

Proposed Aberdeen Local Development Plan 2015 Representation Form

Please use this form to make comments on the Proposed Aberdeen Local Development Plan, ensuring that your comments relate to a specific issue, site or policy in either the Proposed Plan, Proposed Supplementary Guidance, Proposed Action Programme or Strategic Environmental Assessment Environmental Report. Please include the relevant paragraph(s) and use a separate form for each issue you wish to raise.

The consultation period runs between Friday 20th March and Monday 1st June 2015. Please ensure all representations are with us by 5pm on Monday 1st June.

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Please tick if you would like to receive all future correspondence by e-mail

What document are you commenting on?	Proposed Plan <input checked="" type="checkbox"/> Proposed Supplementary Guidance <input checked="" type="checkbox"/> Proposed Action Programme <input checked="" type="checkbox"/> Strategic Environmental Assessment Environmental Report <input type="checkbox"/>		
Policy/Site/Issue	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;"> Spatial Strategy Policy D3 & D5 Policy I1 & Appendix 1,2,3 & 4 Policy H5 & Supplementary Guidance (Housing & Planning Obligations) Policy NE1 & NE3 Opportunity Site OP36 & OP81 Proposed Action Programme </td> <td style="width: 40%;">Paragraph(s)</td> </tr> </table>	Spatial Strategy Policy D3 & D5 Policy I1 & Appendix 1,2,3 & 4 Policy H5 & Supplementary Guidance (Housing & Planning Obligations) Policy NE1 & NE3 Opportunity Site OP36 & OP81 Proposed Action Programme	Paragraph(s)
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What would you like to say about the issue?

See attached Paper Apart

What change would you like to see made?

See attached Paper Apart

Please return the completed form by:

- post to the Local Development Plan Team, Aberdeen City Council, Business Hub 4, Ground Floor North, Marischal College, Broad Street, Aberdeen AB10 1AB; or
- email to ldp@aberdeencity.gov.uk

The representation form can be filled in, saved, e-mailed and/or printed. You must “save as” to ensure the completed form is saved with the changes you have made. If you need more space, please fill out another representation form or send a word document attachment via e-mail with your completed representation form. **Please ensure all representations are with us by 5pm on Monday 1st June.**

Thank you. For more information, please visit www.aberdeencity.gov.uk/aldp2016 or to contact the Local Development Plan Team call 01224 523470.

Data Protection Statement

The comments you make on the Proposed Plan will be used to inform the Local Development Plan process and the Examination into the Local Development Plan by the Scottish Ministers' Reporter. You must provide your name and address for your representation to be considered valid, and this information will be made publicly available. Other personal contact details such as telephone and e-mail will not be made public, although we will share these with the Reporter, who may use them to contact you about the comments you have made. For more information about how Aberdeen City Council maintains the security of your information, and your rights to access information we hold about you, please contact Andrew Brownrigg (Local Development Plan Team Leader) on 01224 523317.

PAPER APART

REPRESENTATION TO THE PROPOSED LOCAL DEVELOPMENT PLAN ON BEHALF OF NHS GRAMPIAN

NHS Grampian welcomes the opportunity to submit representations to the Aberdeen City Local Development Plan.

Background

NHS Grampian is the fourth largest Health Board in Scotland, consisting of three Community Health and Social Care Partnerships – Aberdeen City, Aberdeenshire and Moray and an acute sector, all supported by corporate services. NHS Grampian aims to deliver services as close to patient's homes as it is clinically safe to do so. Services are provided in a range of community settings – work places, people's homes, in one of the GP Practices or Community Hospitals within their area. Highly specialised care is delivered in the acute hospitals of Dr Gray's in Elgin, Woodend and Aberdeen Royal Infirmary. Royal Cornhill Hospital provides inpatient 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.

NHS Grampian work closely with local authorities on the delivery of services and have agreed to set up a joint board to manage integrated health and social care services. The 'Health and Social Care Integration' service came into force in April 2015 creating a new entity to which NHS Grampian and Aberdeenshire Council will delegate a number of services. The aim is to build upon positive relationships to provide quality health and social care across Aberdeenshire.

The Main Issues Report (MIR) was published on 13th January 2014 and a representation to this was submitted to Aberdeen City Council in January 2014 (Appendix 1). Some of these comments have been taken on board which is welcomed, however, there remain some outstanding issues.

