



OLD ABERDEEN HERITAGE SOCIETY

Planning Dept,
Aberdeen City Council,
Marischal College

P&SD Letters of Representation		
Application Number:		
RECEIVED 13 DEC 2016		
Nor	Sou	MAp
Case Officer Initials:		
Date Acknowledged:		

11 Greenbrae Crescent,
Denmore, Bridge of Don
AB23 8LH
12th January 2016

Dear Sirs,

King's Crescent / St. Peter Street, Old Aberdeen

Proposed erection of six blocks of student flats comprising 202 beds, between 4 and 6 storeys high, facing into the Old Aberdeen Conservation Area

The society wishes to register **the strongest possible objection** to this planning application.

We are incredulous that such an intrusive, insensitive and otherwise hugely inappropriate development should even have been mooted, far less submitted as a planning proposal. The company behind this clearly have no appreciation of the character, appearance or historic importance of this area.

King's Crescent forms the main approach to the Old Aberdeen Conservation Area, and is of considerable historical importance, being since mediaeval times the principal route into Old Aberdeen.

This development would utterly destroy the character of this special place, both by the loss the boundary wall and trees, and by the erection of such ugly buildings of such mammoth proportions.

The proposed development would undoubtedly be a major blight on the Old Aberdeen Conservation Area.

In the following pages:

- 1) We examine in details the proposals in terms of the damage they would inflict on the Conservation Area (and its listed buildings).
- 2) We also examine the detrimental impact they would have on the neighbourhood in terms of residential amenity.
- 3) We also examine the unsatisfactory (indeed unsafe) level of residential amenity they would afford the prospective inhabitants of the flats.
- 4) Lastly, we examine the cumulative effect of such developments when in high concentration in one area, (such as this), and show that there is no longer a proven need for such accommodation.

For all the reasons in the enclosed submission, we strongly urge the Planning Committee to refuse this application outright.

Yours faithfully,

B. McPetrie
(Planning Secretary)

Grounds for Objection

Background

King's Crescent is a road of considerable historical importance. It forms the first part of the "mediaeval spine" leading from Aberdeen to Old Aberdeen. It contains in its short length several listed buildings, and a variety of granite houses and cottages/villas dating back as far as the 1830s (some of these on the site of an earlier grand house of the 1700s). It is also now the main entrance to the Old Aberdeen Conservation Area.

At present, King's Crescent is almost exclusively residential, with the main exception being the car park on the east side, where the developers now wish to build. The existing car park has limited impact on the streetscape because it is screened by a high granite boundary wall, and a row of trees. The overall impression, looking either up the hill towards the Spital (and the Category 'A' listed Convent), or downhill towards the Category 'B' listed houses on the curve, is one of an attractive road with a distinctive character, which is highlighted in the newly approved Character Appraisal.

The Appraisal describes this curving road as:-

"noticeably quieter and greener, ... the feeling of being in a distinctive place is immediately apparent"

Outline of Concerns

1) EFFECT ON THE OLD ABERDEEN CONSERVATION AREA

The area on which Ardmuir wish to build is bounded on three sides by the Conservation Area.

The boundary wall which they propose to demolish lies within the Conservation Area, and was specifically included by the City Council in the latest extension to the Conservation Area in recognition of the contribution it makes to the character of the area.

The line of trees directly behind the wall are also partly within the Conservation Area as their branches overhang the wall and pavement, and their roots will also extend to this area.

The site of the proposed development occupies a commanding position going up the hill at the entrance to the Conservation Area, and would undoubtedly dominate the vista looking up or down this road. Any development there would have a profound effect on the character and appearance of the area.

Planning Law and Government Policy decree that:-

*"Proposals for development within conservation areas **and proposals outwith** which will impact on its appearance, character or setting, should preserve or enhance the character and appearance of the conservation area"*

(Scottish Planning Policy Section, para 144)

Also:-

“Once a Conservation Area has been designated, it becomes the duty of the planning authority to pay special attention to the desirability of preserving or enhancing the character of the area”

(Scottish Historic Environment Policy p.27. para 2.44)

The proposed development would clearly have a major impact on the “appearance, character and setting” of the Conservation Area, and so, according to Government planning policy, must preserve or enhance that character and appearance. The City Council’s Local Development Plan commits the Council to abiding by these national planning principles.

We are convinced that the Ardmuir proposals would not in any way preserve or enhance the character and appearance of the Conservation Area. Further, we hold that they would seriously damage that character and appearance, and for that reason should be rejected, even if there were no other cogent grounds for objection.

In broad terms, we should like to highlight the following features which would cause harm to the Conservation Area:-

i) Design, Materials, Colour and Scale

This aggressively modern design is completely out of character with the rest of King’s Crescent and its continuation up the hill.

