

PROPOSED ABERDEENSHIRE LOCAL DEVELOPMENT PLAN 2020 RESPONSE FORM

As part of the production of the Local Development Plan, a 'Main Issues Report' was published in January 2019. The responses from these consultations have helped to inform the content of the Proposed Local Development Plan ("the Proposed Plan").

The Aberdeenshire Local Development Plan will direct decision-making on land-use planning issues and planning applications in Aberdeenshire for the 10-year period from 2021 to 2031. The Proposed Plan was agreed by Aberdeenshire Council in March 2020 as the settled view of the Council. However, the Proposed Plan will be subjected to an independent examination and is now open for public comment.

This is your opportunity to tell us if anything should be changed in the Proposed Plan, and why.

When writing a response to the Proposed Plan it is important to specifically state the modification(s) that you would wish to see to the Plan.

This is the only remaining opportunity to comment on the Proposed Plan. The reasons for any requested changes will be analysed and reported to Scottish Ministers. They will then appoint a person known as a Reporter to conduct a public examination of the Proposed Plan, focusing particularly on any unresolved issues and the changes sought.

Ministers expect representations (or responses) to be concise (no more than 2000 words) and accompanied by limited supporting documents. It is important to ensure that all of the information that you wish to be considered is submitted during this consultation period as there is no further opportunity to provide information, unless specifically asked.

Please email comments to ldp@aberdeenshire.gov.uk or send this form to reach us by 31 July 2020*.

We recommend that you keep a copy of your representation for your own records.

**UPDATE 16 June 2020: Consultation period was extended from 17 July 2020 for a further two-week period.*



ACCESSIBILITY

If you need information from this document in an alternative language or in a Large Print, Easy Read, Braille or BSL, please telephone 01467 536230.

Jeigu pageidaujate šio dokumento kita kalba arba atspausdinto stambiu šriftu, supaprastinta kalba, parašyta Brailio raštu arba britų gestų kalba, prašome skambinti 01467 536230.

Dacă aveți nevoie de informații din acest document într-o altă limbă sau într-un format cu scrisul mare, ușor de citit, tipar pentru nevăzători sau în limbajul semnelor, vă rugăm să telefonați la 01467 536230.

Jeśli potrzebowali będą Państwo informacji z niniejszego dokumentu w innym języku, pisanych dużą czcionką, w wersji łatwej do czytania, w alfabecie Braille'a lub w brytyjskim języku migowym, proszę o telefoniczny kontakt na numer 01467 536230.

Ja jums nepieciešama šai dokumentā sniegtā informācija kādā citā valodā vai lielā drukā, viegli lasāmā tekstā, Braila rakstā vai BSL (britu zīmju valodā), lūdzu, zvaniem uz 01467 536230.

Aberdeenshire Local Development Plan
Woodhill House, Westburn Road, Aberdeen, AB16 5GB

Tel: 01467 536230
Email: ldp@aberdeenshire.gov.uk
Web: www.aberdeenshire.gov.uk/ldp
Follow us on Twitter @ShireLDP

If you wish to contact one of the area planning offices, please call 01467 534333 and ask for the relevant planning office or email planning@aberdeenshire.gov.uk.



Please use this form to make comments on the Proposed Aberdeenshire Local Development Plan 2020. If you are making comments about more than one topic it would be very helpful if you could fill in a **separate response form for each issue you wish to raise**.

Please email or send the form to reach us by 31 July 2020 at the following address:

Post: Planning Policy Team, Infrastructures Services
Aberdeenshire Council, Woodhill House, Westburn Road, ABERDEEN, AB16 5GB

Email: ldp@aberdeenshire.gov.uk

Please refer to our **Privacy Notice** at the end of this form for details of your rights under the Data Protection Act.

YOUR DETAILS

Title:	Mr
First Name:	Allan
Surname:	Robertson
Date:	31 July 2020
Postal Address:	[REDACTED]
Postcode:	[REDACTED]
Telephone Number:	[REDACTED]
Email:	[REDACTED]

Are you happy to receive future correspondence only by email? Yes No

Are you responding on behalf of another person? Yes No

If yes who are you representing?

Tick the box if you would like to subscribe to the Aberdeenshire LDP eNewsletter:

An acknowledgement will be sent to this address soon after the close of consultation.

YOUR COMMENTS

Please provide us with your comments below. We will summarise comments and in our analysis will consider every point that is made. Once we have done this we will write back to you with Aberdeenshire Council's views on the submissions made. We will publish your name as the author of the comment, but will not make your address public.

Modification that you wish to see (please make specific reference to the section of the Proposed Plan you wish to see modified if possible, for example Section 9, paragraph E1.1):

Through this representation, NHS Grampian suggests some amendments to the Plan in order to increase clarity to landowners and developers and ensure the requirements of NHS Grampian are met in relation to the scale of development proposed.

Specific changes are detailed below.

Reason for change:

Background

NHS Grampian submitted a number of site specific development (healthcare) requirements in certain settlements. NHS Grampian submitted representations to the Main Issues Report in April 2019. Appendix 1 provides further details on the background of NHS Grampian's representations. Comments were made on a number of the Main Issues, including the vision; the strategy; rural areas; affordable housing; layout, siting and design; open space; infrastructure; and, developer obligations. More specific comments were made in relation to individual settlements.

Some comments have been taken on board, which is welcomed, however, there remain outstanding issues which will be addressed in turn below:

General

NHS Grampian is generally supportive of the strategy in the Proposed Plan and the recognition and importance of providing good health and social care facilities, ensuring that adequate provision is made for healthcare facilities to serve new developments. However, this needs to be strengthened. Communities and Local Authorities through the Local Development Plan need healthy residential areas to allow communities to grow and flourish.

