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**From:** JEREMY FLETCHER [mailto: [REDACTED]]  
**Sent:** 24 May 2010 12:39  
**To:** Planning  
**Cc:** Frank Bardgett; stuart.black.cllr@highland.gov.uk; badenochandstrathspey.tecsadmin@highland.gov.uk  
**Subject:** Planning Application 09/155/CP Site Visit on 28 May.

Dear Sir,

Further to your letter of 20th May giving details of the proposed site visit in connection with the above planning application, I find it regrettable that, given the concerns I expressed in section 2 of my letter to you dated 11th July 2009 about that part of the B970 north of the Rothiemurchus/Piyoulis march, you have not included in the proposed visit an opportunity for those members of the planning committee who are not familiar with this piece of road to view it and the shortcomings I spelled out. I trust you will amend the programme accordingly.

Yours faithfully,

J.B.Fletcher  
Commander.

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**Mary Grier**

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**From:** Don McKee  
**Sent:** 24 May 2010 13:52 ✓  
**To:** F SMILLIE  
**Subject:** RE: Don McKee letter ref. 09/155/CP development of new community ACM

Dear Mr Smillie

Thank you for your e mail and I note your continued objection which will be reported. The decision has of course yet to be taken and I simply wished you to be aware of up to date information.

Kind regards

Don McKee

Don McKee  
Head of Planning  
Cairngorms National Park Authority  
Albert Memorial Hall  
Station Square  
Ballater  
AB35 5QB

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T:013397 53601  
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**From:** F SMILLIE [mailto:██]  
**Sent:** 24 May 2010 13:45  
**To:** Don McKee  
**Subject:** Don McKee letter ref. 09/155/CP development of new community ACM

Dear Mr McKee

Thank you for your letter of 20 May 2010 advising of the Highland Council TEC Services conclusions re the possible realignment of the B970. We understand that if the proposed new road into An Camas Mor by Rothiemurchus Fisheries were to be constructed to the appropriate standard within that period that there would be no requirement to realign the existing B970. However as nothing has been approved or finalised,

by the Board, to state that this is what would happen we must continue to object on any possible realignment of the B970.

As from my previous letter of 31 May 2009 ( ref. 09/00114/outbs) when I first objected to a realignment of the B970 I am still objecting on those grounds and the stress and anxiety, to myself and my family that is hanging over us like a dark cloud is tremendous.

If the developer(Johnnie Grant) wants to go ahead with this development, he must put the proper roads and infrastructure in from the very start as happened when he had to wait on 11 plots being sold at Coylum Road development before he could go ahead as he needed the funds to put in the correct infrastrucure.

I still object strongly to any realignment of the B970 and do not think that the existing B970 Nethybridge Road should be used for 200 residential units and the Electricity Substation by Rothiemurchus Fisheries road should be put in from the very start.

Regards

Colin Smillie

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Don McKee

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From: Gus Jones [REDACTED]  
Sent: 19 May 2010 12:58  
To: Don McKee  
Subject: BSCG Objection An Camas Mor  
Attachments: BSCG objection 19.5.10.doc

## Badenoch & Strathspey Conservation Group

Fiodhag, Nethybridge, Inverness-shire PH25 3DJ Tel 01479 821491

Scottish Charity No. SC003846

Em [bscg@zetnet.co.uk](mailto:bscg@zetnet.co.uk)

Don McKee

CNPA

Ballater

19.5.10

Dear Don

An Camas Mor Application - 1500 houses and associated infrastructure 09/155/CP

I am writing on behalf of BSCG to **object** to the above application for a new settlement of 1500 houses at An Camas Mor.

Our reasons for objection include the following:

The proposed development conflicts with all 4 aims of the National Park;

- The proposal would impact negatively on priority species, protected species and priority habitats;

- The proposed development would impact negatively on European sites and is in conflict with international obligations relating to protecting the integrity of these sites;
- The proposal has the potential to impact negatively on European Protected Species;
- The proposal is inconsistent with the Cairngorms National Park Plan 2007 in which An Camas Mor is not referred to;
- Determination of the application is premature because the planning process for the CNPA's emerging Local Plan has not run its course and the associated public consultation process is incomplete;
- Key elements of the grounds on which the original allocation was recommended for approval at the Local Plan Inquiry into the Highland Council BSLP are no longer valid.

We will provide further grounds for objecting as well as more detailed information at a later date.

Please note that BSCG wishes to address the CNPA planning committee at the planning meeting to determine this application, and BSCG will be attending the site visit.

Best wishes

Gus Jones

Convener

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# Badenoch & Strathspey Conservation Group

Fiodhag, Nethybridge, Inverness-shire PH25 3DJ

Scottish Charity No. SC003846

Em

Don McKee  
CNPA  
Ballater

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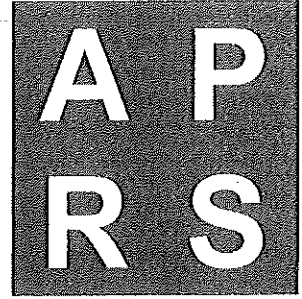
Please note that BSCG wishes to address the CNPA planning committee at the planning meeting to determine this application, and BSCG will be attending the site visit.

