

Response ID ANON-B3JU-DSTS-J

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**

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About You

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What is your organisation?

Organisation:

NHS Grampian

On behalf of:

N/A

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How to Complete

1 Introduction

Section 1 provides a context for the Main Issues Report Do you have any comments in relation to this section?

Do you have any comments in relation to this section?:

2 Settlement Strategy

Question 1 New Housing Sites

Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?:

Q1 – NHS Grampian broadly supports the strategy to encourage brownfield development within the city, and we welcome the inclusion of B03/13, Summerfield House, B03/19 Woodend Hospital, B08/02 Frederick Street, B07/02 Raeden and B08/04 Urquhart Building as ‘preferred’ housing sites. We would also like to highlight the additional sites which NHS Grampian submitted bids for during the Call for Sites consultation at Northfield Medical Practice (B04-04) and Cornhill Road (B07-01) which we note are not in the list of Preferred Sites. We would welcome further discussion with the Council as to the reasons why they have not been preferred, and the potential of these being added back in to the LDP, as NHS Grampian still believes these are valid bid sites.

Question 2 Housing Allowances Beyond 2032

Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:

Q2 – NHS Grampian has no preference regarding the inclusion of further housing allowances or sites for the period beyond 2032. Such information assists the Board in planning its future service provision in these communities, however it has been seen that the level of uncertainty around the timing of the build out of these developments means that this information is not particularly helpful.

Question 3 Brownfield and other Opportunity Sites

Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:

Q3 – NHS Grampian welcomes the inclusion of B04/03 Mastrick Clinic for uses that support the the Mastrick neighbourhood centre, and B08/03 Resource Centre– City Hospital for retail, commercial or office use, in the other proposals section. We have no further comments on this question.

Question 4 New Healthcare Facilities

Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:

Q4 – Since the time of the Call for Sites our intentions around the bid sites we submitted have been developed, and discussion was held with ACC around these bids. We can confirm the following by way of an update:

Cordyce School (B01-11) – Our bid for this site is hereby removed

Central Park, Dyce (B01-10) – Our bid for this site is still valid, and has been followed up with a pre application enquiry.

Bankhead Playing Fields (B01-12) – This bid for this site is hereby removed

Former Bucksburn Primary School (001) – Our bid for this site is still valid

Former Stoneywood School (002) – Our bid for this site is hereby removed

South of Orchard Brae School (B03-17) – our bid for this site is hereby removed

West of Orchard Brae School (B03-18) – Our bid for this site is still valid and a pre application enquiry and land purchase is being progressed for this site.

We would also note that NHSG is in discussion with ACC around the possibility of locating a new health care facility on the site of the existing Bucksburn Clinic, for which a pre-application enquiry has been submitted. We would highlight that the designation of the land in this area in the current LDP is incorrectly all greenspace, and would ask that this is considered as part of the next LDP.

Finally, a bid was submitted as part of the Call for Sites for the Former Nursery site on Oscar Road, Torry, and we requested a designation of health care use. We would still like this to be included in the next LDP. We would be happy to discuss this with ACC in more detail if required.

3 Aberdeen City Centre and the Network of Centres

Question 5 City Centre Boundary

Do you agree the Local Development Plan should modify its City Centre boundary to match the City Centre boundary shown in the City Centre Masterplan?:

Q5 - NHS Grampian believes that Yes, the CCMP and LDP should be aligned. Many aspects as set out in the vision and development summaries are in accordance with the WHO healthy cities principles, offering public spaces, participation, cultural development, and 'walkability'. ACC use of NHS Scotland's Place Standard in pre-MIR consultation is commended.

Question 6 City Centre Masterplan Intervention Areas

Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan?:

Q6 - NHS Grampian does not object to the proposal to include CCMP Intervention Areas as Opportunity Sites. The impact of these sites on health care will be evaluated as/when applications come forward.

