

AGENDA ITEM 6

APPENDIX 2

2020/0193/DET

**REPRESENTATIONS
OBJECTIONS**

Comments for Planning Application 2020/0193/DET

Application Summary

Application Number: 2020/0193/DET

Address: Land To North, East And West Of Dunbarry Terrace And Kerrow Drive Kingussie

Proposal: Erection of 23 houses and garages with associated roads, infrastructure and landscaping

Case Officer: Robbie Calvert

Customer Details

Name: Mr Scott Secker

Address: 3 Croila View Kingussie

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I object to this development on the following grounds

- any construction traffic will have to use Dunbarry Road for access. This road is already congested with parked cars. There is difficulty exiting Dunbarry Road onto the A86 due to parking of cars, often up to the junction. Extra traffic generated by this development will make it worse.
- so many new homes in CNPA end up being second homes and do not offer anything to the local community. Will the CNPA stop this happening?
- as a resident of the village I struggled to get a nursery place for my child last year. I don't think increasing the amount of housing will help.
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Proposal: Erection of 23 houses and garages with associated roads, infrastructure and landscaping

Case Officer: Robbie Calvert

Customer Details

Name: Mrs Aileen Burrow

Address: 6 Croila View Kingussie

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I concur with the other objectors with regard to the unsuitability of Dunbarry Road being used. Visibility at all junctions to it are bad, particularly at the bottom where it joins the main road through the village. Regardless of whether traffic lights are installed or not, the existing dwellings are too close. In addition one exit road from Dunbarry Road is onto East Terrace which is already too narrow in a good number of places for vehicles to pass. There are always a large number of parked vehicles making it extremely difficult for pedestrians including unaccompanied children to walk along there. Given the huge increase of traffic this development will create, East Terrace will become more of a rat run than it already is.

Mr R Calvert
Cairngorms Nation Park Authority Planning Service
14 The Square
Grantown on Spey PH26 3HG

7 Croila View
Kingussie
Inverness-shire
PH21 1PG

6th September 2020

Kingussie Housing Development: 2020/0193/DET 23 Houses Associated Landscaping and Roads

Dear Mr Calvert,

I wish to make the following comments/objections regarding this application:

1. Objection to Dunbarry Road Being Used As a Main Access Route Due To Its Unsuitability

a) Page 6; 3.0 of the Transport Statement (Traffic Network and Generation Analysis): This appears to be the same transport assessment which was carried out in 2013. Whatever, I would argue that it does not accurately reflect usage due to the hours during which the analysis was carried out (bet 8am-9am and 5pm-6pm). Given that most of the people who use Dunbarry Road go to work between the hours of 6am-8am, these vehicle movements would not be counted. Nor are movements relating to service vehicles; ie; refuse collection and deliveries etc, which happen from as early as 7am and continue throughout the day and into the evening.

b) Further pointing up this inaccuracy, Page 7; 3.4 goes on to state that "Due to the low level of vehicle trips generated by the development, it is considered that there is no requirement to undertake a traffic capacity assessment of the surrounding road network. Also as noted above, previous junction analysis work undertaken at the Dunbarry Road/A86 High Street junction indicates that this junction "operates well within capacity". Dunbarry Road already accommodates vehicles from approximately 120 dwellings. Given that detailed planning consent has already been granted for four houses on Dunbarry Road, (likely to generate movement from x2 vehicles per household once they are built) and that there are likely to be a further 90+ movements per day (generated by this, and a previous application for 22 cottage flats which will also use Dunbarry Road), these figures add up to a significant increase in traffic.

c) Pages 13-37 of the Transport Statement (Appendix A; Trics Database Person Trip Generation Information) are virtually illegible. As this is supposed to illustrate the basis on which the Dunbarry Road usage figures were calculated, it does not engender much confidence.

d) Worryingly, nowhere does it mention that Dunbarry Road forms part of the "Safer Routes to School" network. Children from Primary to Secondary School age regularly use this road to walk and cycle to school, not always accompanied by adults.