Best wishes

Gus Jones  
Convener

# The Association for the Protection of Rural Scotland

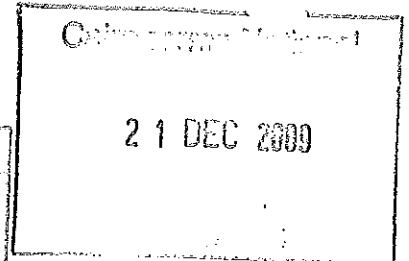
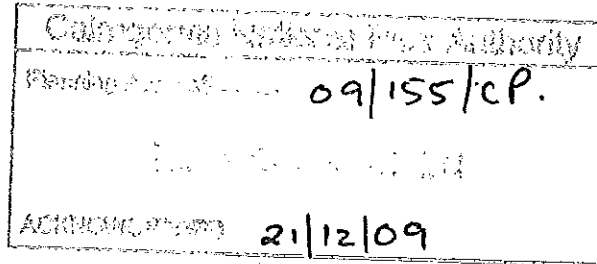
Gladstone's Land (3<sup>rd</sup> Floor), 483 Lawnmarket, Edinburgh EH1 2NT



Head of Planning and Development Management  
Cairngorms National Park Authority  
Albert Memorial Hall  
Station Square  
BALLATER  
AB35 5QB

18 December 2009

*Dear Sir*



## PROPOSED HOUSING DEVELOPMENT AT AN CAMAS MÒR, AVIEMORE Planning Application Reference 09/155/CP

Trustees of APRS with relevant experience have examined this application and associated Environmental Statement, and have visited the site. We wish to offer the following comments on this application; these comments have been approved by our Executive Committee.

### Importance of Decision

This proposal represents a crucial test for the reputation of the CNPA, as this will probably be the most significant planning decision it will make in the whole of its first decade in existence.

### Significance of the Site

This is a highly sensitive and important site, set as it is within both a National Park and a National Scenic Area. The site itself is particularly varied and attractive, due both to its landscape setting and to the combination of heather, birch and pine regeneration currently in evidence. If the existence of the National Park is to be shown to be making a serious difference, the CNPA must ensure that any development on such a sensitive site is of the highest possible quality.

### Principle of Development

The correct place for determining whether a development of this scale is acceptable in principle is through the Local Plan preparation process, and the site is indeed designated for development in the adopted Local Plan. However, the CNPA should not necessarily accept that it should simply carry forward the proposals of its predecessor planning authorities into its own policies and plans, and its decision to do so by retaining this site in the draft replacement Local Plan was of course

challenged at the Local Plan Inquiry (LPI) held earlier this year. We are now aware that the LPI Reporters have criticised the CNPA's approach to allocating housing land, including in relation to this site, in their recently-published report. Any decision on this application should therefore not be made until the CNPA has determined how to address the Reporters' conclusions and recommendations in the finally adopted version of the replacement Local Plan.

### Overall Approach

We commend the overall approach to development on such a sensitive site which has been taken by the design team involved. This has included much background research, detailed masterplanning, a people-centred urban design approach, mixed development proposals and sustainable development aspirations. All of these elements have combined to make the overall application one of significantly higher quality than those for most proposals of this scale.

However, the success of the design concept rests on the idea of the whole mixed development being built to consistently high standards over a period of 15 years or more; the first phase alone would appear unsatisfactory on its own. We are therefore concerned as to the potential implications for the success of the development if at some point in the future the owner chose to sell it on to a developer with less commitment to maintaining such high quality standards on this sensitive site. Indeed, in the current unprecedented economic conditions, there can be no certainty that all phases of the development would be completed as proposed. The CNPA needs to use all available mechanisms to address these issues.

### Housing Need and Housing Demand

There is a clearly identified local need for affordable housing in this area, and this is a reasonable issue for the NPA to address, given its statutory purposes. However, there is also a recognised significant additional demand for housing, largely for second homes, which it is not necessary for the CNPA to accommodate, given that there are already many second homes in the NP.

It is disappointing therefore that the NPA has chosen to procure affordable housing on this site by allowing 60% of the units to be sold on the open market, much of which will inevitably end up as second homes. Innovative thinking is required here, and every possible mechanism should be employed to ensure that as many of any houses eventually built at An Camas Mòr are sold or rented to local people, and remain in permanent local use. This should include giving serious consideration to the introduction of local residency conditions, enforced through legal agreements between developer, occupant and NPA to ensure that affordable housing remains affordable in perpetuity.

The only justification for allowing so much high-quality development on a single site is if sporadic lower-quality development elsewhere in Badenoch and Strathspey can thereby be deterred. We therefore expect the CNPA, if it permits development at An Camas Mòr, to commit itself to demonstrating extremely tight restraint on development elsewhere in the housing market area.