- a) **The blocks are flat-roofed**, whereas all the existing buildings in the road have traditional pitched, slated roofs. This feature immediately makes the proposed blocks stand out as alien to the neighbouring area.
- b) **The overall appearance is disjointed**, with ‘stepped’ or staggered heights, from 4 to 6 storeys, and an extremely irregular frontage in terms of distance from the pavement. None of the existing buildings in the road display these features within their design. Once again, out of character.
- c) **The style, proportions and size of the windows and doors** are completely at odds with those in the rest of King’s Crescent and its continuation up the hill. They do not preserve the traditional character.

Furthermore, the mix of smaller windows with many floor to ceiling ones is not in tune with the fenestrations of the other flats on this side of King’s Crescent, which all have a regular pattern of windows within each block. The floor to ceiling windows are completely alien in character.

The timber vertical ‘slats’ over the windows are another unsympathetic feature of the design. These are particularly out of place in the midst of a traditional Conservation Area. The vertical and horizontal cladding which covers much of the wall surface area is also out of character.

d) **Materials**

All the existing buildings on either side of this section of King's Crescent, from the junction of Jute Street to well beyond Applebank House and the Convent, are of granite construction; traditional granite houses with traditional slate roofs.

The proposed blocks of flats on the other hand, would be constructed of glass, timber and charcoal grey "reconstituted stone cladding" with charcoal grey render to the rear. Windows would be dark grey aluminium, another feature completely alien to this part of the Conservation Area.

None of these materials in the design could be said to "preserve" or "enhance" the character of this part of the Conservation Area. In fact, it almost seems as if every possible effort has been made to make these materials completely different from the rest of the road. Clearly it is a cheap alternative all round and in no way can it be said to be in character.

e) **Colour**

As indicated above, the colours used in these blocks are also inappropriate for the area. The charcoal grey of the reconstituted stone walling looks extremely dark, almost black, and as well as looking forbidding and depressing, it is clearly very different from the colour of the existing granite buildings round about which are of a traditional mid-grey granite, which looks somewhat lighter on a sunny day. In no weather conditions, however, would the charcoal grey/black of the proposed development look anything but a forbidding near-black, totally out of keeping with the rest of the road.

The timber cladding appears to be a bright pink/orange, which no doubt may fade a bit. but huge areas of bright coloured wood, as proposed, would definitely not echo any aspect of the colours of the surrounding buildings.

f) **Scale**

The proposed development is entirely in conflict with the scale of neighbouring buildings. Even when compared with nearby tenements flats it is considerably taller. The 6-storey blocks on the corner of King's Crescent and St Peter Street, in particular, are at least 1½ storeys taller than the neighbouring granite tenement. This is for maximum profit, with no consideration of its effect on those nearby.

The overall effect of the excessive heights, the 'brutalistic' architecture and the cramming in of so many blocks of such depth into such a small space, is to completely swamp this part of the Conservation Area.

The proposed blocks would completely and utterly dominate the area from whichever angle they were viewed.

The scale of these buildings is totally out of proportion to that of the surrounding buildings, even the tenements on the east side of the road. When compared to the family homes opposite, however, they simply dwarf them almost out of significance. The traditional cottages and even the more substantial family homes would be dwarfed; in particular those directly opposite the proposed blocks. These would undoubtedly also suffer loss of daylight and sunlight and overshadowing to their front gardens, as well as to their homes.

The consequences of the monstrous scale of this development would be to turn what is at present an open section of King's Crescent, characterised by open space and light on both sides, into a road dominated by the immediacy of a long row, right on the roadside, of towering, forbidding buildings, bearing down on the Conservation Area, now robbed of its traditional granite boundary wall and trees, and ruining the setting and amenity of the family homes opposite.

Relevant Policies and Guidance

Scottish Planning Policy:-

“The planning system should promote the care and protection of the designated and non designated historic environment.”

(section 137)

“Proposals for development within conservation areas and proposals outwith which will impact on its appearance, character or setting, should preserve or enhance the character and appearance of the conservation area.”

(section 144)

Scottish Historic Environment Policy

“Once an area has been designated, it becomes the duty of the planning authority and any other authority concerned, to pay special attention to the desirability of preserving or enhancing the character and appearance of the area.”

