

The purpose of this report to the Pre-Application Forum (the Forum) is to appraise Members of the background, nature and developmental composition of forthcoming applications for planning permission and listed building consent for the re-development the Woolmanhill Hospital complex (the Site) to provide a hotel, flats and serviced apartments. The report also considers the proposals

relationship to the Development Plan, together with a number of identified key issues.

As required by the Town and Country Planning (Scotland) Act 1997, as amended, the applicants: CAF Properties (Woolmanhill) Ltd and NHS Grampian, submitted a Proposal of Application Notice (the Notice) on the 4th of February 2016. Consequently, the applicant has been in a position since the 28th of April 2016 to lodge both applications with the Local Planning Authority.

Members are advised that this matter was due to be placed before the Forum meeting of the 21st of April 2016 but was rescheduled at the request of the Applicant.

RECOMMENDATION:

It is recommended that the Forum:

1. Note the key issues identified at this stage;
2. If deemed necessary seek clarification, amplification or explanation on any particular matter/s: and
3. Identify relevant issues that Members would like the Applicant to address in any future applications.

APPLICATION SITE AND THE LOCAL DEVELOPMENT PLAN

Application Site

The Site is roughly 'lozenge' shaped sitting on a north north-west / south south-west axis, totalling approximately 1 hectare.

It was declared surplus to the operational requirements of NHS Grampian in 2013 and all facilities, save the audio and ear, nose and throat units, have been relocated elsewhere within the NHS Grampian estate. The internal courtyard remains available for parking to service the retained functions.

The site contains a number of listed buildings, that reflect the incremental and important development of the site as a medical institution within the City. Historic Environment Scotland, describe this as *"a rare example of a hospital that has not been significantly altered since the late 19th century"* and comprises:

- Mount Stephen building (former medical and pathology block) – Grade B listed
- Archive building (former laundry) – Grade B listed
- Former Porters Lodge – Grade B listed
- Victoria Pavilion (former surgical block) - Grade B listed
- Boiler House, outbuilding and stack – Grade B listed

- Simpson Pavilion, including boundary walls, railings and lampstand – Grade A listed

The western/north-western aspect is marked by Spa Street, which to the north of Gilcomston Place is dominated by residential development; whilst the southern section is occupied by a multi-storey car park and the Denburn Health Centre. To the south it is bounded by Woolmanhill itself.

Currently vehicular and pedestrian access is gained to the south of the Simpson Pavilion boundary and off the Woolmanhill Roundabout.

Relationship to the Local Development Plan

Within the extant Aberdeen Local Development Plan (ALDP) the Site, in association with the Denburn Health Centre, Multi-Storey Car Park and associated land, all constitutes an Opportunity Site (OP99) where a mix of used including healthcare, hotel, residential, small-scale retail, food and drink, further education, offices/business are deemed appropriate. The same opportunity uses are carried over within the proposed replacement Local Development Plan (PALDP), as Opportunity Site OP81.

The Site lies within that area covered by the Denburn Valley Development Guidance and Planning Brief. However, this document is not being carried forward, being superseded by the adopted City Centre Master Plan (CCMP). The CCMP sees the opportunity site as an extension to the Union Terrace Gardens, with significant built development envisaged.

In terms of statutory designations the Site lies within the Union Street Conservation Area and abuts the Rosemount Conservation Area.

PROPOSAL

The proposal, which is set out in brief below, is categorised as a major development within the hierarchy of developments, as introduced by the Planning etc (Scotland) Act 2006 (the 2006 Act).

Whilst the Notice describes the proposal as redevelopment to provide: residential development, serviced apartments and boutique hotel, it omitted the quantum of development. A public consultation event, set out below, incorporated a series of display boards that provided an indication of the split and magnitude of the proposals:

- Simpson Pavilion and Porter Lodge (Hotel – 52 bedroom and store room)
- Stephenson Building (27 Serviced Apartments)
- Victorian Pavilion (32 Residential Apartments)
- Archive Building (10 Affordable Apartments)

The Notice also references the provision of car parking, within part of the former basement area, together with additional spaces taken off Spa Street, internal courtyard area and private gardens.

Vehicular access to the hotel is to be via the existing access point; whereas access to the residential and serviced apartments is off Spa Road, at three points all of which service surface car parking. Whilst the southernmost aspect also provides access to an element of underground parking. The existing vehicular access onto the Woolmanhill roundabout is to be restricted to pedestrians only.