## Landscape

If developed as intended in the masterplan, An Camas Mòr should be no more visible than most of Aviemore presently is, ie as a low-level settlement set in a wooded strath. It should certainly be less intrusive than the real current eyesore in the area, the multi-storey hotel in the Aviemore Highland Resort, or than the blot on the landscape which the regrettable High Burnside development threatens to become. However, it should not always be assumed that development must be screened by trees; if the end result is of as high quality as the design team clearly intends it to be, then perhaps it should be allowed to have the potential to make a positive addition to the landscape, in the way that previous planned settlements have done.

## Implementation

The crucial issue with this proposed development is whether what is ultimately delivered on the ground would be of as high quality as is intended by the masterplan, particularly as it is planned to be implemented over such a long timescale. Achieving this will require tight control over detailed site practices, including storage, access and protection of sensitive vegetation. It will also require long-term design control and consistent attention to detail by both the estate and the NPA, as well as the retention as far as possible of the team which has prepared the initial plans.

## Transport

The masterplan includes several elements aimed at promoting walking, cycling and public transport. The CNPA must ensure that all of these are included from the start. However, it must be recognised that in reality there is little that can be done to prevent people buying a house in An Camas Mòr and commuting by car to Inverness or elsewhere. Would it be possible for parts of the development to be car-free settlements, similar to that pioneered at Slateford Green in Edinburgh?<sup>1</sup>

## Sustainability Elements

The masterplan makes reference to several commendable aspirations, which together would go some way towards demonstrating that this could indeed become a relatively sustainable community. Without them, however, it risks ending up as predominantly a commuter suburb. The NPA should therefore ensure that the following are all provided in the first phase: offices and other employment opportunities; district heating from a combined heat and power plant powered by renewable fuel sources; and a pedestrian/cycle bridge across the Spey to Aviemore. Permission for housing development should be tied to the provision of these essential elements of public infrastructure in the first phase.

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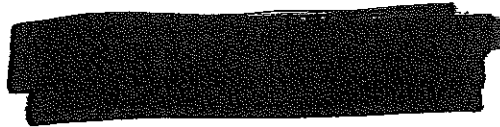
<sup>1</sup> Further information at: <http://www.dunedincanmore.org.uk/default.asp?ID=8025>

Declaration of Interests

You should be aware that the following organisation and individuals associated with this development are all members of APRS: Aviemore and Vicinity Community Council; Johnnie Grant, landowner; and Ben Tindall, architect.

Please let me know if I could provide any further information or clarification. Please keep me informed regarding the progress of this application.

*Yours faithfully*



John Mayhew MA MSc DipTP MRTPI  
Director

APRS - Scotland's Countryside Champion

APRS is the charity which promotes the care of all of Scotland's rural landscapes.

We aim to:

- Protect and enhance Scotland's rural landscapes for future generations
- Promote effective planning and landscape protection systems in Scotland
- Encourage genuinely sustainable development in rural Scotland
- Raise awareness of the importance of Scotland's landscapes to its people and economy
- Support the activity of land managers who care for Scotland's landscapes

We do this by:

- Working in partnership with individuals, other charities, local authority, government and public bodies
- Active involvement in national policy development and advocacy
- Advising members of the public on how to respond to proposals which affect their local landscapes
- Publicising our work to our members and beyond through our website, quarterly newsletter *Rural Scotland* and regular email bulletins

Julie Millman

From: Amy Lyons  
Sent: 16 November 2009 09:20  
To: Planning  
Subject: FW: objection to An Camus Mor planning

Cairngorms National Park Authority	
Planning Application No.	09/155/CP
REPRESENTATION	
ACKNOWLEDGED	16/11/09.

From: Sheena Wilson [mailto: ]  
Sent: 13 November 2009 17:04  
To: Mail Manager  
Subject: objection to An Camus Mor planning

Cairngorms National Park Authority	
16 NOV 2009	
*	RECEIVED

Cairngorm National Park

Planning Department.

I would like to add my objections against the proposed development at An Camus Mor.

This proposed development should not be allowed to happen as I believe it is not in the best interest of the national park the local area , residence along the B970, and Aviemore in keeping with local needs. I believe it cannot meet the needs that it says it will - as it will become a stand alone development not linking in with Aviemore as the road network will not allow this.

- o The development is too big.
- o It does not have suitable proposed road network. The B970 from Boat of Garten through to Coylumbridge is clearly sign posted as not suitable for large vehicles at both ends. This road needs mass amount of upgrading to make the road suitable for two cars , buses to pass safely the whole route. as it is it is not a double lane road.
- o **There has to be a new bridge for car to Aviemore** if this development will function as it state it will as it will not have a very poor connection to Aviemore and will remain a new ghost town development and not add to Aviemore's needs.

It is very Clear that the proposed development should only be considered if the whole road would be upgraded considered if there is another road bridge built connecting to Aviemore to the proposed site for 2 way road traffic. This is most important.

- o The size of the proposed development the proposed routes for traffic are not a realistic option for safe travel. I believe there has been no road studies done for the way the traffic would travel along the B970

The B970 is not shown on the proposed development plan as a route option which is a miss representing the area and obscuring the potentiality big problem .

