



Proposed Aberdeen Local Development Plan 2015 Representation Form

Please use this form to make comments on the Proposed Aberdeen Local Development Plan, ensuring that your comments relate to a specific issue, site or policy in either the Proposed Plan, Proposed Supplementary Guidance, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

The consultation period runs between Friday 20th March and Monday 1st June 2015. Please ensure all representations are with us by 5pm on Monday 1st June.

Name	Mr	Mrs	Miss	Ms	
Organisation					
On behalf of (if relevant)					
Address					
Postcode					
Telephone					
E-mail					

Please tick if you would like to receive all future correspondence by e-mail

What document are you commenting on?	Proposed Plan Proposed Supplementary Guidance Proposed Action Programme Strategic Environmental Assessment Environmental Report		
Policy/Site/Issue		Paragraph(s)	

What would you like to say about the issue?

What change would you like to see made?

Please return the completed form by:

- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to ldp@aberdeencity.gov.uk

The representation form can be filled in, saved, e-mailed and/or printed. You must “save as” to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation form. **Please ensure all representations are with us by 5pm on Monday 1st June.**

Thank you. For more information, please visit www.aberdeencity.gov.uk/aldp2016 or to contact the Local Development Plan Team call 01224 523470.

Data Protection Statement

The comments you make on the Proposed Plan will be used to inform the Local Development Plan process and the Examination into the Local Development Plan by the Scottish Ministers' Reporter. You must provide your name and address for your representation to be considered valid, and this information will be made publicly available. Other personal contact details such as telephone and e-mail will not be made public, although we will share these with the Reporter, who may use them to contact you about the comments you have made. For more information about how Aberdeen City Council maintains the security of your information, and your rights to access information we hold about you, please contact Andrew Brownrigg (Local Development Plan Team Leader) on 01224 523317.

Aberdeen City LDP

Aberdeen Civic Society Comments on Proposed Plan

The Proposed Plan

Clause 2.18 refers to encouraging mixed use and policy LR1. It would be more complete if there was also wording in the policy LR1 that reinforced the desire for all large scale developments to be mixed use. Presently, although this is mentioned in clause 2.18, it is not reinforced by the policy.

Clausae 2.22 talks about allocating additional commercial land at Prime 4 in Kingswells. The current development at Prime 4, whilst some of the design is good, is very low density. The site appears to be car orientated, and this is a shame for a development of this size. The development density of the site could easily be increased.

Clause 2.23 refers to a new community at Countesswells. It is fundamentally important that any development here is mixed, in terms of both uses (ie residential, commercial and leisure) and in terms of residential property sizes. This is important to ensure that the development encourages sustainable means of travel through design, allowing and giving people the opportunity to travel to work on foot.

Clause 3.3. We strongly support having effective and enforceable policies in the Local Development Plan on placemaking and design. We are concerned that clause 3.3 refers to the fact that some developments will not be of a scale to contribute to effective placemaking. We believe that every development, regardless of its size, should have at its core good design and placemaking and this should be demonstrated as part of any planning application.

Policy D1 – Effective Placemaking – the first paragraph mentions a number of key attributes that contribute to good placemaking. Included should be on for vision – as it is the vision that often determines the over-riding design principles that will be followed.

Design Supplementary Guidance – page 18 of the draft plan mentions SPG for the sub-division of residential curtilages. We have noticed an increasing desire in the city for existing buildings in streets to be demolished and rebuilt. There should be a policy that covers this as it is likely to become more prevalent. Buildings that undergo the type of re-development should respect the environment in which they are placed, in terms of scale and massing, proportions and materials.

