

## Response ID ANON-B3JU-DST4-K

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**

Submitted on **2019-05-13 13:34:38**

### About You

**What is your name?**

**Name:**

Peter Carus

**What is your organisation?**

**Organisation:**

GVA Grimley Ltd t/a Avison Young

**On behalf of:**

Mr A Strachan

**How can we contact you?**

**Email:**

[REDACTED]

**Telephone:**

[REDACTED]

**Address:**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

### 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 comment

### 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?:**

No comment

#### 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?:**

Yes. Land at Mains of Charleston within the ownership of our client. A plan is hereby submitted to illustrate the available brownfield land which represents an opportunity for development. Over recent years, areas of our client's land has been subject to compulsory purchase and / or use for works associated with the Aberdeen Western Peripheral Route (AWPR). With the opening of the AWPR, land is in the process of being restored / returned to our client. On this basis, our client is now keen to consider the long term future of land in their ownership and welcomes the opportunity respond to the Main Issues Report.

The extent of land owned by our client is shown in the attached plan. For informative purposes, the area identified as a SUDS facility ['balancing ponds'] was also formerly owned by our client prior to its compulsory purchase associated with the AWPR. In summary;

- Plot 1 (Aberdeenshire) – formerly used as a site compound associated with the construction of the AWPR
- Plot 2.1 (Aberdeenshire) – informally used for livestock grazing. Has a history of landfill for inert material e.g. stone. The site is not known to be contaminated
- Plot 2.2 (Aberdeen City) – as plot 2.1
- Plot 3 (Aberdeen City) – land in control of client
- Plot 4 (Aberdeen City) – land in control of client
- Plot 5 (Aberdeen City) – land in control of client (part of existing Aberdeen LDP OP60 land use designation)

For the purposes of this representation, we focus on the areas of land within Aberdeen City (i.e. plots 2.2, 3, 4 and 5) although it should be noted that this has been prepared and should be considered in the context of the overall site, as noted above whereby representations have also been submitted to the Aberdeenshire LDP Main Issues Report. A plan has been submitted as an additional document.

The focus of our clients response is as follows;

1. To seek removal of the site from the green belt
2. To seek to promote the site as a potential development opportunity for alternative uses

Removal of site from greenbelt:

In overall terms, we seek the removal of these areas from the greenbelt. We recognise the policy basis set out in paragraphs 49 and 50 of SPP and would suggest that a review of the green belt in this location in particular is entirely appropriate at this time. Paragraph 49 of SPP sets out that for most settlements, a green belt is not necessary as other policies can provide an appropriate basis for directing development to the right locations. However, where greenbelts are designated, SPP suggests that this is to;

- Direct development to the most appropriate locations and to support regeneration
- Protect and enhance the character, landscape setting and identity of the settlement
- Protect and provide access to open space

Having considered the policy context to the definition of and purpose of the greenbelt, it is apparent that the sites being considered in this representation do not merit a greenbelt designation. The site does not have a particularly unique or special landscape setting; it is bound by transport infrastructure; residential development and employment / business uses. In all instances views across the site do not place the site in a 'special rural area' or an area that is required to protect coalescence / settlement identity etc. The site is well connected to existing infrastructure and an appropriate scale of development (which can be controlled by other policies) would not appear to be out of place or character given the surrounding context and wider setting of the site.

Promotion of site for alternative uses:

On the basis that the site does not merit inclusion within the greenbelt and is no longer subject to works associated with the construction of the AWPR, our client is keen to promote the site for alternative uses. Parts of the site has previously been subject to EIA Screening in respect of a prospective solar energy development and associated battery storage. From the documentation we have seen, it would appear that Aberdeen City Council (ACC) issued a screening opinion (170822/ESC) on 21 August 2017 concluding that such a development would not require a formal Environmental Statement. Aberdeenshire Council advised ACC in similar terms to inform the final EIA Screening Opinion.

Submissions made in the EIA Screening Opinion request confirm the site as brownfield with low grade characteristics from an agricultural / ecological etc perspective. We are not aware that the site is of high value / prime agricultural land e.g. it is informally used for grazing but is not actively farmed etc. As also noted above, it has previously been used for landfill purposes (inert material) and is not thought to be contaminated.

Whilst this proposal (solar array) is not currently being pursued, it is noted that current policy would support such a use (in principle) in such a location. We agree at Q23 that Policy R8 should include solar farms within it. However, the removal of the green belt designation – for the reasons set out above – would remove a potential barrier to the appeal of the site for energy and associated infrastructure related developers in the future. In the meantime, our client remains keen on renewable energy and sustainable forms of development at the site.

