5.	Site Details	
5.1	What name would you like the site to be known by? (Please note if the site is currently included within the ALDP2017 please use the OP site number)	Land at Woodend Hospital
5.2	Site Address	Woodend Aberdeen
5.3	Postcode	AB15 6YN
5.4	Have you any information for the site on the internet? If so please provide the web address:	No Details:
5.5	Is the site currently being marketed?	No Details:
5.6	Site Location Map (Please include an OS Map with the Boundary of the site clearly marked)	Details: Location plan provided with this bid.
5.7	Please provide the National Grid reference of the site.	NJ 89882 06028
5.8	What is the current use of the site?	Amenity land
5.9	Has there been any previous development on the site? If yes	No
	please provide details	Details:

6.	Legal and Planning History		
6.1	Please indicate the relationship	Sole owner	×
	to the Proposer or Person /	Part owner	
	Organisation they are working on behalf of, has with the site.	Option to purchase	
		No legal interest	
6.2	Is the site under option to a	No	
	developer?	Details:	
6.3	Is the proposed site included in the ALDP2017?	No	
		Details:	
6.4	Is the proposed site included in the Aberdeen City Centre	No	
	Masterplan?	Details:	
6.5	Has the site been subject of previous discussions with the	No	
	Council or any agent there of?	Details:	
6.6	Has the site been subject of previous Planning Applications?	No	
	(Please provide a planning reference)	Details:	
6.7	Has the site been subject of a previous Bid to a previous LDP?	No	
	(Please provide the bid reference number)	Details:	
6.8	Are there any legal restrictions on the title deeds such as rights	No	
	of way, way leaves etc.	Details:	
6.9	Are there any other legal factors that might prevent or restrict	No	
	development? (e.g. ransom strips / issues with	Details:	
	accessing the site etc.)		

7.	Your Proposal (Please provide as much detail as p	possible on your site proposal)	
7.1	Proposed Use	Housing	
		Employment	
		Mixed Use	
		Retail	
		Other (Please Specify)	X .
7.2	Do you have a specific	No	
	occupier in mind for the	D. C. T.	
	site?	Details:	
7.3	Site Area (hectares)	0.59ha	
	Housing		
7.4	Approx. no of units.		
7.5	Proposed Mix and Number		
	(Number of Flats / Terraced /		
	Semi-detached / detached etc.)		
7.6	Affordable Housing	n/a	
	Percentage		
7.7	Affordable Housing Partner	n/a	
	(Details of any partner organisation, Registered Social	Details:	
	Landlord etc.)	Details.	
	,		
7.8	Tenure	n/a	
	(Details of tenure type, Private Rental Sector / private sale /		
	Housing for the elderly etc.)		
	Treating for the enderty every		
	Employment		
	Employment		
7.9	Business and Office	m ²	
7.10	General Industrial	m ²	
7.11	Storage and distribution	m ²	
7.12	Other Please specify	m ²	
	Mixed Use		
	Mixed Ose (Please provide as much detail as p	possible on each use class)	
7.13		No of units and type:-	
7.14	Employment	m ²	
7.15	Retail	m^2	
	Retail		
	Netali		
7.16	Approx. floor area	m ²	
		4 ***	

	Other (Please Specify examples could income and recreation, institutions and edu	clude retailing, tourism, renewable energy, sports, leisure cation.)
7.17	Details of proposal	It is proposed that the site be used for the provision of a care home to meet a range of specialist care needs.
7.18	Approx. floor area	2,000m ²

8.	Engagement and Delivery	
8.1	Has the local community been given the opportunity to influence/partake in the development proposal?	If there has been any community engagement please provide details of the way in which it was carried out and how it has influenced your proposals. If no consultation has yet taken place please detail how you will do so in the future.
		No Details: The size of this development means that it will constitute a local development in terms of the planning hierarchy, however, consultation will take place through engagement with the local community council.
8.2	Will the proposed development be phased?	No Details:
8.3	Expected development start post adoption of the plan in 2022	0-5
8.4	Expected development completion	0-5
8.5	Is finance in place and if so what form? (Secured Loan, Grant Funding etc.)	No Details: Securing finance will be subject to the outcome of the LDP bid process.
8.6	Are there any other issues with the delivery of the site that we should be made aware of? (These should include any issues which may prevent or impact on the deliverability of the site.)	No Details:

