

Royal Burgh of North Berwick Community Council

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Planning Department
East Lothian Council
John Muir House
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Madam/Sir

Planning application 19/01292/PM | Erection of care home, the provision of 152 residential accommodation and care units to people in need of care (Class 8), a community hub and associated works

North Berwick Community Council held a public meeting concerning the above application on 18 February 2020, attended by more than 230 members of the public, whose grave concerns were voiced. At the end of the meeting the Community Council voted unanimously to object to this application on the following grounds:

- The application is lacking both a needs assessment and a site assessment. There is no evidence that the developers considered alternative sites that might have been less controversial (other than the even more controversial one across the road).
- The Local Development Plan does not foresee any such development on this site. Consultation for this plan stretched over 4 years and there was plenty of opportunity to take part in this, but the developers did not make any attempt to engage in this process. A member of the community said that ignoring the LDP would undermine the genuine participation of the community in the LDP process. This they felt would be regarded as a breach of trust.
- While the Planning Statement claims that "This [application] has been the subject of full public consultation and has been amended to reflect concerns and issues raised through

that process” the Health Impact Assessment admits ““There has been no engagement with the community other than an open meeting as part of the preapplication process”.

- The intended site is designated as “Countryside around towns” (LDP DC8), and while it could be argued that condition “ii) required for community uses” is fulfilled by the building of a care home and accommodation for elderly people, the planning application very clearly does not fulfil the central condition: “Any new development must not harm the landscape setting of the countryside location and must be of a scale, size and form that would not harm the objectives for the countryside around towns designation.” Scale and size of the main building and the three apartment blocks do very much harm to the character of the site.
- The site is in a prominent position on the A198, which is a major tourist route and the envisaged buildings would totally destroy the views that are cherished by visitors and locals alike. Furthermore, views would also be destroyed from the John Muir cycle path past Rhodes Farm and from much of the Glen golf course.
- The Health Assessment claims that “The siting and orientation of the built environment celebrates and enhances views to striking local landmarks such as North Berwick Law and Bass Rock” and the Planning Assessment that “The Environmental Impact Assessment concludes that, with appropriate mitigation, the proposed development will not have a significant adverse impact”. The fact is that the intended buildings will make the most of the views to striking local landmarks for the care home residents, but destroy them for everybody outside. Furthermore, the so called mitigation measures foreseen (a few trees and some low Ha Ha walls) are in no way “appropriate”, but are again only designed to make the most of the views outwards, but do nothing to hide, or distract from, the main building and the apartment blocks, which, being up to four floors high, are so out of scale for the countryside.
- The site in question is most definitely Prime Quality Agricultural Land (category 2) as defined by The James Hutton Institute. Appendix 3, page 219, of the East Lothian Local Development Plan (ELLDP) adopted by ELC in September 2018, confirms this fact and further clarifies that Prime Quality Agricultural Land includes Classes 1, 2 and 3.1. Class 2 is fertile, food producing land, a finite and increasingly valuable resource. The developers do not acknowledge this fact in any of their submitted documents. It is their intention, should they receive permission for this application, to concrete over 7.88ha (approx. 20 acres), meaning that this valuable asset would be irretrievably lost.
- Furthermore, wading birds, including the endangered red listed curlews, winter on the site.
- There is also the fear that the development would set a precedent, and a ribbon development would ensue all along the A198 between North Berwick and Castleton.
- A major consideration is that the site is so far out from the town and is effectively a ghetto for elderly people with no chance for them to mingle with younger people on site, other than specific visitors, and therefore creates social isolation.
- The plan foresees 214 parking spaces and garages for a total of 116 Independent Living Units (it should be safely assumed that the residents of the 60 care rooms and the 36 assisted living apartments are not driving cars anymore). Even if 40 are foreseen for staff, this still leaves 174 spaces for 116 apartments, an average of exactly 1.5 per apartment. This, together with the fact that the minimum age for moving in is only 55 years, suggests

that the majority of the development is not about care for the elderly, but about (expensive and exclusive) additional housing.

