

# **17-19 UNION TERRACE/1 DIAMOND PLACE, ABERDEEN**

## **SUPPORTING PLANNING STATEMENT**

### **1.0 Introduction**

1.1 Planning permission and listed building consent is being sought from Aberdeen City Council by our client, Inspired Living LLP, for the conversion of the former Aberdeen Savings Bank and office building at 17-19 Union Terrace/1 Diamond Place, Aberdeen, into student accommodation, including internal alterations. This report provides an assessment of the suitability of these proposals in town planning terms and should be considered alongside the separate Design Statement (Fitzgerald Associates) and Heritage Statement (Ian Mitchell Davidson) which discuss the internal alterations proposed to this listed building.

1.2 In assessing the suitability of these proposals, this report considers the scheme in the context of the development plan which comprises the National Planning Framework (NPF) 4 and the adopted Aberdeen Local Development Plan (ALDP) 2023, including the associated Council adopted Planning and Supplementary Guidance. Furthermore, it considers the proposals against the Historic Environment Policy for Scotland (HEPS), including the best practice guidance on Managing Change in the Historic Environment.

### **2.0 Site Description and Local Context**

2.1 17-19 Union Terrace/1 Diamond Place are category B listed buildings located within the City Centre Conservation Area. They are positioned on the west side of Union Terrace, on the south side of its junction with Diamond Place, overlooking Union Terrace Gardens. The subject properties, which are faced in polished granite, are currently vacant, as are a number of other similar buildings along Union Terrace. Those which remain in use are principally functioning as offices.

2.2 The location is highly accessible to the city centre amenities and to public transport.

2.3 Externally the building design takes two different forms, the original late 19<sup>th</sup> Century block at 19 Union Terrace/1 Diamond Place and the 1960s rebuild of 17 Union Terrace which together create a distinct change in architectural styles. An additional storey was added to the rear of 19 Union Terrace in the late 1930s which resulted in the removal of the original glazed dome over the Telling Hall. Indeed, most of the interior of the original building has been lost with the exception of the first-floor Arts and Crafts boardroom, the main stair, caretaker's stair and various elements of decorative joinery and ironmongery. In the 1950s the attics within 19 Union Terrace were converted to form temporary offices, to be later redeveloped as an apartment.

2.4 With the need for additional accommodation, the former bank acquired 17 and 18 Union Terrace in the 1960s and demolished it, replacing it with what currently exists. Whilst it provided the much-needed additional accommodation and is of a massing similar to the

buildings alongside, it is of no heritage value apart from some 1960s period features limited to the stairwells.

2.5 For a full description of the subject properties, the history of their development and the features of architectural significance that remain, this is provided in the separate Heritage Statement.

### **3.0 The Current Development Proposals**

3.1 The current proposals are for the change of use/conversion of the properties into student accommodation units, including internal alterations to form the individual student apartments. Each unit would comprise bed, desk, ensuite shower room, kitchenette, storage and seating area. The rooms vary in size from 20sqm to 53sqm. In total 28 student apartments would be created as follows:-

- Ground Floor: 4 student apartments (2 of which have accommodation at ground and mezzanine level), social space, music room, office and main stairwell incorporating lift.
- First Floor: 2 student apartments and silent library.
- Second Floor: 9 student apartments.
- Third Floor: 11 student apartments
- Fourth Floor: 2 student apartments

In addition, the basement area, which has full head-height throughout, would accommodate a gym, cinema, data room, toilets, boiler room and secure cycle storage space (10 spaces).

3.2 The proposed internal alterations have been designed to protect those spaces and features of the building which have retained architectural significance (eg. the Telling Hall and the first-floor boardroom in 19 Union Terrace). Similarly, the proposed rear extension at fourth floor level is designed to be within the overall existing pitched roof height of 19 Union Terrace and be reflective of the design of the existing front facing roof extension to 1 Union Terrace. Externally, the masonry, roofscape, windows and doors would all be retained, refurbished as necessary and protected under these proposals.

3.3 There is currently no waste/recycling within the building but it is proposed to arrive at a solution to this through discussion with the Council's Environmental Health Department.