(section 2.44)

Adopted Local Development Plan (2012)

Policy D5 - *“Proposals affecting Conservation Areas or Listed Buildings will only be permitted if they comply with Scottish Planning Policy.”*

(-viz. preserve or enhance the character and appearance of the area)

Proposed Local Development Plan

Policy D4 - *“The Council will protect, preserve and enhance the historic environment in line with Scottish Planning Policy, SHEP, its own Supplementary Guidance and Conservation Area Character Appraisals and Management Plan.*

It will assess the impact of proposed development and support high quality design that respects the character, appearance and setting of the historic environment and protects the special architectural or historic interest of its listed buildings, conservation areas....”

Conservation Area Strategic Overview and Management Plan

1:2 - *“It is not only buildings that are of ... interest ... but also the spaces between them. All these elements combine to create and area’s special character. Planning is therefore directed at maintaining and being mindful of the balance and relationships between the various component parts.”*

2:1 - *“Aberdeen City Council has a statutory duty to protect and enhance the historic environment.”*

SWOT Analysis - page 12

- listed as a ‘threat’:-

“unsympathetic development which does not reflect or relate to the character of the conservation area”

All the above guidance applies to all conservation areas and emphasises the duty of the local authority to protect the conservation area, and to preserve or enhance its character and appearance and setting.

Aberdeen City Council’s Conservation Area Management Plan also stressed the importance of maintaining the integrity of the area, and the balance within it. It also rejects unsympathetic development which does not reflect or relate to the area’s character.

It is our view that Ardmuir’s proposal for King’s Crescent / St. Peter St:-

- a) does not preserve or enhance the character, appearance and setting of the conservation area. The siting and design radically alter its appearance and its character. In no way do they ‘enhance’ it.
- b) does not maintain the integrity of the area. It brings in completely alien elements of design and scale which destroy its cohesion.
- c) does not maintain the balance within it. It fails to take account of the organic, piecemeal development of King’s Crescent, which has resulted in an attractive mix of traditional houses, granite flats and areas of space. This space is part of the balance which is important here, and characteristic. Some of the space is in the form of gardens but some is in areas between tenements such as lanes and the car park bounded by trees and wall. This latter contributes to the balance by being open to the air - not hemming in the road. This open quality echoes the space

created by the gardens opposite, and this gives the area its character:- it is not a typical urban street; - it has a different balance.

- d) does not reflect or relate to the character of the area, and so is unsympathetic in concept. Its design, materials, colour and scale area, as shown earlier, completely at odds with the character of the conservation area.

Old Aberdeen Conservation Area Appraisal

This newly approved and influential document outlines some of the main features of the character of the King's Crescent area:-

In particular, it sets it in historical context at the beginning of the mediaeval road to Old Aberdeen.:-

Page 3 (1.2) - *“Old Aberdeen is an extremely important conservation area because it encompasses a complete town centred on the mediaeval route from Aberdeen, north to the Brig o' Balgownie.”*

“The spinal route continues to be the dominant feature, and there is a wide range of historic buildings of architectural merit along its length.”

And, most significantly -

“To walk along the Spine today leads you through the heart of the Conservation Area and past many of its architectural and historical gems.”

All these extracts, but particularly this last, stress the fact that the mediaeval 'spine', of which King's Crescent is a part, leads through the heart of the Conservation Area.

King's Crescent runs through the heart of the Conservation Area. Any development on King's Crescent will have a massive effect on the character of the Conservation Area.

It can be seen from this that any development here would have to be of exceptional sensitivity, and sympathetic to this “extremely important conservation area”.

The Ardmuir proposal exhibits no sensitivity whatsoever to this special area.

In particular, it would destroy one of the main features of character of King's Crescent identified in the Character Appraisal:-

“King's Crescent is noticeably quieter and greener, ... the feeling of being in a distinctive place is immediately apparent.”

The development proposed would remove the greenery (trees) on the east side entirely, and would destroy the quiet character by introducing a thoroughly urban, extensive complex of large buildings designed to house the maximum number of occupants, resulting in a highly intensive development, which would clearly generate hugely increased comings and goings, and general noise and disturbance.

Thus Ardmuir's proposal would destroy the two main general elements of the character of this area. It would neither preserve nor enhance them - it would therefore be contrary to policy.

ii) Loss of trees

The east side of King's Crescent benefits at present from the contribution made to the Conservation Area made by the line of trees just behind the boundary wall, and which branch out over the street. They not only provide effective screening from the car park and depot, but have value in themselves as an attractive border to King's Crescent, complementing the older trees on the west side, so that the view either up or down the hill is one framed by trees. This is very important to many residents, and something they do not want to lose. The 'immaturity' or relative 'quality' of these trees does not matter. They contribute greatly to the 'greening' of this part of the Conservation Area, and so preserve and enhance that 'green' character for which it has been rightly commended in the Character Appraisal.