- o Traffic congestion at the Aviemore junction is already a big problem. A proposed community will not choose to drive that route and go the back way avoiding

Aviemore and will use the B970 passing through Street of Kincardine and Boat of Garten to reach A9 to commute to work in Inverness.

There has been no recent evidence of road research on road use for this proposed development..

There is no good up- to-date research for this proposal for the need for this level of development .

The developer has indicated that this site will be for a self contained community and link in with Aviemore to enhance the need of the the community needs there , again there is no evidence for this and indeed there needs to be more up to date research on how they think this so called community will be self reliant.

The developer is has made this development proposal seem like there is a need , again i believe the reseach is too old to be acurate. this need to be looked into again.

The proposed development has too much reliance on the belief that this is going to be a self contained development and that affordable houses will be provided and that people will then work in the new development as stated in the architects vision. This is a fantasy vision and convenient to state this to tick boxes for the local plan. This need to be more realistic again more research in who will purchase such a dwelling.

The plans indicates the development of 3 story buildings on the side of the B970 , this seems to be unsuitable for the area as other local buildings along the B970 would not be allowed to build 3 story and not in keeping with local plan.

The state of the B970 is in serious doubt that it will cope with traffic volume from such a development. as there is serious erosion and potential for **land slid into the Spey at Milton Burn opposite the Kincardine Kirk entrance**, where the road is on a steep bank next to the Spey.

There is No Sunday Gritting on this road .

I would be pleased if my views can be passed on to the appropriate department.

Sheena Wilson, Kincardine Coft, Boat of Garten , PH24 3BY

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Scottish Campaign for National Parks

IUCN  
Member of IUCN The World Conservation Union

Honorary Vice President  
John Foster CBE FRSGS

Chairman  
Robert G Maund BSc Dip TP FRTP1 (td)

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Scottish Charity no. SC 31008

DMCK

Cairngorms National Park Authority  
Planning Application No. 09/155/CP  
REPRESENTATION  
ACKNOWLEDGED 10/11/09

D. McKee  
Head of Planning  
Cairngorms National Park Authority  
Albert Hall  
Station Square  
Ballater  
AB35 5QB

8 November 2009

Dear Mr McKee

Cairngorms National Park Authority  
10 NOV 2009  
RECEIVED JM

**CNPA reference: 09/155/CP**  
**Planning application number 09/00114/OUTBS**  
**An Camas Mor: Development of 1500 houses; associated business, community facilities and provision of infrastructure.**

We have now had the opportunity to examine the above application and the supporting material in some detail. After careful consideration, we find that there is no alternative available to us other than outright objection. Please find attached our objection which we trust will be made available to the Planning Committee when the application comes forward for consideration.

Yours sincerely

Chairman



Scottish Campaign for National Parks

CNPA reference: 09/155/CP; Planning application number 09/00114/OUTBS

**An Camas Mor: Development of 1500 houses; associated business, community facilities and provision of infrastructure.**

**OBJECTION ON BEHALF OF SCNP.**

***Preamble***

*The SCNP's primary aim is to promote the protection, enhancement and enjoyment of nationally outstanding areas that are National Parks, or are appropriate to be designated as such, or are of sufficient merit to warrant special protection. This is manifest in our support for good stewardship of the country's best environmental assets and encouragement of environmentally sustainable methods of development, particularly within areas of national park potential. SCNP is a recognised Scottish Charity.*

SCNP has previously corresponded with the Park Authority on the merits of entertaining the concept of a new village of 1,500 houses plus commercial development wholly within the Cairngorms National Scenic Area. We expressed our wholesale rejection of the proposal as being contrary to the natural and cultural heritage interests of the National Park. We were particularly concerned about the effect of the proposal on the status of the River Spey SAC. These comments still stand now that we are in receipt of the outline application.

In now formally objecting to the application for outline consent lodged on 29 May 2009, we detail our objections and reservations by reference to the set of 'principles' agreed by Board on 12 December 2008.

By way of introduction, we find the use of the word 'sustainable' by the Park Authority and the developer quite gratuitous with reference to this development. We accept that a National Park Authority has a basic duty to explore the ramifications of sustainable development in the environmentally sensitive landscapes of its area. However, if the concept is to have any meaning, it must have a context which is long term and it must follow the Bruntland precept of handing on to future generations an environment in no worse, and preferably better, condition than found by the present generation. No amount of promissory action by a developer to compensate for loss of natural heritage elsewhere in the Park, gives any justification for granting permission for this development. As a matter of principle, a development of this scale should only be contemplated if there are no alternative sites outside a national park. That means that it would have to be of strategic importance in the national interest, which it is patently not.

The voluminous documentation attaching to the application attests to the fact that the proposal has been extensively researched over a number of years and everything that could possibly be addressed in regard to a heads of terms agreement for taking forward the proposal has been addressed. There are two major flaws, however, amongst this huge volume of material. The first is that there is little or no justification for placing such a large housing development in a national park, other than that it would be an attractive place to live and work. It is, most definitely, not nationally strategic and could be located on any same-size brown field site in Scotland with appropriate soft landscaping. Indeed, the land-use planning and environmental benefits would be far superior for such an outcome because they would be direct benefits, unlike here, where various measures have to be addressed to off-set the imposition of such a development on a sensitive site. The second major flaw is the whole logic behind the developer's stated objective of developing a new community. Various detailed proposals relating to this are in the form of a wish list with no indication of

how they will be achieved. There is no restriction, for instance, on occupancy, nor is there any hard indication of employment opportunities.