Question 7 City Centre Retail Core

Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?:

Q7 Yes, NHS Grampian is in support of reducing the retail core in line with the proposal, to ensure that policies and plans are aligned.

Question 8 Union Street Frontages

Should the Union Street Frontages percentages be reviewed? Do the current target percentages ensure there is a balance between a strong retail focus and allowing for other uses? What other uses should we allow on the retail core area of Union Street:

Q8 – NHS Grampian does not have specific comments relating to the percentage of retail frontages on Union Street, however is broadly supportive of the spirit of trying to retain a high retail presence. With regards to alternative uses, NHS Grampian would like to see health care as a potential alternative use, particularly since encouraging city centre living is also included within the Main Issues Report. NHS Grampian has no current plans for additional city centre facilities, however should the need arise, then having health care use supported within this area would be welcomed.

Question 9 Out of Town Retailing

Should we direct high footfall uses to existing centres including the City Centre? Should we consider new out of town retail parks? What would the impact of these be on Union Street and the City Centre, and Aberdeen's network of centres?:

Q9 – NHS Grampian does not support the idea to consider new out of town retail parks, as these pull life from city centres, reduce the 'walkability' of cities, and promote private car use.

Question 10 Commercial Leisure Uses

Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:

Q10 – NHS Grampian supports directing commercial leisure uses towards existing centres and the beach and leisure area. This allows for collaboration between health and leisure services within these centres.

Question 11 City Centre Living

How can we encourage more people to live in the City Centre? Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?:

Q11 – NHS Grampian has no comment to make on this question.

MAIN ISSUE 1 Living in the City Centre

Should we include a policy in the Local Development Plan supporting residential development in the City Centre, including the conversion of upper and basement floors of premises to provide residential accommodation?:

Main Issue 1 – NHS Grampian supports the preferred option, as this is in line with the response given for question 5, and ensures best use of existing buildings and existing public services/infrastructure.

Option 2 - Preferred Option

Question 12 Residential Development in the City Centre

Are there any other locations within the City Centre where residential accommodation could be provided?:

Q12 – NHS Grampian has no further areas to recommend.

MAIN ISSUE 2 A 24-Hour City

Should 24-hour activities in Aberdeen be supported and encouraged to grow, especially in the City Centre? Could this be achieved through policy?:

Main Issue 2 – NHS Grampian believes the ambition for a '24 hour city' appears consistent with CCMP – the primary public health issues would be to ensure consistency with alcohol licensing legislation and assurance for community safety.

Option 2 - Preferred Option

Question 13 Encouraging the Creative Arts

What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen City Centre is like no other place?:

Q13 – NHS Grampian has no comments on this question.

Question 14 Proposals for Creative Arts

Are there other buildings or areas within Aberdeen that could accommodate the existing, and support an emerging creative sector for desk-based and studio-based artists?:

Q14 – NHS Grampian has no comments on this question.

Question 15 Percent for Art

To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/ visible place or places within the development?:

Q15 – NHS Grampian is largely supportive of art provision being a requirement of large developments, and the Board involves Grampian Hospitals Arts Trust to create arts strategies for all its major developments. However, allocating 1% of the budget may not always be seen as best use of public funds, and therefore we would not support this arbitrary figure being imposed.

MAIN ISSUE 3 Support for Visitor Attractions

To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?:

Main Issue 3 – NHS Grampian has no comment on this issue.

Not Answered

4 Quality Places

MAIN ISSUE 4 Minimum Internal Space Standards for New Residential Development

How can we ensure that new residential development delivers an adequate amount of internal floor space for future occupants?:

Main Issue 4 – The quality of housing is an important determinant of health (Public Health England Spatial Planning for Health). The stated preferred option would proactively address an important component of housing quality, namely living space.

