, and that is clearly needed.

The University representative at the local Community Council recently stated that there were now 2,000 "voids" in student accommodation across the City. While this form of accommodation is a valuable resource, attractive to many students, and takes some pressure off the increase in HMOs, it is clear to all now, that it has got out of hand.

In some places, ugly and overbearing buildings have been erected in the pursuit of increasing the availability of student accommodation (see the "purple building" in St. Peter St.), and these have had an undeniably detrimental impact on the surrounding area.

It is time now to call a halt, and look at what is needed in the future, and where.

- 4) Another means of preventing the proliferation of HMOs and short-term lets in certain areas, where they are beginning to dominate, is to gain more control through assessment by the Planning Department.

This could be achieved by lowering the threshold of occupancy at which a house or flat is deemed to undergo a material change in use. At present, only houses or flats with six or more occupants require planning permission for change of use to HMO, and they are then assessed as to their impact on the surrounding area in terms of amenity and character, and also in terms of possible cumulative impact brought about by a grant of permission for a further HMO.

If, however, the threshold for a requirement for planning permission were lowered to, say, four occupants, or even three, then all applications would have to demonstrate that

they would not have an adverse effect on the balance and sustainability of the area. This would also give extra protection to more family homes.

2.3 - Aspirations for Old Aberdeen as a whole

- 1) An HMO Overprovision Policy, as detailed in 2.2 above.
- 2) Lowering of the threshold of occupancy which triggers the requirement for planning permission - as detailed in 2.2 above.
- 3) Call a halt to further purpose built Student Accommodation in the light of the present gross overprovision right across the city, and the formation of a proper Policy in the LDP to replace the existing TAN on Student Accommodation, which does not have the necessary prescriptive power - as in 2.2 above.
- 4) A major 'reining-in' of the parts of Old Aberdeen covered by the "CF1" zoning, and the replacement of CF1 zoning in the High Street and College Bounds with a new Policy specifically designed to protect the primarily residential nature of these streets, in light of their distinctive character as the historic heart of a separate historic burgh.
 - a) Policy CF1

We strongly believe that this Policy is not only harmful for Old Aberdeen (especially High Street), but is clearly inappropriate in every way.

If one looks at the "LDP City Wide Proposal Map" 2017, and checks the areas which are zoned as CF1, they are all institutions (or community facilities associated with institutions, and the area covered for the zoning of each is basically just the area where that institutional has its institutional buildings. It does not NOT include areas of housing or a whole community.

Examples of CF1 zoning on the map are Cornhill Hospital, Foresterhill Hospital, Woodend Hospital, MacAulay Institute, NE Scotland College in the Gallowgate, the Sports Village, and RGU at Garthdee.

It is hugely significant that these zones areas do not include communities or areas of housing.

Why, then, is the heart of our community in Old Aberdeen zoned as CF1? The CF1 zoning for the institution (or "community facility") of the University of Aberdeen covers a huge area - far, far beyond the existing campus or institutional buildings.

It extends from Orchard Street / Sunnybank Road, all the way down College Bounds and High Street, with large areas on either side, often right down to King Street, and over to Bedford Road and Tillydrone Avenue. This encompasses vast tracts of land which are residential - purely homes, with some retail.

In particular, all of College Bounds, High Street, most of University Road, Orchard Walk, Spital Walk, the west side of Orchard Place, a cottage and sheltered housing in

Sunnybank Road, Firhill Place, houses in Spital between Orchard Street and College Bounds - all these are zoned as CF1, related to the University's institutional use. This zoning is in effect a presumption in favour of University use for this whole area, which is completely inappropriate.

No other CF1 zoned area spreads across a whole community, and pronounces it as for institutional use, primarily.

RGU has not been given such a zoning. Why should there be one for the University in Old Aberdeen?

The serious impact of this zoning is seen when a planning application is assessed by the Planning Dept., who may state (if it is for some University use), that the policy has a presumption for approval. On this basis we can lose one after another of our homes or shops (especially in High Street) to University uses - offices, HMOs, or student facilities or other social spaces.

We believe that the only way to control this is to have the CF1 zoning for the Old Aberdeen community removed, and replace it with a CG1 zoning for the "Modern University Campus" areas ONLY - the "backlands" behind High Street, plus King's College, and leave areas of housing and shops alone. They can be re-zoned as "residential", which they should always have been.

b) A new Policy for High Street and College Bounds

While the Society of course recognises and sympathises with the University's need for accommodation for various offices and services, we believe that the time has now come to call a firm halt to future expansion of University uses in the High Street, or, indeed, College Bounds.

It would be fair to say, we think, that most local residents and others who care deeply about Old Aberdeen have long accepted redevelopment of some kind, of the huge tracts of land in the "backlands" area well beyond the rear gardens of the High Street, both east and west and clearly there is still substantial room for expansion and re-arrangement there. In particular, large University buildings are now lying empty (Crombie and Johnston Halls).