What change would you like to see made?

Through this representation, NHS Grampian suggests minor amendments to the Plan to increase clarity to landowners and developers.

Spatial Strategy

NHS Grampian is generally supportive of the spatial strategy proposed by the Plan, but wishes to emphasise the importance of ensuring that adequate provision is made for healthcare facilities to serve new development. Many existing facilities are already pressured and are incapable of expansion to cater for new development. In such instances, sites require to be identified and set aside for healthcare facilities. Those sites should have the ability to accommodate 50% expansion in the future should it be necessary.

To achieve this, NHS Grampian are committed to working with Aberdeen City Council to continue to identify areas where new or improved facilities are required. NHS Grampian have previously advised of the healthcare requirements for Aberdeen and will continue to monitor this going forward to assist in determining developer contributions.

It was argued through the MIR that the inclusion of new sites at Peterculter would adversely impact the provision of healthcare facilities in the area, which would not be able to accommodate the additional patients without proportional mitigation, as identified in the Action Programme for Masterplan Zone 10. The Council's response to the MIR in relation to sites B9095 Woodend Site 1 and B0904 Woodend Site 2 stated that these sites are considered to be unsuitable for residential

development due to its relative remoteness from services, facilities and public transport which will make development entirely car dependent. As a result, it was not to be allocated in the Proposed Plan. However, these sites are allocated, as a new site B109 Woodend, Peterculter for 19 houses. Developer contributions from housing on this site, and others within the LDP area, to mitigate any adverse impacts they will have on the delivery of healthcare within these areas will be required and this must be reflected in the Local Development Plan.

The Proposed Plan makes reference to a Planning Brief being required for OP52 at Malcolm Road. NHS Grampian would request that they are consulted on this and that appropriate references are made to the provision of contributions towards healthcare facilities. This applies to other Development Frameworks, Masterplans and Planning Briefs elsewhere in the City where there is a requirement for healthcare.

Policy D3 – Big Buildings

Policy D3 and Supplementary Guidance state that the most appropriate location for big buildings is within the city centre or immediate periphery. However, it is argued that tall buildings should not be restricted to a particular location, as there are a number of locations where big buildings would be appropriate outwith the City Centre, for example, Aberdeen Royal Infirmary.

Big buildings should therefore be determined on the basis of context and a variety of factors, including design and materials. The use of the building and economic rational are important factors in the acceptability of a building. It is considered that Policy D3 and Supplementary Guidance may be too prescriptive and prevent the provision of appropriately designed big buildings in locations outwith the City Centre.

Policy D5 – Our Granite Heritage

NHS Grampian is supportive of the retention and re-use, conversion and adaption of granite buildings. It is accepted that retention is not always possible and Policy should also permit demolition in circumstances when it would assist in the wider regeneration of an area. **Policy D5** should therefore be amended to reflect this.

Infrastructure Provision

Through the MIR representation, NHS Grampian stated that current policy is not sufficiently robust where development proposals are sited outwith Masterplan Zones, brownfield or windfall sites. **Policy I1: Infrastructure Delivery and Planning Obligations** amends the wording of this Policy to recognise the infrastructure requirements for Masterplan Zone sites and other allocated sites outwith Masterplan Zones within Appendices 3 and 4. This is welcomed and supported, however, it is argued that this change does not go far enough to address the concerns of NHS Grampian.

Appendix 3 deals with Masterplan Zones and Appendix 4 with Masterplans. There is no reference to the requirement for Opportunity Sites, Brownfield Sites and windfall sites to contribute to infrastructure requirements, including healthcare facilities. The requirement for Developer Obligations must be recognised for Health services where inner city, brownfield sites which will add pressure to existing Healthcare facilities. There are a significant number of these developments, in all some 10,500 homes and NHS Grampian request the opportunity to review the location of these proposed developments and develop a table similar to that provided for the Masterplan Zones.

In relation to the Opportunity Sites in Appendix 2, the development of these sites will also have a significant impact on existing healthcare facilities in Aberdeen. Similarly, it should be ensured that

contributions are received from sites with the potential for planning consents as identified in Table 1 in Appendix 1. With regard to Table 2 in Appendix 1, although these sites already have planning consent, a number of these have yet to be developed. It is important to understand the status of these sites and ensure that contributions are received from these, if possible, as a number of them have the potential for significant impacts on healthcare facilities in the area.

