

Nigel Small  
Director of Operations  
NHS Highland  
Assynt House  
Beechwood Park  
Inverness  
IV2 3BW

17 July 2014

planning@cairngorms.co.uk

Dear Mr Small

**Proposed Modernisation of Community and Hospital Services in Badenoch and Strathspey: Public Consultation 21<sup>st</sup> April to 21<sup>st</sup> July 2014.**

We refer to the Badenoch and Strathspey Summary Document and Full Public Consultation Document and welcome the opportunity to make comments on your proposals for the future modernisation of community and hospital services in Badenoch and Strathspey.

We note the 3 separate possible options for the future, as highlighted within the consultation documents, and the preference of NHS Highland at this stage for Option 3 – Community Hospital and Resource Centre. We note that this would favour a new community hospital and resource centre in Aviemore, allowing services to be fully integrated and providing the full range of community hospital services, including in-patient beds, out-of-hours, A&E and out-patient clinics. This option would also entail the closure of the existing two hospitals at Kingussie (St Vincent's) and Grantown-on-Spey (Ian Charles) together with the closure of the existing Aviemore Medical Practice and Health Centre (Glen Centre) and relocation of the services currently provided on these sites to the new community hospital and resource centre site to be located somewhere ideally within the centre of Aviemore.

Given the statutory and enabling roles of the Cairngorms National Park Authority (CNPA), we do not feel that it would be appropriate for us to comment, in terms of any preference, on the three modernisation options presented within your public consultation documents. We are happy though to offer comments from a land-use and planning policy perspective and in relation specifically to the four proposed new, and three existing sites highlighted within your full public consultation document, namely your preferred Option 3, as those sites being shortlisted for public feedback as part of the wider public consultation exercise. We hope you find these comments helpful at this early stage, and would be

happy to discuss these in more detail with you in due course when your options appraisal is at a more advanced stage.

### **Cairngorms National Park - General Planning Policy Approach**

The Cairngorms National Park was designated by The Scottish Parliament in 2003 given its outstanding national importance in terms of natural and cultural heritage; the distinctive character and coherent identity of the area; and to ensure that the four statutory aims for Scottish National Parks, as set out by the National Parks (Scotland) Act 2000, are collectively achieved and in a coordinated way. These aims are:

- To conserve and enhance the natural and cultural heritage of the area;
- To promote sustainable use of the natural resources of the area;
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public;
- To promote sustainable economic and social development of the area's communities.

Where there is a conflict between the collective delivery of these four aims, The Act requires that greater weight is given to conserving and enhancing the natural and cultural heritage.

The Cairngorms National Park Authority (CNPA) is the management body responsible for the Cairngorms National Park area. CNPA prepares planning policy consistent with Scottish Planning Policy and Guidance, and against which all applications for planning permission for development within the Park are assessed. CNPA also "call-in" those applications for the consideration of the CNPA Board acting as Planning Authority, where these particular applications are considered to raise issues of general significance to the Aims of the National Park. All other applications remain with, and are considered by, each of the five Local Authority Planning Services within whose administrative area the National Park over-laps, and within which the development falls. All such applications are considered for their acceptability against the terms of national planning policy as set out by The Scottish Government, and National Park planning policy as set out by CNPA.

**Scottish Planning Policy (SPP, Revised 2014)** sets out national planning policies that reflect Scottish Ministers priorities for the operation of the planning system and for the development and use of land. Under Scottish planning law, planning applications must be determined according to the policies within the development plan unless material considerations indicate otherwise. The content of SPP is a material consideration in planning decisions that carries significant weight. The SPP also promotes consistency across Scotland whilst allowing flexibility to reflect local circumstances. SPP highlights the importance of increasing sustainable economic growth to create a more successful country with opportunities for all of Scotland to flourish. It also seeks to ensure that the planning system encourages rural development which supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality. SPP stresses the need for the planning system to

promote business and industrial development that increases economic activity while safeguarding the natural and built environments as national assets. Due weight is to be given to the economic benefit of proposed development.

The SPP sits alongside four other Scottish Government planning policy documents that you may wish to be aware of:

- The **National Planning Framework (NPF3)** which provides the statutory framework for Scotland's long-term spatial development over the next 20-30 years;
- **Creating Places**, the policy statement on architecture and place, containing the Scottish Government's policies and guidance on the importance of high quality architecture and design;
- **Designing Streets**, a policy statement putting street design at the centre of placemaking. It contains policies and guidance on the design of new or existing streets and their construction, adoption and maintenance; and
- **Scottish Government Circulars and Planning Advice Notes**, which contain policy and advice on the implementation of legislation or procedures.

### **Cairngorms National Park Partnership Plan 2012-2017**

The Partnership Plan is the management plan for the National Park for the five year period to 2017. It sets out the vision and overarching strategy for managing the Park and provides a strategic context for the Cairngorms National Park Local Plan 2010, and the Local Development Plan that will soon replace the Local Plan so as to continue to provide relevant planning policy for the next 5 year period from 2015 to 2020.

Three long term outcomes have been identified within the Partnership Plan to deliver the vision for the Park, to continue the direction set out in the first National Park Plan and together deliver the four aims of the Cairngorms National Park. The outcomes are:

- A sustainable economy supporting thriving businesses and communities;
- A special place for people and nature, with natural and cultural heritage enhanced;
- People enjoying the Park through outstanding visitor and learning experiences.

In short, the overarching aim is to make the Cairngorms National Park a world class visitor destination that showcases and protects the very best of Scotland's environment.