What we do not accept is that there is any proven need for the University to continue converting properties in the High Street for University use. This is having a deep impact on both the character and the viability of this village community. Since the early years of expansion, around a quarter of homes in the High Street and its closes have been lost, and this trend continues, with a steady depopulation and consequent loss of sustainability. We have lost shops and local businesses also. University departments, offices and support services have taken the place of both homes and businesses, and unless a clear policy is established now, there will be further erosion of the unique character of this historic township.

We are appealing to the Council to include in the new LDP a policy stating a clear, unequivocal presumption against any further change of use in the High Street from either residential or local shop, to institutional use, whether as office, department, or support services, or indeed to temporary or part-time accommodation.

This is a vital measure, to safeguard our previous heritage of “village” character, not only for the community who lives here, and all the local people who cherish it, but also for the thousands of tourists who visit each year; because for them, (and indeed many students and staff) much of the charm of Old Aberdeen is that it is not just an “academic enclave”, but a thriving distinct “village community” of historic origin.

It is clear that existing Local Plan policies on this issue are inadequate, and are not specific to the needs of Old Aberdeen. We therefore request that the Council puts in place the necessary specific policy to protect what we still have of the historic character of the High Street. There should be plenty of alternative sites for University support services, but there is only one High Street community, which is irreplaceable, - and without a firm protective policy in the LDP, its character is in danger of being eroded away. We ask you to take steps to form such a policy.

2.4 - The City Centre

The City Centre badly needs the return of independent shops and family businesses. Could they be offered reduced rates? Or any other form of support?

2.6 - Transport and accessibility

- a) It is important to keep streets open to buses, or people won't patronise the shops in the City Centre. Also, if buses are all diverted as a result of pedestrianisation, the likely outcome is significant congestion in and around, say, Guild Street, and traffic hold-ups. Also, bus journeys from the end of the City to the other through Union Street (but with a diversions), would take longer, and would produce more pollution from vehicle emissions.
- b) A much more frequent and direct bus service to the Beach is urgently needed, for those without cars, and, importantly, to encourage those with cars to leave them behind, and travel by public transport.
- c) We need the return of a Council-run bus service. The monopoly held by one bus company at present is not in the interests of passengers, and the lack of competition means there is no incentive to provide a better service. At present it is over-priced and routes and timetables are being constantly changed in the interests of the bus company, to the detriment of the interests of those who rely on public transport. Further, the constant changes and the high prices also discourage those who might start using public transport instead of cars. There is then the knock-on harmful effect of unnecessary car-use, and increased pollution.
- d) Can there be any planning incentive to enable the return of the popular “Open Top Bus”? This service, which ran daily throughout the summer, was an excellent day out visiting all the top family destinations, with the added excitement for children of sitting on an open-deck. The fare for the round trip was modest, and encouraged people to have a day out at the city's parks and the Beach. For tourists and other visitors to Aberdeen, it was a great draw, complete with helpful commentary and guide, and meant they could see much of the city without having to find their own way around.

It is our view that the Council should find a way of bringing back this popular attraction. The format is a good one - passengers can get off at any of the attractions (Hazlehead Park, Duthie Park, the Beach), spend as much time there as wished, and catch the next bus to continue to the next. Clearly this could bring much welcome trade to the attractions at the parks, and at the Beach. It would also be an attraction for the City to be proud of.

2.7 - How better to protect our built heritage

- a) We need more planners with specific knowledge of, and enthusiasm for, the preservation and protection of the Historic Environment.
- b) Planning applications for locations in Conservation Areas or affecting Listed Buildings should only be allocated to Case Officers who have the necessary experience, detailed knowledge and commitment to preserving the Historic Environment.
- c) Pre-application discussions, however informal, if relating to development in a Conservation Area, or affecting a Listed Building, should always include input from a planner from the Conservation Section.
- d) The Council should place Press advertisements for all proposals for development in Conservation Areas (including Change of Use, which even on its own can affect their character), other than the most minor. This will maximise informed and often expert input which can assist in the protection of the Historic Environment.
- e) As suggested now over several decades, and acknowledged by the Conservation Section in recent years, there could be a massive improvement in protection of the Historic Environment if people who live in Conservation Areas were reminded, by leaflet, of their responsibilities and the legal restrictions on development - along, of course, with useful information. At present, the lack of such information means that many householders undertake inappropriate alterations to buildings which are meant to be protected, and the cumulative impact of these unsympathetic changes is damaging to Conservation Areas.

The Council needs to include in its Policy a commitment to distribute informative leaflets in each Conservation Area on a regular basis. Local amenity groups could do the delivery, and some have already offered.

- f) The Policy need to include a commitment to procuring specialist training for Council workers on the traditional crafts needed for certain works within Conservation Areas - in particular, training in the correct way to lay granite setts.
- g) There should be a commitment to using only the traditional street-name letter tiles in Conservation Areas. The modern equivalent is out of place.
- h) Bring back Article 4 directions in order better to control what may seem like minor development, but which can have a significant effect on the character of part of a Conservation Area. For instance, there needs to be control over the erection or removal of gates and fences, and indeed hedges. Also, the layout of front gardens, particularly in the case of pairs of houses, where garden layout is intended to be symmetrical.