Section 3: The Vision

This section refers to a national, regional and local vision, however, it does not make any reference to health. Considering the importance placed by NHS Grampian on improving the health and well-being of people and the impact this has on health services in the region, it is requested that more emphasis is placed on health within the vision, especially in relation to healthier living and physical and mental wellbeing. This will integrate well with the outcomes contained in the Proposed Plan which deals with sustainability, well designed places, connections and reducing carbon emissions.

Section 4: The Purpose of the LDP and its Outcomes

This relates to the purpose and outcomes of the Plan. Paragraph 4.2 deals with sustainable mixed communities and design standards making reference to the need for a design process to make sure that the necessary infrastructure is provided.

NHS Grampian acknowledges ongoing work with Aberdeenshire Council to identify suitable sites ensuring infrastructure requirements are identified at an early stage. Health and social care provision is a fundamental requirement for the long term health and wellbeing of a community. It is therefore imperative that it is recognised as essential infrastructure within a community, similar to water, pipes, schools and roads.

It is requested that the third sentence of paragraph 4.2 is amended to state *“A design process is put in place to make sure that land use planning takes place early and over the long term to provide infrastructure, such as water, pipes, schools, **healthcare** and roads, which will be needed.”*

Encouraging healthier lifestyles and physical activity can improve the quality of life and mental wellbeing of the residents of Aberdeenshire and must be considered a priority. NHS Grampian therefore welcomes, at paragraph 4.3 of the Proposed Plan, the encouragement of active travel, through integrated walks and cycleways.

Paragraph 4.6 recognises the social, ecological and economic benefits that connected areas of green and blue space and habitats such as parks, paths, and woodlands provide within villages and towns. Again, the importance of these on health and wellbeing should be noted and it is requested that the first sentence in paragraph 4.6 is amended to state *“...and on the edge of our villages and towns can provide a range of social, ecological, **health** and economic benefits”*.

Section 5: The Settlement Strategy

NHS Grampian welcome the removal of the six different administrative areas in Aberdeenshire and instead, the introduction of a wider context to the settlement strategy as it applies over the whole area. However, it must be noted that **considerable investment is required in health and social care facilities in order to maintain high levels of service to support Aberdeenshire’s growing and ageing population.**

Section 6: Shaping Business Development

Policy B1: Town Centre Development includes references to healthcare facilities and this is welcomed by NHS Grampian. Health Centres must be accessible to all and town centres tend to be the main focus for public transport services. Health centres also bring significant footfall into town centres. This benefits pharmacies and other retailers from additional footfall. The location of health centres in town centres enhances vitality and viability of these areas. Where health centres are located in town centres, support should be given to their continued presence and scope for expansion.

However, it is important to recognise many existing town centre facilities are already pressurised and unable to extend due to the constrained nature of town centre sites. In instances where health centres require to be located out with the town centre, they should be in locations preferably accessible by foot, cycling and public transport. They should also have the ability to accommodate current health and social care requirements and provide 50% expansion in the future should it be required. Sites left redundant after the relocation of health centres from town centres, should be identified as opportunity sites for development.

Section 7: Shaping Development in the Countryside

NHS Grampian reiterate their arguments in relation to the need for development in rural to be easily accessible by public transport and linked to health centres. Rural development not accessible by public transport and remote from health care provision has a detrimental impact on households locating there. Further to this, it places an additional, unnecessary burden on health and social care services.

The cumulative impact of rural development must be considered ensuring it does not adversely affect health and social care services. Most are already oversubscribed and developer contributions are sought to mitigate the impacts arising from a direct impact of development proposals.

Technology can play an important part in the future provision of health care provision in all communities and especially rural areas. It is recognised not everyone is comfortable with using technology, but it is important that digital infrastructure is in place to ensure that services are accessible to all. NHS Grampian therefore welcomes Policy P5: Digital Infrastructure and their response to this is noted below.

Policy R2: Development Proposals Elsewhere in the Countryside states that siting and design of any new development will be a primary consideration. Comments regarding accessibility are relevant to this and this links to NHS Grampian's response to Policy P1: Layout, Siting and Design and Policy P2: Open Space and Access in New Development as detailed below.

Section 8: Shaping Homes and Housing

NHS Grampian support the requirement for 25% affordable housing required under Policy H2: Affordable Housing. This will have a positive impact on some of NHS Grampian's most vulnerable clients who struggle to secure a home of their own. However, as with any development, this approach will also increase the burden on health and social care services due to an increased demand for services, particularly in areas where there is a high proportion of vulnerable people.

Recognition that special needs housing will be supported is welcomed where an obvious need is demonstrated under Policy H3: Special Needs Housing. Engagement is required to evidence that a need for housing for people with disabilities or care homes for the elderly exists with NHS Grampian and Aberdeenshire Health and Social Care Partnership.

This is a sensitive issue, with patients from such developments having complex physical and mental health needs. Patients and their families expect to be able to call a GP. Unscheduled visits add to the pressure on GP practices which are already stretched and struggling. Although the majority of GP consultations may be by visiting the care home, patients may still be required to attend other appointments within NHS facilities. The skill level and experience of the care home staff can also play a vital role, however, some staff nurses cannot carry out the requirements of special needs housing and as a result, community nurses are also required to visit nursing homes.

As such, NHS Grampian and Aberdeenshire Health and Social Care partnership would need more information on the level of care proposed at these facilities before support can be given and it is requested that Policy H3 makes reference to **“the need to consult NHS Grampian and Aberdeenshire Health and Social Care Partnership”**.