Residents do not want to lose these trees. We certainly don't want to have them replaced by severe, depressing, brutalistic architecture. The trees we have are an informal mix of all kinds of species, which really enhance the appearance of the Conservation Area, quite apart from soaking up pollution from the traffic and providing roosting places for birds, which can often be seen and heard singing in their branches. Their loss would be a loss to the character and appearance of this special part of the Conservation Area.

It might be mentioned also that trees can be pruned and tidied, but an ugly development would be with us for decades.

Relevant Policies and Guidance

There are several policies and guidance documents which relate to trees in general, not just in Conservation Areas, or adjacent to them:-

Adopted Local Development Plan (2012)

"Trees and Woodlands"

3.71 - *"Single trees, groups of trees, hedgerow and woodlands throughout Aberdeen all provide important benefits such as a healthier living environment, shade and shelter and habitats for urban wildlife."*

Policy NE5 - “Trees and Woodlands”

“There is a presumption against all ... development that will result in the loss or damage to established trees ... that contribute significantly to nature conservation, landscape character or local amenity.”

Supplementary Guidance:- “Trees and Woodlands”

“The presence of trees contributes to the character, cultural and natural heritage and attractiveness of an area. For this reason, the Council is committed to protecting trees where there is a threat of damage or removal.”

also:-

“Trees help to filter harmful pollutants ... soften hard landscape.”

Supplementary Guidance:- “Landscape”

7.2 - *“All trees contributing to the character of the area must be retained.”*

7.10 - *“The design and layout of the landscape of any development shall demonstrate that it is sustainable, through, for example, the retention of trees, vegetation and open spaces.”*

9.2 - *“Local planning authorities have an express duty through the Planning Act to have regard to the preservation ... of trees.”*

Supplementary Guidance:- “The Subdivision and Redevelopment of Residential Curtilages”

6.1 - Trees

“There will be a presumption in favour of retaining semi-mature and mature trees either within the site or immediately adjacent to it, regardless of whether they are protected by a Tree Preservation Order or sited in a Conservation Area.”

These general policies and guidance stress the need to retain trees when development is proposed, - even small scale trees or hedgerows. Their benefits in filtering out harmful pollution is highlighted (an important consideration at King’s Crescent because of both ordinary traffic and the operations of the bus depot); also their contribution to sheltering wildlife (however small). Further, their importance in terms of landscape character, and attractiveness of the area.

All this applies to the trees in King’s Crescent which would be lost if the current proposal were to proceed and it is therefore contrary to all the above policy and guidance in the Adopted Local Plan.

Specific Conservation Guidance on Trees

Conservation Area Management Plan

- p.11 - SWOT analysis - a “strength of a conservation area:
“open spaces and trees/vegetation ... that soften the extensive use of granite as building material”
- p.13 - a factor to be considered is how to:-
“stem the decline in the number of trees in private properties”

Old Aberdeen Character Appraisal

- p.19 - 3.3.4 - in discussing King’s Crescent:-
“The trees make a significant contribution to the green setting of the Conservation Area and also help to screen the bus depot by the eastern side of King’s Crescent.”
- p.22 - a photograph of King’s Crescent showing abundance of trees.

This specific conservation guidance, then, clearly promoted the retention of trees, in terms of “greening”, screening, and softening the landscape.

The Character Appraisal specifically mentions their contribution to the character of the Area, and their removal would therefore clearly be detrimental to that character and so contrary to Scottish Planning Policy.

iii) Loss of granite boundary wall

Ardmuir’s plans involve the entire removal of the granite boundary wall. This wall is of historical significance to the area, as detailed in the Conservation Officer’s original justification for including it specifically in the new extension to this end of the Conservation Area, approved in April 2015. It also receives special mention in the newly approved Character Appraisal for Old Aberdeen.

The loss of this wall would greatly detract from the appearance of the Conservation Area, and also from its character, as all boundary walls are identified as a characteristic feature of King’s Crescent, and should be retained. This particular wall has also been assigned special value on account of its historical connections.

Some stones from this wall would be incorporated into the proposed development, further back from the road, and considerably lower, with gaps cut out, and railings on top. This is not “altering” the wall, as the developers claim, but demolishing it, and re-using it, further back, only in part. Most of the wall would have gone, with merely a token remnant in front of the proposed blocks. The character of this side of King’s Crescent would be irrevocably lost.

Relevant Policies and Guidance

Adopted Local Plan

Policy D4 - "Aberdeen's Granite Heritage"

"The City Council will encourage the retention of granite buildings throughout the City.

"Consent will not be given for the demolition of granite-built garden or other boundary walls in conservation areas."