9.	Sustainable Development and Design				
9.1	Have you applied principles of sustainable siting and design to your site? The City Council has produced a Sustainability Checklist which provides guidance on the principles of sustainable siting and design and other issues which can be found on www.aberdeencity.gov.uk . Please provide the following information:				
	Orientation				
9.2	Exposure:- (does the site currently have)	Little shelter from northerly winds Some shelter from northerly winds Good shelter from northerly winds			
9.3	Aspect:- (is the site mainly)	North facing East or west facing			
9.4	Slope:- (do any parts of the site have a gradient greater than 1 in 12?)	South, south west or south east facing Yes If yes approx. what area (hectares or %) No	100%		
	Flooding & Drainage				
9.5	Flooding (is any part of the site at risk of flooding or has it previous flooded, if so provide detail You can view the SEPA flood	Yes (If yes please use the SEPA flood maps to determine the risk) Little or No Risk			
	maps at http://map.sepa.org.uk/floodmap/map.htm)	Low to Medium Risk Medium to High Risk			
		If yes approx. what area (hectares or %)			
		No	X		
9.6	Has a flooding strategy been developed for the site?	No Details:			
9.7	Have discussions been had with the Council's flooding team?	No Details:			
9.8	Have discussion been had with Scottish Water?	No Details:			
9.9	Is there waste water capacity for the proposed development? http://www.scottishwater.co.uk/bu siness/Connections/Connecting-your-property/Asset-Capacity-Search)?	Yes Details:			
9.10	Is there water capacity for the proposed development?	Yes			

http://www.scottishwater.co.uk/bu siness/Connections/Connecting-your-property/Asset-Capacity-Search)? Land Use, Built and Cultural Heritage (would the development of the site lead to the loss or disturbance of archaeological sites or vernacular or listed buildings?) No loss or disturbance 9.12 Natural conservation (would the development of the site lead to the loss or disturbance of wildlife habitats or species?) Significant loss or disturbance Some potential loss or disturbance	X
Search)? Land Use, Built and Cultural Heritage (would the development of the site lead to the loss or disturbance of archaeological sites or vernacular or listed buildings?) No loss or disturbance 9.12 Natural conservation (would the development of the site lead to the loss or disturbance of wildlife habitats or species?) Significant loss or disturbance Significant loss or disturbance Some potential loss or disturbance Some potential loss or disturbance	
9.11 Built and Cultural Heritage (would the development of the site lead to the loss or disturbance of archaeological sites or vernacular or listed buildings?) 9.12 Natural conservation (would the development of the site lead to the loss or disturbance Significant loss or disturbance No loss or disturbance Significant loss or disturbance Significant loss or disturbance Some potential loss or disturbance Some potential loss or disturbance No loss or disturbance No loss or disturbance	
9.11 Built and Cultural Heritage (would the development of the site lead to the loss or disturbance of archaeological sites or vernacular or listed buildings?) 9.12 Natural conservation (would the development of the site lead to the loss or disturbance Significant loss or disturbance No loss or disturbance Significant loss or disturbance Significant loss or disturbance Some potential loss or disturbance Some potential loss or disturbance No loss or disturbance No loss or disturbance	
(would the development of the site lead to the loss or disturbance of archaeological sites or vernacular or listed buildings?) Some potential loss or disturbance No loss or disturbance Significant loss or disturbance Some potential loss or disturbance No loss or disturbance Some potential loss or disturbance Some potential loss or disturbance No loss or disturbance No loss or disturbance	
disturbance of archaeological sites or vernacular or listed buildings?) No loss or disturbance No loss or disturbance Significant loss or disturbance Significant loss or disturbance Some potential loss or disturbance No loss or disturbance Some potential loss or disturbance No loss or disturbance No loss or disturbance No loss or disturbance	
9.12 Natural conservation (would the development of the site lead to the loss or disturbance of wildlife habitats or species?) Significant loss or disturbance Some potential loss or disturbance No loss or disturbance	
(would the development of the site lead to the loss or disturbance of wildlife habitats or species?) Some potential loss or disturbance No loss or disturbance	X
disturbance of wildlife habitats or species?) No loss or disturbance	X
Two local of distarbance	
9.13 Landscape features Significant loss or disturbance	
(would the development of the	
site lead to the loss or disturbance of linear and group features of woods, tree belts,	
	×
9.14 Landscape fit (would the development be Significant intrusion	
intrusive into the surrounding landscape?) Slight intrusion	
No intrusion	X
9.15 Relationship to existing Unrelated (essentially a new settlement) settlements	
(how well related will the development be to existing Partially related	
settlements?) Well related to existing settlement	X
9.16 Land use mix No contribution (will the development contribute	
to a balance of land uses, or provide the impetus for attracting	X
new facilities?) Significant contribution	
9.17 Contamination (are there any contamination or present Significant contamination or tipping present	
waste tipping issues with the site?) Some potential contamination or tipping present	
No contamination or tipping present	X