In terms of Policy H5: Gypsy/Travellers Specific Gypsy/Travellers and sites being

identified in the Settlement Statements for Gypsy/Travellers, policy requires that proposals must allow reasonable access to employment, education and other community infrastructure, and the main road network. This would include access to healthcare and it is important to emphasise that proposals for any gypsy/traveller development should also be easily accessible by public transport and linked to health and social care centres.

Section 9: Shaping Places

Within Policy P1: Layout, Siting and Design, NHS Grampian supports requirements for developments to demonstrate the six qualities of successful place, particularly the importance of developments being well connected; safe and pleasant; and the benefits this has on health and well-being.

We also support the requirement, contained within Policy P2: Open Space and Access in New Development for all new developments to be accompanied by adequate public open space appropriate to the standards shown in the Aberdeenshire Parks and Open Spaces Strategy. This provides opportunities for healthy living and wellbeing activities. With nutrition a fundamental source of health, local food growing opportunities are welcomed. However, it should be recognised that existing health and social care sites will need to expand in the future and consideration must be given to the expansion requirements of health and social care facilities.

Policy P5: Digital Infrastructure states Aberdeenshire Council supports development that provides digital infrastructure to homes and businesses. This is welcomed as the use of technology will play a big part in future provision of health and social care within rural communities. Ensuring that digital infrastructure is in place enables further opportunities for health and social provision and ensures services are easily accessible by all. During the coronavirus pandemic technology has played a significant part in health care which is now largely irreversible.

In relation to Policy P6: Community Facilities and Public Amenities it is welcomed that support is given to the re-use or redevelopment of community sites within settlements that have become surplus to requirements. However, it is requested that this policy reads *“where existing community **and health care** infrastructure within settlements has become surplus to requirements...”*. NHS Grampian require clarity that this policy would cover health care sites that have had to relocate in order to expand and this change would provide that comfort.

Section 12: Protecting Resources

Policy PR2: Reserving and Protecting Important Development Sites states that Aberdeenshire Council *“will protect and not allow alternative development on sites that may reasonably be needed in the future”* for a range of requirements. This includes education facilities and other community infrastructure. NHS Grampian request that this policy is amended to include an additional bullet point specifically for **“health care infrastructure”**.

Section 13: Climate Change

NHS Grampian supports the need to tackle climate change. The global climate emergency must be a priority as it is an existential risk to human health.

Due to the nature of health and social care facilities, a number of services require specialised buildings, exclusively tailored for the needs of the specific service provide. This includes air tightness, specialised lighting and higher temperatures for medical examination areas. NHS Grampian struggle to deliver buildings, due to the level and

type of care and support they provide and it is requested that a further exception is added to Policy C1: Using Resources in Buildings at paragraph C1.4 which states that **“specialist buildings are excluded where it can be demonstrated that it would not be possible for targets to be met for reasons related to their specialist nature”**.

Section 14: Responsibility for Developers

Under the heading “Access to New Development” within Policy RD1: Providing Suitable Services, we welcome the requirement for developments to be well related to public transport services, or the delivery of improvements to public transport services. This is considered essential to the accessibility and use of healthcare facilities.

In terms of Policy RD2: Developer Obligations, NHS Grampian welcomes the need for development proposals to provide infrastructure and services and the specific reference to health care contained within this policy. Most healthcare facilities are currently under pressure and will either require internal alteration, expansion or the provision of new facilities to meet the needs of the areas that are proposed for development. Developer contributions, land for development and land for new facilities are essential to mitigate the impact arising directly from those new developments.

NHS Grampian continues to work closely with Aberdeenshire Council identifying areas under pressure; where new facilities are required; and, the scale of contribution required to mitigate the impact of residential development. This will ensure health and social care facilities are provided in the right location at the right time. We welcome close working with other key agencies throughout the preparation of the Local Development Plan ensuring opportunities to share facilities are fully exploited to collocate and reduce cost.

Of important note is the requirement of new technologies by way of developer obligations to be considered which would not only improve access to health facilities in rural areas, but would also have a positive impact on travel and reduced CO2 emissions to further benefit communities. This all contributes to Aberdeenshire Council meeting the outcomes as well as climate change policies contained within the Proposed Plan.

Appendix 3: Regeneration Priority Areas

We support the regeneration priority areas of Banff, Fraserburgh, Macduff, Peterhead (and Boddam). The requirement for development proposals to be located within 200m of the settlement boundary will ensure good accessibility to town centre facilities, including health care provision, located there.

It is also welcomed that the Proposed Plan seeks to promote networks of walking and cycling routes as this will improve accessibility as well as improving the health of users. Although this is specifically noted in relation to Banff, Macduff, it should be included for all regeneration priority areas. It is therefore requested that the text for Fraserburgh and Peterhead include this requirement also.

Appendix 6: Housing Land Allocations

This appendix provides details of all housing allocations made in the 2021 Local Development Plan. In some locations, this is substantial and will have a significant impact on health care provision in the communities of: Balmedie, Blackdog, Ellon, Inverurie, Chapelton, Banff, Fraserburgh, Banchory, Mintlaw, Peterhead, Turriff and Laurencekirk.

Appendix 7: Settlement Statements

NHS Grampian is supportive of the level of growth identified within the settlement

statements, considerable investment is required in health and social care facilities to maintain high levels of service to support Aberdeenshire's growing and ageing population.

NHS Grampian welcomes the inclusion of health and social care as part of the call for sites process, which informed the need for new health and social care infrastructure required within specific settlements. This is a fundamental requirement for the long term health and wellbeing of a community.