- i) Work with the Scottish Government to have the Ecclesiastical Exemption for Listed Buildings in Use for Worship removed from the Statute Books. This anomaly in the Listed Buildings Act has meant the destruction of so many historic church interiors, because the Church has been exempted from the requirement to obtain Listed Building Consent. Examples include the recent loss of historic box pews at Maryculter, and in Fife, the prospect of almost unique 18th century box pews which convert into a communion table being torn out to be replaced with modern seating. If Listed Building Consent had been required, these historic interiors might have been saved.
- j) Policy to ensure that when a planning application is assessed for its effect on the “character or appearance” of the Conservation Area, that “character” is NOT interpreted only as visual. The very fact that the legislation mentions both character and appearance demonstrates that they are not one and the same thing. Furthermore, national guidance - in particular HES guidance on “Setting” - makes it quite clear that “character” has to be open to many different interpretations, involving several different factors.

At present, the Planning Dept. seem to interpret “character” in the legislation only in terms of appearance, and we believe that not only is this an inadequate and faulty interpretation, but also it can seriously undermine the protection of the historic environment, by not taking account of non-visual factors which can be so important to its context.

The Council’s Historic Environment Policy should make clear that non-visual factors are also to be assessed as relevant.

- k) Policy wording about “pastiche”, in relation to proposals in Conservation Areas, is at present somewhat disapproving. The balance needs to be redressed. This is often a perfectly acceptable, indeed commendable and highly appropriate approach.
- l) Explicit acknowledgement is needed in Policy that Change of Use on its own can have an effect on the character or appearance of a building, or the Conservation Area, or the setting of either (as detailed in HES Guidance, particular on “Setting”).
- m) There needs to be a stronger policy protecting the 17th and 18th century substantial boundary walls with distinctive coping found in Old Aberdeen, such as in The Chanonry, St. Machar Drive (Botanic Garden wall), outside 81, High Street, and in the southern section of Dunbar Street.

The 1993 Guidance for the Old Aberdeen Conservation Area contained a presumption against creating openings in these. This needs to be re-affirmed.

- n) Supplementary Guidance must remain in full and not lose its force. This is what provides much of the necessary protection to the Historic Environment.

2.9 - Meeting Housing and Community Needs

- a) “Housing Mix” must be protecting in existing communities, not just promoted in new ones. This is vital in order to maintain mixed, balanced communities. At present there seems to be no policy or guidance which specifically commits the Council to striving to maintain a balanced housing mix in existing communities, and the proliferation of certain housing types, such as HMOs, are steadily displacing homes for permanent residents, and homes

for families with children, especially in Old Aberdeen. This is creating a significant imbalance in some parts of the community. Policy must ensure that this does not happen.

- b) Serious consideration must be given in Policy for the housing needs of those who are employed at large institutions. In consideration of planning applications for Old Aberdeen, for example, what is beneficial to the University is often interpreted as how it affects its students, but the housing needs of staff and their families are equally important. In fact it is arguably more important that housing should be easily available near the University for staff, who work there throughout the year, and have to balance home and family commitments with a heavy load of academic work, including research, and indeed regular attention to laboratory experiments. There is a real need for more staff family housing in Old Aberdeen; yet more and more former staff homes are being converted in either HMOs or University offices or other facilities.

This is a serious imbalance which needs to be addressed in Policy, to stem the tide of losses.

2.10 - Retail Centres and Out-of-town Retail Parks

Existing retail centres across the City must be safeguarded, and individual smaller shops necessary to communities must be safeguarded in particular. Policies to protect these need to be far more robust.

Out-of-town retail parks are damaging to the commercial heart of the City Centre, as would be the proposed extension of Union Square. These should not be supported.

2.11 - Protecting and Enhancing the Natural Environment

- a) First and foremost, maintain all existing Greenspace Network, and do not allow development on this in any circumstances.

Opportunities should be taken to expand the Greenspace Network.

- b) Try planting wildflower verges for biodiversity.
- c) A policy to re-plant more trees at roadsides is needed, to help improve air quality, as well as providing support for the ecosystem. It would also improve the visual environment and provide more privacy for those whose homes are near the road.
- d) Much stronger protection in policy for trees, particularly in Conservation Areas, including fines for unauthorised felling or major disfigurement, and enforced replacement as required.

2.13 - Other Issues

- a) Policy in the LDP regarding impact of development on general amenity must be much more emphatically stated. At present, much seems to be hidden in Policy D1 under the "Safe and Pleasant" heading, and not given enough prominence.

- b) There must be an unequivocal statement of Policy that encapsulates a clear presumption against public houses being allowed in close proximity to noise-sensitive and nuisance-sensitive premises - viz. private homes, places of worship, hospitals, refuges, schools, etc.

A similar presumption ought to be stated in relation to other examples of what used to be called "bad neighbour developments".

- c) We would request an official re-zoning of the area bounded by Jute Street, King's Crescent and Froghall Terrace. This has been classed as Mixed Use up until now, but it is now entirely residential, and we request that it is re-zoned as such in the new LDP.