Policy I1 should be amended to make specific reference to healthcare facilities, within the first paragraph to read “Where development either individually or cumulatively will place additional demands on community facilities or infrastructure, **including healthcare facilities** that would necessitate new facilities or exacerbate deficiencies in existing provision...” It should also refer to the infrastructure requirements relating to Appendix 1 (Brownfield Sites) and Appendix 2 (Opportunity Sites), as well as windfall sites, as they too will have an impact on services, including healthcare facilities. These amendments would fully recognise that the development of all sites will have an impact on infrastructure, including healthcare facilities in the City.

Amendments to the “health” section of Appendix 3 are also necessary to reflect changes in NHS Grampian’s requirements since the extant LDP was prepared. These changes are highlighted in bold below.

<p>Extension(s) to Primary Care facilities such as Bridge of Don Clinic, Scotstown Medical Practice and Oldmachar Medical Practice within the development catchment area to accommodate additional GP’s, support Staff and other primary care support services.</p> <p>One new Community Pharmacy.</p>	<p>Zone1 - Dubford OP10 (and contribution from other residential site at East Woodcroft North OP8, Dubford Community Facilities OP4, Balgownie Centre OP5, Balgownie Primary School OP6, Aberdeen College OP7, Balgownie Home Farm OP11, “One” Sport Centre OP12 and AECC Bridge of Don OP13)</p>
<p>New 16 GP Health Centre (including land) to accommodate existing four GP Practice with 12 additional GP’s, support staff and other primary care support services.</p> <p>Two new six chair Dental Surgeries.</p> <p>Four new Community Pharmacies.</p>	<p>Zone 2 - Grandhome OP9</p>
<p>New 11 GP Health Centre (including land) to accommodate eight existing GP’s with 3 additional GP’s, support staff and other primary care support services.</p> <p>One new Community Pharmacy.</p>	<p>Stoneywood OP17, Former Carden School Dyce OP15, (Support from housing development in Newmachar within the Aberdeenshire LDP is also sought as primary care services are provided from Dyce)</p>
<p>New 15 GP Health Centre (including land) to accommodate 6 existing GPs with 9 additional GPs, support staff and other primary care services.</p> <p>Two new Community Pharmacies.</p>	<p>Zone 3 - Newhills Expansion – Craibstone South OP20, Rowett South OP21, Greenferns Landward OP22 along with contributions from Bankhead Academy OP14, Davidson Papermill OP16 (Support from housing development in</p>

	Blackburn within the Aberdeenshire LDP is also sought as primary care services are provided from Bucksburn Practices)
Provision of Healthy Hoose in Woodside area	Contributions from Woodside OP25, Haudagain Triangle OP65, Manor Walk OP66, Hilton Nursery OP84 and Smithfield Primary OP89
New 6 GP Health Centre (including land) to accommodate 4 existing GPs with 2 additional GPs, support staff and other primary care services including dental chairs	Zone 4 - Greenferns OP28 and OP33
Extension at Kingswells Health Centre to accommodate 2 additional GP's, support staff and other primary care services.	Kingswells OP30
New 9 GP Health Centre (including land) to accommodate 7 existing GPs with 2 additional GPs, support staff and other primary care services.	Zone 5 - Maidencraig South OP31 and Maidencraig OP32, along with contributions from Grenfern Infant OP27, Burnside OP37, Summerhill Academy OP93
New 7 GP Health Centre (including land) including support staff and other primary care services to support the population in this new community. Two new Community Pharmacies.	Zone 6 – Countesswells OP38
Extension to the existing Cults Health Centre to support the General Medical Services with an additional GP, support staff and other primary care services in the Cults community.	Zone 7 – Friarsfield OP41, along with contributions from Braeside OP39, Cults and Pumping Station OP40
Extension to Peterculter Health Centre to accommodate one additional GP, support staff and other primary care services. One new Community Pharmacy.	Oldfold OP48 along with contributions from Kenerty Mill OP42, Milltimber Primary OP43, Peterculter East OP45, Culter House OP46, Edgehill Rd OP47, Peterculter Burn OP51, Malcolm Rd OP52, Mid Anguston OP108 and Woodend Peterculter OP109
Extension to Cove Bay Health Centre to accommodate 3 additional new GPs, support staff and other primary care services. One new Community Pharmacy in the Loirston development.	Zone 8 – Loirston OP59 along with Cove OP56, Stationfields OP58

Similarly Section 11 *Health* of the Infrastructure and Development Contributions Manual makes no provision for developments outwith those stated in Masterplan Zones, brownfield or windfall sites to contribute towards the mitigation of the additional strain they would place on healthcare facilities within their catchment area. It is understood that the Supplementary Guidance has been reordered, however, there is no new guidance on this issue. This should be amended to reflect Policy I1.