There may be cross border issues between the City and Shire that may need to be addressed. The provision of facilities in Aberdeenshire may also serve areas lying within Aberdeen City and vice versa.

Appendix 8: Successful Placemaking Design Guidance

NHS Grampian welcomes and supports the inclusion of a new appendix to provide a more detailed interpretation of the six qualities of successful places. This should continue to be a requirement in the LDP.

The importance of providing well designed buildings, streets and open spaces and the positive impact it has on health and wellbeing cannot be underestimated. NHS Grampian look forward to providing continuing support and advice where required to promote higher standards of design and designing places that support healthy and safer communities.

It is maintained that there needs to be a greater focus on designing homes to provide a "home for life" opportunity as this would specifically allow persons as they age or are affected by illness to remain in their home. This would require the design of homes to provide access for wheel chairs and to have at least one bedroom designed of a size to accommodate hoists and a room adjacent to the bedroom that could be converted to an ensuite wet room. In that regard the NHS would be happy to provide further advice as required.

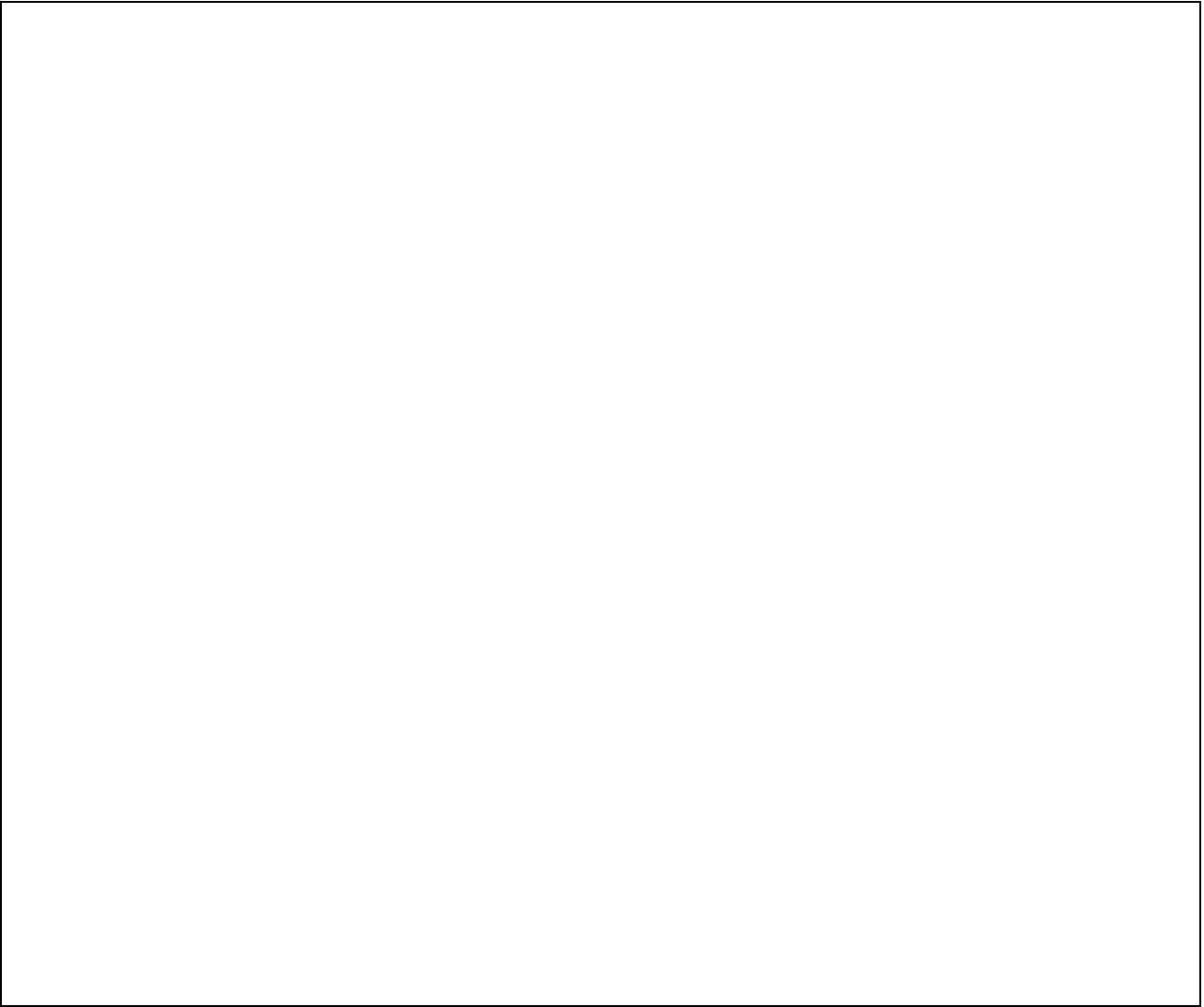
Given the known associations between green space and good mental health, the value placed on green spaces and green-blue networks and their promotion is welcomed by NHS Grampian.

Appendix 9: Building Design Guidance

Again, NHS Grampian welcome and support the 6 qualities of successful placemaking. This should continue to be a requirement in the LDP.

Appendix 10: Standards of Open Space

Similar to Policy P2, NHS Grampian supports the inclusion of Appendix 10 which would ensure all new developments must be accompanied by adequate public open space which provides opportunities for healthy living and wellbeing activities. NHS Grampian particularly welcome the inclusion of community growing areas, community play areas as well as the mix of space requirements depending on the size of the development.