Other indicative uses that are being considered by our client include;

- Renewable energy
- Outdoor recreational uses / facilities
- Tourism related development
- Carehome / additional needs housing
- Bespoke housing
- Garden centre

It is considered that the site would support the above and/or these types of uses as part of a mixed use development by virtue of the location of the site in an edge of settlement location with good road side access/visibility and a more open setting. Whilst we are aware that the wider area has seen development activity in recent years and indeed this is expected to continue given other established initiatives e.g. the Loirston Development Framework, it is not our client's intention to promote high density development that could potentially conflict with other such initiatives in the area. The uses above would indeed be complementary and could fit with a more open landscape where a more recreational / open setting is appropriate and required.

On this issue, it is not clear why Map 4 indicates that land in the control of our client is 'undesirable'. The site can make a contribution to the co-ordinated development of the Loirston Development Framework and current designation OP60 in particular.

Summary:

In overall terms, we would confirm that the site;

- Does not make a meaningful contribution to the greenbelt
- Is brownfield
- Is not affected by sensitive landscape designations
- Is available for development in the short term (OP60 is noted as a 'beyond 2020' timeframe and we accord with this so parts of our clients' site has already been identified for development in any case)
- Has good accessibility
- Will not affect the wider landscape setting which is generally urban / sporadically developed
- Can contribute to organic growth of nearby settlements and / or is suitable candidate site for redevelopment as a large brownfield site

#### **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 comment

### 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?:**

No comment

#### 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?:**

No comment

#### 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?:**

No comment

#### 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?:**

No comment

#### Question 10 Commercial Leisure Uses

**Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:**

As a general comment, this would broadly accord with SPP but other site specific opportunities should still be considered on their merits in accordance with wider development plan and policy objectives

#### 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?:**

No comment

#### 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?:**

No comment

Not Answered

#### 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 comment

Not Answered

#### 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

#### 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?:**

Land within the control of our client at Mains of Charleston could lend itself to a more creative based land use. It is considered that our clients' site would support this use as part of a sympathetically designed mixed use development by virtue of its location in an edge of settlement location with good road side access/visibility and a more open setting.

#### **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?:**

The basis of a £1m construction cost value is not clear; it seems to be an arbitrary figure. In any case, in some cases a percent for art may be appropriate but could raise viability issues that could compromise the main development and design potential. Furthermore, it may be possible to integrate art and/or specific design features into the main building design and this could negate the need for a percent for art contribution. Flexibility should be incorporated into any percent for art policy. Contributions should also be reasonably linked to the development as set out in Circular 3/2012. An obligation to contribute to art work elsewhere in the City would not appear to have any obvious relationship with the project on its own site.

#### **MAIN ISSUE 3 Support for Visitor Attractions**

**To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?:**

We support the 'preferred option'. The delivery of the AWPR has changed the movement of people/traffic to and from the City and other sites and areas have become available for potential development. In the case of our clients' site at Mains of Charleston occupies a prominent location which could support visitor/tourism related development.

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?:**

No comment

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?:**

No comment

#### **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?:**

No comment

#### **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? :**

No comment

Not Answered

#### **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?:**

No comment

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

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

We would wish to ensure that the approach to developer contributions is consistent with advice contained within Circular 3/2012.

### **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?:**

No comment

Not Answered

#### **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; solar farms should be supported within the Council's policy on this issue. Specific guidance should be included within the Policy; the development plan is the primary source of guidance for new development and is the logical place to include specific guidance on solar farm development.

#### **MAIN ISSUE 7 Heat Networks**

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

No comment

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?:**

No comment

#### **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?:**

No comment

Not Answered

### **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?:**

The current policy would appear to be acceptable and broadly accords with SPP in terms of a 25% requirement. It is noted as the preferred option and we would not wish to comment further.

#### **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?:**

No comment

Not Answered

## **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?:**

No comment

Not Answered

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

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

No comment

Not Answered

**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:**

**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?:**

No comment

### **Policy D5 Advertisements and Signage**

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

No comment

### **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?:**

No comment

### **Policy H4 Housing Mix and Housing for Particular Needs**

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

With regards to 'smaller developments' it is noted that a 'suitable mix' is not defined. The policy should reflect that this shall be considered on merit taking into account site specific circumstances

## **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?:**

No comment

## **Policy H10 Houses in Multiple Occupation**

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

No comment

## **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?:**

No comment

## **Policy NC11 Visitor Attractions and Facilities**

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

We welcome that proposals outwith the city centre will be considered subject to activity specific issues.

