

Response ID ANON-B3JU-DSAB-E

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-03-12 19:46:00**

About You

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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?:

The context described seemed very appropriate.

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 would agree with the preferred housing sites. We should be encouraging new housing within the existing city and using "brownfield" or derelict sites wherever possible. Greenbelt land should be left undisturbed as it adds greatly to quality of life & local ecology.

Question 2 Housing Allowances Beyond 2032

Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:

I do not feel this is the case at present: currently there appears to be overprovision of housing within Aberdeen City as shown by the difficulty in selling existing homes due to the significant & lasting downturn in the Aberdeen property market.

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?:

I feel we need to be more radical & proactive in upgrading current healthcare facilities & creating new facilities. In addition to those identified in the Main Issues Report, other primary healthcare facilities do not meet current best standards. For example, disabled access to some primary healthcare centres remains an issue.

While redevelopment of the Denburn Health Centre site was briefly mentioned, there was no detail given and no discussion of how the important city-centre primary care it offers can continue to be offered in premises suitable for contemporary needs.

While access to local primary care has improved significantly in recent years, there is still over-provision in the prosperous west-end and much more limited provision in the more deprived parts of Aberdeen.

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

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

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

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:

We ought to be more sympathetic to the historic Union Street shop frontages and support their restoration. There should be continuing promotion of provision of flats in the upper floors of Union Street buildings, many of which remain vacant or under-utilised.

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?:

We should not support new out-of-town retail parks which would further damage the already precarious city-centre economy. The existing shopping centres in central Aberdeen have been very damaging to traditional shopping streets, particularly Union Street. New retail parks would cause even worse damage.

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?:

Such documentation would be useful.

In order to encourage more people to live in the city centre we need to encourage the businesses which support everyday living and limit businesses (eg.pubs, nightclubs) which are damaging to local quality of life and discourage people from living in the vicinity.

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?:

This should strongly be supported.

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?:

We need to be very careful about encouraging 24-hour activities as these can be damaging to quality of life for local residents and actively discourage people from making their homes in the city centre.

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?:

Yes - such inclusion adds greatly to quality of life and represent excellent value for the money invested.

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 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?:

Minimum standards, greater than at present, should be specified through the planning process

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?:

Current amenity spaces are often unimaginative and offer little to enhance quality of life or the natural environment.

There should be specific high standards & refusal of planning permission to those which do not meet the standard. There also needs to be an enforceable plan for ongoing maintenance of such 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?:

Yes

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?:

Food growing has steadily declined as part of our culture. Many tenements & houses, both publicly-owned & private, have generous space for food-growing at the rear but the space has been abandoned to dereliction or covered-over. Most people now lack the knowledge needed for food-growing & many people for preparing & cooking produce.

An important first step for the Local development Plan would be to offer basic education in food-growing & cookery.

We should also be looking at how the derelict space attached to many public housing tenement flats can be brought back into food-producing use.

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?:

I am not convinced that we need to reduce city centre parking but we do need to consider where is appropriate for parking & where is not. For example, the attractiveness of historic Golden Square is greatly damaged by the site of its former garden being used as a car park.

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?:

Yes

Question 21 Developer Obligations and Infrastructure Delivery

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

We need to be very specific about obligations & ensure that these obligations are legally enforceable.

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 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?:

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 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

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?:

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?:

I agree with the current approach.

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?:

Option 2 - Preferred Option

MAIN ISSUE 10 Residential Care Facilities

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

Option 2 - Preferred Option

MAIN ISSUE 11 Student Accommodation

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

Option 2 - Preferred Option

MAIN ISSUE 12 Houses in Multiple Occupation

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

We need to be much more strict about granting HMO consent, especially in residential areas where they are very damaging to quality of life & a sense of community. It is concerning that so many former council houses have become HMOs - this was not the aim of "right to buy" legislation. There should be a presumption against consent.

Option 2 - Preferred Option

Percentage limit of HMOs in each area:

Option 1 - Preferred Option (15%)

Please explain why you chose your answer:

The other options of 20% & 25% were much too high. Even 15% is too high but a lower option was not given.

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:

I feel that much more scrutiny is needed of HMO applications as such developments are damaging to local communities and can be abused by unscrupulous landlords.

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?:

Yes - all large new venues catering commercially to the public should supply such facilities.

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?:

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