9.18	Will the site impact on any water courses?	No Details:			
9.19	Does the development site contain carbon-rich soils or peatland? http://www.snh.gov.uk/planning-and-development/advice-for-planners-and-developers/soils-and-development/cpp/	No Details:			
9.20	Is the development site within the airport safety exclusion zone?	No Details:			
9.21	Is the development site within the airport 57dB LAeq noise contours?	No Details:			
9.22	Land use conflict (would the development conflict with adjoining land uses or have	Significant conflict Some potential conflict			
	any air quality or noise issues?)	No conflict			X
9.23	If there are significant conflicts, what mitigation measures are proposed?	Details:			
	Transport and Accessibility				
9.24	Has contact been made with the Council's transport team?	No Details:			
9.25	Is access required onto a Trunk road and if so has contact been made with Transport Scotland?	No Details:			
9.26	Accessibility (is the site currently accessible to bus, rail, or major road network?)	More than 800m Between 400-800m Within 400m	Bus Route	Rail Station	Major Road
9.27	Proximity to services and facilities (How close are any of the following?)	Community facilities Local shops Sports facilities Public transport networks Primary schools	400m	400- 800m ⊠ ⊠	>800m
9.28	Footpath and cycle connections	No available connections	S		•

(are there any existing direct footpath and cycle connections to	Limited range of connections	
--	------------------------------	--

	community and recreation facilities or employment? Give the Core Path number if core path is present https://www.aberdeencity.gov.uk/ services/environment/core-paths- plan)	Good range of connections, in close proximity to Core Paths 27, 28 and 91 providing linkages to Hazlehead.	X
9.29	Proximity to employment	None	
	opportunities (are there any existing	Limited	
	employment opportunities within 1.6km for people using or living in the development you propose?)	Significant	X
	Infrastructure		
9.30	Physical Infrastructure (does the site have connections	Electricity	X
	to the following utilities?)	Gas	X
9.31	Does the development have	Yes	
	access to high speed broadband?	Details:	
9.32	Does the development include a Heat Network/District	No	
	Heating Scheme?	Details:	
9.33	How is the development proposing to satisfy the Councils Low and Zero Carbon Policy?	Details: a mix of renewable energy tech be used, such as PV panels and/or air s pumps.	
9.34	Are there any further physical or service infrastructure issues	No	
	affecting the site?	Details:	
	Public open space		
9.35	Will the site provide the required level of open space as per the current LDP (Please provide details of your calculations)	Details: there are no minimum open space standards for non-residential developments, however less than one quarter of the site is to be used for development with the rest remaining as open space.	
9.36	What impact will the	Enhance the Network	
	development have on the Green Space Network?	No impact on the Network	X
		Negatively impact the Network Please justify your response: See pape	r apart
		Tricuse justify your response. Gee pape	. аран.

10.	Education	
10.1	Have discussions been had with the Council's Education Department?	No Details:
10.2	Is there currently education capacity for the proposed development? https://www.aberdeencity.go y.uk/ https://www.aberdeencity.go y.uk/ https://www.aberdeencity.go y.uk/	