### **4.0 The Development Plan**

4.1 Section 25 and 37/2 of the Town and Country Planning (Scotland) Act 1997 (as amended 2006) requires that where making a determination on a planning application, this be made in accordance with the development plan, unless material considerations indicate otherwise. Section 64(1) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 requires that special attention be paid to the desirability of preserving or enhancing the character or appearance of a conservation area. In addition, Sections 14(2) and 59(1) of this same Act require, respectively, that in considering whether to grant listed building consent for any works and planning permission for a development that affects a

listed building or its setting, special regard shall be paid to the desirability of preserving the building or its setting or any features of special architectural interest which it possesses.

4.2 In this case, the development plan comprises National Planning Framework (NPF) 4 and the adopted Aberdeen Local Development Plan (ALDP) 2023, together with relevant Council adopted Planning and Supplementary Guidance.

#### National Planning Framework 4

4.3 NPF 4 was adopted by Scottish Ministers on 13 February 2023 and sets out our national spatial principles, regional priorities, national developments and national planning policy. The relevant provisions of NPF 4 that require consideration in terms of these proposals are as follows:-

*Policy 1 – “When considering all development proposals, significant weight will be given to the global climate and nature crises”.*

*Policy 2 – “Climate Mitigation and Adaptation – to encourage developments to minimise emissions and adapt to the current and future impacts of climate change”.*

Comment: These current proposals involve the re-use of existing building stock which will encourage people to move back into the city centre, thus reducing the need to travel by car. The result being a reduction in emissions and support for the adaptation towards climate change.

*Policy 7 – “Historic Assets and Places – Development proposals with a potentially significant impact on historic assets will be accompanied by an assessment which is based on an understanding of the cultural significance of the historic asset”.*

Comment: The retention and conversion of these vacant listed buildings allows their preservation for future generations and as such is in accord with this policy. The proposed works have been carefully designed with due consideration for the historic interest of the buildings, safeguarding features and accommodation of architectural value with intervention being focused on those areas of limited or no intrinsic value. A Heritage Assessment has been prepared and forms a separate part of this submission.

*Policy 9 – “Development proposals for the re-use of existing buildings will be supported, taking into account their suitability for conversion to other uses”.*

Comment: The principle of this development is therefore supported by this policy. The subject buildings are readily adaptable to the proposed use without detriment to their architectural integrity, whilst being an appropriate use in terms of their local context.

*Policy 12 – “Development proposals will be supported where they re-use existing buildings and infrastructure and make provision to maximise waste reduction and waste separation at source”*

Comment: A waste disposal solution is incorporated into these proposals, involving the separate storage and collection of general waste, recyclable and combustible materials. As such, the proposals are in accord with this policy.

Policy 13 – *“Proposals will be supported where they will be accessible by public transport, ideally supporting the use of existing services and where they supply safe, secure and convenient cycle parking to meet the needs of users and which is more conveniently located than car parking”.*

Comment: Secure cycle parking to meet the number of spaces required (based on standard of one space per every three students) is provided within the basement of the building. This city centre location is, as earlier mentioned, highly accessible to public transport with bus services running alongside the building providing links to the Universities and city centre amenities.

Policy 15 – *“Local living and 20 Minute Neighbourhoods – Development proposals should contribute to local living including, where relevant, 20 minute neighbourhoods. To establish this, consideration will be given to the existing settlement pattern and the level and quality of interconnectivity of the proposed development with the surrounding area, including (where relevant to these proposals) local access to sustainable modes of transport, shopping, health facilities, education, parks and sport and recreational facilities”.*

Comment: The location of these proposals is well within a 20 minute radius of all of the above.

Policy 27 *“City, Town, Local and Commercial Centres*

Comment: The proposals are in line with this policy to diversify the city centre through new accommodation opportunities within vacant properties.

4.4 Having regard to all of the above, these proposals can be seen to fully accord with the policy aims and objectives of NPF 4.

#### The adopted Aberdeen Local Development Plan 2023

4.5 In land-use terms, the subject site is located within the defined City Centre Boundary and within an area allocated as “Mixed Use – Policy H2 applies”. This requires that:-

*“Applications for development or change of use within Mixed Use Areas must take into account the existing uses and character of the surrounding area and avoid direct conflict with the adjacent land uses and amenity”.*

The proposed use of the building for student accommodation will not conflict with existing adjacent uses but rather will only add to the vitality and viability of the city centre, bringing back into productive use important prominent buildings. This is also fully in line with other ALDP policies as discussed below.