In addition to the missing fundamental rationale for the development, the documentation also contains many weaknesses. There are various aspirational statements by the developer that ameliorations may take place if agreements can be reached, or indeed that they will take place, subject to satisfactory solutions being found. A National Park Authority would be grossly failing in its duty to protect its natural heritage if it were to agree any development on this site without cast iron guarantees over its environmental benefits. Needless to say, where damage is a possibility, the precautionary principle should operate. The developer's argument that any deleterious outcomes on the environmental sensitivity of this site would be off-set by ameliorations elsewhere on the Rothiemurchus Estate is wholly specious.

We now address the set of principles which the NPA agreed in 2008 for this development, compare them with the sustainability statement provided by the developer and then analyze in detail the short-comings in the outline application.

### **Fit for a national park**

The above sub-heading was used by the NPA in agreeing a set of principles for the development. Our basic response to this notion is to say that the scale of housing envisaged is not compatible with national park objectives. It is not 'fit for a national park'. The Scottish Government's new Consolidated SPP clearly states that development that affects a national (or international) designation 'should only be permitted where:

- it will not adversely affect the integrity of the area or the qualities for which it has been designated, or
- any such adverse effects are clearly outweighed by social, environmental or economic benefits of national importance.

National parks have been designated because of the national importance of their natural and cultural qualities. Conserving and enhancing this heritage is their primary aim.'

National parks are supposed to be exemplars of sustainability. Given the environmental and natural heritage context which underscores the legislation, the use of the term sustainable for this development is false. With the majority of housing proposed to be available on the open market, where are the measures which will control long distance commuting outside of the Park or the repeat of other housing developments in the area which have seen 60% of open market housing going to the second home market?

### **Distinction of the only new community planned for a national park**

There are good reasons why national parks are designated for their outstanding natural and cultural heritage and the development of a new community is not one of these. Is the Cairngorms National Park in the business of protecting its natural and cultural heritage and encouraging support from its existing local communities to those objectives or is it in the business of risky experimentation with the non-achievable objectives of creating new communities? In this case the experiment cannot be undone. To all intents and purposes, the Park will have to live with the legacy which may in turn bring ridicule, internationally, when it fails.

### **Significant contribution to the delivery of the National Park aims**

With nothing to justify this statement of principle, we have to assume that An Camas Mor will make a significant contribution to meeting local housing needs. Even if the NPA were to negotiate its stated objective of securing 40% of new housing stock in any development for local needs, it would still mean that 60% of the proposed housing stock of 1,500 houses i.e. 900 houses, would be surplus to the identifiable need in the Aviemore area at this time. To place 900 houses with no express need in a National Scenic Area, next to a very sensitive SAC in a national park beggars belief.

Assuming that the justification also concerns alternative energies and new building models, does the NPA need to agree this scale of development? It concerns us that the development proposal lacks any detail in this direction. However our main concern is that the NPA could have achieved its objectives for environmentally sustainable housing through small scale developments within existing settlement boundaries of villages throughout the Park.

### **A real Cairngorms community**

The set of principles state that, *'An Camas Mor will be an inclusive and vibrant community with a demographically balanced resident population...It will be a real community, not a holiday village or second home enclave....It will have a distinct cultural identity that takes account of existing traditions and way of life in the surrounding area'*.

Various attempts have been made throughout the twentieth century to create new communities, notably the new towns with their well resourced development corporations. In social terms, nobody can say that these new towns were an unqualified success. Indeed such planning has largely fallen into disrepute because of the social problems associated with large scale social housing. The new communities which have prevailed have been those created by benevolent employers such as Port Sunlight or Bournville where, importantly, the employment opportunities came before the creation of the communities and there was a real community of interest centred on serving the employer.

None of these qualities is available to An Camas Mor. There is no central and overarching employment opportunity to drive the creation of a new community. Furthermore, with no controls in place other than a negotiated minority proportion of social housing, how is the NPA going to meet its objectives of environmental sustainability? As stated above, long-distance commuting to places of work are likely to feature if there are no residency controls. Second home ownership, on past performance, could see well over 500 houses going to the second home market.

Whether the proposal results in a location with a distinct cultural identity that is compatible with the traditions of the area, only time will tell, but nothing in the proposal supports the prospect.

### **Climate Change**

The NPA states that *'An Camas Mor offers an opportunity for a real community-wide contribution to the challenges of Climate Change'*. Nothing in the proposal suggests that such aspirations can only be delivered by the creation of, arguably, an unsustainably large development. Indeed the challenge is so great that all new housing in the National Park should be addressing this. Some of the thinking behind this by the developer is very non-committal. It comes across as interesting ideas that might be tried...or they might not.