Option 2 - Preferred Option

Question 16 External Space Standards

Do you think that the amenity spaces currently delivered are of a sufficient quality? Should we strive for a better quality/ quantity of private/ semi-private residential amenity space across the city and refuse planning permission to proposals which do not meet our high standards? What standards would you like to see set for new dwellings, flats, and conversions in respect of quality and quantity of external amenity space?:

Q16 – NHS Grampian believes that yes, the LDP should strive for better quality/quantity of amenity space, as per Main Issue 4 preferred option, as this has major benefits to health as already documented in the MIR.

Question 17 Natural Environment

Do you agree that the proposed list of policies for Natural Environment gives a clearer and more coherent structure than at present?:

Q17 – NHS Grampian believes that the promotion and conservation of a City's natural environment is an important WHO healthy cities principle; the proposed list appears clearer and more coherent.

Question 18 Food Growing

How can the Local Development Plan support the delivery of food growing projects in the City? Do you think food growing should be included in the next Plan by way of a new policy, or through existing policy and guidance?:

Q18 – NHS Grampian believes promoting food growing is consistent with good public health (Public Health England Spatial Planning for Health) – a link could be made from the LDP to the community food growing objective in the community planning local outcome improvement plan (LOIP) (through the Sustainable City outcome improvement group), and is being pursued through the council- and NHSG-supported sustainable food cities programme.

5 Transport and Infrastructure

Question 19 City Centre Parking

Should we reduce car parking in the City Centre to support the City Centre Masterplan? If so, how?:

Q19 NHS Grampian believes that yes, this is a logical development in accordance with the ambition to increase sustainable and active travel, as well as access to NHS Facilities. The CCMP proposals e.g. park and ride, offer a way to do this.

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

How best can we encourage the provision of infrastructure to support changes in transport technologies? :

Main Issue 5 – NHS Grampian believes that the preferred option is a sensible way forward with regards to encouraging electric car usage. However, there is some operational considerations which we believe should be considered in any new policy. This primarily focuses around the use of the building, as particularly for health centre developments, the visitors to the building are not in the facility long enough for EV charging to be useful. For staff and pool car use, the chargeplace Scotland network of charging points is a useful funding stream, however the ability for any member of the public to freely use these charging points means that charging for pool or staff vehicles cannot be guaranteed. This is something that should be considered in the policy to ensure that the users of the building, as opposed to local residents are the beneficiaries of the charging points.

Not Answered

Question 20 Digital Infrastructure

Should high speed broadband be mandatory in all new residential developments with 5 or more units? Do you wish to suggest any other proposed changes to the Digital Infrastructure and Telecommunications Infrastructure policies?:

Q20 – NHS Grampian supports the widespread adoption of high speed broadband, this provides the Board with opportunities to use virtual consulting tools and other internet based technology as it becomes available.

We would also welcome inclusion in the LDP of policy around improved mobile data signals, particularly 4g and also reference to 5g adoption.

Question 21 Developer Obligations and Infrastructure Delivery

Do we need to change our approach to securing developer obligations for future development proposals?:

Q21 – NHS Grampian would highlight the importance of Developer Contributions in supporting future service improvements related to new housing developments in the city. The Board will continue to work with Aberdeen City Council to ensure that the contributions secured in section 75 agreements are flexible enough to enable the delivery of new models of integrated Primary Health and Community Care Services, which could be delivered through digital connectivity, integrated Community Hubs, Healthy Hoose Models, Community Campus Model and Integrated Health and Care Centres by a range of Health and Care Professionals. The structure of the Aberdeen City Council developer obligations team has recently changed, and we have recently made steps to further improve relationships and engagement, and we'll continue to make our views and requirements known via this engagement.

6 Resource and Business Policy

MAIN ISSUE 6 Low and Zero Carbon Generating Technologies and Water Efficiency

Should the requirement of existing Policy R7 be changed?:

Main Issue 6 – NHS Grampian believes the impacts of climate change are a significant risk to public health (Public Health England Spatial Planning for Health); carbon-reduction actions are an important factor to safeguard population health for the future, and we would support the preferred option.