4.6 Increasing the resident population of the city centre, which these proposals would facilitate, is a key objective of the Aberdeen City Centre Masterplan. By so doing, they will generate footfall, activity and related expenditure, including outwith normal retailing hours. As such, the proposals accord with the objectives of Policies VC1 (Vibrant City) and VC4 (City Centre and Retail Core Area). In this regard, paragraph 10.6 of the ALDP states:-

*“The city centre is a place where people can actively interact with one another; where shopping, working, living, sharing, playing and learning can co-exist while also allowing people to spend time in attractive, social, safe and well-connected spaces. To ensure this happens, the introduction of a broader mix of uses to the city centre, alongside public realm and environmental improvements, should be considered to increase social interaction and bridge the gap between the day and evening economy by encouraging people to dwell for longer outwith traditional office or shopping hours. Creating a link between people and place encourages ownership and stewardship”.*

4.7 The above objective is further emphasised by Policy VC5 (City Centre Living) which states that:-

*“Living in the city centre is a positive way to ensure it has vibrancy, vitality and viability and support an economy based around day-to-day living. To achieve this there needs to be an increase in the number of people living in the city centre”.*

By bringing students into the city centre to live, these proposals will in turn support the vitality and viability of the area. Specifically in terms of the requirements of this policy, the accommodation which will be provided will be to a high standard with the added benefit of outstanding views over Union Terrace Gardens and the city beyond. As the entire buildings will be utilised, there will be no issue regarding conflict with any other established use within the same built structure.

4.8 Policy H7 (Student Accommodation Developments) states that:-

*“Proposals for new Student Accommodation development will be supported in principle where:-*

- *the location is accessible by means of walking, cycling, wheeling and public transport to the university and college facilities;*
- *the proposals offer appropriate facilities; in particular providing an appropriate level of amenity space, refuse/recycling storage space and secure bike storage facilities; and,*
- *there will be no significant adverse impact to the amenity of the surrounding area.”.*

The subject site is conveniently located to fulfil the above requirements in respect of accessibility to university and college facilities. Although the site offers no ability to provide outdoor amenity space, its location immediately overlooking Union Terrace Gardens and close to Bon Accord Square and Bon Accord Gardens which are historic public parks of high heritage value, as well as having excellent accessibility to public transport to more distant public parks, more than adequately makes up for this. Finally, as previously stated, the proposals would not impact adversely on the amenity of the surrounding area.

4.9 Policy D1 (Quality Placemaking) is applicable to all new developments and seeks to ensure high standards of design, the creation of sustainable and successful places and have a strong and distinctive sense of place. In this case, an existing building of heritage value will be re-used with due care and attention to ensure the preservation of architecturally important features within the building and appropriate design/scale/materials of the

proposed rear facing roof extension. Moreover, the re-use of the buildings also complies with a number of essential qualities of a development in that it is adaptable, accessible, safe and resource efficient.

4.10 Policy D2 (Amenity) requires developments to be designed to ensure occupiers are afforded adequate levels of amenity in relation to outdoor space, daylight, sunlight, noise, air quality and immediate outlook. The report has already commented on the position relative to outdoor space and immediate outlook. In terms of daylight/sunlight, an evaluation has been undertaken of the amount of daylight/sunlight to the rear (west) facing apartments and this has shown that they all achieve the required levels. Regarding privacy, noise and air quality, no issues are anticipated in this regard.

4.11 Policy D6 (Historic Environment) requires that development must protect and enhance the city's historic environment, including its historic fabric, with a presumption in favour of the re-use of vacant historic assets such as is proposed in this instance. The retention and conversion of these buildings allows their preservation for future generations. Moreover, by virtue of the nature of the internal and external works proposed, these have been designed and sited with due consideration to the architectural interest of the buildings. On this basis, the proposals would satisfy the requirements of this policy.

4.12 With regards Policy D8 (Windows and Doors), these will either be retained and restored to meet the requirements of the Council.

4.13 Policy I1 (Infrastructure Delivery and Planning Obligations) requires development to be supported by the appropriate level of infrastructure, services and facilities. Our client fully accepts this obligation and is agreeable to pay the appropriate developer contribution.

4.14 In terms of Policy T2 (Sustainable Transport), the application site is readily accessible by sustainable and active travel modes given its city centre location and its proximity to the arterial routes, as well as the city's bus and rail station at Union Square. Both university campuses are accessible by public transport with bus services operating from the city centre to both Aberdeen and Robert Gordon Universities. Both campuses can also be accessed by means of the city's cycle network.

