



# Comment on Representations

**Proposed Development of an  
Ambulance Station at Victoria  
Infirmary, Helensburgh**

***Scottish Ambulance Service***

**ATKINS**



# Proposed Development of an Ambulance Station at Victoria Infirmary, Helensburgh

## Scottish Ambulance Service

### Comment on Representations

23 December 2009

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# 1. Introduction

This 'Comment on Representations' report is submitted to Argyll & Bute Council Committee Services (Local Review Board) on behalf of the Scottish Ambulance Service (SAS). The report responds to the three representations which have been received by the Local Review Board objecting to the proposed development for the erection of an ambulance station at Victoria Infirmary, 93 East Kings Street, Helensburgh.

This report should be read in conjunction with the 'Grounds of Review' report submitted to the Local Review Board on 23 November 2009, as part of the planning appeal for the above development.

In accordance with The Planning etc (Scotland) Act 2006 and The Town and Country Planning (Schemes of Delegation and Local Review Procedure) (Scotland) Regulations 2008, Atkins are submitting the 'Comment on Representations' report in response to representations submitted by:

- **Mr Jonathan Cooper**
- **Helensburgh Community Council**
- **Argyll and Bute Planning Department**



## 2. Mr Jonathan Cooper Representation

### 2.1 Outline of Representation

The representation made by Mr Jonathan Cooper on 7 December 2009, lists the following issues associated with the proposed development:

1. Recent capital developments on the Infirmary site have not provided sufficient on-site parking spaces;
2. Continued dangerous and inconsiderate parking along Granville Street by staff, visitors and contactors and speed at which vehicles enter and leave the infirmary site is dangerous;
3. Approval of the proposed development could mean that more parking spaces will be lost, with vehicles having to find alternative spaces during construction;
4. Supports consent for the new ambulance station if SAS and NHS Highland provide sufficient parking for staff, visitors and contractors and that vehicles do not park inappropriately along Granville Street; and,
5. Submission of photographic evidence which demonstrates examples of 'bad parking' from a previous project.

### 2.2 SAS Comments

SAS agree with Mr Cooper regarding dangerous parking by a number of on-site users, along Granville Street and the speed at which vehicles are leaving the site.

As detailed in the 'Grounds of Review' report, ambulance vehicles are being blocked in by parked cars along Granville Street, which is having a severe detrimental effect on their response times. The proposed location of the new ambulance station would play a key role in speeding up ambulance response times. Direct access to the main road will help to alleviate the speed of ambulance vehicles along Granville Street during emergency call outs.

The Council's Roads Department have raised no objection to the proposals, and in fact have confirmed that the various activities carried out within the grounds of the Victoria Infirmary placed a high demand on the existing car parking provision, and as such the proposals would assist in improving the current situation.

SAS are unable to comment on other recent developments within the grounds of Victoria Infirmary, as these have been proposed and managed by NHS Highland. However the proposed ambulance station development includes the provision of 18 no. designated parking spaces to accommodate ambulance vehicles, station staff and infection control. As confirmed by the Council's Roads Department, the proposed parking spaces will not exacerbate the existing situation but instead they will help to alleviate the parking situation within Victoria Infirmary, especially along Granville Street.

The breakdown of parking for the proposed development is outlined in the Car Park Plan (Drawing No. 5084539 GLA A/P/00/010 Rev 1- Appendix A) and is as follows:

- 4 Infection Control;
- 3 Ambulance Vehicles;
- 2 Patient Transfer Service (PST);
- 1 Disabled;



- 1 Rapid Response;
- 1 Urgent Tier;
- 1 Officer Response Vehicle; and,
- 5 Staff Spaces.

Mr Cooper has submitted a number of photos as evidence to demonstrate examples of 'bad parking' from a previous project. It is unclear to SAS as to when and where these photographs have been taken and to which previous project they relate to, as there is not clear annotation or supporting information attached.

It is apparent, however, that the photographs are not within the grounds of the Victoria Infirmary. As the 'evidence' does not relate to the proposed development nor demonstrate bad parking on the site, it is considered that these photographs are not a material consideration to the determination of this appeal.

It should be noted, that Mr Cooper also made the same comments in a representation to Argyll and Bute Council Planning Department on 16 June 2009, during the determination of the planning application. The comments were considered and subsequently dismissed by the Planning Department as the Council's Roads Department had no objection to the proposed development.