These changes should also be followed through to the Proposed Action Programme to ensure consistency between the documents. It is recognised that the Action Programme has been updated to identify developer contributions required towards healthcare requirements for each of the Masterplan Zones and this is also welcomed and supported.

Although the Proposed Action Programme identifies housing sites outwith Masterplan Zones, it is considered that this does not provide enough detail in relation to the contributions required to healthcare facilities. This especially the case in instances where some of the Masterplan Zones have been removed, for example, Stoneywood, Kingswells and Oldfold and re-identified as "Sites Outwith Masterplan Zones". Their impact on healthcare facilities must continue to be identified and it is requested that the healthcare requirements for Housing Sites Outwith Masterplan Zones are specifically recognized in the Action Programme.

It must also be ensured that the Local Development Plan and the Action Programme are consistent in their identification of sites. In particular, Stoneywood has been removed from the Action Programme as a Masterplan Zone, but it continues to be identified as a Masterplan Zone in Appendix 3.

Policy H5 - Affordable Housing

It is considered that the wording of **Policy H5** allows for flexibility in the delivery of affordable housing in that no *less* than 25% may be provided on housing developments of 5 or more units. An additional paragraph should be added to after this to state "This meets the flexible approach to the delivery of affordable homes that Aberdeen City Council favour and more importantly understanding that there are distinct differences between affordable housing and key worker housing".

It is noted that Supplementary Guidance on Affordable Housing makes no reference to the 5 or more units and it is considered that the LDP and SG should be consistent.

Supplementary Guidance states at paragraph 6.2.1 that SPP and PAN 2/2010 sets out details of Specialist Housing which includes the elderly and students. However, it is argued that the Proposed LDP Policy does not specify this in enough detail. It should specifically define affordable housing for students as well as NHS staff accommodation.

It is also requested that the delivery of affordable housing or commuted sums in lieu, that are agreed as part of the redevelopment of former NHS Grampian land and buildings should be ring fenced specifically for the implementation of key worker and student accommodation in conjunction with NHS Grampian. This meets the flexible approach to the delivery of affordable homes that Aberdeen City Council favour. Representation was made on this issue to the MIR, however, no response was provided. It is considered that this change should be carried forward into the LDP.

Natural Environment

NHS Grampian supports policy which protects and enhances the natural environment. However, some of the areas identified as Green Space Network (**NE1**) and Urban Green Space (**NE3**) are incorrect. The Aberdeen Open Space Audit 2010 includes Amenity Greenspace, defined as:

landscaped areas providing visual amenity or separating different buildings or land uses for environmental, visual or safety reasons for a variety of informal or social activities". However, these results have translated into land being identified for protection through the Local Development Plan under these policies which is inappropriate.

From NHS Grampian's perspective, this includes, but is not limited to land in the vicinity of the Foresterhill, Woodend and Cornhill Hospital campuses. Where a development proposal is acceptable, **Policy NE3** requires "*an equivalent and equally accessible area for public space is laid out and made available in the locality by the applicant for urban green space purposes*". In circumstances where identified land has become surplus to NHS Grampian requirements, the policy designation prohibits their development for other uses, compatible with the local area, which effectively blights the NHS estate. It is not accepted that the Policy has been amended to improve its clarity and it is requested that provision is made within **Policy NE3** for the sensitive development of land within the NHS estate, where proposals are in accordance with Policy D1: Quality Placemaking by Design.

Denburn and Woolmanhill

The MIR identified Denburn and Woolmanhill as an opportunity for retail development. Objection was made to this as it would prejudice the redevelopment of the buildings as a viable mixed use scheme. It is therefore welcomed that it is now identified as an **Opportunity Site OP81** for a mixed use development, part of which may be suitable for retail development.