PRIVACY NOTICE

LOCAL DEVELOPMENT PLAN PUBLIC COMMENT

The Data Controller of the information being collected is Aberdeenshire Council.

The Data Protection Officer can be contacted at Town House, 34 Low Street, Banff, AB45 1AY.

Email: dataprotection@aberdeenshire.gov.uk

Your information is being collected to use for the following purposes:

- To provide public comment on the Aberdeenshire Local Development Plan. The data on the form will be used to inform Scottish Ministers and individual(s) appointed to examine the Proposed Local Development Plan 2020. It will inform the content of the Aberdeenshire Local Development Plan 2021.

Your information is:

Being collected by Aberdeenshire Council	X
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The Legal Basis for collecting the information is:

Personal Data	
Legal Obligations	X

Where the Legal Basis for processing is either Performance of a Contract or Legal Obligation, please note the following consequences of failure to provide the information:

It is a Statutory Obligation under Section 18 of the Town and Country (Scotland) Act 1997, as amended, for Aberdeenshire Council to prepare and publish a Proposed Local Development plan on which representations must be made to the planning authority within a prescribed period of time. Failure to provide details requested in the 'Your Details' section of this form will result in Aberdeenshire Council being unable to accept your representation.

Your information will be shared with the following recipients or categories of recipient:

Members of the public are being given this final opportunity to comment on the Proposed Aberdeenshire Local Development Plan. The reasons for any changes that the Council receives will be analysed and reported to Scottish Ministers. They will then appoint a person to conduct a public examination of the Proposed Plan, focusing particularly on the unresolved issues raised and the changes sought.

Your name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your

submission) will be published alongside a copy of your completed response on the Proposed Local Development Plan website (contact details and information that is deemed commercially sensitive will not be made available to the public).

In accordance with Regulation 22 of the Town and Country (Development Planning) (Scotland) Regulations 2008 where the appointed person determines that further representations should be made or further information should be provided by any person in connection with the examination of the Proposed Plan the appointed person may by notice request that person to make such further representations or to provide such further information.

Your information will be transferred to or stored in the following countries and the following safeguards are in place:

Not applicable.

The retention period for the data is:

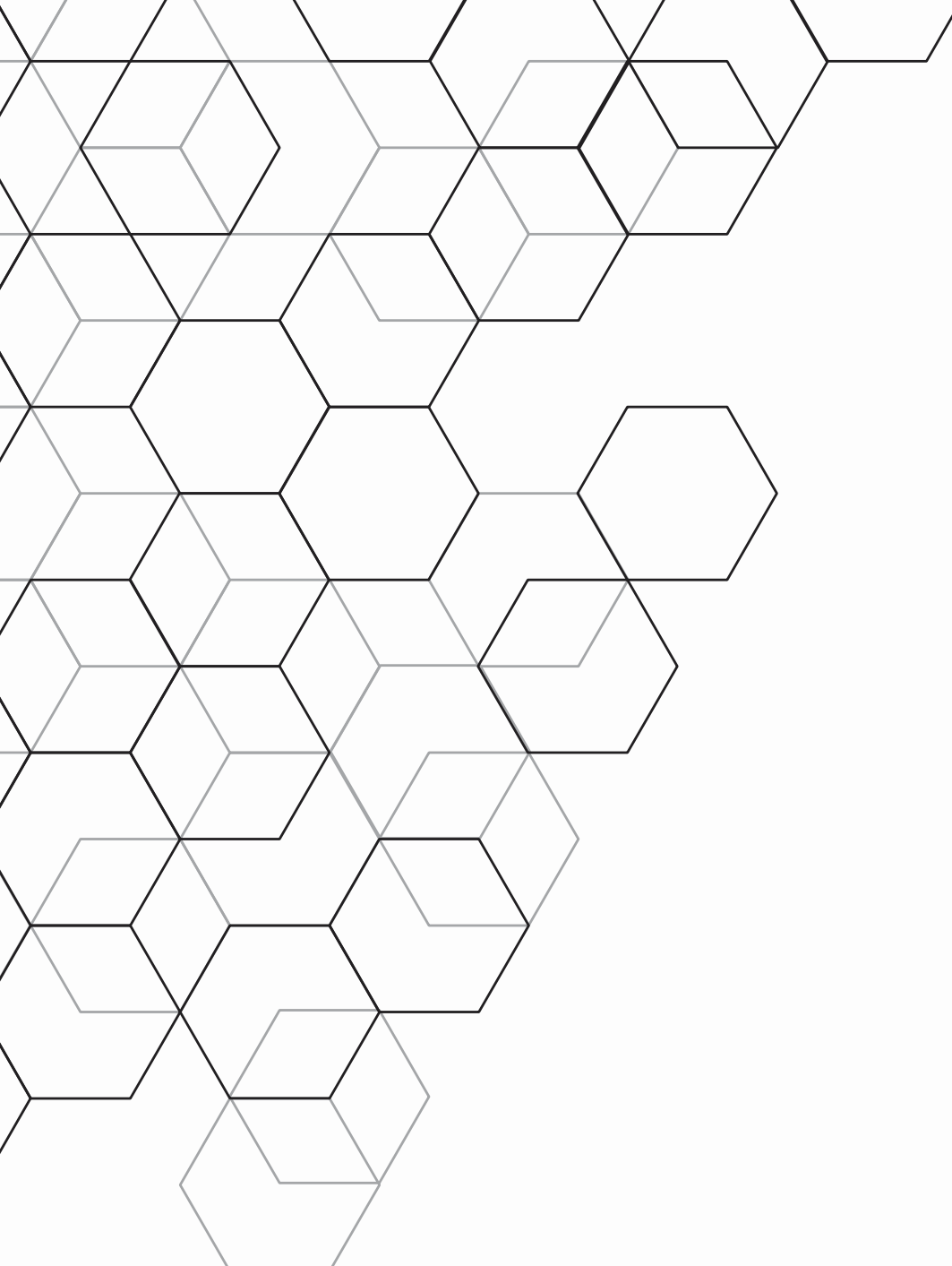
Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037.