### 3. Helensburgh Community Council Representation

#### 3.1 Outline of Representation

HCC support the proposed development for a new ambulance station in principle, as it would enhance the provision of healthcare for residents in the Helensburgh and the surrounding area. However, they support the Planning Department's decision to refuse the planning application on the grounds of poor and inappropriate external design and siting.

The representation made by HCC on 10 December 2009, outlines the following issues:

1. The need to find a less visible location on the site;
2. Design of building is inappropriate and does not reflect the setting of the listed building, nor does it complement the style or design of the other building on the infirmary site; and,
3. Removes significant amount of open space, and the loss of memorial garden.

HCC have confirmed that their position is based on the Helensburgh Design Statement.

#### 3.2 SAS Comments

As outlined in Section 3 of the 'Grounds of Review' report SAS and NHS Highland met on site with the Planning Officials to discuss the four alternative sites within the hospital grounds, which had been considered prior to the submission of the planning application. These were considered unsuitable for the reasons identified in Table 3.1 and the location of the options laid out in Drawing No. AP(SK)101 Rev1, which forms part of the 'Grounds of Review' report.

The proposed site is the most suitable location for the ambulance station, due to its close proximity to the main road, which will help to speed up ambulance response time for emergency calls out, which at present is being severely undermined by parked vehicle along Granville Street.

The four alternative sites cannot accommodate the number of parking spaces required for the ambulance station. Subsequently, the lack of parking spaces will have a negative effect on the already low levels of parking within the infirmary site, which will be in direct contradiction to the comments made by the Council's Roads Department.

SAS do not agree that the design of the proposed building does not reflect the setting of the listed building or complement the existing style and design of the other buildings on site. As stated in Section 6.1 of the 'Grounds of Review', the integrity of the infirmary has been considerably compromised by the erection of various inappropriate extensions, which do not reflect the character of the listed building.

Additionally, the erection of 1960s and 1970s styles of the adjacent, and free standing hospital buildings, including the Out Patient Department (OPD) Building and The Jeanie Deans Unit, have further compromised the integrity of the listed building and its setting.

The scale, precise siting and overall profile of the proposed building (i.e. a shallow pitched building) have all been carefully considered and are intended to keep any perceived impacts to a minimum, as well as be in keeping with the site and its surroundings. The proposed landscaping of the ambulance building will further mitigate concerns regarding the impact on the setting of the listed building.



In terms of the materials, brick cladding is proposed for the external walls of the ambulance station. This is a reflection of the existing OPD building, which is adjacent to the listed building and the various extensions to the east of the listed building. SAS are willing to accept any reasonably worded condition that requires agreement of the materials pallet prior to commencement of the development.

The existing garden area was created on an informal basis by previous patients. As a matter of goodwill NHS Highland has proposed that the garden would be relocated to another part of the hospital grounds, therefore entirely mitigating the loss of this space. Its removal and re-location elsewhere in the hospital grounds was not in itself a matter for concern to the Council when refusing the application. It must be concluded therefore that the existing garden area itself has no intrinsic historic value, and therefore its loss would not compromise the setting of the listed building.

HCC confirmed that their position is based on the 'Helensburgh Design Statement', which describes the design characteristics they wish to be incorporated into significant development proposals in the town. This document is a non-material consideration in terms of assessing the proposed development, as it has not been formally adopted by the Council. Therefore, the document carries no planning weight and as such cannot be used in determining this appeal.



## 4. Argyll and Bute Council Planning Department Representation

### 4.1 Outline of Representation

The representation make by Argyll and Bute Council's Planning Department on 7 December 2009, outlines the following issues:

1. The LRB should question if the development accords with the Development Plan Policies and whether there are any material considerations to outweigh these adopted policies;
2. The need for the development to be assessed against the Council's Heritage policies and the Scottish Historic Environment Policy 2008;
3. Location of the proposed station will have an adverse impact on the setting of the listed building, especially views from East King Street;
4. The other buildings on site have been sited to minimise their effect on the setting of the listed building;
5. The ambulance building in the proposed 'open space' would destroy the relationship between listed building and open space and as such it would diminish the special contribution the listed building makes to the townscape;
6. No set definition of a material consideration, as it is up to the decision maker on how much weight is attached to each material consideration;
7. Health is a 'minor' material consideration and as such does not outweigh the built heritage policies within the development plan;
8. Question the substance of the reasons afforded into why the alternative sites have been discounted, especially that site A and C merit further investigation;
9. Although Local Plan Policy LP COMM 1 supports the formation of new and improved community facilities, the proposed development is still contrary to a number of polices with the Development Plan; and,
10. Requirement for a hearing and site visit due to high levels of public interest.