In addition, the Notice was devoid of any reference to the demolitions, which include:

- Demolition of boiler house (B Listed)
- Demolition of range of outbuildings (B Listed)
- Demolition of part of part of boundary walls (A Listed)
- Demolition of external enclosed staircases (B Listed)

PRE-APPLICATION CONSULTATION

Prior to the Applicants issuing the Notice, NHS Grampian sought bids for the site from interested parties. As a positive manner of engagement the author and officers of the Masterplanning, Design and Conservation Team met with the bidders (including the Applicant) and their representatives to provide guidance on what the Council would expect in terms of development proposals, allowing for the significance and location of the buildings. This professional oversight was extended to NHS Grampian for the interview process, with Officers available to address factual matters; however, this offer was not taken up.

The Notice described the consultation to be undertaken as part of the Pre-Application Consultation process and further information was sought of the Applicant on how the local community was to be informed of the public event. The Applicant undertook one public consultation event that was held in the Central Library on the 23rd of March 2016 between 13:00 hrs and 19:00 hrs. The Applicant and their representatives were advised at the public consultation event to engage with Historic Environment Scotland at the earliest opportunity as HES are a statutory consultee on the application/s. Electronic versions of the display materials were forwarded to Officers of the Council following the event.

The event was publicised by way of a newspaper advert, as well as a leaflet drop, via the Aberdeen Citizen free newspaper and the display of posters in local commercial premises. Clarification was sought with regard to whether the leaflet drop included Spa Street, which forms the western boundary of the Site. The Applicant informed Officers that the residents of Spa Street did not receive a leaflet (i.e. notification of the event) as the road is not covered by the Aberdeen Citizen newspaper. Therefore the Applicant/Agent has failed to fully allow

members of the community on Spa Street to participate meaningfully in the public event.

In addition, the Rosemount and Mile End Community Council, together with Councillors B Comrie, J Laing, A Nicoll, J Corall, M Greig, J Stewart and R Thomson received a copy of the Notice.

Since the production of the Notice and the public engagement event the Applicant has engaged with the Development Management and Master Planning, Design and Conservation Teams to consider the nature of the proposed development with particular regard to the interventions to the listed buildings, their setting and context, demolitions and the arrangement of the internal courtyard space and car parking. A further meeting is to be held on the 7th of June 2016.

Aside from the above, discussions also have been held between representatives of the Applicant and Officers of the Road Development Management and Traffic Engineering Teams of the City Council.

CONSIDERATIONS

The main considerations against which the planning and listed building consent applications would be assessed against are likely to be;

- Principle of the development;
- Impact of the proposed development upon the listed buildings their fabric (external and internal), context, setting and status as buildings of special architectural and historic interest;
- Impact upon the character and appearance of the two Conservation Areas;
- Demolition of listed buildings;
- Amenity space (provision and quality);
- Parking and Access;
- Flooding/Drainage; and
- Protected Species (primarily Bats and Swifts).

Principle of the Development

Both local and national planning policy and guidance is supportive on the productive adaptation and re-use of historic assets, including listed buildings, to ensure their continued use and contribution to the built environment, provided such uses do not harm the buildings special architectural or historic interest.

Here, in general, the scope of the proposed uses accord with the menu set out within the opportunity site descriptions of the extant and emerging Local Development Plans. Therefore it is accepted that the proposed uses are deemed acceptable in principle.

Impact of the proposed development upon the listed buildings

Notwithstanding the acceptability of the principle of the development, primacy clearly resides with the impact of the proposed development upon the listed buildings their fabric (external and internal), context, setting and status as buildings of special architectural or historic interest.

Section 14 (2) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 states that in considering whether to grant listed building consent for any works the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

National guidance within the Scottish Planning Policy (SPP) document is clear on the consideration in dealing with applications for the re-use of listed buildings in that...*Planning authorities should support the best viable use that is compatible with the fabric, setting and character of the historic environment yet there should be a presumption against the demolition of Listed Buildings.*

This position is also set out with ALDP policy D5 (Built Heritage) and emerging PALDP policy D4 (Historic Environment) and the Applicants will have to provide a justification for the proposed development impact upon the listed buildings. In addition, as it is proposed to demolish around the listed chimney the Applicants will need to provide a structural report, from an appropriately qualified and experienced party, on if the proposed works will affect the integrity of this structure and if so, the mitigation measures required for the chimneys retention.

Demolition of listed buildings

Scottish Historic Environment Policy (2009) (SHEP) reinforces the issues outlined in the Scottish Planning Policy (SPP) in relation to Listed Buildings and states that in the case of applications for the demolition of listed buildings it is the Scottish Ministers policy that no listed building should be demolished unless it can be clearly demonstrated that every effort has been made to retain it. Local Planning Authorities should therefore only approve such applications where they are satisfied that it can meet 1 of the following 4 SHEP tests:

1. the building is not of special interest; or
2. the building is incapable of repair; or
3. the demolition of the building is essential to delivering significant benefits to economic growth or the wider community; or
4. the repair of the building is not economically viable and that it has been marketed at a price reflecting its location and condition

Impact on the character and appearance of the Conservation Areas

Section 64(1) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 requires that in the exercise of its planning functions that local planning authorities shall pay special attention to the desirability of preserving or enhancing the character or appearance of Conservation Areas. This consideration extends to views into and out of conservation areas and is passive neutral (i.e. proposals that do not harm the character and appearance of the conservation area should be treated as preserving its character or appearance).