### **Cairngorms National Park Local Plan 2010**

The Local Plan contains a range of policies dealing with particular interests or types of development. These provide detailed guidance on the best places for development, and the best ways to develop. All relevant policies will apply to all of the four shortlisted sites as promoted by NHS Highland as part of the preferred option for a new hospital and resource centre in Aviemore. They will also apply to the

sites and properties in Grantown-on-Spey, Kingussie and Aviemore that we understand may be vacated and re-developed, pending the outcome of the ongoing consultation exercise.

### **Site-Specific Proposals**

Planning permission will most likely be required in all cases for any new development, or re-development of the existing properties referred to in the public consultation documents and in current NHS use. Planning consent may also be required for the change of use and/or demolition of buildings, and we would strongly recommend that appropriate professional advice is taken by NHS Grampian from a Registered (RTPI and/or RICS) Planning Consultant before any works are undertaken or plans progressed.

Pre-application advice is strongly encouraged, initially with the Planning Department of The Highland Council, within whose administrative area the location of the four shortlisted sites in Aviemore, and the existing sites throughout Badenoch and Strathspey, are located (contact Andrew McCracken, Development Planning Manager, The Highland Council, Kingussie Area Office T: 01540 661 700). Given the very strong likelihood that any or all applications for development (including change of use and demolition) are likely to be of significance to the Aims of The National Park and therefore “called-in” once formally submitted in due course, we would also strongly recommend that you seek the participation of CNPA in any pre-application meetings and discussions with Highland Council (contact Jane Shepherd, CNPA Development Manager T: 01479 870 548).

### **Site-Specific Initial Advice**

Four sites (see plan attached) are identified in the consultation paper as being shortlisted, under Option 3, as possible new sites for a new hospital and resource centre in Aviemore:

**Site A: Grainish Farm** – on the eastern side of the B9152 travelling north leaving the village. This site is outside the settlement boundary and would therefore be contrary to the local plan allocations for Aviemore. We would therefore resist development here unless a compelling case to do otherwise was accepted by us.

**Site B : Milton** – beside the A9 underpass (north side) leading to Upper Burnside. We aren't sure of the site here, and think part of what you have looked at may be outside the settlement boundary so this, in theory would be contrary to the local plan allocations for Aviemore. It is a highly visible site and any development would need particular care in the design. Also as it is adjacent to the A9 there may be implications coming as a result of the dualling work. We are still unclear of the exact amount of land required for this work so at least some the land you have looked at may be required for this transport work.

**Site C: Technology Park** – land between the two railway lines beyond the closed call-centre. We have no development concerns about this site but from a planning point of view would prefer this as an alternative site rather than a front runner as we think it will eventually be taken up as a business site

again, and fits well with the surrounding uses. However, as an alternative to the Pony Field land (see below), this may be a good option.

**Site D: Pony Field** – beside the MacDonald Aviemore Highland Resort and lies between the A9 and new housing to the north of the Scandinavian Village. The site lies within the settlement boundary and from a policy point of view would most likely be our preferred site for the new hospital. Any design would need care in the landscaping and design, but we think the options for sharing car parking etc would work well and we are keen to see more people from the village and vicinity using this area, so close to the village centre. With road and footpath improvements coming as a result of the new Tesco development this would also assist in accessing the site.

### **Existing Sites**

**Grantown-on-Spey: Ian Charles Hospital** – The whole site lies within the settlement boundary and within Grantown-on-Spey, a strategic settlement within the settlement hierarchy and a main settlement in the Cairngorms National Park. The redevelopment for new hospital, residential and/or other commercial uses would appear acceptable in principle, subject to compliance with all other policies of the Local Plan and with regard to other relevant material considerations including suitable access (the bend at the start of the hill at the point of the current access may require to be looked at carefully by The Highland Council as Roads Authority for example). Given the prominence of this site at the northern gateway to the town, the highest standards of quality in design and sustainability would be required, with the emphasis in any housing redevelopment being the provision of housing that meets the needs of residents and workers in the Park.

**Kingussie: St Vincent's Hospital** - The whole site lies within the settlement boundary and within Kingussie, a strategic settlement within the settlement hierarchy and a main settlement in the Cairngorms National Park. The redevelopment for new hospital, residential and/or other commercial uses would appear acceptable in principle, subject to compliance with all other policies of the Local Plan and with regard to other relevant material considerations including suitable access. Given the prominence and importance of this site to the town, the highest standards of quality in design and sustainability would be required, with the emphasis in any housing redevelopment being the provision of housing that meets the needs of residents and workers in the Park.

**Aviemore: Health Centre** - The whole site lies within the settlement boundary and within Aviemore, the largest strategic settlement within the settlement hierarchy and a main settlement in the Cairngorms National Park. The redevelopment for new medical/hospital, residential and/or other commercial uses would appear acceptable in principle, subject to compliance with all other policies of the Local Plan and with regard to other relevant material considerations including suitable access. Given the prominence and importance of this site to the town, the highest standards of quality in design and sustainability would be required, with the emphasis in any housing redevelopment being the provision of housing that meets the needs of residents and workers in the Park.

In all cases we would recommend advice from a qualified architect in your design proposals, and the involvement from Architecture+Design Scotland to help you with development concept evolution, design and other planning supporting statements, and appropriate public consultation. You may also benefit from the appointment of other design and infrastructure specialists, and from the appointment of a lead consultant (preferably RTPI/RICS) to manage the planning application and development processes for NHS Highland.

We trust that these comments may be of assistance to you in your consideration of options for the proposed modernisation of community and hospital services in Badenoch and Strathspey, and we thank you for the opportunity to do so.

**Yours faithfully**

**Cairngorms National Park Authority**