

# **AGENDA ITEM 6**

## **APPENDIX 3**

**2020/0193/DET**

## **COMMUNITY COUNCIL COMMENTS**

Dear CNPA Planning Support Team,  
With reference to your letter dated 17<sup>th</sup> August 2020 regarding the planning application no.2020/0193/DET please find below our comments and queries below;

Application 2020/0193/DET; Erection of 23 houses and garages with associated roads, infrastructure and landscaping  
Land to North, East and West of Dunbarry Terrace and Kerrow Drive, Kingussie.

1. The Kingussie and vicinity Community Council are supportive in principal of the building of new houses in Kingussie however until the following comments and objections have been addressed and met we cannot give our full support to this planning application.
2. It stated that there are no related cases however applications reference numbers 2020/0067/DET (23 Affordable Houses) and 2020/013/DET (22 apartments and formation of access road) are related as these properties are proposed being built in the same area are also part of a bigger overall development as is this proposal. There is little reference to this overall development which proposes up to 300 new properties to be built. This proposal was given planning permission in principal 18 January 2013 (ref. 09/048/CP).
3. A Haul Road for construction of the overall housing development was proposed and permission granted on the 29/03/2017 however this road is not shown in the planning application documentation. Unless a haul road is provided that will be used by all construction traffic without the use of Kerrow Drive, Dunbarry Terrace or the Dunbarry Road / High Street junction or other established roads Kingussie & vicinity Community Council would like their objection registered.
4. It is not acceptable to use Kerrow Drive, Dunbarry Terrace and Dunbarry Road for any construction traffic access as the roads and associated pavements are currently used extensively by Kingussie residents. Note Dunbarry Road is used as a main route for School Children attending both the primary and secondary schools and is currently not fit for purpose (ref also comment 7 below).
5. Until the contractor submits a construction method plan for this development including the Haul Road and Haul Road usage and a Construction Traffic Management plan. Kingussie and vicinity Community Council (KvCC) registers an objection.
6. In the Pre-Application Consultation report dated 28<sup>th</sup> May 2020 it was noted that a number of comments were raised by the general public which included; keeping construction traffic off Dunbarry Road / Terrace and increased use of the Dunbarry Road / High Street junction due to the new development. Written comments were also received about using a separate haul road for construction traffic and the capacity of the Dunbarry Road / High Street junction. The Design Team's response was to say these concerns would be addressed in the Supporting Statement Submitted with the planning application. In the Planning Support Statement dated 7<sup>th</sup> July 2020 the "Design Team Response" was copied verbatim from the Pre-Application Consultation Report without addressing the issues raised. Given this response by the design team KvCC cannot support this application.
7. With the building of the new houses there will be increased traffic using the Dunbarry Road / High Street junction. This junction is not fit for purpose at the moment. There is currently only one pavement on the West side of Dunbarry Road which does not extend to the junction of the High Street. There is no pavement on the East side of Dunbarry Road. With increased traffic, pedestrian safety will be further compromised. It was understood that the new junction to the East of Kingussie with the A86 will be the main junction for this development. In the Transport Statement (June 2020) it has been assumed by the consultant that Dunbarry Road is to be the main access to the houses when built and calculations carried out showing that there will be negligible traffic impact on the surrounding road network however no account has been taken of the intended overall development of 300 houses, which includes the planning applications for the 22 apartments and 23 affordable houses. Note for the 23 affordable houses (2020/013/DET) a new junction with the A86 is to be built to the East of Kingussie which can also be used to access this development (2020/0193/DET).
  - a. In the Transport Statement an average of 30 additional journeys for this development of 23 houses has been used for peak times. It is not clear why no cycle journeys and few pedestrian journeys have been accounted for particularly as these modes of transport are prioritised by the Scottish Government (ref. comment 9.c. below). If this calculation is extrapolated to the 300 house development then 360 motorised vehicle journeys would be done in a 1 hour slot. This would far exceeds the capacity of the existing Dunbarry Road / High Street junction if not the A86 junction.
8. Other comments on Transport Statement June 2020:
  - a. 1.6 and 4.6 Development proposals states that Dunbarry and Kerrow drive have 2m wide footpaths either side of the road. This is not the case. Please clarify.
  - b. 2.1.1 The existing bus stop is over 400m from the site which means that this does not meet the stated criteria of "reasonable walking distance". The Railway station, primary school and secondary school are also not reasonable walking distances using the stated criteria of less than 400m. Please clarify.
  - c. 2.1.3 states that planning permission should not be granted if direct links to walking and cycling routes are not available or cannot be provided and if access to public transport networks involves more than 400m walking. Note, priority is given to walking, then cycling, public transport and car and other motorised vehicle. To meet the requirements it is proposed that the A86 is used as an on-road cycle route and there is easy access to the Route 7 cycleway. This is not acceptable to the KvCC as the A86 is a busy road and not a designated cycle route. Route 7 has recently been

