

# AGENDA ITEM 7

## APPENDIX I

2014/0296/DET

## REPRESENTATIONS

Jimmy & Amanda Mitchell



5th October 2014

Planning Dep't,  
CNPA,  
The Square,  
Grantown on Spey,  
PH26 3HG

Dear Madam / Sir,

Planning Application - CNPA Ref 2014/0296/DET - Care Home, Seafield Avenue, Grantown on Spey.

We refer to the above planning application.

First of all, may we take this opportunity to congratulate the architects and all others concerned with this application. Great thought, time and consideration, both from the point of view of the local neighbourhood and also the potential residents, has gone into this project. The intended building would seem to fit well into the local built environment.

We have just one matter of concern, (objection), which relates to the planting of trees on the borders of the car parking area of the proposed care home and the impact that the subsequent shading will cause.

This matter is inextricably linked to considerations already and properly given to the sighting of the proposed care home, as can be noted from the extracts of the Design Statement, below.

P 6 states, '..... *The set-back, (of the care home), from the road will also have the benefit of reducing any possible overshadowing of the proposed care home from existing mature trees on the south side of Seafield Avenue during winter months when the sun is low in the sky.*

P 11 of the same statement mentions resource efficiency when it says that, '..... *the building is designed to maximise the benefits of natural daylight which will improve the quality of life for residents and maximise the benefits of energy consumption / whole life costs.*

It may be of use to note that P 7 of the same statement deals with the introduction of appropriate planting to hide car parking from the bungalows of Seafield Court.

We now refer to the Landscaping Plan A1 and deal with the border planting on the south-eastern boundary of the site, which overlooks Seafield Court.

We agree that the car park area of the new building will be quite suitably screened from Seafield Court with hedging as described at L2 and L3 in the Landscaping key. However, between every third car park bay, the intention is to plant *Pyrus Calleryana*, 'Chanticleer', (L4 in the Landscaping Key.)

Albeit the narrow-crown variety, we understand that this fast-growing species of tree will readily grow to heights in excess of 12 metres.

We do not see why such tall trees would be required adjacent to a single-storey building. In any event, their crowns will be so tall that they will not afford any camouflage of the proposed car park to Seafield Court, nor will they afford any visual protection of the care home from Seafield Court or vice versa.

One must also bear in mind that the ground level of the new care home will be nearly 2 metres above that of Seafield Court.

From April to September, the late afternoon and evening sun shines onto the rear of these 'boundary' houses in Seafield Court, thus improving quality of life and warming these homes. To plagiarise from Page 11 of the Design Statement, *the natural daylight improves the quality of life for Seafield Court residents and maximises the benefits of energy consumption.* The shading from the intended trees will disrupt these benefits.

My wife and I have a sun lounge at the rear of our property which overlooks the proposed care home. The heat generated from the sun warms the whole of our house, which is especially welcome on cool evenings when heating would otherwise be required. Thus, shading caused by such trees would not only impact on our quality of life, it would add to our carbon footprint. We are sure that the same applies to our near neighbours.

Also, it seems likely that the introduction of such tall trees adjacent to the care home would adversely affect the maximisation of energy consumption of the new care home, itself.

To clarify, it does not appear that any existing trees will be felled to make way for this proposed care home.

We are mindful that the architects are keen that this new care home progresses quickly through the planning stage and we have no wish to impact upon this.

It should be reasonable that the same considerations given to the sighting of the care home ought to be afforded to existing nearby residents. Accordingly, we would be delighted to be given the opportunity to discuss this oversight with the architects and/or landscapers regarding the use of, and perhaps complete removal of, such problematic trees.

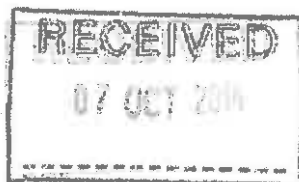
We trust that our concern will be treated with appropriate sincerity.

We will be grateful to receive your confirmation of receipt this letter.

Yours sincerely,

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

Jimmy & Amanda Mitchell.



Roseburn  
19 Seafield Court  
Grantown-on-Spey  
Moray  
PH26 3LE

07 October 2014

Cairngorms National Park Authority  
14 The Square  
Grantown-on-Spey  
PH26 3HG

Dear Sir

**Construction of Care Home on Seafield Avenue Ref: 2014/0296/DET**

We refer to the application by Parklands Developments Ltd for the construction of the above Care Home in the field at the back of our house.

There are a few matters of concern that we would like to bring to your attention.