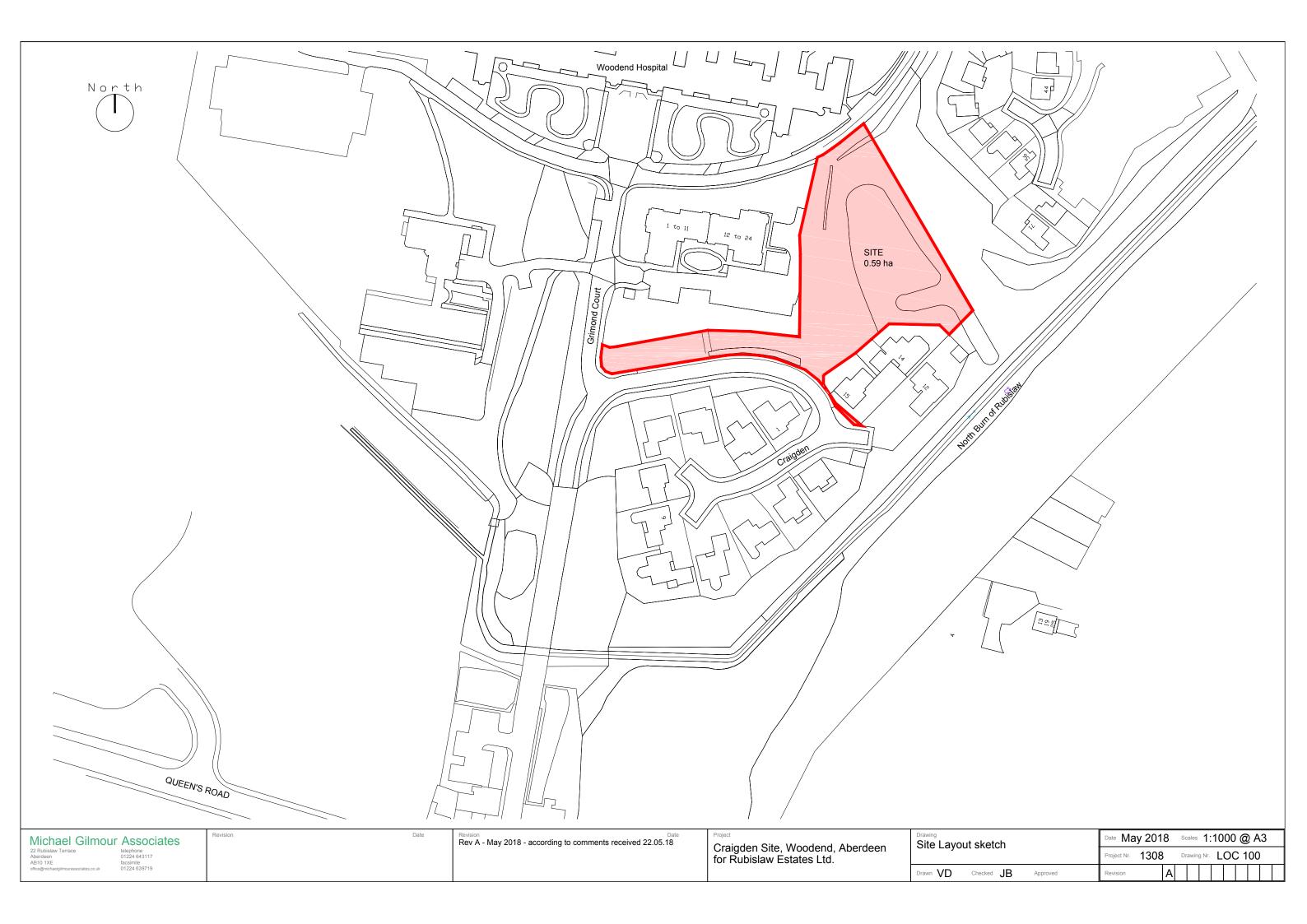
11.	Community benefits		
	education, leisure and community fa open spaces. Include elements wh	w community facilities (such as local shops, health, acilities), affordable housing, green transport links and ich you anticipate may be required as developer. (Please note, specific contributions will have to be passis of the proposal.)	
11.1	Does the development proposal give any benefits to the community? If so what benefits does the development bring, and how would they likely be delivered?	Yes Details: The proposed allocation is to allow for the provision of a care home which will be a valuable community facility.	

12.	Masterplan Development Framework		
12.1	If you have prepared a framework or masterplan showing a possible layout for the site, please include it with this form.	Yes Details: An indicative layout plan has been prepared and is included with this submission.	