Charlie House

It is also welcomed that Charlie House has been identified as an **Opportunity Site OP36** as a Community Facility for Children's Respite. Support is given to the retention of the site boundary as contained in the Development Bid, in order to accommodate infrastructure works and landscaping,

Conclusion

A number of issues raised in the MIR representation have been carried forward into the Proposed Plan. However, it is considered that there are still some areas of concern in relation to health care sites and the interests of NHS Grampian which require to be taken into consideration in taking the Plan forward.

Recommendation

It is therefore respectfully requested that the specific changes requested by NHS Grampian are carried forward into the Local Development Plan.

Main Issues Report Consultation 13th January to 24th March Response Form

The Main Issues Report describes and invites discussion on options for policies and land allocations in the next Aberdeen Local Development Plan. No settled view on the content of the next plan has yet been reached, making the Main Issues Report the key stage for public consultation. Giving us your views will help to shape the future strategy for development and the policies by which future planning applications are determined. You can view a copy of the Main Issues Report on our website at: www.aberdeencity.gov.uk/planning_environment/planning/local_development_plan/pla_local_development_plan.asp. A series of accompanying documents, including an Interim Environmental Report, Monitoring Statement and Developer Bids Assessments, can also be viewed online.

How to respond

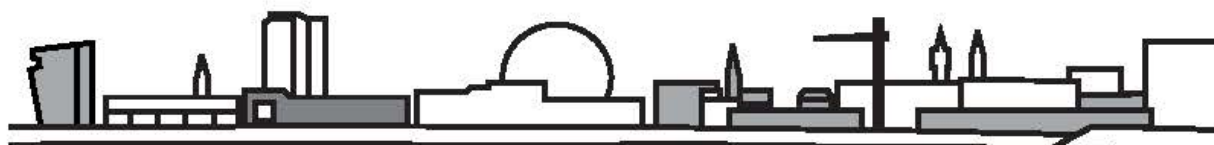
The Main Issues Report contains a series of issues and questions which we would particularly like to hear your views on. Use this form to respond to these, or any other issues raised by the Main Issues Report, Monitoring Statement, Interim Environmental Report or any other accompanying documents. **Please return it to reach us by 5pm on Monday 24th March.**

- **Post:** Local Development Plan Team, Planning and Sustainable Development, Aberdeen City Council, Business Hub 4 Marischal College, Broad Street, Aberdeen AB10 1AB
- **Email:** If you are filling out our online PDF form, please be aware that you cannot save what you have written and come back to it later. Once you have finished filling it in, you can print to PDF. You could also scan your paper form if you have this facility. You can then email your response to ldp@aberdeencity.gov.uk
- If you prefer not to use this form, you could also send us an email or letter with your comments. Please include your name, address, telephone number and email address (if applicable), as well as the details of anyone you are representing.

Data Protection Statement

The comments you make on this form will be used to inform the preparation of the next Local Development Plan. Aberdeen City Council (ACC) will not share or disclose the personal information provided on this form with other parties or organisations unless we are required to do so by law.

The Local Development Plan Team may use your contact details to contact you to seek further detail or information about the comments you have made. Your name and organisation (if relevant) will be published alongside your comments, but personal contact details (address, telephone, e-mail address) will not be made public. If you choose not to provide a name or any contact details, your comments will still be valid.



For more information on how your information is used, how Aberdeen City Council maintains the security of your information, and your rights to access information ACC holds about you, please contact Andrew Brownrigg (LDP Team Leader), Planning and Sustainable Development, Aberdeen City Council, Business Hub 4, Marischal College, Broad Street, Aberdeen AB10 1AB.

Please provide your name and contact details:

Name (Mr/Mrs/Miss/Ms) _____

Organisation (if relevant) **Ryden LLP** _____

Address **25 Albyn Place** _____

Aberdeen _____

Postcode **AB10 1YL** _____

Telephone **[REDACTED]** _____

E-mail address **[REDACTED]** _____

If you are completing this form on behalf of an organisation, group or landowner, please provide their details below.

Please tick this box if you wish further correspondence to be directed to this address:

Name (Mr/Mrs/Miss/Ms) _____

Organisation/Group **NHS Grampian** _____

Address **Summerfield House** _____

2 Eday Road, Aberdeen _____

Postcode **AB15 6RE** _____

Telephone _____

E-mail address _____

If you wish to be added to the LDP e-mailing list to be kept informed of our progress in producing the next LDP, please tick here: and provide the email you wish to be added to our database:

E-mail address **[REDACTED]** _____

Please use a separate box for each issue/question you wish to respond to. If you wish to continue on a separate sheet, please attach to the paper copy or email.

