

RHU & SHANDON COMMUNITY COUNCIL

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24/00888/PP: Partial Demolition, refurbishment and change of use of care home to form residential apartments and erection of 4 dwelling houses Lochside Care Home, Shandon, Helensburgh, G84 8NN

In general RSCC welcome the redevelopment of the Gullybridge Care Home site as it is abandoned, becoming derelict and is a brownfield site. We welcome the proposal to restore and refurbish the 19th century house. However, we have several reservations and **object** to the current proposal as it stands.

We would also note that in a declared housing emergency the proposal for four large houses will not address the housing crisis and a care home would be of much greater social value, address local needs and contribute more to community wealth building objectives. This proposal is not for affordable homes and care home housing is not only desperately needed but it contributes to releasing homes onto the open market.

Our points of concerns and objections are as follows:

- We cannot envision how the access from the A814 can be made safe. Since the 2014 application there have been developments at Kings Point, Blairvadach and an increased volume of traffic to Faslane. The last recorded accident was at the Queen's Point turnoff in July 2023, which is very near to the access point to this development. The applicant states that in addressing LDP2 Policy 37: Utilising Existing Private Access and NPF4 Policy 13: Sustainable Transport it is proposed to use the access arrangements agreed under 14/02905/PP. The applicant states that 'The anticipated volume of traffic accessing the new junction will be significantly less than the numbers which utilised the existing care home or those proposed under the above noted approval.' However, this takes no cognisance of the increased volumes of traffic on the A814. At the very least the road markings for these two exits should be considered together, and consideration given to a reduction of the speed limit.
- We consider that this development is contrary to Policy 05 of LDP2. The applicant claims that the proposed development would be compatible with surrounding land use. There are no other private housing developments of this kind that are visible from the loch or the A814 and if permitted this one would create a precedent. The proposed development certainly does not integrate into the existing landscape. The open views of the loch are highly valued by residents and contribute enormously to the sense of place. This proposed development would be visible from the A814 and block the current views and have an adverse effect on the setting and amenity of existing houses in Shandon. The four seemingly haphazardly placed houses (presumably to achieve maximum solar gain) will be an eyesore from the loch, and are not sympathetic to the 19th century building.
- LDP 2 Policy 66 - This is not an allocated housing site. Whilst the previous site use was low level care home accommodation, the four proposed new houses on this site will have to be raised to form a flood protection platform. The height of the proposed houses and their overall scale and mass is excessive for

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the site. The southernmost house appears shoe-horned in and would require tree felling and land re-profiling as well as raising the ground to create an effective flood defence. The proposed houses would tower above the old house as demonstrated in the applicant's Site Section and Elevations pdf. It is certainly not true to say that this development is sympathetic to the character of surrounding buildings in the local area.

- We are concerned that the unnamed watercourse which runs under the old house will be a problem in the future, both from fluvial flow and backflow from the loch. Most of the culverts in Shandon which run under the A814 have issues. We note specialist reports utilising SEPA data and flood risk projections have been provided to the Council. SEPA point out that it is not up to the developer to alter or maintain the culvert, this falls to A&B C. Given the current culvert maintenance programme and established flooding problems along the A814 in the near vicinity what reassurance can A&B C provide that the culvert would be maintained to a consistent standard to minimise and avoid flood risk?
- The use of resources in raising the ground level above flood risk levels and raising the sea wall must also be considered with regard to our commitment to attaining Net Zero. Whilst the applicant has argued that the development will 'Address the risk of flooding, tidal inundation, coastal erosion or ground instability.' With a limited lifespan due to climate change and rising sea levels can this really be considered sustainable development in accordance with LDP2 Policy 04?
- We question the accuracy of the tree line as shown in Site Sections and Elevations pdf. We suspect that the houses will be visible from the A814 and Broomfield Gardens and with no Council track record of enforcement on the removal of trees protected for screening and landscape purposes under planning consents there is a high risk that the development will be visually intrusive from land as well as the loch.
- We are of the view that a revised proposal for houses with reduced roof heights, reduction of the number of houses from four to three, and considerable improvements to access and road safety in general around the junction would be preferable. Careful consideration of the flood risk issues and whether upfilling the site to create a raised building platform can be considered as sustainable development is required. If the land requires engineering solutions to make it suitable for building due to the current existing and predicted impacts of climate change and rising sea levels it really does beg the question as to whether the site is suitable for this kind of development.



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