Option 2 - Preferred Option

Question 22 Low and Zero Carbon Generating Technologies and Water Efficiency

What methodology should the Council use in calculating compliance with Policy R7, specifically how should the target of reducing carbon dioxide levels be calculated?:

Q22 – NHS Grampian does not have any comments on this question.

Question 23 Solar Farm Developments

Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy developments, and should specific guidance be included within Policy R8?:

Q23 – Yes, NHS Grampian would be broadly supportive of the concept of solar farms as a way of achieving energy targets.

MAIN ISSUE 7 Heat Networks

Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?:

Main Issue 7 – NHS Grampian is supportive of the preferred way forward, and developing a cohesive policy sounds a sensible action to take.

Option 2 - Preferred Option

Question 24 Supporting Business and Industrial Development

Should we carry forward our current policy approach to safeguarding existing business and industrial areas from other development pressures into the next Local Development Plan?:

Q24 – NHS Grampian do not have any comments on this question.

MAIN ISSUE 8 West End Office Area

Should the policy support a mix of uses in the West End Office Area? If so, what types?:

Main Issue 8 – NHS Grampian would be largely supportive of the preferred option to ensure vibrancy within the West End. Significant residential development in the area will, however have an impact on existing health care provision in the area which will have to be considered.

Option 2 - Preferred Option

7 Affordable Housing

Question 25 Affordable Housing

Do you agree with the Local Development Plan's current affordable housing approach being carried forward? What other measures could the Council consider in order to assist with the delivery of affordable housing units via the Plan? Should the threshold of not applying affordable housing requirements to developments smaller than 5 units remain in place?:

Q25 – NHS Grampian believes that the affordability of housing is an important determinant of health (Public Health England Spatial Planning for Health). Affordable housing approaches should continue.

Question 26 Private Rented Accommodation and Build to Rent

Are there ways that the Local Development Plan can facilitate Build to Rent development, through policy?:

Q26 – NHS Grampian has no comments on this question.

8 Sustainable Mixed Communities

MAIN ISSUE 9 Inclusive Housing Mix (Housing for the Elderly and Accessible Housing)

How can the Local Development Plan ensure a greater mix of housing types is achieved in new developments?:

Main Issue 9 – NHS Grampian welcomes Inclusive Housing being identified as a main issue, and supports the preferred way forward on this issue. Providing suitable housing for these patient groups will support their care needs.

Option 2 - Preferred Option

MAIN ISSUE 10 Residential Care Facilities

How should the Local Development Plan cater for proposals relating to Residential Care Facilities?:

Main Issue 10 – NHS Grampian believes that given the dramatic demographic changes projected over the next few decades, care for older adults is a societal priority. The preferred option sets out a sensible and proactive way to ensure residential care facilities get the high level of attention that they require.

Option 2 - Preferred Option

MAIN ISSUE 11 Student Accommodation

How can the Local Development Plan cater to proposals relating to student accommodation?:

Main Issue 11 – NHS Grampian has no comments on this question.

Not Answered

MAIN ISSUE 12 Houses in Multiple Occupation

How can the Local Development Plan support sustainable mixed communities, with regards to HMOs?:

Main issue 12 – NHS Grampian has no comments on this question.

Not Answered

Percentage limit of HMOs in each area:

Please explain why you chose your answer:

Geographical boundary of each area:

Please explain why you chose your answer:

Threshold for when planning permission is required for a HMO:

Please explain why you chose your answer:

Question 27 Community Planning

Is there anything else that the Local Development Plan can do to support the objectives of the LOIP or the aims of Community Planning?:

Q27 – NHS Grampian is supportive of the LOIP, and the 'prosperous' headings within this MIR are an evident link to the LOIP.

Question 28 Changing Places Toilets

Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?:

Q28 – NHS Grampian is supportive of the suggestion that developments include Changing Places, and the Board is now providing these as part of its new build facilities. The provision of these facilities is a key factor in increasing the overall accessibility of public facilities and the city as a whole, therefore efforts to increase the network of changing places is vital.