Main Issue and/or Question Number	1	MIR Page Number	7-1
SETTLEMENT STRATEGY - SEE PAPER APART			

Main Issue and/or Question Number	5.2	MIR Page Number	33
INFRASTRUCTURE PROVISION - SEE PAPER APART			

Main Issue and/or Question Number	Q4	MIR Page Number	19
TALL OR BULKY BUILDINGS - SEE PAPER APART			

Main Issue and/or Question Number	3	MIR Page Number	20-23
ISSUE 3 - A RETAIL STRATEGY FOR THE CITY CENTRE - SEE PAPER APART			

Main Issue and/or Question Number	2.2	MIR Page Number	11
BROWNFIELD SITES AND OTHER PROPOSALS - SEE PAPER APART			

Main Issue and/or Question Number	B0302	MIR Page Number	11
CHARLIE HOUSE, WOODEND HOSPITAL WEST (B0302/037) - SEE PAPER APART			

Main Issue and/or Question Number	8.4 Q19	MIR Page Number	47
DEMOLITION OF TRADITIONAL GRANITE BUILDINGS - SEE PAPER APART			

Main Issue and/or Question Number	Q20	MIR Page Number	48-49
NATURAL ENVIRONMENT - SEE PAPER APART			

Main Issue and/or Question Number	8	MIR Page Number	40-41
HOUSING NEEDS AND AFFORDABLE HOUSING - SEE PAPER APART			

PAPER APART

Representations to Aberdeen City Council in response to the Main Issues Report 2014, on behalf of NHS Grampian

Introduction

NHS Grampian welcomes the opportunity to submit representations on the Aberdeen City Council's Local Development Plan 2016 Main Issues Report. It is generally supportive of the spatial strategy proposed by the Plan, but wishes to emphasise the importance of ensuring that adequate provision is made for healthcare facilities to serve new development. Many existing facilities are already pressured and are incapable of expansion to cater for new development. In those instances sites require to be identified and set aside for healthcare facilities. Those sites should have the ability to accommodate 50% expansion in the future should it become necessary.

To achieve this, NHS Grampian are committed to working with the Council to continue to identify areas where new or improved facilities are required. NHS Grampian have previously advised of the healthcare requirements for Aberdeen and a copy of the requirements is appended to this representation, this document will be updated to reflect these requirements to assist in determining developer contributions.

Background

NHS Grampian is the fourth largest Health Board in Scotland, consisting of three Community Health Partnerships – Aberdeen City, Aberdeenshire and Moray and an acute sector, all supported by corporate services. NHS Grampian aims to deliver services as close to patients' homes as it is clinically safe to do so. Services are provided in a range of community settings – work places, peoples' homes, in one of the GP Practices or Community Hospitals within their area. Highly specialised care is delivered in the acute hospitals of Dr Gray's in Elgin, Woodend and Aberdeen Royal Infirmary. Royal Cornhill Hospital provides inpatient 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.

NHS Grampian also work closely with local authorities on the delivery of services and have agreed to set up a joint board to manage the integrated health and social care services in Aberdeenshire. The 'Health and Social Care Integration' service will come into force in April 2015 creating a new entity to which NHS Grampian and Aberdeenshire Council will delegate a number of services. The aim of the new venture is to build upon the positive relationships already in place to provide quality health and social care across Aberdeenshire.

Main Issue 1 – Settlement Strategy

NHS Grampian generally supports the Council's settlement strategy as set out in the Main Issues Report (MIR) (2014), in respect of the carrying forward of the greenfield allocations from the Aberdeen Local Development Plan (LDP) (2012) into the forthcoming LDP; with the addition of small sites at Peterculter to increase housing choice and support the primary school; these sites are forecast to deliver between 96 and 98 houses over 4 sites and will adversely impact the provision of the healthcare facilities within the area, which would not be able to accommodate the additional patients without proportional mitigation, as identified in the Action Programme for Masterplan Zone 10. Developer contributions from housing within the Aberdeen City Council area, to mitigate any adverse impacts they will have on the delivery of healthcare within these areas will be required.