The following automated decision-making, including profiling, will be undertaken:

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Please note that you have the following rights:

- to withdraw consent at any time, where the Legal Basis specified above is Consent;
- to lodge a complaint with the Information Commissioner's Office (after raising the issue with the Data Protection Officer first);
- to request access to your personal data;
- to data portability, where the legal basis specified above is:
 - (i) Consent; or
 - (ii) Performance of a Contract;
- to request rectification or erasure of your personal data, as so far as the legislation permits.



Aberdeenshire Local Development Plan 2021: Main Issues Report 2019 **Main Issues Report Response Form**

Important Information: Please Read

The Main Issues Report (MIR) is a key stage in preparing the Aberdeenshire Local Development Plan 2021 (LDP 2021). The MIR sets out options for how the LDP 2021 could be improved both in terms of the policies that Aberdeenshire Council will use to determine planning applications as well as identifying land allocations for development. The MIR has been published along with a Monitoring Report and Interim Environmental Report of the Strategic Environmental Assessment. These, along with other supporting documents are available at: <https://www.aberdeenshire.gov.uk/planning/plans-and-policies/ldp-2021/main-issues-report/>.

Comments are sought on the MIR and Interim Environmental Report, or indeed any other matter that you feel that we need to consider, by 5pm on Monday, 8 April 2019. Responses can be emailed to us at ldp@aberdeenshire.gov.uk or received via post, Planning Policy Team, Infrastructure Services, Aberdeenshire Council, Woodhill House, Westburn Road, Aberdeen, AB16 5GB.

Please note that in order for comments to be considered as valid you must include your contact details.

We will use these details to confirm receipt of your comments and to seek clarification or request further information as required. Should you have any concerns regarding the holding of such information please contact ldp@aberdeenshire.gov.uk. Anonymous comments will not be considered as part of the consultation process. Petitions will only be noted in the name of the person submitting the document.

All comments received will be carefully assessed and will be used to inform the preparation of the Proposed Aberdeenshire Local Development Plan. There will be a further opportunity to comment on the Proposed Plan when it is published in December 2019.

Name	██████████
Organisation (optional)	NHS Grampian
On behalf of (if relevant)	
Address	██████████ ██████████ ██████████
Postcode	██████████
Telephone (optional)	██████████
E-mail (optional)	██████████



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Fair processing notice

Please tick to confirm your agreement to the following statements:

By submitting a response to the consultation, I agree that Aberdeenshire Council can use the information provided in this form, including my personal data, as part of the review of the Aberdeenshire Local Development Plan. This will include consultation on the Main Issues Report (including any subsequent Proposed Plan).

I also agree that following the end of the consultation, i.e. after 8 April 2019, my name and respondent identification number (provided to you by Aberdeenshire Council on receipt of your submission) can be published alongside a copy of my completed response on the Main Issues Report website (contact details and information that is deemed commercially sensitive will not be made available to the public).

The data controller for this information is Aberdeenshire Council. The data on the form will be used to inform a public debate of the issues and choices presented in the Main Issues Report of the Aberdeenshire Local Development Plan 2021. It will inform the content of the Proposed Aberdeenshire Local Development Plan.

Aberdeenshire Council will only keep your personal data for as long as is needed. Aberdeenshire Council will retain your response and personal data for a retention period of 5 years from the date upon which it was collected. After 5 years Aberdeenshire Council will review whether it is necessary to continue to retain your information for a longer period. A redacted copy of your submission will be retained for 5 years beyond the life of the Local Development Plan 2021, possibly until 2037

Your Data, Your Rights

You have got legal rights about the way Aberdeenshire Council handles and uses your data, which include the right to ask for a copy of it, and to ask us to stop doing something with your data.

If you are unhappy with the way that Aberdeenshire Council or the Joint Data Controllers have processed your personal data then you do have the right to complain to the Information Commissioner's Officer, but you should raise the issue with the Data Protection Officers first. The Data Protection Officers can be contacted by writing to:

- [REDACTED], Data Protection Officer, Aberdeenshire Council, Business Services, Town House, 34 Low Street, Banff, AB45 1AY

If you have difficulty understanding this document and require a translation, or you need help reading this document (for example if you need it in a different format or in another language), please phone us on 01467 536230.

Which document(s) are you commenting on?	Main Issues Report	<input checked="" type="checkbox"/>
	Draft Proposed Aberdeenshire Local Development Plan	<input type="checkbox"/>
	Strategic Environmental Assessment Interim Environmental Assessment	<input type="checkbox"/>
	Other	<input type="checkbox"/>

Your comments

Introduction

1.1. NHS Grampian welcomes the opportunity to submit representations on the Aberdeenshire Council's Local Development Plan 2021 Main Issues Report. NHS Grampian are generally supportive of the Aberdeenshire Councils 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 Future Infrastructure Requirements for Services (FIRS) Group to continue to identify areas where new or improved facilities are required. NHS Grampian have previously advised of the health and social care requirements for Aberdeenshire and a copy of the requirements is appended to this representation.

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 Aberdeenshire and this should be considered a priority. NHS Grampian has therefore taken the opportunity to seek responses from NHS Grampian Public Health Directorate and Aberdeenshire Health & Social Care Partnership and have included their comments within our response.