13.	Additional attachments				
	No site is going to be perfect and the checklist above will inevitably raise some potential negative impacts from any development. Where negative impacts are identified, please provide details of their nature and extent and of any mitigation that may be undertaken. Listed below are examples of further information that may be included in your submission;				
		Included	Not Applicable		
13.1	Contamination Report		X		
13.2	Flood Risk Assessment		X		
13.3	Drainage Impact Assessment		X		
13.4	Habitat/Biodiversity Assessment	X			

13.5	Landscape Assessment		X
13.6	Transport Assessment		\boxtimes
13.7	Other as applicable (e.g. trees, noise, dust, smell,		
	retail impact assessment etc. please state)		

14.	Development Viability		
14.1	Taking into account all the information provided above, and the requirements of the Aberdeen Local Development Plan 2017 and supporting Supplementary Guidance, please confirm that you have assessed the financial viability of your proposed development and found it to be viable for development in the timeframe set out above.	I confirm that I consider the site to be viable as per the details provided above.	⊠
		Please provide details of viability: colassessment provided.	nfidential viability







Aberdeen Local Development Plan Review

Pre-Main Issues Report Bid Land at Woodend Hospital

Our client, Rubislaw Estates, wishes to promote 0.59ha of land in its ownership at Woodend Hospital for a care home. Details of the site and an outline of the proposed development are set out in the Pre-MIR Bid form, while this paper provides further background and information in terms of the wider policy context that supports the allocation of the site.

The site is located within a residential zoning in the Aberdeen Local Development Plan (2017) (ALDP) and surrounded by residential properties to the south, east and west, with Woodend Hospital to the north. Also in close proximity is the site identified in the current ALDP as OP36, which lies just to the west of Woodend Hospital and is allocated for a children's respite centre and interactive garden area.

In nature conservation terms, the site is covered by the North Burn of Rubislaw Green Space Network, but is **not** identified as Urban Green Space in the current ALDP. The Rubislaw Local Nature Conservation Site (LNCS) also runs along the Burn of Rubislaw to the south of the site, and core path 27 runs along the southern boundary of the site

The indicative layout plan submitted with this bid shows how a care home could be accommodated on the site while also providing high quality open space. In doing that, the allocation of the site for such a use would be entirely consistent with the core values and policy principles of the planning system expressed in Scottish Planning Policy (2014) (SPP), including a focus on outcomes, promoting strong, resilient and inclusive communities and using land within settlements for a mix of uses.

For the reasons given in this paper apart, it is submitted that the site should be allocated as an Opportunity Site within the Green Space Network for a care home.

Impact on natural environment

In terms of valuing the natural environment, SPP is clear that the planning system should facilitate positive change, with new development providing biodiversity benefits where possible. Whilst seeking to protect and enhance green infrastructure, SPP also acknowledges that open space should be valued and functional, or capable of being brought into use to meet local needs.



As set out below, this area of land does not currently meet those criteria. Conversely, if the site is allocated as proposed in terms of this bid, it is submitted that this would provide a valuable community facility whilst also providing an opportunity to enhance the natural environment.

Specifically, in respect of the Green Space Network, the ALDP states that:

"By encouraging connectivity between habitats, the Green Space Network helps to improve the viability of species and the health of previously isolated habitats and ecosystems. An extensive network of open spaces, together with path networks, will also encourage active travel and healthier lifestyles. Protecting and enhancing the Green Space Network will also provide opportunities to enhance the landscape of Aberdeen, improve biodiversity and amenity, provide community growing spaces, reduce the impact of flooding and help us mitigate and adapt to the effects of climate change and support successful placemaking."

The site forms part of the North Burn of Rubislaw Green Space Network, which is classified as a "link" green space, intended to link green spaces such as paths or core paths, waterbodies and wildlife corridors together rather than having significant ecological value in its own right. Major habitat types identified in this Green Space link are broad leaved woodlands, improved grasslands, built up areas and gardens.

An environmental survey carried out in February 2018 (the report of which is submitted with this bid) confirms the limited ecological value of the site, concluding that the habitats present on the site do not in themselves represent an important ecological resource. The Riparian land which straddles the North Burn of Rubislaw was identified as being the most biodiverse habitat on the site, but the largest habitat is semi-improved neutral grassland. At most, this could support protected species of bird at certain times of the year, beyond which it contributes little to the objectives of the Green Space Network. However, landscaping associated with the development of a care home on the site would facilitate significant enhancement of biodiversity of the area, as set out in the Environmental Assessment Update submitted with this bid.

