



**Aberdeen City Local Development Plan Main Issues Report - April 2019**  
**Cults, Bieldside and Milltimber Community Council Responses To Questions**

**1. Do you agree with the preferred housing sites?** Yes. In particular we support the proposed refusal of most of the further housing development proposals in Lower Deeside until the existing approved developments are closer to completion and the better infrastructure need to support further development has been implemented. We recommend that the site Milltimber South B0940, allocated for development by the Scottish Reporter in current LDP, be rezoned to greenbelt and part of the greenspace network.

**Are there any other sites suitable for housing?** We offer conditional support for the proposed retirement community development between the North Deeside Road and Inchgarth Road, west of Pitfodels Station Rd., subject to the provision of the much needed link road enabling bus transport between the North Deeside Road and Inchgarth Road and increased support for the local medical services.

**2. Is there a need for us to identify any further housing allowance or sites for the period beyond 2032?** No. There are sufficient plans and approvals in place for this cycle of planning. Building progress on the approved sites should be monitored to see the pace of development justifies additional sites being included in the next LDP.

**3. Are there any further brownfield sites or other opportunities which would be suitable for re development?** No.

**4. Do you have any comments on these sites for NHS?** Preference should be given to use of brownfield sites rather than open space. If open space is to be used, it should be replaced by an alternative site which should be appealing to the public.

**Are there any other sites in these areas that we should be considering for NHS?** No, but it is worth reiterating the need for the timely delivery of a new medical service provision at Countesswells, which is part of the planned development.

**5 .Do you agree that the local development plan should modify its centre boundary to match the city centre boundary shown on the city master plan?** Broadly agree - the boundary for the CCMP could also be modified to



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incorporate the section of the LDP boundary that includes a section of King Street.

**6. Do you agree that the city centre master plan intervention areas should be identified as opportunity sites with the local development plan? Yes.**

**7. Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?** The current limits for a central retail area defined by Union Square to the Bob Accord Centre and Broad Street to Huntly Street still appear to be appropriate. However this should not prevent conversion of some properties from retail to residential use if there is demand for this. Also see question 8 below.

**8. Should the Union Street frontages percentages be reviewed? Do the current target percentages ensure a balance between a strong retail focus and allowing for other uses?** Some of the % levels could be reduced to encourage the occupation of unlet properties for non-retail use. We believe the public would rather see buildings occupied than left standing empty for lengthy periods, as long as there is control over the types of use e.g. limit gambling premises and fast food outlets.

**What other uses should we allow on the retail core of Union Street?** We suggest the inclusion of local business hubs and innovation centres which are open to the wider community (Ref. Case study from Brighton in "Innovation on the High Street: Journal of the RICS March/April 2019"). There could also be more residential and leisure sites.

**9. Should we direct high footfall uses to existing centres including city centres?** Yes, but this goes together with the requirement for good public transport links to the city and city centre parking for rural area residents.

**Should we consider new out of town retail parks?** No - retailers should be directed towards the existing city retail areas.

**What would be the impact of these be on Union Street and the city centre and Aberdeen's network of centres?** We believe the impact of out of town retail parks will be negative and hence they should be refused planning permission.



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**10. Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?** Yes. Cinemas and other visual attractions should be in the centre to increase footfall for restaurants etc. However sports, gyms and other active facilities should be spread throughout the city area so their use by residents would be made easy for the benefit of a more healthy population. New large scale housing developments e.g. Countesswells, should incorporate a local leisure centre.

**11 How can we encourage more people to live in the city centre?** Provide good quality accommodation and better public transport across the city.

**Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?** Yes

**12. Are there any other locations within the city centre where residential accommodation could be provided?** No suggestions to offer.

**13. 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?** Create more art and cultural centres where people can use studios and meet to exchange ideas. Encourage and support more street art - sculptures, murals - in public places.

**14 Are there any other buildings or areas within Aberdeen that could accommodate the existing and support an emerging creative sector for desk based and studio artists?** Use the old Scottish Water Pump House in Cults for a new creative centre. Support the creation of a museum showcasing the quarrying and use of granite in Aberdeen at the Rubislaw Quarry. Promote the creation of a dedicated oil & gas exploration and production museum (we note that the Maritime museum has a section addressing the O&G industry - perhaps this could be expanded).

**15. To ensure Aberdeen city centre retains its distinctiveness should developments with construction cost of £1m or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publically accessible visible place or places within the development?** Yes, culture is good for public wellbeing as demonstrated by the popularity of Nuart.



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**16. Do you think that the amenity spaces currently delivered are of sufficient quality?** Some of the recent new developments e.g. Friarsfield, Countesswells, have established some good quality amenity spaces. All new developments should provide spaces of a similar standard.

**Should we strive for a better quality quantity of private semi-public residential amenity space across the city and refuse permission to proposals which do not meet our high standard?** Yes and importantly, ensure that the amenity spaces are well maintained, developers set up appropriate funding provisions for maintenance and that public access is allowed.

**What standards would you like to see set for new dwellings flats and conversions in respect of quality and quantity of external amenity space?**

There should be appropriate legal provisions that enable ongoing maintenance to be funded and these should be affordable for residents and the local authority going forward.