4.15 In respect of Policy T3 (Parking), the principle of "*zero parking*" for all new developments within the city centre boundary applies due to city centre living and, therefore, these are compliant. The report has already discussed the provision of secure cycle parking within the development to meet Council requirements. Car club contributions will be incorporated within the required developer obligations, which our client accepts.

4.16 Policy CI1 (Digital Infrastructure) requires all new residential development where five or more units are proposed to have access to high-speed broadband. The proposals will be connected to Ultrafast broadband which is available at this city centre location and, therefore, will comply with this policy.

4.17 Policy R5 (Waste Management Requirements for New Development) requires that all developments have communal facilities for the separate storage and collection of general

waste, recyclable and combustible materials. A waste disposal solution will be the subject of discussion and agreement with the Council.

#### Aberdeen Planning Guidance and Supplementary Guidance 2023.

4.18 The Council has produced Planning Guidance and Supplementary Guidance (2023) to cover in more detail topics which are important to the assessment of proposals. The Planning Guidance has been adopted as non-statutory Planning Advice whilst the Supplementary Guidance has been adopted as part of the statutory development plan alongside the ALDP 2023. They are, therefore, material considerations in the determination of planning applications. The following are of particular relevance to the current proposals:-

#### 4.19 Student Accommodation

This states at the outset that: *“The Council aims to take a positive and proactive approach to new student accommodation to ensure that they are in the most suitable location in terms of accessibility and amenity impacts on the surrounding area; that they are well managed and are appropriate in size and scale; meets the needs of the further education institutes; and that they offer appropriate accommodation.”*

The Guidance sets out various criteria which will be used to assess purpose-built student accommodation (as below) against each we have commented on as it relates to these proposals:-

*“A. The development meets an identified need for the type of accommodation proposed.”*

Our client’s Commercial Property Agents have confirmed that there remains a need for further student accommodation in Aberdeen and it is self-evident that they would not be advancing these proposals unless they were satisfied that there is a demand for such.

*“B. The development should be in a location that is easily accessible to the higher education campuses by sustainable transport modes.”*

The city centre is a highly desirable location for student accommodation by virtue of its sustainable nature, high level of connectivity and range of available amenities alongside. Accordingly, it is very well placed to serve the existing further and higher education establishments in Aberdeen.

*“C. The development should be designed in a way that does not conflict with adjacent properties or the general amenity of the surrounding area.”*

The development would sit within what is a mixed-use environment, typical of a city centre, which includes evening activities such as restaurants and bars. Given such, the proposed conversion would not result in a detrimental impact on the amenity of surrounding residents or businesses. The guidance advises that such uses should be in locations which will be attractive to students and clearly a city centre location such as this, being alongside a range of facilities and attractions, meets this requirement.

*“D. The layout, standards and facilities provided within the development are of high standards.”*

Our client has experience in providing high-quality student accommodation elsewhere in Aberdeen city centre, namely at 52-60 Langstane Place as well as having gained planning approvals for Victoria House (259 Union Street) and Braemar House (267 Union Street). Each student apartment would have room to accommodate a double bed, desk, ensuite shower-room, kitchenette, storage and a small seating area. Although the units are single aspect (as is largely the norm elsewhere), those located on the west (rear) facing elevation have large windows which allow in a suitable amount of light. As has been made clear earlier, although there is no scope to provide on-site outdoor amenity space, the site lies immediately opposite Union Terrace Gardens and close to Bon Accord Square and Bon Accord Gardens, these being historic parks of high heritage value. Given the nature of the proposed use and the city centre location, on-site car parking provision is not required, albeit that a car club contribution would form part of the required Developer Obligation.

*“E. The development scheme has an appropriate Management Plan in place.”*

As they have done for their other student developments in Aberdeen, a fully detailed Management Plan forms part of this submission.

#### 4.20 Harmony of Uses

This highlights the need to ensure that in areas where there is a mix of uses, as in this case, that the proposed use does not impact negatively on existing uses, such as noise, smell and litter. In this case, given the existing range of uses in the area, the proposed development would not detract from the existing character and no such adverse impacts would arise. Furthermore, as stated above, the proposed Management Plan highlights how the student accommodation will be maintained, delivered and managed.

