

OLD ABERDEEN COMMUNITY COUNCIL

Development Management
Planning and Sustainable Development
Aberdeen City Council
Business Hub 4, Marischal College
Broad Street
Aberdeen, AB10 1AB

107 High Street
Old Aberdeen AB24 3EN

12th January 2016

Dear Mr Evans

Planning application 151811 – student accommodation; King's Crescent & St Peter's Street

On behalf of the nearby residents and to protect the Old Aberdeen Conservation Area, the Old Aberdeen Community Council wishes to OBJECT to this application on the following grounds:

1. Overdevelopment of the site

Not in compliance with: 'Student Accommodation TAN'. para 3.4; 'Successful built developments ... must be located and designed to minimise adverse impacts on their surroundings. Such impacts include overlooking, overshadowing or over-domination of buildings'.

Too high. The scale of the proposed development is significantly higher than the 3 storey block to the immediate north, 2 the Spital, and higher than the 3 storey block to the south; 54 Kings Crescent. On 26 November we asked the developer; Montagu Evans, for an elevation to show the relationship between the proposed development and the existing housing, but they have given no indication that this will be provided. This may be construed as an indication as to just how excessive the development height is likely to be. Copies of the email communication are with the Planning Department.

Too close to the road. The proposed new building comprises a number of blocks which vary in distance from the road edge, but the overall impression is of close proximity. This makes the structure highly intrusive and offers an overbearing aspect to the residents of Kings Crescent.

2. Lack of parking

Not in compliance with: 'Student Accommodation TAN'. para 3.10; 'car parking guidelines'.

- King's Crescent is not in a CPZ and residents currently experience difficulty parking nearby. Add into the mix friends and family of 202 students and this could become impossible. While the developer seeks to make a virtue of providing zero parking for students, the reality will be that a small number will have cars and will create further parking pressure on the limited existing parking spaces in what is not a CPZ.
- There is no adequate provision for temporary unloading and loading of students' property at the beginning and end of each academic year.
- As per the relevant TAN and the Local Plan Supplementary Guidance on Transport and Accessibility, one parking space per 10 students should be provided.
- As designed, First Bus will lose 26 car parking spaces and while the stated intention is for FirstBus to provide supplementary parking on site, this does not form part of the application and thus may never happen, creating significantly more pressure on the road parking. It should be noted that the present level of parking available for FirstBus drivers is already insufficient as the intense use of Advocates Road and its pavement attests.
- The provision of a car club space on public road would appear to exceed the gift of a private developer?

3. Overprovision

There is already a high density of dedicated student accommodation in the immediate area with a new block on the North side of St Peter's St and a further two blocks at King St, at the end of St Peter's Street and Merkland Road, while St Martha's House, just a few yards up the Spital, is also a dedicated student accommodation block.

The proposal fails to meet: 'Student Accommodation TAN'. para 3.2; '...proposals ... should give adequate consideration to ... identified need'.

4. Pedestrian Safety

Not in compliance with: 'Student Accommodation TAN'. para 3.3; '... safe and secure pedestrian links ..'.

If all the many student accommodation units current being built and under planning application end up built, then at around 9am there is likely to be hundreds of students all walking north to get to their first lesson of the day.

151811 This development: 202 beds

151772 Former BT workshops: 425 beds

120946 St Peters Street 125 beds

141753 Causewayend 173 beds

141090 Powis Place 196 beds

141096 Causewayend school 400 beds (approx)

1521 beds, excluding all students in HMOs and any students from the Spring Garden student accommodation development

The Spital – College Bounds pavements are narrow and undersized for pedestrians, as noted in the Old Aberdeen Conservation Area Appraisal (para. A.3.3.3) and on refuse collection days pavements are often semi-blocked. While the ACC desire for students to be located where they can walk to work is full of good intentions, the reality could become pretty chaotic and is likely to result in many walking along the roadway. It is notable that none of the Transport Statements for the listed planning applications considers the cumulative impact of student from multiple developments heading for the same destination.

5. Noise attenuation

Main entries lead straight off public roads and will be a focus for smoking breaks and for late night noisy farewells to the detriment of the neighbours. The loss of trees will mean this source of noise attenuation is no longer available.

6. Heritage and Conservation

Not in compliance with: 'Student Accommodation TAN'. para 3.7; 'Where new developments are proposed in residential areas outwith the city centre, these must have regard to the local residential environment by respecting the existing character, massing and height of the area. These developments must also respect and consider form, landscape and topography, existing street pattern and permeability, noise, scale, materials, connectivity and urban grain'.

- This is a major development in size and mass and entirely unsuitable for its location on land adjoining and overlooking Aberdeen's prime historic Conservation Area. The design is aggressively modern and out of character with the rest of King's Crescent, - reconstituted stone cladding and timber cladding may have a place in Ardmuir's development on King Street but certainly not here.
- While visual presentation is a highly subjective issue, the drawings provided give little confidence that a sensitive development appropriate for a Conservation boundary is being proposed. While the Old Aberdeen Community Council is not looking for a Georgian / Victorian

pastiche, we expect something better than this overbearing and dull structure that fails to take into consideration its position alongside the Conservation Area.

- Trees. While the trees running along the east wall are of variable quality, the total destruction of 28 trees along the road is unacceptable. The Old Aberdeen Conservation Area Character Appraisals and Management Plan (September 2015) paragraph 3.3.4 notes of the Spital; '... the trees make a significant contribution to the green setting of the Conservation Area ...'. While it is appropriate to remove those trees that are in poor condition or which will shortly damage the old wall, the wholesale removal simply for the convenience of the developer shows a gross lack of sensitivity to the Conservation Area and community.
- The two 16thC 'march stones', while acknowledged, have not been assured a safe home.

The Strategic Overview and Management Plan of Conservation Areas - July 2013 makes clear that Aberdeen City Council has a statutory duty to protect and enhance the historic environment and ... try to ensure that initiatives and projects in the area are mindful of this.

Scottish Planning Policy Section 144 also makes clear that proposals outwith a conservation area which will impact on its appearance, character or setting should also preserve or enhance the character or appearance of the conservation area.

In Summary

OACC contends that this planning application will severely impact the southernmost end of the Old Aberdeen Conservation Area and the residents in King's Crescent and we would therefore ask the Planning Committee, for all the reasons outlined above, to refuse permission for this proposal:

1. Overdevelopment of site - totally overbearing upon the surrounding area
2. An irresponsible lack of parking provision
3. Adds to a significant overprovision of student accommodation in the immediate locality
4. Increases the numbers of students who must negotiate the narrow pavements of Old Aberdeen
5. Lack of consideration of noise mitigation
6. Severe detriment of conservation area due to an unsympathetic, brutalist design

The above is non-compliance with ACC 'Student Accommodation TAN' and the 'Strategic Overview and Management Plan of Conservation Areas - July 2013'.

Yours sincerely