



Aberdeen Local Development Plan Review

Main Issues Report Consultation Response

Question 3 – Brownfield and other Opportunity Sites

Are there any further brownfield or other opportunity sites which would be suitable for re-development?

Yes, bid reference: B0304 – Land at Woodend Hospital

Our client believes that, in order to address an identified need, their site at Woodend Hospital should be identified as an opportunity site for a care home. In doing that, they contest the officers' conclusion that the proposed allocation of this site is undesirable.

As set out in our client's initial response to the call for sites, Scottish Planning Policy (SPP) states that planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites to address any specialist housing need identified through a Housing Need and Demand Assessment (HNDA). It is accordingly important to note that the Aberdeen City and Shire HNDA highlights both the City's ageing population and the need to plan for a range of housing options for older people, with 67 per 1,000 people aged 65 and over likely to require higher levels of care than can be provided in their own homes or in sheltered accommodation. The Main Issues Report recognises this need, deeming housing for this sector of the community a Main Issue for the next Aberdeen Local Development Plan, and highlighting the need to be proactive to the challenges that will arise in meeting the needs of this changing demography. In such circumstances, it would be expected that sites for specialist care homes would be allocated for development.

With regards to this site, the officers' assessment concludes that the proposed use as a care home would fit well within the surroundings and would provide a positive facility for elderly people. Indeed, it scores the maximum of 3 for all but four of the assessment checklist criteria, with a total score of 55.

Within that assessment, it should be noted that the criteria against which the site did not receive the maximum score include "Other Constraints", with the other constraints that are identified being the Green Space Network and the gradient of part of the site. However, these factors have already been taken into account against the "Natural Conservation" and "Slope" criteria respectively, such that the site has effectively been marked down twice on these.



Instead, given that nature conservation and slope are dealt with separately, and no constraints other than these have been identified, the score for other constraints should in fact be 3. That would bring the total score for the site to 57, equal to or higher than many of the sites which have been assessed as desirable.

In terms of the other criteria against which the site was not assessed favourably, the following should be noted:

- **Nature conservation** – it is accepted that the site forms part of the Den of Maidencraig Local Nature Conservation Site and North Burn of Rubislaw Green Space Network. At the same time, as set out in our client's initial bid, an environmental survey was carried out in February 2018 which confirmed that the site has limited ecological value.

The survey did note the presence of bird species of conservation concern due to the site providing some foraging habitat for these species, but also highlighted that these habitats are common in the surrounding area. In addition, the trees on the site will provide sufficient nesting for breeding birds, including house sparrows and starlings.

Whilst Pipistrelle bats can be seen in the area, these are most likely to be roosting in the roof and roof spaces of the hospital buildings, rather than in the trees which have little roost potential in this area, with foraging along the Burn. It is though possible to erect bat boxes on the site to provide roost diversity if required.

In terms of the wych elms identified in the officers' assessment, there are clear signs that these have been affected by Dutch elm disease, having not yet come in to leaf, nor produced flowers as they should have done at this time of year.

The site does not therefore make any real or special contribution to either nature conservation or the objectives of the Green Space Network, and proposed development here would not impact on the trees or ecology of the area. The site's value in this regard could, however, be enhanced through new landscaping associated with any development of the site such that, combined with careful siting of the care home, there could be an improvement to biodiversity.

It should also be noted that a number of other developments have been approved and implemented within close proximity of the Burn, demonstrating that it is possible to incorporate these into the landscape without having any adverse impact on the Local Nature Conservation Site.

- **Landscape features** – the assessment states that the site comprises several mature trees and overgrown bushes, and that redevelopment would result in the likely



loss/disturbance of these. Whilst recognising that a tree preservation order covers the broadleaf and coniferous trees on the site, those trees remaining have very limited amenity and nature conservation value. In addition, enhanced landscaping and replacement planting could be implemented around the boundaries of the site where their contribution is most significant in terms of both amenity value and providing a wildlife corridor.

Slope – officers conclude that access to site would be a challenge as the western and southern part slopes steeply with a gradient of 1:14. It should, however, be noted that the gradient at the south western part at the site, where access would be taken from Craigden, is in fact only 1 in 63 (between Craigden and the access to the proposed new building). The drawing submitted with this response shows a section through the proposed location of the access road, demonstrating that it is perfectly possible to create an acceptable access by removing the existing slope with a retaining wall

Other allocations

In determining the desirability of our client's site for its proposed use as a care home, it is important to compare it with other sites which have been assessed as desirable. Most notable are:

- **Site OP36** – the Council has previously accepted the allocation of site OP36, which is located on land zoned as both Urban Green Space and Green Space Network. In making that allocation, it was noted that the site had steep slopes, that there were records of bats and Wych Elm within the vicinity, and that development here would cause some disruption to the Burn of Rubislaw in terms of landscape, all factors for which our client's site has been assessed as being undesirable. It is difficult to understand how such different conclusions can be reached on sites which are so similar, and which are proposed to be used for the same use class.
- **Bid reference B0319 Woodend Hospital** – this site has been assessed as preferred, despite scoring only 53 in total. It is particularly important to note that, for this site, the nature conservation criteria was scored as 2 (compared with 1 for our client's site) but with the same constraints identified in terms of it being part of the Local Nature Conservation Site and Green Space Network. It also scores 2 in terms of landscape features even though the officers' assessment states that development outwith the existing building fabric is likely to disturb existing landscape feature, something for which our client's site has been scored as 1. In the case of B0319 though, part of the site is also adjacent to a Prime Landscape, which would suggest that this site is in fact less desirable than our client's in terms of landscape features.



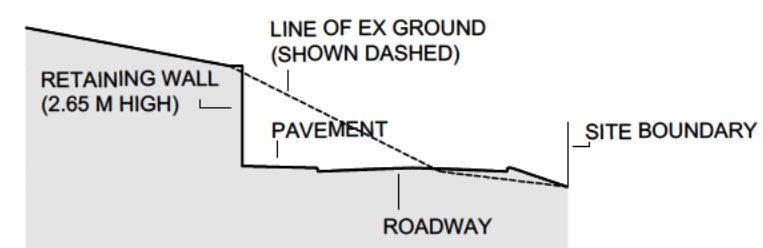
For the reasons set out above, as well as those given in our client's initial response to the call for sites, it is submitted that the site should be allocated in the new Aberdeen Local Development Plan as an Opportunity Site for a care home in order to provide a valuable and much needed community facility, and to do so within high quality open space which would enhance the nature conservation and amenity value of the site.

Main Issue 10 – Residential Care Facilities

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

Section 8.3 of the Main Issues Report highlights the need for housing development to seek to accommodate the demographic trends found across Scotland and support independent living. At the same time, it recognises that it is appropriate to consider the needs of elderly people, or those who require specific care who cannot live independently. To do that, it proposes three options in terms of potential policy approaches to achieve this. Whilst the inclusion of a specific policy for residential care facilities is supported, our client is also of the view that opportunity sites should also be identified for such uses for the reasons given above, and maintains that their own site, bid reference B0304, is appropriate for such a use.





Section line A-A

Revision		Date	Revision		Date	Project Proposed Nursing Home Craigden, Woodend, Aberdeen Rubislaw Estates Ltd	Drawing Site Layout Plan Section thru access road			Date	April 2019	Scale		1:200
										Project Nr.	1308	Drawing Nr.		SK01
										Drawn	JB	Checked		Approved
								Revision						