Policy D3 deals with big buildings. There have been a number of buildings proposed for Aberdeen recently that have achieved planning consents or are even being built. These have come under fairly strong local criticism for the way that the buildings do not respect their surroundings (much of it may be listed or in a conservation area). The local community feels that it's voice is not being heard, and this is something that we receive much comment about. We therefore have concerns about the policy on big buildings. A fundamental part of any policy should be to avoid the proliferation of large buildings that are uninteresting and overpower our existing heritage, it is important that proper consideration is given to the density of these, perhaps even using guidelines for plot densities, comparing the new building with the adjacent and surrounding area. Large buildings often tend to have low or standard floor to ceiling heights with flat roofs on which there is located a variety of service equipment (such as lift gear), which only tends to re-inforce the unattractiveness when seen from a distance and compared to the historic buildings that already exist. Aberdeen's skyline is generally not particularly high, but it is punctuated extensively by beautiful spires from our many old

buildings. The policies in this Plan and in the supplementary planning guidance needs to ensure that large buildings are not just rubber-stamped by the planning department, just because they comply with this policy. They need to be considered carefully and local opinion needs to be taken into account. It is a shame that the wording here, much of which was already included in previous local development plans, has not been able to influence the council to support local people in their horror of some recent proposals.

Page 25 of the proposed plan deals with our Granite Heritage. We have concerns about the protection of our heritage, and once a building is demolished it is lost for ever. Many landowners allow some of our old buildings to deteriorate through neglect and then argue that it is not commercially viable to carry out repairs and thus demolition is the only alternative. Policies should be introduced to enforce maintenance on vacant or unoccupied buildings that may be listed or lie in a conservation area.

Paragraph 3.18 refers to the City Centre as being a focus for employment and business interaction. Mention should also be made that the City Centre also has many residential properties and that these contribute to the vitality of the centre.

Policy NC2 refers to the City Centre Retail Core is the preferred location for major retail developments. This should not mean that areas outside of the centre that could benefit from additional retail and commercial development that contribute towards making a balanced and mixed use settlement should be turned down just because there is not a suitable site in the city centre. What needs to be avoided is out of town retail centres, but retail development that is a major part of a mixed use area should be encouraged. To some limited extent this is covered by clause 3.28, but it should be given more strength by being included as part of the policy.

Policies NC2 and NC3 refer to change of use from retail to other uses and lists how it may be acceptable. This list should be used to encourage the use of upper floors in existing buildings (particularly in Union Street but also in other historic streets in the centre). The policy should therefore make it clear that any proposal that means that the upper floors of existing properties will be used or brought back into use (from whatever use class this may be, including residential) will be supported. It is better to have the upper floors used rather than leave them lying empty in the hope of a retail offering wanting to use them.

The wording in Policy NC4 relating to support for new retail and commercial centres in major new development areas (about half way through the policy) we would strongly support.

Policy NC6 – Town, District, Neighbourhood and Commercial Centres refers to the fact that retail is the preferred use. We would like to see this policy encouraging more than just retail in these areas. Office or other commercial use adds 24 hour vitality to an area and the lack of available space for these uses currently means that they are preferentially choosing to locate to areas such as Queens Road and Carden Place that were previously primarily residential. These areas are therefore changing to become more commercial than mixed use and this is a shame. The way to mitigate this is for some of the space in existing town or neighbourhood centres to be available for small and medium sized office uses.

We strongly support Policy NC8 (Retail Development Servicing New Development Areas, but would like the wording to also include space for offices and leisure as well as retail. This will add to the mixed use vitality of the area.

Policy I1 refers to Infrastructure Delivery and Planning Obligations. There is a desire in the development industry to only build single use sites (for example only residential or only commercial). Mixed use does allow for some traffic mitigation as it gives people the opportunity to live and work in the same area, possibly within walking distance. In calculating the need for developer contributions relating to a mixed use scheme, some form of allowance should be made for the fact that it is mixed use, and this could be a reasonable deduction in planning obligations relating to transport. This would be one way to encourage the delivery of mixed use areas.

