

PLA/21/157 City Centre Conservation Area Character Appraisal Public Consultation Response

TABLE 2: Summary of responses and issues arising from public consultation held from 19th February until 16th April

Question 2: Please give us your view on the proposed Regulation 11 Direction.

<i>Key issue</i>	<i>Officers Response</i>	<i>Action as a result of Representation</i>
1. Scottish Water		
1.1 No comments.	None.	No action required.
2. SEPA		
2.1 No comments.	None.	No action required.
4. Historic Environment Scotland		
4.1 No comment.	None.	No action required.
5. Bon Accord Heritage		
5.1 (ANON-1RU9-AY31-F) No comments.	None.	No action required.
6. Public Responses		
6.1 (ANON-1RU9-AYVH-9) The respondent supports the proposed Regulation 11 direction.	Comment noted.	No action required.
6.2 (ANON-1RU9-AY8J-D)		

<p>The respondent considers that signs should be made bigger as they consider them difficult to read at present.</p>	<p>The Regulation 11 direction would not prevent larger For Sale / To Let signs being installed it would just require the applicant to apply for Advertisement Consent. Any scheme would then be assessed against local and national guidance. It would however be unlikely that applications for particularly large projecting For Sale / To Let signs than the ones generally used currently would be supported by the Planning Service.</p>	<p>No action required.</p>
<p>6.3 (ANON-1RU9-AY6X-S)</p> <p>The respondent asks why the Council is trying to hide the fact that the city centre is in decline.</p>	<p>The proposed Regulation 11 direction is not trying to hide the level of vacant units in the city centre. The intention is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 Direction would allow the Council to better control the number, size and location of these projecting signs.</p>	<p>No action required.</p>
<p>6.4 (ANON-1RU9-AY6E-6)</p> <p>The respondent believes the Council should fix the root cause of the problem rather than tackling a symptom.</p>	<p>The intention of the proposed Regulation 11 is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.</p>	<p>No action required.</p>
<p>6.5 (ANON-1RU9-AY6C-4)</p>		

<p>The respondent believes the Regulation 11 Direction is an excuse for the Union St business community to manipulate political opinions.</p>	<p>The Regulation 11 Direction is being proposed by the Planning Service. The intention of the Regulation 11 is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.</p>	<p>No action required.</p>
<p>6.6 (ANON-1RU9-AY6S-M)</p> <p>The respondent supports the proposed Regulation 11 Direction is a good idea. The respondent also notes that the area around Rubislaw Terrace also includes a large number of large For Sale / To Let boards</p>	<p>The comments are noted. Rubislaw Terrace is in the Albyn Place and Rubislaw Conservation Area which is not covered by the proposed Regulation 11 Direction. There may be scope to expand the use of Regulation 11 Directions to other Conservation areas in the future if the one proposed for the City Centre Conservation Area is approved and is then felt to be a success.</p>	<p>No action required at this time.</p>
<p>6.7 (ANON-1RU9-AY66-Q)</p> <p>The respondent feels the proposed Regulation 11 Direction is acceptable. They would also like to see it be extended to shop signage.</p>	<p>There are currently a number of planning controls in place to regulate the type of shop signage that is installed. Planning applications for new shop signage are determined as far as possible in line with local and national guidance. This has seen some improvements in shopfronts on Union Street. Regulation 11 Directions could possibly be used to further control shopfront signage but this is not felt necessary at this time.</p>	<p>No action required at this time.</p>
<p>6.8 (ANON-1RU9-AY61-J)</p> <p>The respondent does not support the proposed Regulation 11 Direction. They feel the For Sale / To Let signs let people</p>	<p>Business rates are controlled by the Scottish Government. This is not something that can be controlled by the Council. The intention of the proposed Regulation 11</p>	<p>No action required.</p>

<p>see how many buildings have expensive rates applied to them.</p> <p>The respondent feels there is little else available to comment on except the proposed boundary and so they feel they cannot comment further at this time due to the lack of information provided.</p>	<p>Direction is not to hide the number of vacant units. It is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.</p> <p>The Proposed Regulation 11 Direction was explained through a document that was available on the ACC Cconsultation hub with the Conservation Area Appraisal. This document set out the intention of the Regulation 11 Direction, the legislative context and the area to be covered by the Regulation 11 Direction.</p>	<p>No action required.</p>
<p>6.9 (ANON-1RU9-AY6Y-T)</p> <p>The respondent believes the problem isn't the big For Sale / To Let signs but rather that the buildings are vacant. They feel something should be something done to fill these buildings rather than hide the fact that they are empty.</p> <p>The respondent feels Aberdeen has become a ghost town. They would like something to be done as they feel this is driving business outside of Aberdeen and online.</p>	<p>The proposed Regulation 11 Direction is not meant to resolve the issue of vacant units in the city centre. The intention of the proposed Regulation 11 Direction is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.</p> <p>The issue of vacant units is one that the majority of town and city centres are suffering from and requires a bespoke solution depending on the town/city. This has been exacerbated further by the COVID-19 pandemic. The City</p>	<p>No action required.</p> <p>No action required.</p>