## **Policy NC12 Public Art Contribution**

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

The basis of a £1m construction cost value is not clear; it seems to be an arbitrary figure. In any case, in some cases a percent for art may be appropriate but could raise viability issues that could compromise the main development and design potential. Furthermore, it may be possible to integrate art and/or specific design features into the main building design and this could negate the need for a percent for art contribution. Flexibility should be incorporated into any percent for art policy. Contributions should also be reasonably linked to the development as set out in Circular 3/2012. An obligation to contribute to art work elsewhere in the City would not appear to have any obvious relationship with the project on its own site.

## **Additional Documents**

**Please include comments on other documents below:**

**Please include comments on other documents below::**

No comment

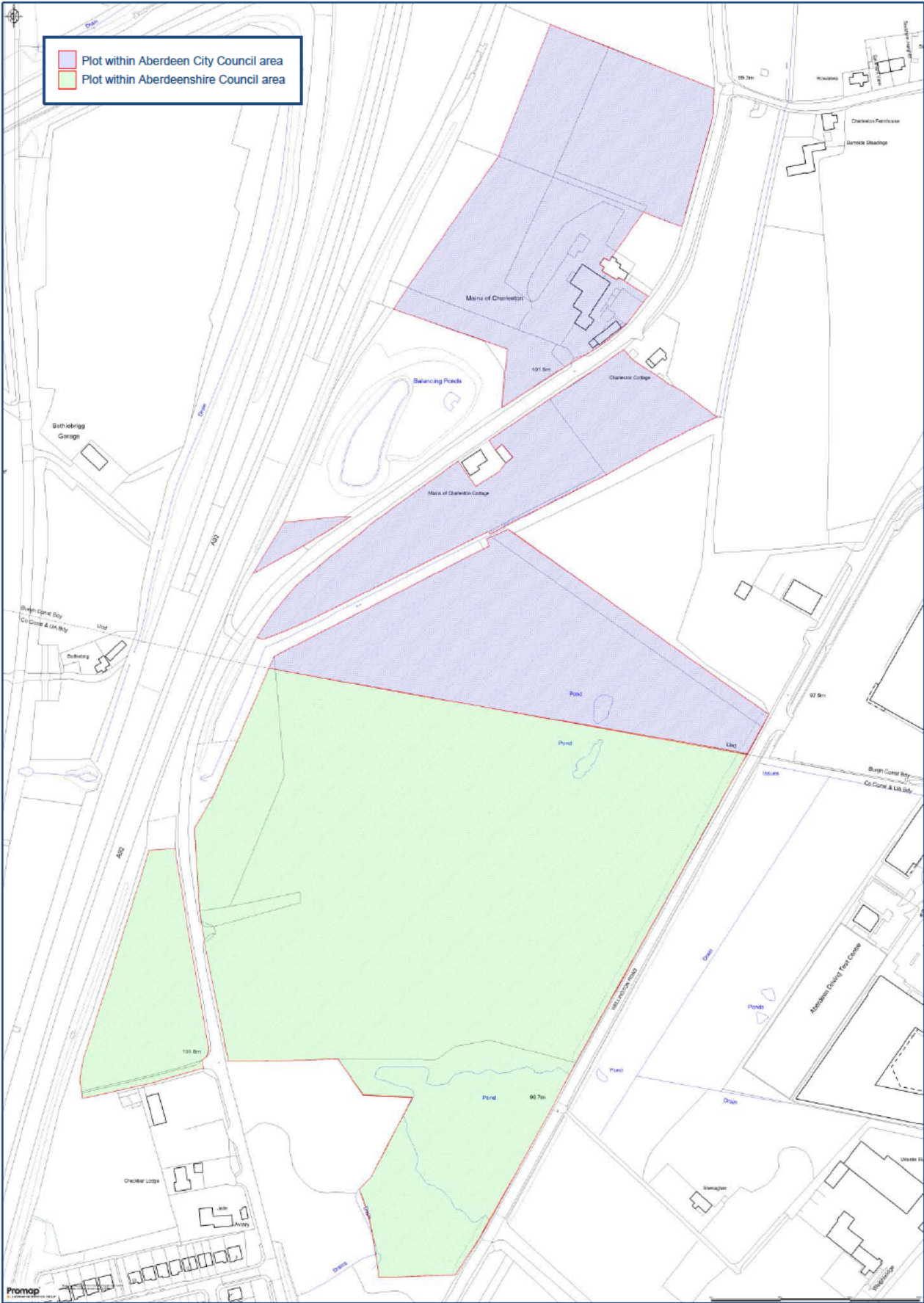
## **Additional Files**

**If you have further information you would like to provide you may upload it here.:**

190510 - Plans.pdf was uploaded

# Mains of Charleston

## PLAN 1: Extent of Ownership Plan





**AVISON  
YOUNG**