Against this background, the indicative layout plan submitted with this bid shows how a care home could be accommodated on the area of semi-improved neutral grassland, while still leaving a significant area of that habitat, the broadleaved woodland and the riparian land along the Burn as wildlife linkages (this being the key objective of the current designation, rather than protection of the site as a whole). Hence any development here would not erode the function of the Green Space Network.



At the same time enhancements could be made to the remaining land through strategic landscaping, as well as improvements to the remainder of the Green Space Network in the area under our client's ownership, to enhance the value of the wildlife corridor overall.

Although the Rubislaw LNCS runs to the south of the site, a number of other developments have been approved and implemented within close proximity of the Burn, and have been successfully incorporated into the existing landscape without any adverse impact on the LNCS. Similarly, there is no reason why the same would not be true in this instance, and this could be controlled through the development management process.

In terms of the potential impact on open space in the area, public use of the site is limited, with the focus being on the use of Core Path 27, although the site is used to connect the residential areas to the north and the south. This may reflect the fact that the Council's Open Space Audit (2010) shows that the Kingswells and Sheddocksly Ward (within which the site is located) has a significant level of residential amenity space, twice as much as in most other wards in the City, with it also being amongst the highest quality of such space in the City. Indeed, Hazlehead Park is located less than 1.5km away. Given the extent and quality of the greenspace provision elsewhere in the Ward, it is submitted that the use of a small part of this site (23%) to provide a much needed and valuable local service will have no material impact on the availability of residential amenity space in the area. And, with the enhancement of the remaining green space around the proposed development as shown with the indicative layout plan submitted with this bid, public access to higher quality green space would be improved, and pedestrian and wildlife corridors will be maintained

In this respect, it should be noted that site OP36 (which lies just slightly to the west of this site and is allocated for a children's respite centre and interactive garden area as set out above) is located on land zoned as both Urban Green Space and Green Space Network. In assessing that site for allocation in the ALDP, the Council concluded that it was "desirable", despite those zonings, since it was to provide a specialist care facility to serve the North East of Scotland. It is however important to recognise that, once planning permission has been granted for a care home, it would then fall within Use Class 8 – Residential Institutions, and could be used for any type of care home by any organisation. Given that this was deemed acceptable for site OP36, it is submitted that the same should be the case for the site to which this bid relates. That is particularly so since OP36 was also identified as having the following constraints: steep slopes; susceptibility to flooding according to the SEPA indicative flood maps; development there intruding on the hospital listed buildings; a record of bats and Wych Elm within the vicinity; and causing some disruption to the Burn of Rubislaw in terms of landscape. None of these factors apply in the case of the currently proposed site.



Positively, a number of factors cited in support of the allocation of OP36 apply equally to the current site, in particular in that this: will have no significant impact on the tree preservation order; is compatible with the existing residential and hospital uses; is just over 400m from the nearest bus stop; is close to core paths; would be an employment opportunity in its own right; would contribute to the mix of land uses in the area; would have no impact on the hospital listed building; and would make no demands on school infrastructure. Each of these, along with other relevant factors, is considered below.

Tree preservation order

Is it acknowledged that a tree preservation order covers the broadleaf and coniferous trees on the site, the reason for this being to protect the trees given their perceived contribution to the amenity of the area. However, as stated above, the site does not make a significant contribution to the Green Space Network, nor the overall amenity of the area. Development of the site will be on the semi-improved neutral grassland and tall ruderal vegetation, with only a limited amount of encroachment into the woodland area, for which tree protection measures would be put in place. Enhanced landscaping and replacement tree planting will also be implemented around the boundaries of the site where their contribution is most significant in terms of both amenity value and as a wildlife corridor. As such, it is submitted that the allocation of the site as proposed in terms of this bid would to no extent undermine the purposes for which the tree preservation order was put in place.

Compatibility with existing uses and accessibility of services and facilities

SPP requires the planning system to support development which optimises the use of existing infrastructure, reduces the need to travel, provides safe and convenient opportunities for walking and cycling for both active travel and recreation, and facilitates travel by public transport.