This statutory requirement is set out a paragraph 143 of the SPP and is reflected within policy D5 (Built Heritage) of the ALDP and policy D4 (Historic Environment) of the PALDP. The Applicants will need to demonstrate that this statute and policy requirement is addressed within the submissions.

Amenity Space

This has been the subject of discussions with the Applicant and has focussed upon the internal courtyard area as well as the peripheral areas, in particular the retention of the green areas fronting Spa Street.

The production of meaningful amenity space, both private and public, is seen as an essential element of securing high quality development of a high quality design within the SPP, Creating Places as well as policies D1 (Architecture and Placemaking) and D2 (Design and Amenity) of the ALDP and emerging policy D1 (Quality Placemaking by Design) of the PALDP.

The SPP sees that development proposals should consider place and the needs of people before the movement of motor vehicles and in turn car parking.

Flooding / Drainage

Policy NE6 (Flooding and Drainage) of the ALDP will not permit development, in part, that would increase the risk of flooding by the discharge of additional surface water. The explanatory text to the Opportunity Site reference states that a Flood Risk Assessment will be required in order to assess its suitability for redevelopment. Representatives for the Applicants have been notified of this requirement.

Protected Species

Whilst the proposal is principally the re-development of the buildings, with elements of demolition, it has the potential to have impacts upon protected species, particularly bats and nesting swifts. It will therefore be necessary for appropriate studies/supporting information to be submitted with the application to demonstrate compliance with Policy NE8 (Natural Environment) of the ALDP. Details of any mitigation/restoration/provision of habitats are also likely to be assessed as part of the application process.

Whilst the emerging replacement Aberdeen Local Development Plan does not form part of the statutory Development Plan it has been adopted by the Council as constituting a material consideration in the decision-taking process and should be accorded the appropriate

The planning policy schedule, which is not exhaustive, includes:

National Policy and Guidance

- 3rd National Planning Framework
- Scottish Planning Policy
- Scottish Historic Environment Policy
- Creating Places
- PAN 61 – Planning and Sustainable Urban Drainage Systems
- PAN 65 – Planning and Open Space
- PAN 68 – Design Statements
- PAN 71 – Conservation Area Management
- PAN 78 – Designing for Safer Places
- PAN 78 – Inclusive Design
- PAN 3/2010 – Community Engagement
- Online Planning Advice on Flooding

Adopted Aberdeen Local Development Plan:

- T2 - Managing the Transport Impact of Development Transport Assessments and Travel Plans required also Supplementary Guidance (SG)
- I1 - Infrastructure delivery and Developer Contributions
- D1 - Architecture and Placemaking
- D2 - Design and Amenity
- D3 - Sustainable and Active Travel
- D4 – Granite Heritage
- D5 - Built Heritage
- NE4 - Open Space Provision in New Development
- NE6 – Flooding and Drainage
- NE8 - Natural Heritage
- R6 - Waste Management Requirements for New Developments

Proposed Aberdeen Local Development Plan:

- D1 - Quality Placemaking by Design
- D2 - Landscape
- D4 - Historic Environment
- NC1 - City Centre Development
- T2 - Managing the Transport Impact of Development
- T3 - Sustainable and Active Travel
- NE4 - Open Space Provision in New Development

- NE6 - Flooding, Drainage and Water Quality
- NE8 - Natural Heritage
- R6 - Waste Management Requirements for New Developments
- C11 - Digital Infrastructure
- I1 - Infrastructure delivery and Developer Contributions

The Applicants will be required to submit sufficient information to demonstrate that the site can be developed having regard to the identified mains issues, including:

- Pre-Application Consultation Report
- Planning and Sustainability Statement
- Design Statement
- SHEP report on demolition
- Green Travel Plan/Access Statement
- Heritage Asset Statement
- Window Condition Survey
- Protected Species Report
- Management Plan for the operation of the development
- Flood Risk Assessment
- Waste Management Plan

CONCLUSION

This report highlights the main issues that are likely to arise in relation to the various key considerations of the proposed development. It is not an exhaustive list and further matters may arise when the subsequent application is submitted. Consultees will have the opportunity to make representations to the proposals during the formal application process.

RECOMMENDATION

It is the recommendation that the Forum; firstly, note the key issues identified at this stage; secondly, if deemed necessary seek clarification, amplification or explanation on any particular matter/s; and thirdly, identify relevant issues that Members of the Forum would like the Applicant to address in any future applications.