Policy D6 - "Landscape"

"Development will not be acceptable unless it avoids":-

- 1) *"significantly adversely affecting landscape character and elements which contribute to, or provide, a distinct 'sense of place'."*
- 2) *"Development should avoid significant adverse impacts upon existing landscape elements, including linear and boundary features or other components which contribute to local amenity."*

Historic Environment Scotland - "Managing Change" Guidance: "Boundaries"

Page 4 - stresses:-

"Many present day boundary walls provide visual clues to earlier buildings and structures in the form of blocked windows, doors and other features. These can be important in understanding the historical landscape."

Old Aberdeen Character Appraisal

p.22 - "Key Characteristics of Area 'A'" (viz. King's Crescent / Spital)

"Granite boundary walls are a strong feature"

(Examples in King's Crescent can be seen on the photograph on the same page)

p.73 - SWOT analysis for King's Crescent / Spital:-

a "Strength" identified is:-

"Significant numbers of dominant and historic boundary walls remaining"

In particular, specific to this area:-

p.14 - *“The bus depot’s granite wall on the east side of King’s Crescent is a strong linear feature that shows evidence of former buildings belonging to a prominent granite merchant.”*

The Character Appraisal makes specific mention of the wall which is at risk from Ardmuir’s proposals. It makes clear that it is of importance both to the landscape and by virtue of its historical associations. This last concern is echoed by the “Managing Change” quotation, which places importance on retaining such a wall, (which shows clues to earlier structures) for understanding the historical landscape.

The Character Appraisal denotes this wall as central to the character of this area, so it would be contrary to Scottish Planning Policy to remove it or alter it. Similarly, the current proposals would be contrary to Policy D6, in that they would adversely affect an existing landscape element, and especially a “linear and boundary feature” which contributes not only to local amenity, but also provides a distinct sense of place. Policy D6 deems this unacceptable.

Policy D4 forbids the demolition of granite-built boundary walls in conservation areas. The wall in King’s Crescent must therefore not be taken down from its present position.

All these policies and guidance, drawn together, prohibit the removal of the existing wall.

iv) **Loss of Important Views**

The proposed development would result in the loss of two important views, both of Category ‘A’ listed buildings.

a) **Complete loss of well-known views of Marischal College from the brow of the Spital**

This view, which has often been captured in paintings and etchings, is giving special mention in the Character appraisal. The 6-storey blocks planned for the corner of King’s Crescent and St. Peter St would completely obliterate this view.

b) **Loss of the main uninterrupted view of Category ‘A’ listed St. Margaret’s Convent and Chapel**

There is a splendid view from Mounthooly Way. This, too, would be obliterated by the development.

Relevant Policies and Guidance

Local Development Plan

Policy D6 - "Landscape"

"Development will not be acceptable unless it avoids:-

"obstructing important views of the City's townscape, landmarks and features, when seen from busy and important publicly accessible vantage points, such as roads and pathways."

Conservation Area Management Plan

p.14 - *"Where possible, proposed development should enhance or maintain views of local landmarks."*

Old Aberdeen Conservation Appraisal

p.18, 3.3.1 - *"In winter, the gentle climb up King's Crescent affords view of Mariscal College to the south."*

According to Policy D6, then, Arduir's proposals are not acceptable. They breach this Local Plan Policy, by obstructing these important views. One, in particular, is noted as a characteristic of this part of the Conservation Area, and the proposals would therefore be destroying a feature of its character. This would be contrary to SPP policy which requires development to preserve or enhance its character.

v) Setting of Listed Buildings in Conservation Area

- 1) As noted above, the 6 storey development, in front of the Category 'A' listed St. Margaret's Convent would obliterate the view of this historic building. The development would, however, also detrimentally affect the setting of the Chapel from other vantage points. Looking up King's Crescent, one could not look up to the Convent without having the dominating presence of the new development in the same visual frame. Even worse would be the view of the Convent looking up St. Peter Sreet. From there, the 6 storey aggressively modern development would hugely intrude on the setting of the Chapel. Its special character would be severely damaged by this setting.
- 2) The proposed development would have a detrimental effect on the setting of the two Category 'B' March Stones at the site. The newer one of these, which stands in place of the original, would now be set against a low wall in front of an ultra-modern design of a building, instead of against a high granite boundary wall as at present. The setting of the original stone would be more radically altered. This stone, although at present situated on

private ground, is protected by a granite wall which encloses it within the First Bus property, but in the new proposal would have a backdrop not of granite, but of a huge modern building, which would harm its special character.

Both 1) and 2) would contravene Scottish Planning Policy, by virtue of being harmful to the setting of listed buildings.