1.3. NHS Grampian notes that the Aberdeenshire Health and Social Care Partnership Commissioning (Implementation and Change) Plan 2017 – 2019 has been created in partnership with Aberdeenshire Council and sets out how to improve the health and wellbeing of adults and older people in Aberdeenshire and deliver the 9 National Health and Wellbeing core indicators set out by the Scottish Government. The plan is included as part of our response.

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 Aberdeenshire 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.

General

- 3.1. Whilst NHS Grampian is broadly supportive of the preferred options proposed within the Aberdeenshire Local Development Plan 2021 Main Issues Report and the level of growth identified within the settlement statements. We will require considerable investment in health and social care facilities in order to maintain high levels of service to support Aberdeenshire's growing and ageing population. NHS Grampian acknowledges the ongoing work with Aberdeenshire 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.
- 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 the Cairngorms National Park that in certain instances there may be cross-border issues which require to be addressed.

Main Issue 1 – The Vision

- 4.1. It is proposed that whilst the preferred option is for the existing vision statement to be remain unchanged, NHS Grampian would like to see more emphasis on health within the vision especially on healthier living and wellbeing (physical and mental) and would be keen to provide support and advice where required.

Main Issue 2 – The Settlement Strategy

NHS Grampian supports the preferred option to remove the sections which refer to the six different administrative areas and instead give a wider context to the settlement strategy. As previously stated, NHS Grampian will require considerable investment in health and social care facilities in order to maintain high levels of service to support Aberdeenshire's growing and ageing population.

Main Issue 7 – Different Types of Rural Areas

- 6.1. NHS Grampian is broadly supportive of Aberdeenshire Council's preferred option to use the Scottish Governments Six Fold Urban Rural Classification. NHS Grampian would highlight that proposals for rural development should be easily accessible by public transport and linked to health and social care centres. Rural development that is not accessed by public transport and remote from health and social care provision has a detrimental impact on these individuals locating there and consequently places an additional, unnecessary burden on health and social care services. However, that said, the use of technology can play a big part in the future provision of health and social care within rural communities. Ensuring the digital infrastructure is in place will enable further opportunities as to how health and social care is provided and will ensure that services are easily accessible by all, but we also need to recognise that not all of the population are entirely comfortable or knowledgeable to use technology.
- 6.2. The cumulative impact of rural development must also be considered to ensure it does not adversely impact on health and social care services which may already be oversubscribed and although developer contributions are sought to mitigate the impacts arising directly as a consequence of those new developments, this does not resolve the impact developments will have on staffing levels which have been well documented.

Main Issue 11 – Affordable Housing

- 7.1. NHS Grampian supports the preferred option that the scale of affordable housing need in Aberdeenshire is acknowledged in the policy, and that developers are encouraged to engage with a housing association or affordable housing provider to deliver more than 25% of new homes on any development site. This is expected to have a positive impact on some of our most vulnerable clients who struggle to secure a home of their own. However, as with any housing development, this approach will also increase the burden on health and social care services due to an increased demand for services, particularly in areas where there is a high proportion of vulnerable people.

Main Issue 12 – Layout Siting and Design

- 8.1. NHS Grampian welcomes the inclusion of a new appendix to provide a more detailed interpretation of the six qualities of successful places as the preferred option. The importance of providing well designed buildings, streets and open spaces and the positive impact it has on health and wellbeing cannot be underestimated. NHS Grampian look forward to providing continuing support and advice where required to promote higher standards of design and designing places that support healthy and safer communities.
- 8.2. Perhaps there needs to be a greater focus on designing homes to provide a “home for life” opportunity – specifically this would allow persons as they age or are affected by illness to remain in their home. This would require the design of homes to provide access for wheel chairs and to have at least one bedroom designed of a size to accommodate hoists and a room adjacent to the bedroom that could be converted to an ensuite wet room. In that regard the NHS would be happy to provide further advice as required.

Main Issue 13 – Open Space and Access in New Development

- 9.1. NHS Grampian supports the preferred option which would ensure all new developments must be accompanied by adequate public open space. This provides opportunities for healthy living and wellbeing activities. However, it should be recognised that existing health and social care sites may need to expand in the future and as a result consideration should be given to the expansion requirements of health and social care facilities when identifying and enhancing green networks.

Main Issue 15 – Community Infrastructure

- 10.1. NHS Grampian welcomes the acknowledgement that it may not be appropriate in all cases for all community facilities to be located in local town centres. As previously stated health and social care facilities are best placed within town centres. 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. Adequate sites within town centres are few & far between and therefore new sites tend to be located on the periphery of towns within new developments.

Main Issue 16 – Using Resources in Building

- 11.1. As highlighted in previous consultation responses, due to the nature of health and social care facilities a number of services are specialised and require specialised buildings, exclusively tailored for the needs of that specific service provider ie air tightness, specialised lighting and higher temperatures for medical examination areas. NHS Grampian struggle to deliver buildings, due to the level and type of care and support they provide and again we would suggest that a further exception is added which would exclude specialist buildings where it could be demonstrated that targets could not be met.

Policy RD2 Developer Obligations

- 12.1. NHS will continue to work closely with Aberdeenshire Council to identify those areas currently under pressure, where new facilities are required and the scale of contribution required to mitigate the impact of residential development. This will ensure health and social care facilities are provided in the right location at the right time. NHS Grampian also welcomes continued involvement with the Future Infrastructure Requirements for Services (FIRS) Group and close working with other key agencies throughout the preparation of the Local Development Plan thus ensuring opportunities to share facilities are considered fully to reduce build and operating costs where possible.
- 12.2. Health and social care provision is a fundamental requirement for the long term health and wellbeing of a community. As such, it requires being central to that community and accessible to all. The proposed Aberdeenshire Local Development Plan 2021 requires to recognise further the importance of health and social care and should identify it as a fundamental component of a community, similar to education and community facilities.