### **Relationship with Aviemore**

We have observed some muddled thinking between the NPA and the developer here. At the Local Inquiry into the Local Plan, the NPA acknowledged that the natural envelope for Aviemore was the A9 and the Spey and that any expansion would be to the North. The NPA has also stated in the Local Plan (Deposit Edition) that An Camas Mor would be a discrete



development separate from Aviemore. The developer, in the early literature for the proposal, stated that Cambusmore (An Camas Mor) would balance up development on both sides of the Spey. Notwithstanding the desire to treat An Camas Mor as a separate development, on the part of the NPA, the phasing of the project will see inescapable reliance on Aviemore for all sorts of social and retail needs. The idea that An Camas Mor will be anything other than a suburb of Aviemore is far fetched. The developer even suggests playing fields and sporting facilities would be available to the whole of Aviemore if a pedestrian/cycling bridge is provided across the Spey, presumably at public expense.

### **Landscape context**

The site for An Camas Mor sits on the edge of the Cairngorm Mountains NSA. The development would occupy a strategic position viewed from Aviemore. The developer states that An Camas Mor *'will have no significant effect on the landscape of the Cairngorms National Park and the NSA'*. Furthermore, whilst recognising the importance of the native pinewoods around the 'plateau foot', he states that .....*'Within the An Camas Mor boundary, the ancient woodland in the south east part of the site will be conserved. Other parts of the site are less important for the NSA citation. The proposed development will not affect the integrity of the NSA'*.

This is a wholly specious argument since it is the open land aspect looking towards the Cairngorms Plateau which is at issue. There has already been major intrusion into this with developments at Coylum Bridge, but there is nothing on the scale proposed for An Camas Mor. The developer makes use of the theory that all scenic heritage issues will be addressed when there is a mature tree screen within and around the site. This approach is naive, especially since the proposed High Street with its three and a half storey housing is planned for the elevated part of the site.

If allowed, this proposal would see a major failure in the protection of the NSA system by the NPA, and as such, would present a credibility issue for the Authority.

### **Movement, lighting, drainage etc**

Designing out the use of cars and separating them from pedestrians is easier said than done as any reference to the complicated and grossly unused aerial walkways of the new towns would testify. The dependent relationship with Aviemore makes the aspiration even more improbable. Such measures as a plethora of traffic calming measures will simply annoy the residents, even to the extent of seeking their removal at the earliest opportunity. In regard to services, the lighting proposals are similarly couched in the aspirational language of minimal effects on the natural environment when in reality this is a housing development whose residents will demand sufficient lighting for safety and security. In such circumstances any pretence that this development is anything other than a suburb of Aviemore, and indeed a suburb bigger than Aviemore itself, is risible. The proposal to link to the main sewer does not rest easily with the concept of sustainable drainage, since it will simply add to the burden of nutrients entering the River Spey as a point source. Surely a more imaginative solution would have been found in the developer providing reed bed technology or biological digestion on site and provision to stop nutrients and noxious substances entering the River channel through groundwater seepage on what is a free draining site.

There are tenuous suggestions of combined heat and power based on biomass and hydro-electric if Loch Einich becomes available, but if the NPA is serious about the exemplar status of this development, these sorts of proposals should be basic provisions, which become commitments at outline stage.

### **Biodiversity**

The NPA statement says that '*An Camas Mor will be expected to demonstrate how a development of this size and quality can both conserve and enhance the biodiversity of the site*'. Again this begs the question of the nature of the biodiversity. What happens when residents start introducing exotic species to their gardens which become alien invaders, compromising the status of the SAC and having to be controlled at vast expense? What happens when groundwater nutrient levels are raised as a result of fertiliser application to gardens and to the extent that they are detrimental to the native, acid-loving bog plants? What happens when dogs and cats are introduced to the development? If the NPA states a principle which will so obviously be compromised by the development is it worth stating it? Reference to off-setting the negative environmental effects elsewhere on the Estate should not be tolerated for a development which is not of national strategic importance. The effective isolation of the River Spey SAC from the deleterious on-going effects of a major housing development must be an essential pre-requisite within a national park.

### **Affordable Housing**

Affordable housing and local needs housing in the context of the Cairngorms National Park amount to the same thing in SCNP's view because the NPA's duty at this juncture is to address the issue of affordability based on local housing need. The fact that Aviemore has an express need for 500 affordable houses over the next ten years is a comment on the poor quality of planning decisions over recent years which has led to an explosion in open market housing, many of them, second homes. However, despite the difficulties, it is our view that the Authority should re-double its efforts to secure this provision within the A9/River Spey corridor and plan for it on the basis of social housing by direct grant rather than planning gain.

### **A place to work**

The stated principle that '*An Camas Mor will be designed and promoted to actively encourage the provision of jobs within the community and seek to minimise levels of commuting*' is truly aspirational, but somewhat naive in this context. The developer's idea for achieving this objective is to offer a High Street with retail and other unidentified tourist related jobs, together with work places for entrepreneurial activity. It is ironic that a supposedly environmentally sustainable development should turn to consumerism for its identifiable job opportunities.