**17. Do you agree that the proposed list of policies for natural environment gives a clearer and more convenient structure than at present?** We support simplification but it is impossible to provide further comment without seeing the details of the proposed new policies, to ensure that current provisions are protected. Too much compression could reduce clarity and make the policies difficult to use.

**18. How can the city local development plan support the delivery of food growing projects in the city?** Provide more land to be used for allotments - review existing unused sites and make them available to communities e.g. some of the proposed redevelopment of the current Milltimber Primary school.

**Do you think food growing should be included in the next local development plan by way of a new policy or through existing policy and guidance?** If there is a consensus that a policy would help encourage and enable more food growing then it should be considered.

**19. Should we reduce car parking in the city centre to support the city centre master plan?** No - certainly not until a better and affordable public transport service can be delivered. The city needs to recognise that it supports



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a large rural population and retailers need those residents to visit their businesses.

**If so how?** Careful planning and siting of car parks, rather than reduction of capacity, can help smooth traffic flows.

**20. Should high speed broadband be mandatory in all new residential developments with 5 or more units? Yes, absolutely.**

**Do you wish to suggest any other changes to the digital infrastructure and telecommunications infrastructure policies?** All new houses should be fitted with a fibre optic link from the house to the property boundary for a future tie-in to a street fibre network.

**21. Do we need to change our approach to securing developer obligations for future development proposals?** There should be greater transparency on the setting and use of developer contributions and the constraints on their use should be less restrictive. Work with the Scottish Government to develop a more open process and policy for use of developer contributions. The requirements should be applied uniformly and enforced. Work more closely with communities on the use of developer contributions - it is currently haphazard and done at arms length.

**22. What methodology should the Council use in calculating compliance with policy R7 on Low and Zero Carbon Generating Technologies and Water Efficiency, specifically how should the target of reducing carbon dioxide levels be calculated?** We are not able to comment on this question - a useful answer requires some specialist knowledge. The City Council should seek expert opinion.

**23. 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. Furthermore it should be a requirement that all new properties be fitted with solar panels and sited such that they can take advantage of solar power. Also start to assess the requirement for a policy around the use of heat pumps for space heating in new properties.**



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**24. 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, we agree with this approach - minor amendments should be limited.**

**25. Do you agree with the local development plan's current affordable housing approach being carried forward? Yes - ensure that the 25% requirement is adhered to rather than allowing developers to negotiate a lower figure.**

**What other methods could the council consider in order to assist with the delivery of affordable housing units via the local development plan? We suggest you give a higher level of support and encouragement to developers who offer a higher % e.g. 50%, of affordable housing units on preferred sites.**

**Should the threshold of not applying affordable housing requirements to developments smaller than 5 units remain in place? Yes, this is reasonable.**

**26. Are there ways that the local development plan can facilitate build to rent development through policy? The current property market would suggest that there is no need for the LDP to facilitate Build To Rent - there are over 1000 properties available for rent in Aberdeen 2Q2019.**

**27. Is there anything else that the local development plan can do to support the objectives of our LOIP or the aims of community planning? No comments.**

**28. Should large new developments that require public access provide changing places toilets? What type of venue should provide them? There should be a broader policy addressing the provision of public access to toilets, including 'changing places'.**

**Responses to the Main Issues Proposed**

- 1. Living In The City Centre - we support Option 2**
- 2. A 24 Hour City - we support Option 2**



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**3. Visitor Attractions** - we support the intent of attracting more visitors to the city and a policy which achieves that would be welcome. We would like to see the details of such a policy before it is implemented.

**4. Minimum Internal Space Standards** - while a better than minimum internal space standard would be preferred, we recognise that Option 2 in line with a Nationally Described Space Standard is likely to be more acceptable to developers.

**5. Electric Vehicle Charging Infrastructure** - we support Option 2

**6. Low and Zero Carbon Generating Technologies and Water Efficiency** - we support Option 2. We also suggest that Aberdeen City Council together with Aberdeenshire Council should be pressing the Scottish and UK Governments to invest in new hydro-electric schemes, to complement the investment in wind and solar power schemes. Some loss of wilderness in creating reservoirs and dams can be tolerated for a greater benefit.

**7. Heat Networks** - we support Option 2 and could also support Option 3 if it included a provision that the developer should be required to do a technical and commercial appraisal of a heat network's economic viability to see if it can be supported.

**8. West End Office Area** - we support Option 2

**9. Inclusive Housing Mix** - we feel that the preferred Option 2 is insufficiently defined and open to negotiation and excessive flexibility. We prefer Option 3, where the City Council should provide more detailed guidance on methodology. This should include relevant demographic information for neighbourhoods to allow minimum standards to be set.

**10. Residential Care Facilities** - we support Option 2 and we suggest that the new policy and Policy H1 should include a requirement that the developer can demonstrate that a consultation on Health and Social Care provision has taken place with the relevant bodies and that an adequate service provision will be available for the new development.

**11. Student Accommodation** - we support Option 2



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**12. Houses In Multiple Occupation** - we support Option 2. Regarding the questions on percentage limits, boundaries and thresholds for planning permission our views are;

- Percentage Limit of HMOs in each area - we support a level of 20%
- Geographical Boundary of each area - we support the use of Option 2, Intermediate data zones
- Threshold for when Planning Permission is required - we support Option 1