**1 Flooding.** There is a burn between our house and this site. The level of this burn can rise substantially after heavy rainfall and the site in question is quite boggy in places. We are therefore concerned that any development and the necessary drainage has the potential to increase the level of water in this burn which could in turn lead to flooding of our property.

**2 Increase in traffic on Seafield Avenue.**

- a) The junction of Seafield Avenue with Grantown High Street already presents problems. There is considerable congestion at this junction for several reasons. Cars turning into Seafield Avenue from the High Street can be held up by cars trying to park outside the Co-op which can cause a backlog into the High Street as well as on Seafield Avenue. This is further aggravated by cars parking on the double yellow lines round the corner from the Co-op on Seafield Avenue with no regard for the law. Co-op delivery lorries have their own problems so perhaps the area outside the Co-op, on the Square, could be for deliveries only. Traffic lights might well improve the situation and certainly make it safe for the many pedestrians who use this junction.
- b) There are many caravans travelling up and down to the Caravan Park at the top of the Avenue and this already causes difficulties when they meet another large vehicle on Seafield Avenue. There would clearly be more large vehicles using this road in the event of a Care Home as well as more cars. Once again the illegal parking on the double yellow lines causes problems for the caravan park traffic as does other indiscriminate parking especially near the crossroads with Grant Road.
- c) The visibility is restricted at the crossroads of Seafield Avenue/Grant Road particularly when cars are travelling east/west. This means that cars have to edge out some way into Seafield Avenue to see if the way is clear.
- d) After heavy rain or an accumulation of snow there is flooding, due presumably to poor drainage, at the above crossroads as well as at the entry to Seafield Court.
- e) Traffic using Seafield Avenue can be fast, certainly over the speed limit.

**3 Noise/Pollution** We see from the plans that the car parking for the Care Home will be directly opposite our house. We are concerned that this may cause problems for us especially early morning or late at night when staff shifts change.

Despite our very real concerns we feel a new Care Home could and should be a great asset to our town if the facilities can cope. This would certainly seem to be a promising site as long as certain difficulties can be addressed and we would much prefer to have a Care Home behind us rather than a large number of houses over a much wider area. We would sincerely hope that approving a Care Home would lessen the chances of any such larger development as this proposed plan would have considerably less impact on the services locally and on the precious wildlife on the Mossie.

Yours sincerely



David and Katherine Elder

# Comments for Planning Application 2014/0296/DET

## Application Summary

Application Number: 2014/0296/DET

Address: Development Northwest Of Seafield Court Seafield Avenue Grantown-on-spey Highland

Proposal: Construction of Care Home (Class 8) with associated external areas, gardens, car parking, bin stores, cycle stores, vehicle and pedestrian access and boundary treatments.

Case Officer: Fiona Murphy

## Customer Details

Name: Mrs Lynette Goodwin

Address: 1 Rhuarden Court Grantown On Spey

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Regarding the above application I wish to raise two points of concern.

It is noted from the plans and company statement that limited availability for parking is outlined - 25 spaces. It is further noted that the proposed limited spaces are justified as staff will be encouraged to car share or use public transport. Having first hand experience of a company which promotes and facilitates car sharing and bike to work schemes I can testify that in theory this is an ideal, however one that is rarely enforced or practiced by staff. This also fails to account for any residential vehicles and visiting vehicles to the care home.

Seafield Road is currently an access route for residential and caravan site traffic, whilst also serving as a cycling/walking route for local families and visitors. It would be unthinkable to have traffic parking outwith the proposed care home site due to the sizeable vehicles which pass regularly en route to the caravan site. It is, in our opinion, essential that further assurances must be provided by Parklands Dev. Ltd. that this issue is fully addressed prior to completion, in order to prevent any parking difficulties which cannot be addressed at a further date.

One further point of concern relates to the possible raised levels of the Kylintra Burn which borders many properties on its course through the local area. Having read over the documents relating to the flood risk assessment etc. it appears to indicate that no problems are predicted due, in part, to reduced snow melt expected in the future (although not the case in 2009/10 when snow levels were immense). Further assurances again are sought from Parklands Dev. Ltd. that should future levels of the burn raise due in any part to the increased drainage directed to the burn via the proposed development, that accountability be taken by the company regarding any damage or flooding.

# **OBJECTION TO PLANNING APPLICATION**

## **PROPOSED CARE HOME, SEAFIELD AVENUE, GRANTOWN-ON-SPEY**

PLANNING APPLICATION 2014/0296/DET

The above application by Parklands Care Homes for a 40 bedroom residential care home in Seafield Avenue has been well presented and the proposed structure sympathetically designed in accordance with traditional local architecture. I can appreciate that Grantown-on-Spey would benefit from a quality care home to satisfy increasing demands and therefore would not wish to seem unsupportive of the proposal. I do however feel compelled to raise a number of concerns that may directly impact those residing in the immediate locality and regular visitors to the area and amenities in general.