- downgraded by Sustrans and is for the use of experienced cyclists only. Provision should be given to new cycle and pedestrian paths.
- d. 4.12 It is stated that safe access is provided to the schools by provision of a controlled crossing at the A86 / King Street / Arbroilach Road junction. To access this crossing East Terrace and Arbroilach Roads are used which do not have pavements. Additionally there is no pavement at the High Street / Dunbarry Road junction. Please clarify why this is considered as safe access.
  - e. 4.14 It is stated that the High School can be accessed via a remote footpath off Spey Street which is seldom used by any Kingussie residents as it is a rough vehicle track, has no lighting and takes children on a detour from more direct routes to the school. Please clarify.
  - f. 4.3 The proposal is for a 30mph speed limit for the development which contradicts Scottish Government commitments to introduce 20mph speed limits. A 20mph limit enhances pedestrian and cyclist safety and is better for the environment. The KvCC would like to see a 20mph speed limit for this development. Please note that on the related planning application 2020/0067/DET (23 Affordable Houses) a 20mph speed limit is clearly shown just off the new A86 junction. This contradicts the proposed 30mph speed limit for this development. Please clarify.
  - g. 6.0 Conclusions;
    - i. No account has been taken of future development in the traffic impact assessment for the Dunbarry Road / High Street junction (ref. also 7a. above). Please clarify.
    - ii. There is no link from the proposed development to existing cycle routes path except by use of the A86, Dunbarry Road, East Terrace and Arbroilach Road despite statements to the contrary. Please clarify how recognised links to safe footpaths and cycle paths will be made.
    - iii. Links to existing well-lit footpaths are by roads without pavements. Please clarify how this is considered to be safe?
    - iv. Recently the bus service has been reduced which is contrary to the statement made in item 14 saying that there is good sustainable transport links. Please clarify.
9. In conclusion the Kingussie & vicinity Community Council support the building of this new development however it should integrate with the existing transport system, be future proofed, an integrated phased approach taken to the overall development which makes full use of a haul road to keep Kingussie residents safe with the least disruption. We would like to see an overall project plan for the development of the whole site for the building of 300 houses.

Yours sincerely  
Kingussie & vicinity Community Council

Subject: Planning Application no.2020/0193/DET  
 10<sup>th</sup> November 2020

Dear CNPA Planning Support Team,

With reference to our response, published 10<sup>th</sup> September 2020, to the subject planning application please find below the results of a traffic survey conducted by the Kingussie & vicinity Community Council on Thursday 29<sup>th</sup> October 2020.

This survey is related to our previous letter items 7 & 8 where we had comments on the Transport Statement, produced by Cameron + Ross ref A/191443 for Davall Developments Ltd. dated June 2020.

In this document, section 3.2 an estimate was made of Total Person Trips which appeared to be remarkably low given the number of houses on and to the North of Dunbarry Road.

The conclusion of the Cameron + Ross person trip estimate was that the junction was operating well within capacity however our survey shows that the junction is currently operating significantly over capacity as shown below and the actual Total Person Trips that we recorded are approximately 4 times those estimated by Cameron + Ross.

On this basis the development cannot proceed unless the junction is improved and meets current Transport Standards and Dunbarry Road cannot be safely used as a construction haul road.

MODE	WEEKDAY AM (08:00-09:00 29th October 2020			WEEKDAY PM 17:00-18:00 29th October 2020		
	Weather: dry, cloudy, 5 degrees.			Weather: light rain, dark, 10 degrees		
	IN	OUT	TOTAL	IN	OUT	TOTAL
VEHICLE	18	60	78	45	25	70
TAXIS	0	0	0	0	0	0
OGVs	3	7	10	10	4	14
PSVs	2	1	3	0	0	0
CYCLISTS	0	0	0	1	0	1
VEHICLE OCCUPANT (Includes Driver)	25	85	110	67	29	96
PEDESTRIANS	1	17	18	5	4	9

<i>PUBLIC TRANSPORT</i>	0	0	0	0	0	0
<b>TOTAL PERSON TRIPS</b>	<b>26</b>	<b>102</b>	<b>128</b>	<b>73</b>	<b>33</b>	<b>106</b>
<b>Cameron + Ross Estimate Transport Statement 3.2</b>	<b>7</b>	<b>23</b>	<b>30</b>	<b>20</b>	<b>12</b>	<b>32</b>

Yours sincerely

Kingussie & vicinity Community Council