2. Dunbarry Road Junction with A86

a) Kingussie residents who regularly use Dunbarry Road will tell you that its junction with the A86 High Street is already dangerous as it stands. Having only one very narrow pavement on one side of the road makes it impossible for pedestrians, people with pushchairs, or wheelchair users, to negotiate the junction safely without actually walking into the carriageway.

b) The Transport Statement goes to great lengths to illustrate how residents are actively being encouraged to walk, cycle, or use public transport, implying that the development will not cause a significant increase in vehicular traffic and goes on to say that the junction "can be shown to operate

within capacity" and that: "it can be concluded that there is no capacity issue to be addressed within the existing road network as a result of the proposed 23 detached houses applied for" (Page 7, 3.3). Given all of the above, this is arrant nonsense.

- **A previous planning consent for development of this site (before it was split into the current smaller new applications) acknowledged that the junction was unfit for purpose and required improvement works to be carried out at the junction, with the cost being met by Highland Council and the developer. This should be included as a condition if consent is granted.**

3. Haul Road

- a) Nowhere in the comprehensive documentation available to view on-line is there a Method Construction Statement or Construction Traffic Management Plan. Consequently there is no detailed information as to how construction traffic will access the site in order to develop it.
- b) The developers made it very plain early on that they would not be prepared to build a proper fully serviced road due to cost. However they did promise to build a haul road at a public meeting several years ago. Consequently the community have fought long and hard for a haul road to be made a condition of any planning consent/s, as they do not wish to have a cavalcade of heavy plant/delivery lorries and construction workers vehicles driving past their houses for months/years on end.
- c) Pages 5 and 20 of the Planning Supporting Statement (Transport and Access) indicate that site access from the town centre for lighter construction vehicles will be along Dunbarry Road, Dunbarry Terrace and Kerrow Drive. It states that "a temporary construction haul road can be provided for heavy construction vehicles", but the way this reads it is not apparent whether this will be definite or not.
- d) A Government Reporter's earlier determination of a planning application on this site made it a condition that a haul road should be constructed for the use of all construction traffic. This could also be used during development of the adjoining site on Land 65M South of 22 Kerrow Drive (2020/0013/DET).

- **A haul road with a wheel wash facility (to ensure that mud etc is not tracked onto the A86) should be included as a condition if consent is granted.**

4. Design

- a) It is very disappointing to see that the proposed designs for the housing are of a generic urban type, very similar to ones built in nearby Aviemore. While perhaps suitable for an urban area, are they really appropriate for a small Highland Town in the middle of a National Park?
- b) General Design Guidance in the 2015 Local Development Plan for Kingussie states that development should: "reflect existing housing development in terms of positions, density and scale" and "maintain building lines, plot sizes, building sizes and building orientation. This should be done in a way which raises architectural and design quality". As an example of what ought to be considered good practice within the Park, earlier this year the CNPA Planning Committee gave consent for a housing development on ground opposite the BSW timber sawmill in Boat of Garten. While appreciating that this development is smaller in scale than that being proposed for Kingussie, the dwellings intended for Boat of Garten are simple and sustainable, and surely far more appropriate for a National Park than the

current rash of urban generic developer led designs which seem to be proliferating. Doesn't Kingussie deserve better?

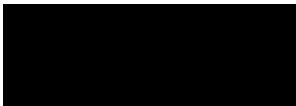
5. Landscaping

While it is encouraging to see so much effort expended with regard to landscaping, the current information does not specify exactly how many new trees etc the developer intends to plant. Compared with previous applications, the proposed planting looks sparse in comparison.

4. Developer contributions

- **Given that this application relates to 23 detached houses which are likely to contain multiple occupants (with associated multiple vehicles), I would suggest that appropriate developer contributions in this case should be levied for the improvement Dunbarry Rd/A86 High Street junction, and Kingussie Medical Practice.**

Yours sincerely



Mrs Ailsa Schofield

110 High Street
Kingussie
PH21 1JB

7 September 2020

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

Planning Application Ref: 2020/0193/DET

Dear Sir,

I write to register our extremely strong objection, concerning Planning Application Ref: 2020/0193/DET, to any access to the site for construction traffic using either Dunbarry Road or Dunbarry Terrace. Any access using either of these routes would further compromise an already busy area making life unacceptably hazardous for the local residents. Our community has already stated its objections to access using these routes, on the previous application.