As stated previously, living/working communities tend to be more successful if they depend on a major source of employment. To this can be added various ancillary enterprises which grow organically from this initial source. The developer's thought that the social housing and servicing of the High Street job opportunities would fit well together is accepted but it can only account for a very small part of the employment strategy. In the absence of a solid core of employment, the pretence that this will be a self-contained community is obvious.

### **Conclusion**

We are asked to accept An Camas Mor as a bold approach to sustainable living in a national park. In reality this is a housing development, with a few green attachments, in the wrong place. In our view, it will do damage to the concept of Scottish national parks in the international arena, since we see it failing in the stated objectives if it is allowed to take place.

If the NPA seeks to develop the concept of an eco-community, a concept that we have great difficulty with at this stage of its development, we would emphasise that in a national park context, it should have the following characteristics: -

- 1) It should be small scale.

- 2) It should have identifiable employment provision which is based on a national park ethos, or at least is not inimical to it.
- 3) It should be based on a reliable source of renewable energy
- 4) It should be sited in an environmentally robust site
- 5) It should have sustainable sewerage and surface water drainage.
- 6) It should have no adverse affect on the landscape of the national park

An Camas Mor, as described in this outline application is an alien concept for a national park. In reality it is a large housing development dressed up in environmentally pleasing phraseology which does not stand up to scrutiny.

### **Recommendation**

It is recommended that the National Park Authority Planning Committee refuse this application because:

- the size, scale and location of the proposed development are incompatible with the Park's aims,
- it will do serious and irreversible harm to the landscape of the park and the integrity of the NSA,
- it will place the River Spey SAC under threat,
- It does not and cannot meet the requirements of the criteria (whatever their shortcomings) laid down by the Park Authority.

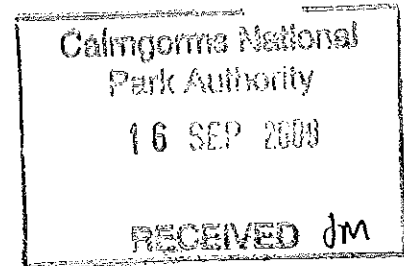


**For and on behalf of SCNP.**

**8 November 2009**

Cairngorms National Park Authority	
Planning Application No.	09/155/CP
REPRESENTATION	
ACKNOWLEDGED	16/9/09

Martin Ross Esq  
19 Coylum Road, Coylum Bridge, Aviemore, PH22 1QG



14th September 2009

Head of Planning  
The Cairngorms National Park Authority  
Albert Memorial Hall  
Station Square  
Ballater  
AB35 5QB

An Camas Mor planning application reference: 09/155/CP

Dear Sirs

I am writing to lodge my objection against the realignment of the B970 at Coylumbridge and its use as the primary access route to An Camas More.

My objection has to be mainly as a resident of Coylum Road, having recently finished building my property I was shocked and dismayed to hear of the potential building of the road behind our house. I am sure you can understand from a personal point of view I would be devastated if the building of the road went ahead, as the impact of the building of the road and the traffic that would subsequently pass our house would be intolerable. I decided to purchase my house in this area for peace and relaxation and not to be in the middle of a building site or major traffic congestion. The Environmental Statement confirms that the noise impact on Coylum Road would be severe during the construction of the realigned B970 and also from the traffic (including construction traffic) flowing on the realigned road. I am also concerned for the safety of our children, and those that live in Coylum Road, who now currently enjoy relative safety playing in the area, this would undoubtedly change should the new road be built. We would all have to pay additional costs in fencing our homes from the road, as I am sure you are aware little enough space has been left for the development of the road as it stands and there appears not to be enough space for even a grass margin or barrier of trees.

I also wish to object to the road from an environmental perspective, it has been brought to our attention that The Environmental Statement does not adequately assess the environmental impact of the B970 realignment on the SSSI which borders Coylum Road. I am appalled that a designation of this nature has been seemingly over looked to benefit the development of this project, the sustainability of this area must surely rely on all its residents, and government officials, placing the fragile nature of this SSSI under the highest importance and its protection must be placed above all else.

I am also aware of the fact that the An Camas Mor development is supposed to fulfil a number of sustainable aims, according to the Transport Assessment the traffic movements arising from the

B970 realignment at Coylum Road would result in around 1.1 million extra miles (than the Inverdrue substation route) being driven every year (not counting the proposed public bus services) flowing on the realigned road. I would greatly like someone to explain to me how a huge additional mileage like that in any way agrees with the principles of sustainability.

I would also like to add that the proposal of the realignment of the B970 at Coylumbridge and then its use as a 'temporary' main access route to An Camas Mor for several years until the new route from Inverdrue is constructed is inappropriate. It will result in unnecessary construction works, unnecessary cost, environmental impact and impact on residential amenity at Coylum Road that could easily be avoided through provision of the road from Inverdrue at the outset. There is also the concern that if the B970 were aligned at Coylumbridge and the B970 was then used as the initial main access route to An Camas Mor, the developers, for a variety of reasons, would never build the proper access route from Inverdrue.