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2) **DESIGN**

Relevant Policies and Guidance

Local Development Plan

Policy D1 - “Architecture and Placemaking”

“New development must be designed with due consideration for its context and make a positive contribution to its setting. Factors such as siting, scale, massing, colour, materials, orientation, details, the proportion of building elements, together with spaces around buildings, including streets, squares, open space, landscaping and boundary treatments will be considered in assessing that contribution.”

We believe that we have shown already that the proposed development does not have “due consideration for its context”, but is completely at odds with its character. It most certainly fails to make a positive contribution to its setting. We have enumerated the multitude of negative contributions, but no positive ones are apparent. The Ardmuir proposals are contrary to Policy D1.

Supplementary Guidance:- “The Subdivision and Redevelopment of Residential Curtilages

1.4 - *“It should be noted that some elements of this guidance are applicable to other types of development e.g. ... the construction of dwellings on greenfield and brownfield sites that are not currently in residential use.”*

4.0 - **Design and Materials**

“In general the design and external finishes of any new dwellings should complement those of the surrounding area.”

4.2 - *“In conservation areas where granite architecture predominates, there will be a requirement that all elevations of a new*

development that would be prominently visible from the street (including gables) should be finished with natural granite, and the main roof should be of complementary natural roofing materials (almost always natural slate).”

The current proposals are not of design and external finishes which ‘complement those of the surrounding area’. As shown earlier, every element of design, scale and materials is alien to that of the neighbourhood. Nor do they have natural granite finish, and traditional roof, both of which are required by the Supplementary Guidance.

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3) **RESIDENTIAL AMENITY**

Local Plan Policy and guidance make provision to protect the residential amenity of both existing residents and the prospective occupants of new developments.

Lack of residential amenity for the inhabitants of the proposed student accommodation

The plans contravene Council policy in that they do not provide suitable residential amenity for the students.

A ‘sitting out area’ area behind the flats would be only feet away from the boundary with the bus depot, a large-scale commercial operation containing a fleet of 160 buses – not just single-deckers, but also double-deckers, bendi-buses, coaches, etc.

The so-called ‘amenity area’ would be a very noisy place, with all the constant movement of heavy goods vehicles around the yard, the loud beeping of horns when reversing, the running of idling engines, etc. There would also be the smell of diesel, the vibrations from the movement of heavy vehicles, and the noise and possible vibrations from the access and egress of the 26 bus drivers’ cars which would have their parking spaces in the space underground, directly below the students’ ‘amenity’ or sitting-out area.

The students’ rooms, half of which would face in to the bus depot, would suffer from HGV noise, vibrations, idling engines, noise from night-time bus-washing operations and also extremely bright “motorway” lighting.

All areas of the proposed development would suffer from the pollution produced by the bus depot, chief of which would be the diesel particulates emitted into the air, which could have serious health implications.

None of these things could be ‘screened off’ effectively, with the consequence that these flats would not have an acceptable level of residential amenity, contrary to Council Policy. It is,

frankly, quite incredible that anyone could have thought it acceptable to build homes facing on to an industrial site of this sort.

We understand the distance from the windows at the back of the King's Crescent blocks is only 7 metres from the boundary wall with the bus depot - incredibly close to all the bus operations of a fleet of 160 buses. This is NOT a satisfactory living environment, and no 'slatted wooden screen' of any height could eliminate the detrimental effects, especially for the upper flats.

Policies contravened include:-

Adopted Local Development Plan 2012 - "Spatial Strategy"

p.8, 2.5 - "New development ... will have to be of the best standard to deliver opportunities for people to enjoy a high quality of life within an attractive, sustainable and safe environment."

The site adjacent to the bus depot is not an "attractive" or "safe" environment. Nor is the development, therefore, "of the best standard", and so this proposal is contrary to the Council's Spatial Strategy.

Policy H2 - "Mixed Use Areas"

This policy requires that there must not be undue conflict between a new development and adjacent land uses and amenity; that new housing should have a satisfactory residential environment, and it should not impinge upon the viability or operation of existing businesses.

The proposed flats would clearly conflict with the adjacent bus depot, as described earlier; they would not have a satisfactory residential environment; and in all likelihood, the depot operations might have to be curtailed to avoid the inevitable conflicts and problems that would arise.

This application is clearly in direct conflict with Policy H2

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4) EFFECT ON AVAILABLE LIGHT

Overshadowing

The proposed development would most definitely cause overshadowing of this section of King's Crescent and also of many of the front gardens on the west side of the road, thereby

detracting greatly from the appearance and residential amenity of these family homes. The reduced amount of sunlight would also be to the detriment of flowers and shrubs in these gardens. Over and above this, King's Crescent itself would become considerably overshadowed and dark, particularly at certain times of the day. The overall effect would be to create a dark and dreary road, where at present there is a light and airy one.