Additional Documents

Please include comments on other documents below:

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1. Introduction

1.1. NHS Grampian welcomes the opportunity to submit representations on the Aberdeen City Council's Local Development Plan 2019 Main Issues Report. NHS Grampian are generally supportive of Aberdeen City Council's priorities and the main issues identified within the report, and wish to emphasise the importance of providing good health and social care facilities and ensuring that adequate provision is made for health and social care facilities to serve new developments. Many existing facilities are already pressured and are incapable of expansion to cater for new development. In those instances new sites are required to be identified and set aside for health and social care facilities. Those sites should have the ability to accommodate health and social care current requirements and provide 50% expansion in the future should it be required. To achieve this, NHS Grampian is committed to working with the Council to continue to identify areas where new or improved facilities are required.

1.2. NHS Grampian also wishes to emphasise the need to address a number of health and social care challenges that we face and will continue to face moving forward. Encouraging healthier lifestyles and more physical activity can improve the quality of life and mental wellbeing of the residents of Aberdeen and this should be considered a priority. NHS Grampian has therefore taken the opportunity to seek responses from NHS Grampian Public Health Directorate and Aberdeen City Health & Social Care Partnership and have included their comments within our response.

2. Background

2.1. NHS Grampian is the fourth largest Health Board in Scotland, and within the Board area there are three Integrated Joint Boards (IJBs), which are separate legal entities; Aberdeen City, Aberdeenshire and Moray, which along with the Boards acute sector, is supported by corporate services. The introduction of The Public Bodies (Joint Working) (Scotland) Act 2014 created the IJBs. The aim of the Act was to ensure that people 'receive the care they need at the right time and in the right place, focussing on a community base and preventative care'. In Grampian services are provided in a range of community settings; work places, homes, in one of the 72 GP Practices providing services from 104 locations or 16 community hospitals. Highly specialised care is delivered in the acute hospitals of Dr Grays in Elgin, Woodend in Aberdeen and Aberdeen Royal Infirmary. Royal Cornhill Hospital provides the main in-patient and community support for mental health services. For women and children, specialist services are provided at Aberdeen Maternity Hospital and the Sick Children's Hospital.

3. General

3.1. Whilst NHS Grampian is broadly supportive of the preferred options proposed within the Aberdeen City Local Development Plan 2019 Main Issues Report and the level of growth identified within the housing allowances, we will require considerable investment in health and social care facilities in order to maintain high levels of service to support Aberdeen's growing and ageing population. NHS Grampian acknowledges the ongoing work with Aberdeen City Council to identify suitable sites to ensure the infrastructure requirements are identified at an early stage. It is however noted that where possible suitable sites should be located centrally to the community in which it serves, visible, accessible and be well served by public transport. NHS Grampian is keen to stress the importance of continued joint working in the creation of successful communities; sites and buildings of joint occupation should be considered wherever possible when serving housing communities. NHS Grampian would also highlight the importance of Developer Contributions in supporting future service improvements related to new housing developments in the city. The Board will continue to work with Aberdeen City Council to ensure that the contributions secured in section 75 agreements enable the delivery of new models of integrated Primary Health and Community Care Services, which could be delivered through digital connectivity, integrated Community Hubs, Healthy Hoose Models, Community Campus Model and Integrated Health and Care Centres by a range of Health and Care Professionals.

3.2. Healthcare provision is a fundamental requirement for the long term health and wellbeing of a community and NHS Grampian would like to see further recognition that health and social care is seen as an essential key infrastructure service that communities need.

3.3. It is also important to recognise that as NHS Grampian also covers Aberdeenshire Council's administrative area and in certain instances there may be cross-border issues which require to be addressed. The provision of facilities in Aberdeen City may also serve areas lying within Aberdeenshire and vice versa.

Additional Files

If you have further information you would like to provide you may upload it here.:

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