	Centre Masterplan is currently being reviewed in light of the effects of the pandemic.	
6.10 (ANON-1RU9-AY6B-3)		
No comment	None.	No action required.
6.11(ANON-1RU9-AY6W-R)		
The respondent does not support the proposed Regulation 11 Direction. They feel the properties should be occupied rather than hiding that they are vacant.	The intention of the proposed Regulation 11 Direction is not to hide the number of vacant units. It is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.	No action required.
6.12 (ANON-1RU9-AY6A-2)		
The respondent believes the For Sale / To Let signs should remain as it makes visible how prosperous the city is.	There needs to be balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number and size of these projecting signs.	No action required.
The respondent asks is it better for the Council to have high business rates and low occupancy rates or lower business rates and higher occupancy rates	The Council do not set business rates this is managed centrally by Scottish Government.	No action required.
6.13 (ANON-1RU9-AY68-S)		
The respondent does not support the proposed Regulation 11 Direction and consider it is being proposed to hide the problem of empty buildings rather than address it.	The intention of the proposed Regulation 11 Direction is not to hide the number of vacant units nor is it meant to be a solution to the number of vacant properties on Union Street. The proposed Regulation 11 Directions intention is	No action required.

<p>The respondent believes years of mismanagement by Aberdeen City Council has resulted in the large number of vacant properties in the conservation area (alongside additional covid impacts) and feels this solution would only hide the problem. The respondent would like to see the Council working towards filling these vacant spaces by encouraging business investment in the city, rather than hiding the to let signs</p>	<p>to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.</p> <p>The issue of vacant units is one that the majority of town and city centres are suffering from and requires a bespoke solution depending on the town/city. This has been exacerbated further by the COVID-19 pandemic. The City Centre Masterplan is currently being reviewed in light of the effects of the pandemic.</p>	<p>No action required.</p>
<p>6.14 (ANON-1RU9-AY6D-5)</p> <p>The respondent supports this proposal. They feel in this digital age, there is no need for physical signs to advertise available space.</p>	<p>Comments noted.</p>	<p>No action required.</p>
<p>6.15 (ANON-1RU9-AY62-K)</p> <p>The respondent agree with removal of large signs.</p>	<p>Comments noted. For clarity the Regulation 11 would not ban large projecting For Sale / To Let signs it would just regulate where they can be installed and what size they can be.</p>	<p>No action required.</p>
<p>6.16 (ANON-1RU9-AYP7-J)</p> <p>The respondent does not support the proposed Regulation 11 Direction. They feel more effort should be spent occupying these lots rather than trying to hide them.</p>	<p>The intention of the proposed Regulation 11 Direction is not to hide the number of vacant units nor is it meant to be a solution to the number of vacant properties on Union</p>	<p>No action required.</p>

	<p>Street. The proposed Regulation 11 Directions intention is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.</p> <p>The issue of vacant units is one that the majority of town and city centres are suffering from and requires a bespoke solution depending on the town/city. This has been exacerbated further by the COVID-19 pandemic. The City Centre Masterplan is currently being reviewed in light of the affects of the pandemic. .</p>	
<p>6.17 (ANON-1RU9-AYP4-F)</p> <p>The respondent believes money needs to be spent on fixing the city's pot holes before anything else gets done.</p>	<p>The proposed Regulation 11 Directions intention is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.</p> <p>Day to day roads maintenance is not covered by the proposed Regulation 11 direction. The Roads Service is delivering an ongoing schedule of repairs to potholes in the city.</p>	<p>No action required.</p>
<p>6.18 (ANON-1RU9-AYPG-2)</p>		

No comments.	None.	No action required.
6.19 (ANON-1RU9-AYPH-3) The respondent does not support the proposed Regulation 11 direction . The consider the proposals is not based on concern for conservation of historical aesthetics, but rather the Council trying to hide how many empty commercial properties exist in the city centre.	The intention of the proposed Regulation 11 Direction is not to hide the number of vacant units nor is it meant to be a solution to the number of vacant properties on Union Street. The proposed Regulation 11 Directions intention is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.	No action required.
6.20 (ANON-1RU9-AY37-N) Yes	Comment noted.	No action required.
6.21 (ANON-1RU9-AY3E-3) The respondent believes the Council is trying to hide the number of vacant buildings from the public. The respondent believes the Council is not assisting small businesses to fill vacant units. respondent	The intention of the proposed Regulation 11 Direction is not to hide the number of vacant units nor is it meant to be a solution to the number of vacant properties on Union Street. The proposed Regulation 11 Directions intention is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs. The issue of vacant units is one that the majority of town and city centres are suffering from and requires a bespoke solution depending on the town/city. This has been exacerbated further by the COVID-19 pandemic. The City	No action required.