I should like to add that I think the planning Authority should consider the views of the residents of the village above the profits of the builder.

Douglas and Gwen Mackie

Comments for Planning Application 2020/0193/DET

Application Summary

Application Number: 2020/0193/DET

Address: Land To North, East And West Of Dunbarry Terrace And Kerrow Drive Kingussie

Proposal: Erection of 23 houses and garages with associated roads, infrastructure and landscaping

Case Officer: Robbie Calvert

Customer Details

Name: Mr John Niblock

Address: Slemish, Dunbarry Road Kingussie

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I have no objections to the construction of these houses. However I do OBJECT to the use of Kerrow Drive and Dunbarry Road By the construction traffic by the developers.
Outline planning permission for this development was first granted in 2013. At that time a condition of construction was that a haul road be constructed to the site from General Wades Road. This condition was attached to the permission as Dunbarry Road was already deemed as unsuitable and also unsafe, an accident waiting to happen especially at junction of Dunbarry Road and A86. Since then all traffic has increased, both primary and secondary pupils , elderly pedestrians, cyclists, mobility scooters and riding for the disabled use Dunbarry Rd daily, with no form of traffic control, calming, introduced. If the CNPA considered it unsuitable then, nothing has happened to make it less of a safety hazard.

Professor Robbie Nicol and Jane Nicol
Owners of:
Canisp
1 Kerrow Drive
Kingussie
Ph21 1QS
28 August 2020

An application for the erection of 23 houses and garages with associated roads, infrastructure and landscaping at Land To North, East and West of Dunbarry Terrace and Kerrow Drive, Kingussie (Ref:2020/0193/DET)

Dear Mr Calvert,

We are writing to you with reference to the call in of this application and to object to specific aspects of it.

A condition of the original planning consent was that no construction traffic should be allowed to access the site using Dunbarry Road/Kerrow Drive but that permission was granted for an amended route for a haul road (2015/0316/DET) in March 2017. To maintain public confidence for the integrity of the planning system, and in respect of the depth and breadth of the public consultation already undertaken, it is essential that no construction traffic should be allowed to access the site using Dunbarry Road/ Kerrow Drive.

In support of this objection we cite the evidence already presented during the consultation phase that construction traffic using Dunbarry Road/ Kerrow Drive represents a threat to the safety, health and well-being of residents and to the construction workers themselves who will be forced to navigate unsuitable roads (see below). This will place employees in a situation where they have to navigate unsafe routes. Amongst a pandemic when so many construction workers' employment remains uncertain, their need to work simply contributes to an already unsafe set of circumstances.

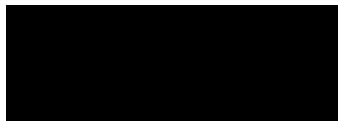
The developers have stated that the junction at Dunbarry Road/A86 High Street is deemed to "operate well within capacity" but the evidence gathered at the public consultation demonstrates otherwise. The survey that was conducted contained data that were unreliable. For example, the sampling times (8am-9am and 5pm-6pm) do not really reflect peak usage. Kingussie is a commuter village and many of the residents work in Inverness and Perth (and even further) meaning early starts and late finishes, others simply travel to work outwith these times. Furthermore, it has already been identified that the junction at Dunbarry Road/A86 High Street is completely unsafe for construction traffic. Not only is it too narrow but traffic parked both sides of the junction and on both sides of the High Street mean that it is already unsafe for cars because of the lack of visibility. We frequently have to brake hard to avoid collisions when navigating this junction. This junction cannot be made safe because of the parked traffic that will always be there. It has already been pointed out that the current junction is not fit to carry the extra traffic which this development will generate after construction, never mind the heavy level of use for

construction. This is a route that is used every day by children, unaccompanied by adults, walking to and from school yet their safety has not been considered.

When the application was first made available for public consultation it was for one overall application whereas now it has been broken up into different bits. This is of specific concern because if construction traffic is allowed to use Dunbarry Road/Kerrow Drive for this phase then that simply opens the door to it being used for other applications still to be considered (e.g. application 2020/0013/DET for the "Erection of 22 apartments, formation of access road, SUDS, landscaping, Land 65M South of 22 Kerrow Drive Kingussie". It is difficult not to reach the conclusion that this is a *sleight of hand* by the developers which simply undermines the process of public consultation within the planning system.