Policies T1 and T2 relates to Land for Transport and Managing the Transport Impact of Development. Members of the civic society are often concerned about the resultant impact of increased traffic that always follows on from any new development. For example, the development of the single use zoned area at Prime 4 has resulted in considerable increases in traffic movements during peak time. To some extent this is unavoidable, but in considering land required for transport, the council should carefully consider the impact that such schemes have on the functioning of existing neighbourhoods – for example be carrying out a walkable neighbourhood analysis before making a final commitment to a particular transport proposal. We definitely support the paragraph relating to how the employment opportunities created by the development of new communities should reduce the need to travel, and we would hope that a proper mechanism is in place against which to judge whether or not this will succeed (and then measure its success after the fact also).

Policy B1 refers to buffer zones to separate commercial from residential areas. It would be much better to allow these to be mixed use, rather than increase separation of them by the provision of buffer zones. The wording should be adjusted to allow for this to happen and not solely rely on buffer zones.

In general all of the development proposals for supporting Business and Industrial development tend to support single use zoned areas. These have proliferated around the city in recent years (eg the airport, Kingswells, Murcar). These areas encourage the use of motorised vehicles as people travel to and from their place of work. A further problem is that these areas are often not very densely developed. In order to reduce their impact on the landscape, they should be encourage to be at a much higher density of development (in relative terms, the density of a commercial area is no higher than a suburban housing estate, ie very low density).

Policy B3 relates to the West End Office area. It says that “Proposals for change of use to residential will be considered on their merits”. It is beneficial to encourage the resident to remain in this area of Aberdeen as it will mean that the area retains some vitality at times when the offices are not occupied. As a result the reference should be to ensure that this area of Aberdeen remains mixed use, both for residential and commercial uses.

Policy H3 deals with the density of residential development, suggesting a level of density that can easily be provided on the basis of a good mix of properties. However, care needs to be taken to ensure that a development of too high a density is also avoided. There is a balance in seeking to ensure that an area of development is an attractive place in which to locate (either a business or a residential dwelling). A density of much above 70 dwellings per hectare is too high.

It is a shame that the policy H3 on density is not extended into the density of commercial areas. Often modern, out of town commercial development is very low density and this should be avoided as it uses too much land.

We support Policy H4 on housing mix and would like to encourage its application for developments that are smaller than 50 units also.

Policy H5 on Affordable Housing should mean that the affordable housing is provided on site and through a variety of means. The use of commuted payments should be avoided.

Supplementary Planning Guidance

SPG – Big Buildings

When considering views to the building from a distance, the context should include views from 360 degrees around the building rather than just one or two selected views. Buildings granted consent in Aberdeen recently have had a big impact from views in directions other than envisaged and presented as part of the planning application.

Building Design – Upright proportions

Buildings should refrain from having standard floor to ceiling heights that tend to “horizontalise” the elevation. Consideration should also be given to the building’s surroundings and historical context to ensure that a large building does not overpower existing buildings that show off Aberdeen’s granite heritage.

Planning Process

The list must include the fact that a big building must respect it’s surroundings and improve rather than detract or overpower the existing heritage.

SPG – Harmony of Uses

There is a section on Residential Developments in the City Centre. This mentions the challenges of allowing residential development to occur in the centre, but it should also provide some encouragement. Wording should therefore be included saying something like “Despite the fact that there are challenges accommodating residential development in a thriving city centre , where there are a mix of uses, it is to be encouraged as a way of ensuring vitality of the centre, particularly in buildings that otherwise would not have a use above ground floor level.”

SPG – The Sub Division & Re-Development of Residential Curtilages.

We support a SPG that addresses the issue of the re-development of existing properties within any area. In general we would like to see developments that involve the demolition of existing buildings and the re-building of new ones to be carefully considered in the context of their surroundings. The policy covers this to some extent, but it needs to ensure that there is not an over development of a single house in a group, and that any redeveloped property is sympathetic in terms of scale, design, height and materials. We do acknowledge that there may be occasions when this needs to be reviewed (for example the retrofit of a neighbourhood centre in a specific location to which this can be supported) but in general we feel that the priority in cases such as these has to be that the character of the existing neighbourhood is retained.