

## **APPENDIX 2**

### **KINGUSSIE , & VICINITY COMMUNITY COUNCIL LETTERS**

# KINGUSSIE AND VICINITY COMMUNITY COUNCIL

Highland Council  
Badenoch and Strathspey  
Planning and Building Standards  
18 AUG 2009  
Received

Address for correspondence:  
KVCC Secretary  
Drumlins  
Newtonmore Road  
Kingussie  
Inverness-shire  
PH21 1HD

Mr A McCracken  
Area Planning & Building Standards  
Manager  
Badenoch and Strathspey  
100 High Street  
Kingussie, PH21 1HY

Caingorms National  
Park Authority  
01 SEP 2009  
RECEIVED JM



17 August, 2009

09/191

Dear Mr McCracken,

## Re. Planning Application from Scottish Water for upgrading and construction of additional infrastructure at Kingussie Wastewater Treatment Works.

Kingussie and Vicinity Community Council has considered the above application carefully. As Chairman of KVCC, I write to you on behalf of my fellow councillors to give our corporate view.

We welcome and support, in principle, the application to upgrade the current wastewater treatment works. We do have some serious concerns and objections to some aspects of the current plans. We urge that the following points are taken into consideration when the application is considered for permission or refusal.

1. We question if the site is an appropriate one on which to build a new treatment plant, since it is on the flood plain. The new works are likely to facilitate further housing developments in Kingussie with increased flows of untreated wastewater, and this could increase the risk of flooding of land and properties adjacent to the new treatment plant at certain times.
2. We note that the flood risk assessment by Halcrow Group for Scottish Water makes it clear there is a definite risk of flooding with untreated wastewater in major residential parts of Kingussie under conditions of high flows. Councillors regard this as unacceptable.
3. Kingussie has experienced several instances of major flooding in the past ten years, and areas of Spey Street and King Street together with the domestic properties along them, the land surrounding the Highland Folk Museum site plus some of its buildings, and more especially Kingussie High School have been inundated. Plans for replacement of the waste water treatment works should include actions to overcome such flooding events, not ignore or possibly exacerbate them.
4. The land on which Scottish Water is planning to build the new works is not currently owned by them and Councillors point out that access to the site is very difficult. The plans do not show the access route.
5. Access to the site: Councillors have serious concerns about safety on the following grounds. We wish to draw your attention to the following points:

- (i) At the eastern end of the site, the railway bridge over the extension of Manse Road is too low to allow the passage of large vehicles that will undoubtedly need access to the site, not only during the construction period, but also to remove solid waste materials on a regular basis throughout the life of the new works.
  - (ii) Alternative access at the western end uses an unmade track running parallel to the railway line from the Ruthven Road. This route is hardly satisfactory, since large vehicles serving both the existing plant and an adjacent business have to traverse the Gynaack Burn over a bridge shared with the only entrance to Kingussie High School. Access to the school is already crowded at the beginning and end of the school day when pedestrians, cars and school buses are trying to gain access to and from the school site. Councillors consider this to be a significant safety hazard, and are concerned about a potential increased risk of accidents involving pupils at the school.
  - (iii) If Scottish Water plans to use this shared access and route and does not plan to build a separate access away from the school entrance, then KVCC wishes to object.
6. Councillors are concerned that during the construction phase there is likely to be a significant increase in heavy vehicular traffic through the centre of the town while considerable amounts of infill and building materials, equipment, etc are transported to the site. Increased vehicular traffic increases the risk of accidents to pedestrians and other vehicles alike. The planning application does not include any reference to steps to be taken by Scottish Water during this period to minimise disruption along the narrow, busy and crowded High Street and past the Primary and High Schools in Ruthven Road. We urge that if permission is granted, then special conditions should be imposed to overcome such likely problems.
7. We welcome the inclusion of a tree and shrub planting scheme to screen the new site from the south and replace trees which have to be felled. However the plans do not include any additional screening on the northern and western side to screen the plant from Kingussie itself. Since the new constructions are to be built on a raised platform and some are taller than the existing buildings we anticipate the works will be more visible, especially from residences on the hillside, such as East Terrace, and other properties higher up the hill. The Council asks if more consideration could be given to screening of the northern and western boundaries of the new works.
8. The Council notes that provision is made for maintenance of the tree planting scheme with replacement of any plants that fail. We consider the three year maintenance period is too short and ask who is to be responsible for the maintenance and care in the longer term.
9. The site is not remote from the major residential part of Kingussie. The plans do not indicate what steps will be taken to reduce any possibility of malodours emanating from the site, especially since in an early part of the treatment process untreated dilute effluent is to be held in a large open reservoir for several days at a time while aerobic microbial activity effects digestion of the waste. Residential properties on the opposite side of the railway line are very close to the site and under prevailing wind conditions could be adversely affected by unpleasant odour. This should be regarded as unacceptable in the 21<sup>st</sup> century.
10. The new treatment works will not overcome other existing problems with mains drainage of many areas of Kingussie. The planning application for the treatment plant refers to upgrading and construction of additional infrastructure, yet the nature of this aspect of the plans are not included. There is an urgent need to review and upgrade

the existing infrastructure if the new treatment works are to be wholly effective. Residents and pedestrians complain of foul odours emanating from the drains along the High Street and Spey Street. The mains drains from the western end of Newtonmore Road and the West Terrace area are inadequate and flooding of the fields with raw sewage is well known to Scottish Water. Yet the plans for upgrading the wastewater treatment plant do not include any intentions to overcome the major deficiencies of the whole system of drainage of properties in Kingussie. The Councillors regard this as a significant weakness in the plans. The construction of the treatment works is only part of the overall need.