5.2 Infrastructure Provision

Section 5.2 of the MIR states the intention to *improve our Supplementary Guidance on developer contributions and provide greater clarity on delivery through our Action Programme*. This is welcomed by NHS Grampian as the current policy is not sufficiently robust where development proposals are sited outwith Masterplan Zones or are not identified in the LDP. It is disappointing however that whilst the MIR acknowledges that in addition to transport and education, *there are many other types of infrastructure required to make a successful development including water and sewage, utilities, waste, health and community facilities and green infrastructure*, the provision of healthcare is not mentioned. Healthcare provision is as important as education provision in the creation of a successful development and should be afforded the same status in the Local Development Plan.

The current policy 11 *Infrastructure Delivery and Developer Contributions* identifies 11 Masterplan Zones and the Opportunity Sites which are included within them. Infrastructure requirements to which the development of the allocated sites within these zones must contribute are identified in the *Action Programme*. Through this strategy contributions towards identified measures to mitigate against the cumulative impacts of the development of the allocated sites within the zones are identified, however in respect of healthcare, no provision is made to require developer contributions to mitigate the cumulative impacts of development outwith these zones and additional brownfield and windfall development, which is not identified in the LDP, but which could still have an adverse impact on the healthcare facilities within whose catchment they fall.

Similarly, section 11 *Health* of the *Infrastructure and Developer Contributions Manual* sets out that *infrastructure requirements have been calculated with NHS Grampian on the basis of national health standards and by estimating the likely number of new patients generated by each proposed development*. However no provision is made for developments outwith those stated within Masterplan Zones, brownfield or windfall development proposals to contribute towards the mitigation of the additional strain they would place on healthcare facilities within their catchment area.

Policy I1 is not sufficiently robust to secure contributions to mitigate circumstances where development outwith a Masterplan Zone, or that is brownfield or windfall would have an adverse impact on the provision of healthcare facilities within the catchment area of the development. It is requested that policy I1 is amended to make specific reference healthcare facilities, with the insertion of 'including healthcare facilities' so that the first paragraph reads:

*Development must be accompanied by the infrastructure, services and facilities required to support new or expanded communities and the scale and type of developments proposed. Where development either individually or cumulatively will place additional demands on community facilities or infrastructure, **including healthcare facilities** that would necessitate new facilities or exacerbate deficiencies in existing provision, the Council will require the developer to meet or contribute to the cost of providing or improving such infrastructure or facilities.*

Question 4 – Tall and/or Bulky Buildings

a. Where do you think would be the most appropriate locations for new tall and/or bulky buildings to be located?

Tall buildings should not be restricted to a particular location, rather the acceptability of development proposals for tall buildings should be determined on the basis of its context. Aberdeen City Centre for example is built over a series of valleys, a significant amount of Aberdeen's historic fabric is multi-storey in order to address street level.

b. Are there any locations where you think tall and/or bulky buildings should not be allowed? Where do you think these are?

Similarly the Local Development Plan should not designate areas where tall and bulky buildings should not be located, the acceptability of a building within the existing environment depends on a variety of factors: clever design and use of appropriate materials are crucial determining features. The Council's existing policy D2 provides sufficient weight to ensure that proposals for development respect their context.

c. What do you think is important for us to consider when assessing proposals for tall and/or bulky buildings?

When assessing tall bulky buildings the design, materials and context are appropriate. The use of the building and economic rational are important factors in the acceptability of a building. It could be argued that historic and Conservation Areas such as Old Aberdeen should be "protected" from tall or bulky development, however the recent Queen Mother Library development is a good example of where sizeable buildings appreciate their context and respect the historic environment.

Issue 3 – A Retail Strategy for the City Centre

The land at Denburn and Woolmanhill is subject to an approved Development Brief which identifies their potential to accommodate mixed use development. While these sites are well-located in respect of the city centre, they are brownfield sites with issues such as demolition of existing substantial buildings, category A-listed buildings at Woolmanhill Hospital, flooding issues, infrastructural issues and neighbouring residential amenity. Given the requirement for a redevelopment scheme to address these issues and sensitively redevelop the listed buildings, the number of potential developers and economically viable redevelopment proposals is restricted.

It is important that these two sites should remain allocated for mixed use development to permit suitable reuse which works with both the site and the location, retaining the option to accommodate retail development as an element of a mixed-use scheme, should a suitable proposal be identified. Identification of these sites for a retail development that is undeliverable would prejudice the remaining retail land supply and prejudice the redevelopment of the buildings for a viable mixed use scheme. There is a well-documented shortage of land for commercial development in the city centre and a sensitive development proposal which met the terms of the development brief and incorporated sensitive redevelopment of the listed buildings as part of a mixed use scheme is preferred. It is requested that the site continues to be identified as an *Opportunity Site*, for a mix of uses, including retail, as is the case in the current Aberdeen Local Development Plan.