My immediate concerns relate to the following;

- Limited Parking
- Potential for flooding
- Demands on existing water supplies and sewer

### **PARKING**

Whilst the proposed plan looks to have been carefully projected, the intended allocation of 25 parking spaces for a development catering for 40 bedrooms, plus an as yet unconfirmed number of staff, doesn't appear to be adequate and may therefore result in vehicles being parked on Seafield Avenue thus creating potential safety issues during specific periods throughout the year. The caravan park is a very popular site during holiday periods and significantly increases the traffic on Seafield Avenue. The proposed access and egress from the care home falls within metres of the main access to Rhuarden Court, the main access to The Dulaig and also both access gates to my own property (Braeriach). Any additional parking immediately adjacent to these access points would potentially create a hazard and increase the probability for accident or incident.

I'd like to propose that a more detailed assessment on parking requirement is made taking into consideration realistic staffing and visitor levels, increased traffic levels during peak seasonal periods and also the immediate impact on safety due to the likelihood of overspill parking immediately outside the care home on Seafield Avenue.

Consideration should also be given to designating restricted or no parking zones immediately adjacent to, and to an extended section North West of, the access point to the care home.

### **FLOOD POTENTIAL**

I note that SEPA has raised an objection to the Flood Risk Assessment (FRA) and has requested further clarification on a few issues. I'm not familiar with the processes utilised in 1D/2D hydraulic modelling of flood risks but have read and endeavoured to understand the information provided by Wyg Group Ltd.



The FRA executive summary states that *'A comparison of the flood levels established during hydraulic modelling and the topography of the application site reveals that it is not subject to flood risk for any of the flood periods or associated scenarios modelled'*. Whilst this is undoubtedly the case, it is the storm water runoff from the site and the management of such runoff that should be of most concern; the application states that flow rates and volume will be restricted to greenfield rates by using flow control and attenuation. The conclusion on page 37 states that *'Flooding to the Seafield Avenue occurs for some of the events considered to a depth of 0mm to 300mm. Whilst this flood depth is passable with specialist emergency vehicles, an alternative route exists to provide a failsafe means of access/egress to and from the proposed development'*.

It appears that the risk assessment's executive summary and conclusion seems to concentrate on flood impact to the site have fails to identify that a significant flood risk already exists for some of the properties in Seafield Avenue; Page 23 (Figure 5) clearly highlights this potential with at least four properties in Seafield Avenue being directly affected with a maximum flood depth of 0mm – 300mm.

Whilst the developer may be satisfied that hard standing will be kept to a minimum and porous materials will be utilised where possible; and therefore an increased flood risk will not be presented to the proposed site. Without doubt the management of runoff during extreme weather conditions would affect fluvial flooding which will impact or adjacent properties and therefore should require a greater degree of management than a flow control chamber.

#### **USE OF EXISTING WATER SUPPLIES/SEWER**

It is common knowledge that the water supply to this area, although adequate for the residential properties currently in existence, may not be sufficient for a property with a potentially high demand. One guest house located in an elevated position was required to install ground storage tanks as the existing water pressure was insufficient to provide a continuous supply of water during combined, but not excessive, use.

The planning application states that both existing public water supplies and sewer will be utilised but I can find no evidence within the documentation provided to confirm that sufficient capacity exists within the system to satisfy the demands of the home without impacting on neighbouring properties. Similarly there doesn't appear to be any information estimating anticipated water requirements of the care home or any contingency measures should an assessment indicate a potential problem.

I would suggest that a suitable and sufficient assessment should be completed taking into consideration the anticipated impact on the existing properties currently using these services.

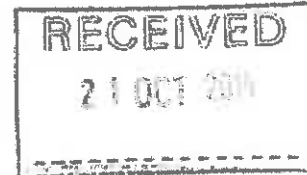
**Leslie McAuly-Brand**

**Braeriach, Seafield Avenue (formerly Rhuarden)**

The Dulaig  
Seafield Avenue  
Grantown-on-Spey  
PH26 3JF

21 October 2014

Cairngorms National Park Authority Planning Office  
14 The Square  
Grantown-on-Spey  
PH26 3HG



Dear Sir/Madam

**PLANNING APPLICATION 2014/0296/DET – PROPOSED CARE HOME, SEAFIELD AVENUE, GRANTOWN-ON-SPEY**

I appreciate that Parklands Care Homes has put considerable effort into submitting an application for what looks like a quality care home development sympathetically designed to reinforce the traditional character of the locality. Many of the planning application documents are well presented and well argued. Whilst not objecting in principle to a quality care home development on the proposed site, I do have a number of concerns which I believe must be addressed and satisfied before planning consent can be granted.