Supplementary Guidance: "The Subdivision and Redevelopment of Residential Curtilages"

states:-

3.1 - *"As a general principle, new residential development should not borrow amenity from adjacent land, or adversely affect existing development in terms of privacy, overlooking, daylighting or sunlighting."*

3.10 - *"Proof of this is required, in order to protect the amenity of existing residents".*

The proposed development would be in conflict with this guidance, as there would definitely be a loss of light to homes and gardens in both King's Crescent and St. Peter Street. At the latter, there would be a particularly severe detrimental impact on the property at no.38, St. Peter Street, where main windows as well as the building itself would be hugely overshadowed.

The developers have clearly not considered the damaging impact of their proposed development on its neighbours.

* * * * *

5) PARKING

There are two separate issues here – that of provision for the inhabitants of the proposed development, and that of effect on availability of parking in local streets for local residents and their visitors.

Parking for inhabitants of proposed student flats.

The only spaces provided within the proposed site are two spaces for the use of disabled students. There is no indication that all other students will be required to agree to a no-car tenancy. Even if they were, it could not work.

Setting aside the obvious problems in detecting violation of such a rule by students bringing cars and parking them nearby, there would, we suggest, be a problem proving such misconduct, and taking punitive action. There could be no guarantee that students would not bring cars.

Furthermore, where would students' visitors park? Friends and family of the 202 students living there are bound to bring cars on occasion, and will have to park in the already overcrowded streets round about. There is already a widespread and serious problem with parking in the area, and this would exacerbate an already major problem.

The developers' answer to this is to suggest that parents dropping off their offspring at the beginning of each term, delivering their extra belongings mid-term, or collecting them at the end of term or year, could make use of parking space associated with another of their blocks of student flats situated in Pittodrie Place – half a mile away!

This is a ridiculous suggestion. Parents bringing students to and from their temporary home at University will always bring with them a considerable amount of luggage of all kinds, much of which will be bulky and/or heavy. This could not be carried on foot all the way from Pittodrie Place. Parents would clearly have to park in King's Crescent or nearby to offload and have somewhere to park for the duration of their visit.

There is therefore not adequate parking provision for visitors, and this inadequacy would result in increased pressure in parking in an area where there is already a severe shortage.

The site of the proposed development is not in the City Centre area, as the applicant claims, but in Zone 2, and therefore is not best suited to a zero parking parking development. The Local Plan Supplementary Guidance on Transport and Accessibility gives clear guidelines for proposed purpose-built accommodation such as this, viz. one parking space for 10 students. The proposals for King's Crescent should therefore provide 20 spaces.

The fact is that many students do own cars; and they want to bring them to University. If enough parking spaces are not provided for that proportion of students (10% in the Council guidelines), then they will park in surrounding streets, putting extra pressure on an area which already has severe parking problems.

In this connection, it is ludicrous of the developers to suggest that this pressure might be mitigated in the light of the students not being entitled to residents' parking permits. There is no controlled parking zone in this area, and no parking permits, so permanent residents would have no preference over students as regards parking spaces. Long-term local residents would undoubtedly find increased difficulty in finding somewhere to park, as a direct consequence of the introduction of accommodation for 202 new residents, if it were to be approved.

The other consideration here is the 'provision' of a car-club car space. The space 'provided' however, is not within the site of the proposed development, but is shown as being sited on Advocates' Road, which does not belong to the applicant, and which space is relied upon by local residents for domestic parking. The 'provision' of a car-club space is therefore an illusion, and does not take into account the detrimental effect of the loss of a further parking space would have on amenity for existing residents.

Further effects on parking provision for local residents and their visitors

We understand that there is likely to be a proposal to extend the double yellow lines to the full length of Advocates' Road, which would mean the loss of 5 parking spaces currently available to local residents and their visitors. The triangle of ground at the corner of Advocates' Road and King's Crescent would almost certainly also be lost to parking, losing a further 3 spaces.

This still needs to be clarified, but there is a distinct possibility, or likelihood, that 8 current parking spaces would be lost as a result of the proposed development. This would make life even more difficult for those who rely on these spaces.

It should be noted that the Adopted LDP, (3.16), states that:

“Opportunities for low or no car households will be encouraged in appropriate circumstances where it can be demonstrated the proposed development will not have an adverse impact on residential amenity.”

This cannot, however, be demonstrated in the King’s Crescent area, as there can be no guarantee that students will not bring cars, nor their visitors, and park them locally, thus having an adverse impact on residential amenity.