	Centre Masterplan is currently being reviewed in light of the affects of the pandemic. .	
6.22 (ANON-1RU9-AY38-P) The respondent supports the proposed Regulation 11 Direction.	Comment noted.	No action required.
6.23 (ANON-1RU9-AYQ7-K) The respondent agrees the signs are not attractive, but believes the ones which stick out are visible from a distance and can be seen from motor vehicles, which may encourage letting.	<p>The projecting signs are more visible but it is questioned how much more they would encourage letting. There are arguably more effective ways of encouraging the letting of these buildings that would have considerably lesser impact on the special character of the historic buildings and streetscapes in the city centre (e.g. online advertisement and various social media platforms).</p> <p>The proposed Regulation 11 Direction would not prohibit projecting For Sale / To Let signs. Advertisement consent would need to be applied for and the proposals assessed against to local and national guidance. Consent would not be required for For Sale / To Let signs of a standard size that were not projecting into the street.</p>	No action required.
6.24 (ANON-1RU9-AYQR-E) The respondent considers the proposed Regulation 11 Direction to be tokenism.	The proposed Regulation 11 Directions intention is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.	No action required.

<p>6.25 (ANON-1RU9-AYQP-C)</p> <p>The respondent agrees with the proposed Regulation 11 Direction but feels more needs to be done at a national government level to encourage reuse of buildings.</p>	<p>Comments noted. The Union Street Conservation Area Regeneration Scheme (CARS) which is a part-national funding scheme from Historic Environment Scotland makes grants available for repair works to historic buildings which encourages their reuse and continued use.</p> <p>The Council cannot control what initiative are brought forward by the Scottish Government but would welcome any new schemes that encouraged the reuse of vacant buildings in city centres.</p>	<p>No action required.</p>
<p>6.26 (ANON-1RU9-AYQ2-E)</p> <p>The respondent supports the Regulation 11 Direction and considers that it should have been put in place a long time ago.</p>	<p>Comments noted.</p>	<p>No action required.</p>
<p>6.27 (ANON-1RU9-AYEF-P)</p> <p>The respondent supports the proposed Regulation 11 Direction.</p>	<p>Comments noted.</p>	<p>No action required.</p>
<p>6.28 (ANON-1RU9-AYEZ-A)</p> <p>No comments.</p>	<p>None.</p>	<p>No action required.</p>
<p>6.29 (ANON-1RU9-AYEM-W)</p> <p>The respondent considers the proposed Regulation 11 direction to be a logical way to give the Council more control over the type of For Sale or To Let signs erected, and so to</p>	<p>Comments noted.</p>	<p>No action required.</p>

<p>help minimise possible detracting from the amenity and special character of the Conservation Area.</p>		
<p>6.30 (ANON-1RU9-AYED-M)</p> <p>The respondents are in favour of the reduction in large signage. The respondent also disapproves of poor quality shopfronts using inappropriate materials. The respondent is pleased the appraisal document addresses this.</p> <p>Removal of roofline foliage should be mandatory before it becomes a danger.</p>	<p>Comments are noted. For clarity the Regulation 11 direction is limited to large For Sale / To Let signs. The planning service looks for good quality materials in line with local and national guidance when determining Planning Permission and Listed Building Consent applications.</p> <p>The enforcement team are in communication with owners of buildings on Union Street regarding their maintenance and up keep including vegetative growth is ongoing and enforcement notices will be served as required</p>	<p>No action required.</p> <p>No action required.</p>
<p>6.31 (ANON-1RU9-AYE1-1)</p> <p>The respondent supports the proposed Regulation 11 Direction. They believe although there are some circumstances where planning permission / approval could be sought for other kinds of advertisements and signs providing notification of sale of a premises, property or space - withdrawal of deemed consent will mean there is the ability for this to be decided on a case-by-case basis.</p>	<p>Comments noted. The proposed Regulation 11 Directions intention is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.</p>	<p>No action required.</p>

<p>The respondent believes although the removal of the signs would by its nature be addressing a symptom rather than the cause of these vacancies, it would at least mitigate the impact of a potential lowering of property values on the areas overtime, which would otherwise serve as a disincentive of occupiers, letters and renters wishing to move into or occupy these spaces.</p>	<p>The intention of the proposed Regulation 11 Direction is not to hide the number of vacant units nor is it meant to be a solution to the number of vacant properties on Union Street. The proposed Regulation 11 Directions intention is to ensure there is a balance between advertising vacant properties and preserving the special character of the historic buildings in the city centre. The proposed Regulation 11 direction would allow the Council to better control the number, size and location of these projecting signs.</p>	<p>No action required.</p>
<p>6.32 (ANON-1RU9-AYEB-J)</p> <p>The respondents agree with the proposed Regulation 11 Direction.</p>	<p>Comments noted.</p>	<p>No action required.</p>