We understand that given the current situation with Covid and the need for social distancing that CNPA Planners and Park Board Members are unlikely to be able to undertake a site visit for themselves. This is worrying because the assurances form the developers that appear on paper contrast vividly with the reality of living on Kerrow Drive. The residents will have to live with the consequences of this decision. Furthermore, should any accidents occur the developers will be in the spotlight since so many concerns and warnings already appear in the consultation of the unsuitability of Dunbarry Road/Kerrow drive for construction traffic.

Yours sincerely,



Robbie and (on behalf of) Jane Nicol

Oriole House,
Ardbroilach Road,
Kingussie.
Inverness-shire.
PH21 1JY

Mr R Calvert,
CNPA Planning Service,
14 The Square,
Grantown on Spey.
PH26 3HG

[REDACTED]

Thursday 10th September 2020

**KINGUSSIE HOUSING DEVELOPMENT: 2020/0193/DET 23 HOUSES ASSOCIATED
LANDSCAPING AND ROADS**

Dear Mr Calvert,

With regard to this application I feel it necessary to express my concerns and objections regarding the following observations :-

1. My first concern and objection is to the proposal to Dunbarry Road being used as a main access route to the new development.

[1] Despite a previous assessment which concluded that Dunbarry Road was an adequate thoroughfare to allow for the increase in traffic created by a significant number of new houses it should be noted that the survey of 2013 was of a restricted nature being confined to two 2 hour periods, namely 8-9am and 5-6pm. This limited survey, which I assume is the one cited, does not measure and record the number of vehicles which regularly use the road during the intervening hours.

[2] It is of significant concern that an increase in traffic engendered by the new development would render the road less safe for the daily movement of pedestrian schoolchildren, especially during term time.

[3] The junction of Dunbarry Road and Kingussie High Street is currently a hazard for vehicles and especially for pedestrians. At present the pedestrian footpath on the western side of Dunbarry Road is severely narrowed by virtue of the driveway access to the adjacent property, indeed the footpath is non-existent at this point! Vehicles entering or exiting Dunbarry Road at this narrow junction already need to exercise great caution. It has been admitted in an earlier planning application that this junction, being inadequate, should be upgraded. Although this stipulation applied to the original full-scale planning application it should be re-instated for the current one and made a condition of consent. Integral to any improvement should surely be the installation of traffic lights and provision of adequate and safe pedestrian pathways.

2. Secondly, there is no mention of how heavy lorries transporting building materials will access the site.

The Planning Support Statement states that '*a temporary construction haul road can be provided for heavy construction vehicles*'. It is obvious that the developers are not willing to commit themselves to the building of a temporary haul road. The 'can' should be 'will'. It should be insisted that in the event of planning permission being given, a haul road be constructed to obviate the use of Dunbarry Road as the access for lorries and all other vehicles connected with the development.

3.Thirdly, it is regrettable that the proposed house designs are of poorer quality than is desirable.

In particular, have the architects put sufficient weight on the importance of sustainability and environmental concerns? Priority should be given to creating houses aiming for the lowest possible carbon footprint. Consideration needs to be given to the utilisation of triple glazing, solar photovoltaic panels, thermal solar power, and other types of the latest renewable technology. The proposed designs are hardly inspiring examples of eco building. One does not need to conduct an extensive search to see vastly more environmentally attractive examples of eco friendly designs. Stone, timber and other locally sourced materials, wherever possible, should be incorporated in the designs.

Positive features regarding the landscaping are the provision of a ‘Remote access path’ and ‘Rural Finish FP connections’ - which will be appreciated by the many local people who regularly walk across the fields to the woods. However, it is unclear what is meant by the ‘*Potential FP connection*’? It is to be hoped that this FP will be linked to the adjacent wood.

This development is an excellent opportunity to design and build a model residential example within the Cairngorm National Park of enterprising properties which raises the standard and demonstrates what could be achieved with more imagination. Such a striking contemporary development would prove to be an asset to Kingussie and a valuable showcase for the CNP.

Yours sincerely,

Rev John M Pickering