I therefore **object** to the planning application on the following grounds:

1. There is insufficient parking spaces within the proposed development
2. The Transport Statement is insufficient and contains errors and omissions
3. Sufficient mains water capacity has not been demonstrated
4. The Flood Risk Assessment has major omissions

**1. Parking Spaces**

The Transport Statement does not provide accurate evidence to support the proposal for 22 car parking spaces within the development. (Please note that even the Transport Statement discounts the 3 disabled parking spaces at the entrance to the building from its calculations as they are essentially drop off spaces). The Statement admits that staff numbers and shift patterns are not currently known (see para. 4.32 of the Transport Statement as an example), thus the assumption of 6 car spaces for staff has little or no foundation. In assessing trip numbers the Transport Statement uses comparisons with Nursing Homes in suburban locations in England. There is no attempt to demonstrate that these comparisons are valid. I have real doubts that a suburban located nursing home adjacent to a large town or city can be compared with a rural located care home in the Scottish Highlands.

In the Design Statement it is claimed that the number of car parking spaces is based on Parklands experience with their care homes at Muir of Ord and Tain. I do not have knowledge of the specific local dynamics and constraints influencing the car parking at these care homes, however my

objection is based on my direct experience of visiting the Grant House care home in Grantown-on-Spey on an almost daily basis over the past 17 months. I believe that this experience is much more relevant than any evidence presented in the Transport Statement or Design Statement on car parking requirements.

Grant House has about 12 car parking spaces, and on the basis that Grant House has 20 bedrooms, it might be thought that 22 car parking spaces in this 40 bedroom development would be sufficient. However, Grant House has up to 8 informal parking spaces where cars can be safely parked without restricting access and traffic flow. I find that in approximately half of my visits I am forced to use the informal parking at Grant House. I do not see any facility in the proposed development for similar informal parking and thus any vehicle not parked in a parking space will block or restrict traffic flow – of visitor, delivery and/or emergency vehicles - within the site. I therefore strongly believe that the car parking spaces should be increased to at least 35 spaces, assuming staffing levels are approximately double that of Grant House.

My reason for being concerned about the limited provision of car parking spaces within the development is based on the need to avoid any on street parking in front of the care home development. The Transport Statement has ignored the fact that considerable numbers of large vehicles (including cars towing caravans and campervans) use Seafield Avenue to access the Caravan Site. At peak occupancy of the Caravan Site, I understand that somewhere in the order of 600 -1,000 people can be living on the Site. Consequently, parking on the road side outside the proposed development must be discouraged as this will have a detrimental effect on road safety and in particular for persons and vehicles accessing or egressing the several residential driveways and the road junction with Rhuarden Court - all located immediately opposite the proposed development.

## **2. Transport Statement**

Before commenting on the Transport Statement, I was concerned to discover that this document was not on the CNPA Planning website. One of the CNPA Planning staff kindly informed me of this, however, if as I was told the file size was too large to go onto the CNPA website, a link to the document on the Highland Council website should have been inserted.

The Transport Statement is of insufficient quality to support this planning application. My comments and recommended improvements include:

- Base the staff trip analysis on the staffing levels and shift patterns Parklands Care Homes intends to employ, and not on the simplistic assumptions currently used
- Provide an honest appraisal of the bus service and comment on how the existing limited bus service fits or does not fit shift patterns. The current Transport Statement emphasises the peak bus frequency and glosses over the fact that off-peak buses are few and far between and that there is no bus service on a Sunday.
- Recognise that the current bus service routes give limited coverage over the local area and provide little or no service for centres of population beyond Tormore (11 miles to the north) and Aviemore 15 miles to the south. Settlements outside of this narrow bus corridor (e.g. Aberlour, Dufftown, Forres, Kinraig, Kingussie) are in all practical terms not connected to Grantown-on-Spey by public transport.

- Delete the pretence in para. 4.24 of the Transport Statement of bus-rail multi-modal travel options. The train timetable does not connect with the bus timetable.

I appreciate that any new development must at least aspire to introduce staff travel plans in line with Scottish Government planning guidance – much of which is city based and ignores or minimises travel issues in rural areas. My issue is that due to the limited public transport service to and from Grantown-on-Spey and the need to recruit quality staff who might need to travel distances, any staff travel plan is likely to have limited impact, reinforcing the need to increase the car parking spaces within the proposed development. An example of this is Sundays – when there is no public transport available to travel to Grantown-on-Spey – so staff and visitors (generally a busy day for visiting a care home) cannot rely on public transport.