In this context, it is submitted that this site is well located for a care home, this being a quiet residential location with good access to shops, services and other facilities by a range of sustainable modes of transport, consistent with SPP. Specifically, there is a parade of shops on Rousay Drive as well as a Tesco store (a 6 minute walk away), with frequent bus services running along Queens Road (First Bus service 11 and Stagecoach service x17) to the south (around 300m away) and the Langstracht (First Bus services 22 and Stagecoach service 218) to the north (just over 400m away). These provide access to services and facilities in Aberdeen City Centre as well as to the west, and hence minimise the need to travel by car.



In terms of other services that are likely to be used by residents of a care home, Woodend Hospital is just a few minutes walk from the site, and specifically caters for care of the elderly, orthopaedics, mobility and rehabilitation service, wheelchair services, audiology and hearing aid services, amongst others.

And finally, Core path 27 runs to the south of the site along the North Burn of Rubislaw, providing opportunities for gentle exercise in the natural environment.

Creation of employment opportunities

Although access to employment opportunities is not relevant in terms of the proposed use of the site, it is important to note that the development itself would create a new employment site, complementing those already available in the area and particularly those health related ones at Woodend Hospital.

Contribution to housing need and housing/land use mix

SPP states that where a specialist housing need is identified though a Housing Need and Demand Assessment (HNDA), planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites. The HNDA for Aberdeen City and Shire highlights the ageing population in the City and the need to plan for a range of housing options for older people. It suggests that 67 per 1,000 people aged 65 and over could require higher levels of care than that provided in their own homes or in sheltered accommodation.

The Council's Local Outcome Improvement Plan also highlights that people in Aberdeen are living longer. The over-65s account for over 15% of the population of Aberdeen, and projections are that the population will continue to age, bringing many benefits and challenges. In particular, older people are more likely to suffer from multiple and complex care needs, and therefore the demand for all services will shift.

The vision for Aberdeen expressed in the LOIP is:

"...of a place where all people can prosper. This reflects our desire to help all people, families, businesses and communities to do well, succeed and flourish, in every aspect. To achieve this vision we are committed to tackling the issues that exist in our society which prevent equal opportunity for all to lead a happy and fullfilling life."

That includes ensuring that people of all ages, and with all types of care needs, are catered for and supported to live full, active and safe lives. The provision of a care home on this site would contribute to meeting that vision.



Impact on Category B listed building

It is recognised that Woodend Hospital to the north of the site is a Category B listed building and, as such, SPP requires that this be protected from any work that would adversely affect its setting. At the same time however, SPP supports positive change where this is informed by a clear understanding of the importance of heritage assets. In this instance, it is submitted that the indicative layout plan submitted with this bid shows how the setting of Woodend Hospital would be positively enhanced by sensitive development, with the proposed use of this site being complementary to the use of the hospital itself. As such, it is submitted that there would be no negative impact on this element of the historic environment.

Other issues

With regard to other criteria against which the site requires to be assessed in terms of the bid form, it should be noted that:

- the site is not covered by any natural or built heritage designations;
- there is no risk of flooding identified in the SEPA flood risk maps;
- although the site is at a gradient of greater than 1 in 12, a building can be designed to fit within the contours and provide barrier free access;
- the availability of education capacity is not relevant given the proposed use; and finally
- the site is deliverable within the timescale of the LDP.

Further, the SDP recognises that both brownfield and greenfield land will be required to accommodate future development, but with any new greenfield allocation to preferably be under 100 units in size, aim to deliver affordable housing above 25%, and not be extensions to existing sites which could delay their delivery. The allocation proposed in terms of this bid is for a small-scale stand-alone development which, whilst not providing affordable housing, will meet an identified housing need and hence meets all of the criteria set out in the SDP.

Conclusion

For the reasons given in this paper apart, it is submitted that the allocation of this site as an Opportunity Site for a care home within the Green Space Network would:



- not adversely impact on the function of the Green Space Network either as a wildlife corridor or a pedestrian link;
- facilitate enhancement of biodiversity in the area;
- provide a much needed service for Aberdeen's ageing population;
- be compatible with existing uses and services;
- create new employment opportunities;
- have no adverse impact on the Category B listed building.

As such, it is submitted that the site should be allocated accordingly.