### 4.2 SAS Comments

SAS fully acknowledges the requirements of the planning policies relating to the design, scale and setting of a development within the vicinity of a listed building, However, the design and siting of the proposed facility has been carefully considered to minimise the perceived impact therefore SAS does not agree that the proposal is contrary to the development plan in relation to these policies.

It is disappointing to read that the Planning Officials consider 'health' to be of a minor material consideration, given that the Argyll and Bute Local Plan clearly supports the need for continued campaigning to retain adequate health facilities throughout Argyll and Bute (page 77) together with the existence of key government policies, Health Building Note 44 Accommodation for Ambulance Services (1994) and, Scottish Health Facilities Note 30 Infection Control (2007).

SAS totally refute the Planning Department's claim that health does not outweigh the built heritage polices with the development plan. The very principle that a building should be put before the life of a human is morally questionable, and as such the 'health' and indeed the life of a human should be an important material consideration in this appeal case.



Given at that the integrity of the listed building as been severely compromised by various inappropriate extensions, which do not reflect the character of the listed building, and the erection of adjacent, free standing buildings, the proposed development would not negatively impinge on the setting of the listed building. Furthermore, as stated in Section 3.2 above, brick cladding is proposed for the walls of the ambulance station, which reflects the existing OPD building and the various extensions to the east of the listed building. SAS are willing to accept any reasonably worded condition that requires agreement of the materials pallet prior to commencement of the development.

The Council has stated that the principle viewpoint of the listed building will be impacted on from East King Street, and that the garden area to the front creates a sense of open space which gives open views of the listed building. It should be noted that the topography of the hospital grounds is such that the listed building sits at a significant height from the garden area. The proposed ambulance building has been designed with a shallow pitch roof to reduce as far as reasonably practicable, the potential impact on the wider views of the listed building from the main access road. The proposed landscaping of the ambulance building will further mitigate concerns regarding the impact on the setting of the listed building. The issue of open space, to the front on the listed building, has been discussed in Section 3.2 above.

As discussed in Section 3.2 above and outlined in detail in Section 3 of the 'Grounds of Review', four alternative sites within the hospital grounds, have been considered prior to the submission of the planning application, and were considered unsuitable for the reasons identified in Table 3.1.

However, Argyll and Bute Council Planning Department claim to question the substance of the reasons afforded into why the alternative sites have been discounted, especially that site A and C merit further investigation.

In order to demonstrate the points raised in Table 3.1 (Grounds of Review) outlining the unsuitableness of the sites, Appendix B provides a 'best' site layout plan of Option A, while Appendix C provides the 'best' site layout plan for Option C. Table 4.1 below, details the reasons why both Sites A and C are considered unsuitable.

**Table 4.1: Reasons for unsuitability of alternative sites A and C**

Site	Reasons of unsuitability
A	<p>The site layout plan denotes the only location where the ambulance building can be located on this very small site with spaces for only 3 parking spaces. This is significantly less than the number required for the proper functioning of the ambulance station.</p> <p>There is insufficient room for the ambulance turning circle, which would encroach onto Granville Street. This would raise serious safety issues, as Granville Street is already heavily used by parked vehicles.</p> <p>The close proximity of the building to the site boundary would also eliminate the possibility for windows to the south and west elevations of the building, therefore reducing natural sunlight into the station.</p> <p>The Planning Department state in its representation that parking provision for Site A could be increased by the relocation of the main access route into the hospital. The LRB should be aware that the relocation of the main access to the hospital is out with the control of the SAS, as NHS Highland, the land owner, has the responsibility to for running the hospital and setting the development agenda. Furthermore, any plans to relocate the access would have a severe detrimental effect on any planned future expansion of hospital facilities by NHS Highland, which is paramount in order to provide adequate health care facilities for Helensburgh and its surrounding area.</p>
C	<p>The site layout plan demonstrates that NHS Highland would lose eight car parking spaces, as these would be required for the functioning of the ambulance station. This would take away parking facilities for visitors and other site users, which would</p>