Other improvements to the Transport Statement include:

- There is a need to recognise the traffic impact from the adjacent Caravan Site which, in particular during the summer months, significantly increases traffic movements on Seafield Avenue – I understand between 600 -1,000 persons can be in residence with the associated larger vehicular movements of caravans and campervans. For example para 4.38 inadequately addresses the traffic found on Seafield Avenue.
- The TRICS for this proposed development needs to be re-assessed based on real data and checking carefully the validity of comparison sites.
- Para 4.45 glosses over increasing problems with the junction between Seafield Avenue/The Square/High Street. Transport Planning at Highland Council mentions this potential concern in their email appended to the Transport Statement. The only TA information on this junction dated 2006 is well out of date and an updated TA is needed to demonstrate that the extra traffic associated with this proposed development can be accommodated.
- Should there not be some reference to demonstrating adequate access to and within the development for emergency vehicles?

### **3. Mains Water Capacity**

The Planning Statement in Support of the Application states in response to CNPA Development Plan Policy 12 that *“the proposed development is to connect to the public mains water supply and waste water systems, in which there is sufficient space capacity.”* No evidence of sufficient space capacity is provided and I do not see any comments from Scottish Water on available local capacity. My concern is based on the fact that the local water pressure in this part of Grantown-on-Spey is known to be low. The very low water pressure resulted in the need to install a pumped water supply to our house in 2008 to enable us to simultaneously operate more than two or three water taps or showers.

The capacity of the local mains water to cope with this development must be ascertained before any approval of this planning application is granted. Similarly a statement from Scottish Water on sewage capacity needs to be sought.

### **4. Flood Risk Assessment**

All of the SEPA objections and concerns need to be fully satisfied before granting planning consent for this proposed development. Particular FRA concerns to me include:

- Need to show the size of onsite storm water attenuation holding capacity and how this was calculated to avoid overloading the neighbouring Kilyntra Burn at times of flood – i.e. the design of the complete SUDS scheme needs to be submitted.
- The Flood Risk Assessment focusses solely on the Kilyntra Burn and its northerly (with reference to the proposed development) tributary. The burn most likely to flood the neighbourhood of the proposed development is not even mentioned or included in calculations. This is the fast flowing tributary of the Kilyntra which runs south-east alongside Seafield Avenue from the Caravan Site, is culverted under Rhuarden Court and joins the Kilyntra Burn downstream of the proposed development. The flooding of Seafield Avenue in February 2009 which SEPA refers to was almost solely due to this burn overflowing. Since then I have witnessed flooding in the same place on Seafield Avenue (west of the proposed development near to the Caravan site access and the entrance to the house called Revoan) at least once every year. It is therefore imperative that the Flood Risk Assessment is broadened to also address the impact of this burn in combination with the Kilyntra Burn upstream of the confluence of the two burns.
- The alternative emergency access and egress to the proposed development shown in Fig7 of the Flood Risk Assessment is not accessible by normal vehicles. A walk over of the route will confirm this. In addition, if the lower half of Seafield Avenue floods as shown in one of the FRA scenarios, the alternative route will be completely flooded around the Caravan Site and Revoan entrance. This part of Seafield Avenue floods regularly when there is no flooding from the Kilyntra Burn as it crosses under Seafield Avenue: in the scenario contemplated in the FRA, in all likelihood flooding at the Caravan Site and Revoan entrance is likely to be so severe that these flood waters will flow south-east down Seafield Avenue to combine with the Kilyntra Burn flood waters thus flooding Seafield Avenue on both sides of the proposed development.

The SEPA objections and the concerns I have described above need to be fully addressed by a new Flood Risk Assessment report.

I request that all of these objections are satisfied before planning consent for this development is granted.

Yours sincerely,



Dr Gordon Bulloch

email: 

# Comments for Planning Application 2014/0296/DET

## Application Summary

Application Number: 2014/0296/DET

Address: Development Northwest Of Seafield Court Seafield Avenue Grantown-on-spey Highland

Proposal: Construction of Care Home (Class 8) with associated external areas, gardens, car parking, bin stores, cycle stores, vehicle and pedestrian access and boundary treatments.

Case Officer: Fiona Murphy

## Customer Details

Name: Dr Gordon Bulloch

Address: The Dulaig Seafield Avenue GRANTOWN-ON-SPEY

## Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I request permission to speak to the Planning Committee when this application is being considered by the Committee.