- However, for those residents, who do not own a car and are most in need of accessible transport options, there are only 7 buses per day in the week and 2 on Sundays to connect to North Berwick. Goldcrest is promising a shuttle bus, but there is no confirmation how frequent and convenient that would be and who it would serve.
- The other key issue, apart from the location of the development, is the impact on health and care services in North Berwick, which support everyone one of us in North Berwick, all ages, all health conditions. The community is strongly supportive of the need to support and enhance our primary and social care services and this is a priority. The view was confirmed at the community meeting in no uncertain terms. Concerns were raised by local GPs who described the current situation as a nightmare and that they are pushed to breaking point. Our discussions with groups of local older people who the proposers would probably consider as potential buyers or residents, and with people in NB care homes shows that whilst people agree there is a clear need for housing options and choices with a range of levels and types of care provided, people rely very heavily on primary care and care services at home. They were deeply concerned about the impact of the proposals on current services which would affect the whole community. They felt that the risks posed to primary care and current health and social care services far outweighed any benefits of the proposal and that options should add to not undermine current provision.
- The Health Assessment claims that the local surgery has a spare capacity of 1,211 patients. However, this is based on wrong data, since it assumes that there are 9 full-time GPs, while in reality only 2 work full time, which equates to 6.25 full-time GPs. This means the surgery is already oversubscribed by 2,097 patients, and struggles to cope with the current patient load¹. The development would attract some local people to move in, but the majority of residents will come from outside North Berwick, and being all elderly, will increase the demand on the surgery over proportionally to their number. Until the NHS makes provision to extend the surgery, adding to the pressure on the health centre with so many new elderly people would be irresponsible and to the detriment of the community, as doctors pointed out in the public meeting.
- Local social care providers have raised concerns with Members of the CC about the impact of this proposal on their ability to retain staff and meet increasing demand. In support of this, a recent report by the Care Inspectorate and SSSC shows that care homes for older people and care at home struggle to recruit staff, and that this gets worse year by year: "At 31 December 2017, 38% of [care] services reported having vacancies. This was an increase of 2 percentage points on the proportion of services with vacancies at 31 December 2016 and an increase of 3 percentage points from 2015 (35%)." (<https://data.sssc.uk.com/images/StaffVacancies/Staff-vacancies-in-care-services-2017.pdf>). If Goldcrest were able to recruit staff for their proposed facility, it is highly likely that this would be at the expense of a wide range of current providers, reducing access to staff, especially trained and experienced staff, and undermining the strong and stable teams that are essential to providing good quality care in the community. This will also have negative impacts on unpaid carers - families and friends who are already struggling.

¹ This could very easily have been ascertained and is one particularly crucial example for the lack of rigour and of analysis in the reports that form part of this proposal.

- Developing an effective health and social care system requires services that are connected, planned and properly resourced to ensure quality and sustainability. The community and local services are working with the H&SCP on the delivery of health and social care services. Carers, older people and local GPs are very concerned that there has been no attempt by the proposers to engage in this. We think that a genuine and serious proposal would have involved such engagement or at least an approach to the Community Council about the impact on the community. Dr Flynn from the Health Centre has outlined the potential significant risks to current services, including the potential closure of the Abbey and Edington and the risks of not have a considered and planned approach to ensure the community retains essential services. We fully support his analysis and concerns.
- A final major consideration is the need for affordable housing for staff employed by the care village. The Planning Statement claims that the development will create local jobs, but the mix of qualifications needed there will mean that the majority of staff will be have to be recruited from outwith North Berwick and will either have to travel here or, preferably, find housing locally. Many of these jobs will be relatively low paid, and therefore the pressure on affordable housing will increase even further from the already poor current situation.

For all of these reasons, North Berwick Community Council objects unanimously and in the strongest terms against the proposed development.

Yours faithfully



Christiane Maher
Planning Liaison



Judy Lockhart
Chair