Finally we would urge that steps are taken for a wider public consultation than the current time allowed for a response by interested parties.

Yours sincerely,

A large black rectangular redaction box covers the signature area of the letter.

Alan Davidson  
Chairman of the Council.

## KINGUSSIE AND VICINITY COMMUNITY COUNCIL

Cairngorms National  
Park Authority

08 JUL 2010

PWS RECEIVED

Mary Grier  
Cairngorms National Park Authority (Planning)  
Albert Memorial Hall  
Station Square  
Ballater  
Aberdeenshire AB35 5QB

Address for correspondence:

KVCC Secretary  
Drumlins  
Newtonmore Road  
Kingussie PH21 1HD

6<sup>th</sup> July 2010

Dear Ms Grier

**09/255/CP Planning Application For Upgrading And Construction Of Additional Infrastructure (Above And Underground) At Wastewater Treatment Works, Manse Road, Kingussie For Scottish Water.**

Firstly we must apologise for the lateness of our reply to your letter of 17<sup>th</sup> May 2010. This is due to the difficulties encountered in obtaining information from Scottish Water, which would have enabled us to make an informed response. Despite protracted jargon filled email contact with them over a period of several weeks, we are still not in possession of the information we originally sought.

At a meeting held on 27<sup>th</sup> May 2010 with representatives from Scottish Water we discussed the following concerns:

1. Aspects of the design of the new plant, especially the sequence of operations. The role of the large open sludge aeration tank in the early stages of the process and the likelihood of bad odours from the untreated sewage at this stage.
2. The possibility of bad odours pervading the town, since the works are just across the railway from the more densely populated areas of the town.
3. The effects of bad odours on tourism, which plays a significant economic role in the town. Kingussie could not agree to any works that would have a deleterious effect on the economy.
4. The lengthy and detailed Odour Management Plan produced by Scottish Water, which clearly implies bad odours are a significant problem. Councillors noted that odours are likely to be more noticeable in warmer weather – when residents will wish to have windows open in their houses and also when there will be more tourists in the town.
5. Problems with the new treatment works in Newtonmore and Grantown on Spey have been reported – clearly such problems are unacceptable to Kingussie, since the works are close to the town.
6. Removal of large screening trees adjacent to the railway, likely to make the new larger buildings more visible from adjacent housing and houses on the higher roads above

Kingussie. But new screening trees are to be planted on the south side of the works where nobody lives.

7. Safety issues concerning access to the site – the need to use the same bridge over the River Gynack as is used by the High School.
8. Safety concerns about heavy vehicular traffic on the High Street and Ruthven Road at times of day when children are walking unaccompanied to and from the primary and secondary schools.
9. The operating plans indicate that an operative will only be present for two hours a day Mon-Fri, what plans are there if problems arise at other times?
10. We have worries about potential flooding, as the plant is on the flood plain. What steps are being taken to prevent back flow into the town drains at times of exceptional rain, river flows etc.
11. Are there plans to renew and upgrade the main drains in Kingussie?

We were advised by the Scottish Water representatives that they are aware of the problems with the new Works at Newtonmore and Grantown on Spey which both have open sludge holding tanks, and that Kingussie will have covered sludge holding tanks. However they did acknowledge that there will be odours at times, when the sludge holding tanks have to be opened and the sludge is pumped into tankers for transport off-site to finish the process. This is likely to take place twice a week and any odour will obviously be worse in warmer weather. Operatives are given strict guidelines for these operations to minimise disturbance, but there were tacit indications that the rules are not always adhered to closely. We are still unhappy about this aspect of the Works.

We were further advised that Scottish Water will install a continuous monitoring system to give 24 hour alarm notification which will include some telemetry. However, ultimately the smooth running of the plant will rely on the operatives adhering closely to procedures. It was suggested to us that Community Councillors should urge residents to complain if problems arise so they can be fixed promptly. *Does this mean they know there will be lots of problems?*

Our concerns regarding screening trees and our suggestions regarding the movement of construction vehicles and tanker traffic were passed on to the appropriate Scottish Water departments. We were subsequently advised that their Landscape Architect did not feel that there was sufficient space to accommodate planting on the side of the existing railway line.

We have received no feedback regarding the concerns we expressed about the shared use of the bridge over the River Gynack or the potential flooding of the town streets and are extremely unhappy with this, as we feel that this poses a potential blight on existing properties. The fact that a pre-application response from SEPA stated “that the treatment tanks will be designed not to overtop during a one in two hundred year flood event” holds no comfort, as we know that there was serious flooding in Kingussie as recently as 2006 and given that future rainfall is predicted to increase, who is to say that flooding may not occur on a more regular basis?

We are still unsure as to what the final capacity of the new Water Treatment Works is likely to be, despite repeatedly asking for this information. We were given a figure of 858 PE (Person Equivalent)

making it difficult to equate with a specific number of houses. We were advised that a back- log figure was included in this number but again after repeated attempts, we are still no nearer to ascertaining what this is, effectively leaving us completely in the dark regarding the future potential growth of Kingussie.

This also raises concerns as to the efficiency of our existing sewer network, as without knowing the exact number of houses to be built and the exact capacity of the new treatment works, we have no idea how our current decrept sewer network is likely to cope. As it is, we are well aware that West Terrace routinely experiences flow back during periods of heavy rain, with young children having to negotiate streams of raw sewage whilst walking to school. We are sure you will agree that this is unacceptable.

Again, we apologise for our late response, which you would have received much sooner had we received timely information from Scottish Water. We are keen to ensure that Kingussie gets the very best Water Treatment Works possible, which means that it must be efficient as well as having the flexibility to cope with future development.

Yours sincerely,



Alan Davidson



Chairman  
Kingussie & Vicinity Community Council