Settlements

13.1. NHS Grampian welcomes the inclusion of health and social care as part of the call for sites process, which has informed the need for sites for new health and social care infrastructure where required within the settlement areas. The levels of development proposed in the Aberdeenshire Council's Local Development Plan 2021 Main Issues Report will require considerable investment in health and social care facilities (Existing & New), in order to maintain high levels of service for an increasing, and ageing, population

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

13.2. NHS Grampian also notes the following:

Banff & Buchan

Fraserburgh - NHS Grampian welcomes the inclusion of site BB032 as the officer's preference for health and social care use.

Macduff - NHS Grampian welcomes the inclusion of site BB032 as the officer's preference for health and social care use.

Buchan

Mintlaw - NHS Grampian welcomes the inclusion of site BU048 as the officer's preference for health and social care use. We acknowledge site BU049 is not the officer's preference and the reasons behind this decision.

Peterhead - NHS Grampian acknowledge that sites BU046 and BU047 are not the officers preferences, although it is stated for site BU047 that a minor amendment of the boundary of the P1 site may be accepted and NHS Grampian would welcome further discussion on this. For site BU046 (site OP1 within the current LDP) it states within the current LDP that "Provision of land for a health centre may be required as part of the development". NHS Grampian request that this wording is amended to 'Provision of land for a health and social care centre...' and retained within the proposed plan.

NHS Grampian wish to highlight that the existing hospital site which includes the health centre is already constrained with no room for expansion. It is preferred that sites should be located centrally to the community in which it serves, however we are not aware of any centrally located sites large enough to accommodate a new health and social centre. NHS Grampian will however, continue to work with Aberdeenshire Council to identify suitable sites for future health and social care facilities.

Garioch

Kemnay - NHS Grampian welcomes the inclusion of site GR083 as the officer's preference for health and social care use.

Marr

Banchory - NHS Grampian welcomes the inclusion of site MR080 as the officer's preference for health and social care use.

Public Health Comments

14.1. When reviewing the report Public Health Directorate have made use of Public Health England's Spatial Planning for Health review (www.gov.uk/government/publications/spatial-planning-for-health-evidence-review) to consider the content. Comments provided under the headings have used in that review below:

14.2. Neighbourhood Design

The main criteria are 'walkability', 'completeness' and 'safe infrastructure'.

"Place and Design" (pp24) is relevant.

- "Policy P1" refers to Designing Streets with its emphasis on pedestrians (walkability) and cyclists (safe), which is to be strongly commended
- "Policy P6" refers to ensuring adequate and accessible community infrastructure, addressing both walkability and completeness

14.3. Housing

The main criteria are 'high quality' and 'affordability'.

"Homes and Housing" (pp.19-23) is relevant.

- "Policy H1" relates to quality
- "Policy H2" fully addresses affordability
- "Policy H3" addresses quality and affordability of special needs housing
- "Policy H4" addresses caravans
- "Policy H5" addresses Gypsies and Travellers, an important population from a public health perspective, as they are a potentially marginalized and excluded group, and a lack of halting sites can impair their access to healthcare services.
- "Policy R2" (p.15) is also relevant through permitting continued growth and availability of housing in remote rural areas, although this has implications for 'transport' below.

14.4. Natural and sustainable environment

The main criteria are 'reduced hazards', 'access to greenspace' and 'climate mitigation and adaptation'.

- "Policy P2" (p.26) specifically relates to the provision of greenspace
- "Policy P4" (p.27) specifically relates to safeguard the environment, health and biodiversity through mitigating risks of environmental hazards
- "Policy R1" (p.13) is relevant, noting the potential to review the green belt in 2022 in light of the AWPR: this review could be helpful if the outcome was to protect public access to greenspace.
- "Organic Growth" (p.17) highlights risk awareness of flood risk amongst others, important for climate mitigation and adaptation.
- "Policy R3" (p.18) highlights the adverse impact assessment required in relation to mineral extraction and access tracks, important for reduced hazards
- "Policy E1" (p.29) highlights the protection of nature conservation sites
- "Policy PR3" (p.34) gives due regard to waste facilities (reduced hazards)

"Climate Change" (p.35) merits its own section with four policies addressing resource use, renewable energy, carbon sinks and stores and flooding

14.5. Transport

The main criteria are 'active travel infrastructure', 'public transport provision', 'priority to active travel and road safety'.

- "Policy RD1" (p.39) refers to public transport and the need for transport assessments when considering development proposals; electric charging points are also highlighted here

- “Policy RD2” (p.40) highlights developers’ obligations, including consideration of public transport infrastructure
- “Policy P1” refers to Designing Streets with its emphasis on pedestrians and cyclists (active travel)

4.6. Healthier Food

The main criteria are ‘healthy food outlets’ and ‘community food infrastructure’.

- “Policy P2” (p.26) specifically relates to the provision of greenspace and the positive example of using vacant and derelict land for community food growing is to be commended

Clarification is required on whether there is any provision within Aberdeenshire Council for addressing the density of unhealthy food outlets in towns?

Overall it is clear that the Aberdeenshire draft LDP meets all the criteria set out in spatial planning for health, and as such is to be commended from a public health perspective.


Property Planning Manager

04 April 2019