<p>exacerbate the already dangerous parking situation on Granville Street.</p> <p>The location of Site C would still mean that ambulance vehicles would continue to be blocked in by parked cars along Granville Street. In order to achieve the expected standards of performance in responding to emergency calls, the NHS Act 1997, HBN 44 and SHFN 30 outline requirements to be considered when assessing the suitability of the site for new ambulance station. Furthermore, the NHS Act 1997 places a statutory duty on ambulance services to achieve certain standards of performance particularly in responding to emergency calls. It is acknowledged within the NHS Act that this requirement will inevitably influence the scale and siting of the resources devoted to this task. Consequently, Site C would still severely limit ambulances in the Argyll &amp; Bute area being able to accord to with national and statutory requirements.</p> <p>The required proximity between vehicles and the ambulance station cannot be attained through Option C, with only space for a one way road system. The Planning Department have stated that the existing eastern access to the hospital could be extended to increase the width of the road to allow passage of vehicles along the eastern boundary. Once more, the LRB should be aware that creation of a new access route long the eastern boundary is out with the control of the SAS, as NHS Highland has the responsibility to for running the hospital and setting the development agenda. Lastly, this site conflicts with possible future expansion plans of NHS Highland.</p>
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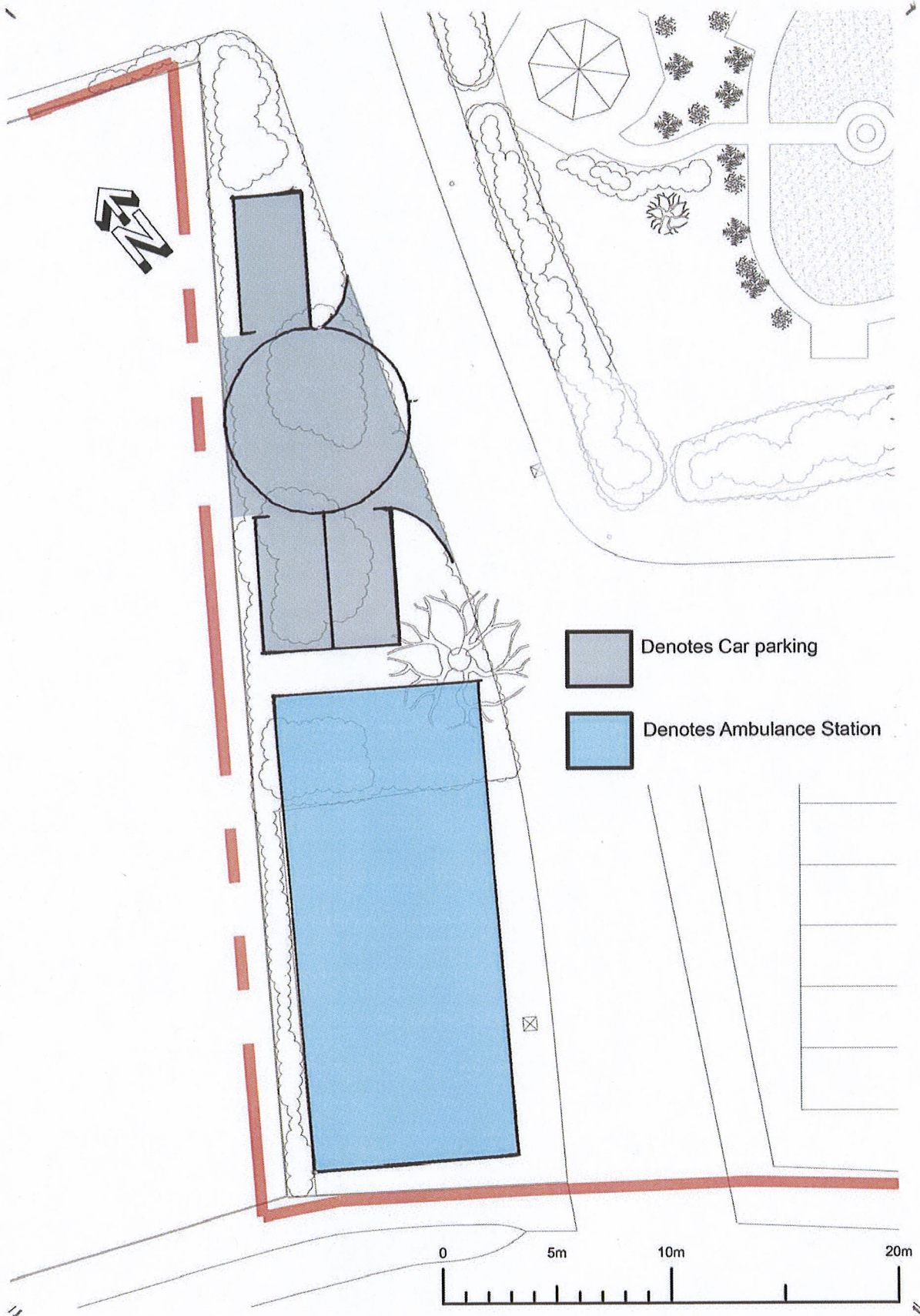
Finally the Council has requested that a hearing and site visit take place due to high levels of public interest. SAS feel this is unnecessary as all of the arguments as to why the proposed ambulance station should be approved have been clearly made in the 'Grounds of Review' submitted on 23 November 2009, and reiterated this 'Comments of Representation' document.