2.2 Brownfield sites and Other Proposals

Charlie's House, Woodend Hospital West (B0302/0307)

NHSG welcomes the identification of the above proposal, but notes that it should be referred to as "Charlie House".

The text accompanying this designation suggests that *"it may be necessary to alter the layout of the proposed development from that which has been submitted with this bid in order to best accommodate the development in light of flooding and slope issues which have been identified on part of the site."*

The boundary of the site should not be realigned; whilst the physical development of the Charlie House facility will not occupy the entire footprint of the site, all the land within the site boundary, as identified in the development bid is required to accommodate infrastructural works required, necessary landscaping and the grounds of Charlie House, which will include sensory gardens, which are as much a part of the respite care services provided as those within the physical building.

Main Issue 8 – Housing Needs and Affordable Housing

In respect of issue 8: Housing Needs, the NHS Grampian supports Option 2, which allows for *flexibility in the policy approach for affordable housing options that can help deliver greater numbers of affordable homes*. However it is requested that the definition of 'affordable homes' includes student and NHS staff accommodation.

The Proposed Aberdeen City & Shire Strategic Development Plan (as modified) defines affordable housing as:

Housing which is made available at a cost below full market value to meet an identified need. It includes homes rented from the council and housing associations and, in some cases, homes sold or rented from the private sector.

On this basis it is requested that the delivery of affordable housing or commuted sums in lieu, that are agreed as part of the redevelopment of former NHS Grampian land and buildings should be ring-fenced specifically for the implementation of key-worker and student accommodation in conjunction with NHS Grampian. This meets with the flexible approach to the delivery of affordable homes set out in option 2.

8.4 Question 19: Demolition of Traditional Granite Buildings

NHS Grampian are supportive of current Local Development Plan policy D4 which encourages the retention of granite buildings, which are of special interest, except where they are incapable of repair; that the demolition of the buildings is essential to delivering significant benefits to economic growth or the wider community; or the repair of the building is not economically viable.

It is suggested that this list also include provision for circumstances where the demolition of a building would assist the wider regeneration of an area.

Question 20: Natural Environment

NHS Grampian supports the current policy approach to protecting and enhancing the natural environment, however the designation of some of the areas identified as Green Space Network (NE1) and Urban Green Space (NE3) are incorrect. The *Aberdeen Open Space Audit 2010*¹ includes *Amenity Greenspace*, defined as: *landscaped areas providing visual amenity or separating different buildings or land uses for environmental, visual or safety reasons and used for a variety of informal or social activities*

¹ <http://www.aberdeencity.gov.uk/nmsruntime/saveasdialog.asp?IID=31734&sID=14344>

such as sunbathing, picnics or kickabouts (table 2); however these results have translated into land being identified for protection through the Local Development Plan under policies NE 1 and NE3 which is inappropriate.

From NHS Grampian's perspective this includes, but is not limited to land in the vicinity of the Forresterhill, Woodend and Cornhill hospital campuses, such as OP113 which is vacant, but earmarked for institutional development and maintained to a high standard until it is required for such purposes. Where a development proposal is acceptable, policy NE3 requires *an equivalent and equally convenient and accessible area for public access is laid out and made available in the locality by the applicant for urban green space purposes*. In circumstances where identified land has subsequently become surplus to NHS Grampian requirements, the policy designation prohibits their development for other uses, compatible with the local area, which effectively blights the NHS estate.

This policy could actively discourage the upkeep of vacant institutional land, earmarked for future development. It is requested that provision is made within policy NE3 for the sensitive development of land within the NHS estate, where proposals are in accordance with policy D2 *Design and Amenity*.

NHS Grampian would welcome discussion with Aberdeen City Council regarding the issues raised above, particularly in relation to the mitigation of adverse impacts on healthcare facilities through developer contributions. We reserve the right to expand on any of the above.

Ryden

March 2014

Appendices

Appendix 1: Aberdeen City Main Issues Report 250909

Appendix 2: HNSG Action Programme Masterplan Zone 1 to 11