#### 4.21 Transport and Accessibility

This shows the application site located within the ‘City Centre’ parking zone and comments that *“The city centre is highly accessible by public transport and the density of population relative to the mixture of land uses allows for a large proportion of pedestrian and cycle journeys. On-street parking, public off-street parking, public transport hubs and park-and-ride opportunities are also available. These factors allow for the lowest maximum levels of parking associated with new developments. In addition, the City Centre Masterplan has recommended zero parking for new developments within the city centre.”* This zero-parking recommendation is now incorporated within the adopted ALDP (Policy T3). Accordingly, these proposals are fully compliant.

#### 4.22 Planning Obligations

As earlier confirmed, our client is agreeable to pay the appropriate level of developer contribution.

### **5.0 Other Material Considerations**

Historic Environment Policy for Scotland (HEPS)



5.1 Produced by Historic Environment Scotland, HEPS is a non-statutory policy statement directing decision making that affects the historic environment. As such, it is a material consideration in this case and requires to be taken into account when deciding on the merits or otherwise of the proposals. The following HEPS policies have relevance in this case:-

5.2.1 HEP1 – *“Decisions affecting any part of the historic environment should be informed by an inclusive understanding of its breadth and cultural significance.”*

A separate detailed Heritage Statement forms part of this submission. In drawing up these proposals, the historical and architectural significance of the buildings and their immediate environs have been fully recognised. The detailed scheme has been designed to ensure the protection and preservation of spaces and features within the buildings of importance.

5.2.2 HEP2 – *“Decisions affecting the historic environment should ensure that its understanding and enjoyment as well as its benefits are secured for present and future generations.”*

The proposed works will ensure the long-term retention and maintenance of these listed buildings which will also be important for the character of the Conservation Area.

5.2.3 HEP4 – *“Changes to specific assets and their context should be managed in a way that protects the historic environment. If detrimental impact on the historic environment is unavoidable, it should be minimised. Steps should be taken to demonstrate that alternatives have been explored and mitigation measures should be put in place.”*

The buildings have been the subject of significant alterations over the years, as discussed in the separate Heritage Statement. Notwithstanding this, the objective in designing these proposals has been to ensure that nothing further is lost which is of value to the building. There is nothing of any significant architectural value within the rebuilt the building which is 17 Union Terrace, with 19 Union Terrace containing spaces and features of value. As already stated, these will be preserved as part of these proposals.

5.2.4 HEP5 – *“Decisions affecting the historic environment should contribute to the sustainable development of communities and places.”*

As highlighted earlier, the locational attributes of the application site will encourage sustainable principles.

5.2.5 HEP6 *“Decisions affecting the historic environment should be informed by an inclusive understanding of the potential consequences for people and communities. Decision-making processes should be collaborative, open, transparent and easy to understand.”*

This part of the city centre is defined as a mixed-use area where uses such as offices, commercial, retail, residential and entertainment function without adverse issues arising, as one would expect in a city centre environment. The proposed use as student accommodation will not change this position.

## Managing Change in the Historic Environment: Use and Adaptation of Listed Buildings.

5.3 This document forms part of a series of non-statutory guidance notes produced by Historic Environment Scotland and is of relevance as the proposals involve the conversion and re-use of a listed building.

5.4 The guidance highlights that *“Proposals that keep buildings in use, or bring them back into use, should be supported as long as they do the least possible harm.”* (ref. Key Messages, Para. 5). As earlier stated, the proposed internal works largely take place within those areas of least architectural value, with the important spaces (ie. the Tellers Hall and the first-floor boardroom) being preserved intact.

### **6.0 Conclusion**

6.1 To summarise, these proposals are fully compliant with the development plan and national historic environmental policy guidance. The proposed use is acceptable within this mixed-use part of the city centre, bringing residents back into the city centre to live, which in turn supports the vitality and viability of the area, as well as enhancing activity and increasing footfall throughout the day and evening hours.

6.2 The proposed use will not conflict with existing uses, nor will it detrimentally impact on the amenity of the area. Furthermore, the works involved in the conversion of the buildings will not adversely impact on their architectural features of note or character. As such, the re-use and restoration of the buildings should be welcomed, as should the enhancement that the proposals bring to the visual amenity of the City Centre Conservation Area.

6.3 Accordingly, we would respectfully request that these proposals receive the support of Aberdeen City Council.

W.B.Allan

Dip T&CP

11/04/2024.