The parking guidelines set out in the LDP for Student Accommodation recommend 1 parking space for every 10 students. In the proposed development of 202 students, this would amount to 20 parking spaces. These guidelines should not be ignored, and it should also be noted that the local bus service (no. 20 and 25) is not always very frequent. In vacation it is only every ½ hour, and so postgraduate students who live there (who often have shorter vacations) would not then have access to a regular local bus service. Sundays are only every ½ hour throughout the year, and evenings can also be sparse in provision.

There certainly are other bus routes, but the nearby provision is not good. Students are likely to bring cars.

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6) Cumulative effect of high concentrations of purpose built student accommodation in one small area

Purpose-built student accommodation brings a large number of people into a relatively small area, because planning regulations allow student flats to be smaller than average. Developers then tend to cram as many rooms in as possible, creating a significant intensification of use in that area, which not only increases pressure on local infrastructure and services, but also begins to upset the demographic balance of an area.

When a second, then a third, and perhaps a fourth such development is allowed in this same small area, the pressure on infrastructure intensifies, and demographic balance is lost. Suddenly, or so it seems, a community which has been always largely made up of permanent residents becomes one where the vast majority are temporary, part-time residents.

This process effects a distinct change in the character of an area. Its settled residential nature is lost, and it is the Society’s view that this could and should be avoided, by directing further purpose built accommodation away from areas which already have many such developments close together. This is because the intensification of use inevitably brings with it problems to

do with a clash in lifestyles, which can be difficult for long-term residents to accommodate, particularly in terms of noise and late-night social activity.

The area surrounding King's Crescent has an excessively high concentration of purpose-built student accommodation. Residents have calculated that, if the Froghall Terrace plans were to be approved, the number of student beds in purpose-built student accommodation in the area circling King's Crescent would be no fewer than 1600. (e.g. St Peter Street, Liberty House, Zetland House, Glamis Cottage, Spital, St. Martha's, Spital, Froghall Road, Froghall Terrace, Causewayend School, 2 Powis Place and 140 Causewayend) This does not take into account the large number of HMOs.

There comes a point when proliferation of student flats in one small area must be halted. This extremely high density of students in a very tight area has already had serious effects on our community. Demographics are being turned upside down, and residential balance is being lost.

Analysis of 'Need'

The Council's Technical Advice Note on Student Accommodation sets out various criteria for the assessment of planning applications for Purpose Built Student Accommodation.

The first one is that the development should meet an identified need for the accommodation proposed.

Developers are asked to demonstrate 1) what specific need the proposal is aimed at, and why this need is currently unmet and 2) whether the proposal is to meet a recorded increase in student numbers.

The current position is that there is no an unmet need for this kind of accommodation.

Both the Principal and Senior Vice Principal of the University of Aberdeen have recently confirmed that there is no shortage of accommodation. Indeed they have empty bed spaces in their accommodation. RGU do also.

Further, the University of Aberdeen has stated that it has no plans significantly to increase the total number of its students.

So is there a justification for continuing to allow more and more applications? Perhaps it might be reasonable to allow a few more, but we hold that it is not reasonable to allow more in an area where they have already begun to dominate.

If a development is allowed in an area where there are at present no purpose-built student flats, then it will not have altered the area much, and can no doubt be reconfigured for other use. If however, such a development is allowed in an area which is already tightly packed with these, then the incremental change which would result might destroy the settled residential character of that area irrevocably.

In such cases, and we believe that King's Crescent is one, permission should not be granted because it would tip the balance. There would surely be solid planning grounds for this.

In conclusion, we might mention that in the last 2 years, there have been 1186 bed spaces in student accommodation approved, and 2036 are pending - a total of 3222. A solid bank of these flats are now being built or probably about to be. King's Crescent is not needed for this.

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To sum up, the Society believes that the proposed development at King's Crescent and St. Peter St should be refused, as it would damage the character of the Conservation Area, and be harmful to the residential amenity of both existing residents and prospective occupants of the development. Lastly, the onus is on the applicants to demonstrate an unmet need, and they have not done this.

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It is our view that this application contravenes the following policies and guidance:

SPP
SHEP

LDP 2012 - 'Trees and Woodlands' policies
Policy D1
D4
D5
D6
H2
and the "Spatial Strategy"

Supplementary Guidance - "Trees and Woodlands"
"Landscape"
"The Subdivision and Redevelopment of Residential
Curtilages"
"Transport and Accessibility"

Conservation Area Management Plan
Old Aberdeen Conservation Area Character Appraisal
Historic Scotland: "Boundaries" guidance

King's Crescent looking south



King's Crescent looking north



← Proposed development which would take the place of the granite boundary wall on the right of the photo (above), along with the loss of those trees on the right.