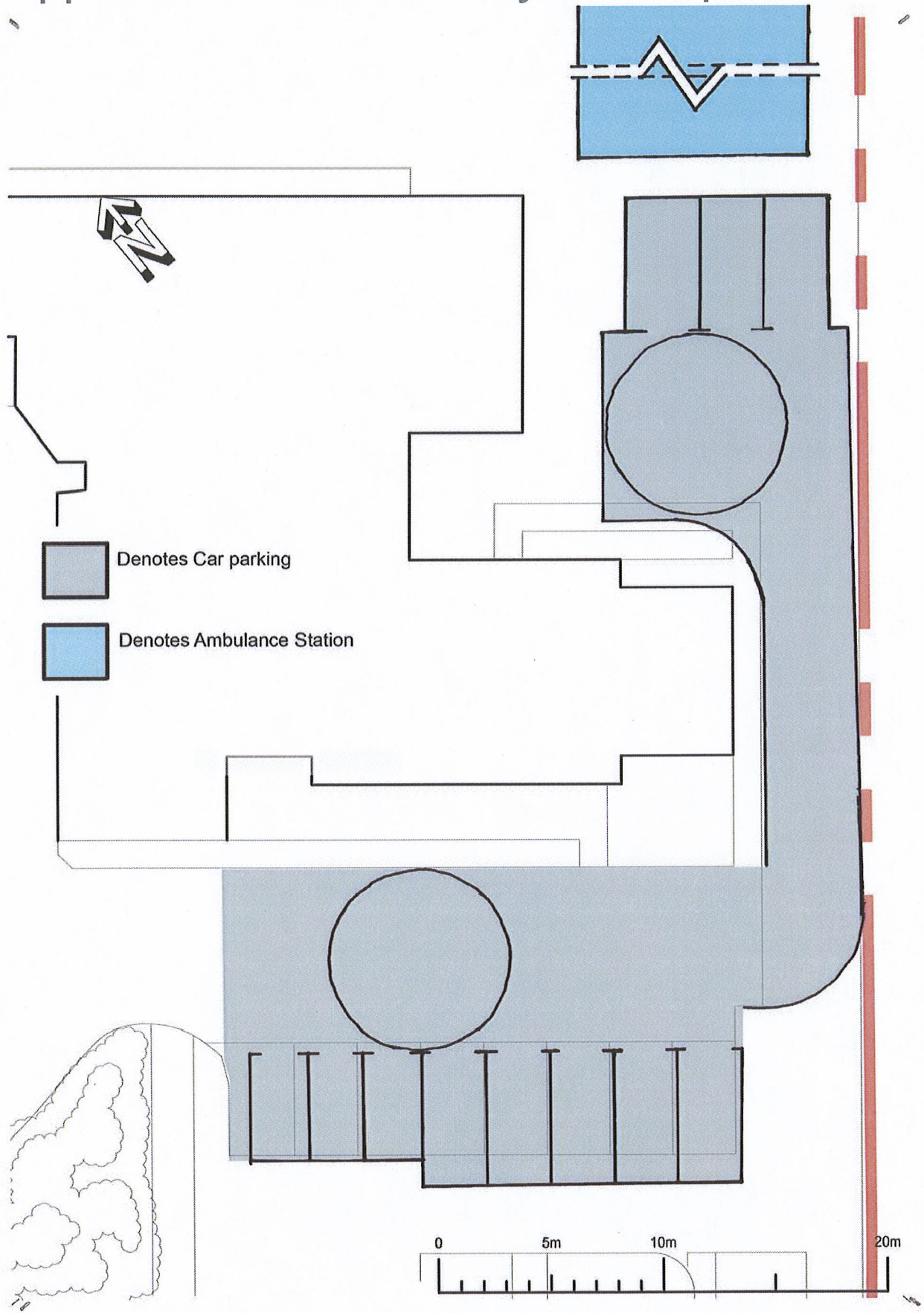


# Appendix B: Best Site Layout of Option A

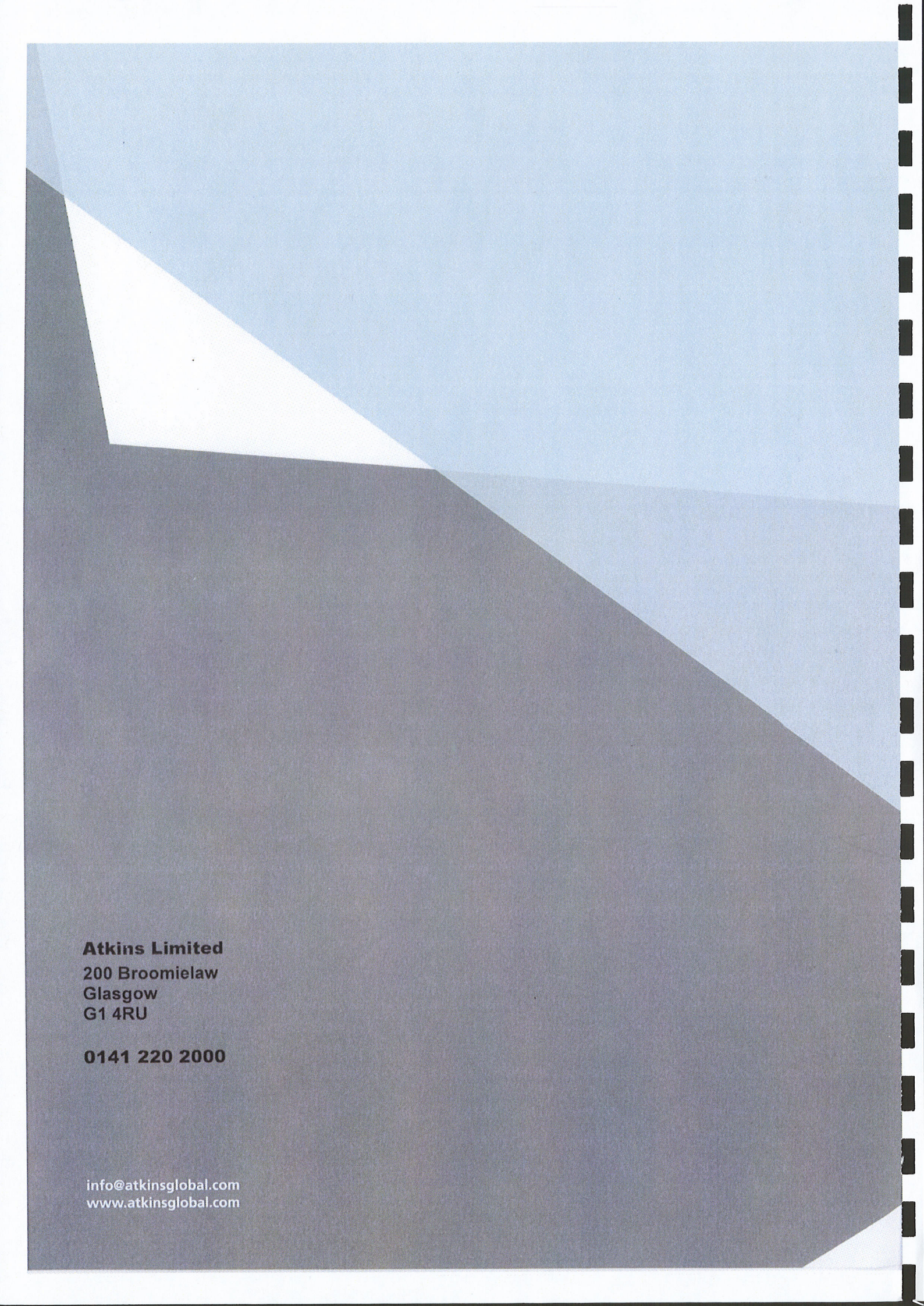




# Appendix C: Best Site Layout of Option C







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