

RHU & SHANDON COMMUNITY COUNCIL

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23 October 2015

Jack.Rudram@btopenworld.com

Dear Mr Young,

Planning Application Ref: 14/02905/PP
Lochside Nursing Home, Shandon

I write on behalf of Rhu and Shandon Community Council (R&SCC), a statutory consultee, with regard to the above planning application for the demolition of the existing nursing home and erection of a replacement nursing home. In my letter of 15 April I outlined some of the concerns of the R&S CC but asked that we had an opportunity to comment on the amended designs when these were submitted.

Now that we have had an opportunity to review briefly the new design, the drawings for which appeared on the public website only on 23 October 2015, we are disappointed to note that the Developer has made no attempt to address our concerns. He has not provided any information in response to the requests in our email of 5 February 2015 and, with respect to building heights, the elevation and overall height of the building has been increased.

We would ask you to consider the following points, in conjunction with those submitted in our earlier correspondence:

1. R&S CC would like to encourage this development as we believe it will result in an improved facility for the area, as well as continuing employment for the staff, however this must not be at the expense of introducing an inappropriate or poorly designed building at the very water's edge of the Gareloch east bank. If we are to lose the existing lodge house then it should be replaced with a building of the highest quality design which is compatible with the existing large houses around the Gareloch.
2. The drawings do not specifically state the overall building height but it has been estimated by scaling the drawings as approximately 20m AOD. Compared with the original submission which

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was estimated as approximately 18m this is a move in the wrong direction. For comparison the existing lodge building has been estimated as having a maximum ridge height of approximately 10m AOD and nestles well below the ridge between it and the A814. The highest point of the ridge of the proposed building will be some 10-12m above the A814 road level. The proposed building is some 67m long so it will clearly be a massive building right on the shore of the Gareloch.

3. The scale and height of the proposed new building seem out of proportion with the setting and overly intrusive into the surrounding. The building will be highly visible and will intrude into the landscape from both the north and south approaches along the A814 as well as from all over the loch, a popular sailing locale, and from the peninsula. The failure of the Developer to provide montages to illustrate the impact of the building on its setting is a disappointment
4. The final finish to the building is not specified but is unlikely to materially ameliorate the impact it will have on its setting in the Gareloch landscape.
5. It is noted that there will be considerable but unquantified excavation at the south end of the site to accommodate the new building. The effect of this on the ridge behind is unclear.
6. It appears that mature trees will be felled to accommodate the new building thus reducing the amount of natural screening currently available.
7. Parking does not meet the normal requirements for the scale of this development. We note that what is proposed is acceptable to the Roads Department albeit representing a relaxation of normal practises. However part of that argument uses the existence of the "Site for future development" as a potential overspill parking area. It does not seem logical that this site can be assigned for parking yet be available for future development. Given the nature of the A814 road external to the proposed development site it is critical that roadside parking be completely avoided – possibly double yellow lines along the road from the bus stop to the south and for some 100m to the north should be considered
8. Of considerable concern is the road access. Currently this is extremely awkward, particularly for vehicles turning in from the south, or turning out to go south, and also because the driveway drops away sharply from the road, and traffic approaching from the south appear over the brow of a hill. The recent submission from the Roads Department quotes the preferred splay visibility as 136m which is achievable looking north but is reduced to 63m when looking south, albeit if the distance from the road is reduced to 2.5m the 136m can be achieved. The speed survey conducted in January 2013, indicated the mean number of vehicles per day was 7447 with peak traffic flows between 7 and 9 in the morning and between 4 and 5 in the afternoon, coinciding with peak access and egress from the nursing home. The Roads Department's submission accepts that 15% of those cars travel at above 54 mph despite a 50mph speed limit. Traffic travelling north are known to infringe the double white lines coming down the hill meaning that vehicles turning out to go south can be particularly vulnerable. Whilst we recognise that the proposals are better than the existing situation R&S CC nevertheless have trouble in accepting the Roads Department willingness to compromise on the preferred design parameters and would suggest that they be asked to re-visit this decision.

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9. R&S CC is concerned that approving the construction of a building of this height and scale right on the water's edge will provide a precedent not only for further development on this site but for other potential development sites around the Gareloch.
10. Given the R&S CC view that the facility of a care home is appropriate on this site, and it provides local employment, we do not wish to see the business leave, but we do think that, as presented, this building is too big and too intrusive. We would suggest that if a building on this site were limited to two floors it would nestle below the background ridge and look far more in keeping with its surroundings.
11. Considering the above we feel that the following policies of Argyll and Bute Council have not been complied with:
 - a. Within the LDP, Key Objective E requires development "To ensure the outstanding quality of the natural, historic and cultural environment is protected, conserved and enhanced"
 - b. LDP STRAT 1, (h), (i), require conservation and enhancement of the natural and built environment and respect to the landscape character of an area.
 - c. LDP 3 B(i), C, does not protect, conserve or where possible enhance the established character of the built environment in terms of its location, scale, form and design
 - d. SG LDP ENV 14: Argyll and Bute Council will consider landscape impact when assessing development proposals, and will resist development when its scale, location or design will have a significant adverse impact on the character of the landscape
 - e. LDP 4, SG LDP CST 1, C: It will not have a significant adverse impact, either individually or cumulatively, on the natural, built or cultural heritage and amenity value of the area and is compatible with Policy LDP 3 – Supporting the Protection, Conservation and Enhancement of our Environment; and, D) The location, scale and design are such that it will not have an unacceptable impact, either individually or cumulatively, on the landscape and seascape character of the coast.
 - f. LDP 9, A, B, C: design of developments and structures shall be compatible with the surroundings. Particular attention shall be given to massing, form and design details, etc etc.

In summary, R&S CC do not believe their concerns about scale and height, and impact on the adjacent landscape setting, have been addressed in the amended design and feel that the application as presented should be refused as it clearly does not comply with Argyll & Bute development policies.

Yours sincerely,



Jack Rudram, Convenor, For Rhu & Shandon Community Council

By email copy to:

*Cllr Maurice Corry, Cllr George Freeman, Cllr Robert McIntyre
Members of R&S CC*