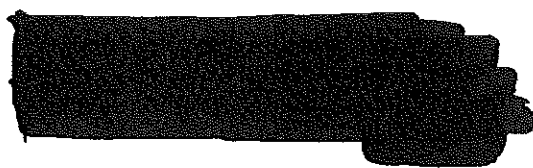
As a keen cyclist, I was horrified to hear of the possibility of the main access for An Camas Mor being off of the B970. The B970 forms part of the National Cycle route and is very popular and often makes up part of a cycle route. At present the B970 can be dangerous and with the addition of further cars and construction traffic, I fear there may well be a fatality. I for one, will no longer use this route if the main access for An Camas Mor joins the B970. I think it's a great shame that both locals and visitors are going to have their lives significantly disturbed down to one fact and that fact is that the proper access for An Camas Mor is not being put in from day one!

In closing I would like summarise my objection to the realignment of the B970 at Coylumbridge is unacceptable from the following points:

- 1) Devastating safety and noise impacts.
- 2) Irreversible environmental damage.
- 3) Unsustainable additional traffic causing damage for future generations.
- 4) Excessively expensive.

My final point to make to you is that the alignment of the B970 at Coylumbridge is illogical, the correct access as highlighted in many reports should come in from Inverdrue.

Yours faithfully

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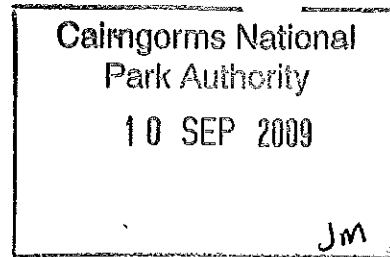
Martin Ross

Cairngorms National Park Authority  
Planning Application No. 09/155/CP  
REPRESENTATION  
11/9/09

4 Coylum Road  
Coylumbridge  
Aviemore  
PH22 1QG

8<sup>th</sup> Sept 2009

Cairngorm National Park Authority,  
Albert Memorial Hall  
Station Square  
Ballater  
AB35 5QB.



Dear Sir,

Re: planning application 09/155/CP

Further to our holding objection we would now like to submit a fuller more detailed objection to the proposal to realign the B970 at Coylumbridge and its use as the principal vehicular access serving An Camus Mor, possibly up to 2027 and beyond.

The realignment of the B970 would have a severe detrimental impact on the residential area of Coylum Road and the wider area including the adjacent SSSI.

The submitted Transport Assessment provides no justification for the realignment of the B970 and contradicts the Proposed Masterplan Report. The realignment of the B970 would mean a massive increase in traffic, including ALL construction traffic, which until completed cannot be fully realised, this has not been adequately assessed in the Transport Assessment and Environmental Statement.

Using a realigned B970 would mean a massive increase in extra miles, many more than the substation route. This would surely be unacceptable at a time when the environment is of the utmost importance and carbon emissions need to be reduced not increased. Without a direct access to An Camus Mor emergency services would have to travel many more miles and this delay may cost lives.

Increased traffic would also mean that there would be severe noise impact on the residents of Coylum Road. This is a quiet peaceful location, this would be lost forever!

A realigned B970 would also increase traffic on the already busy ski road past Inverdrue and Coylumbridge as well as increased traffic flow through Street of Kincardine and Boat of Garten. These are fast, narrow routes without lighting barely coping with the existing traffic.

The B970 route adjacent to Coylum Road, is an area of Specific Scientific Interest where people can walk and observe nature safely, this would be destroyed.

We would also be concerned as to the safety of the school children. The school bus pick up point is currently at the junction where the B970 would join the ski road this would surely be unacceptable as a massive increase in traffic would endanger the children.

According to the 1997 Local Plan a thick band of trees would shield the housing at Coylum Road from a realigned B970 but however the site was laid out with a minimum amount of space for the road and the gardens would be adjacent to the edge of the realigned B970.

The forthcoming CNPA local Plan, which has increasing weight, does not stipulate that the B970 should be realigned. Instead it suggests that a detailed transport assessment of all potential access routes should be carried out. The Transport Assessment submitted by the developers of An Camus Mor does not fulfil this requirement as it only looks at one option.

The 2004 An Camus Mor Feasibility Study discounts any requirement for the B970 to be realigned and states there are no technical constraints to the development of a route through Inverdrue.

We are concerned that if the B970 were realigned at Coylumbridge from the outset the developers may never build an access route from Inverdrue.

We conclude that the proposal to realign the B970 at Coylum Road would result in a highly detrimental impact on the residential amenity of Coylum Road and surrounding environment and suggest that the access route from Inverdrue substation be pursued as the principle access for An Camus Mor from the outset.

Yours sincerely,

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

Leslie I Grant, E. Dawn Grant, Emma Grant, Nicola Grant.

Calmgorms National Park Authority  
Planning Application No. 09/155/CP  
**REPRESENTATION**  
ACKNOWLEDGED 19.8.09

Calmgorms National  
Park Authority  
19 AUG 2009  
RECEIVED



## Guide Dogs

### **AN CAMAS MÒR PROPOSED MASTERPLAN - CNPA reference number 09/155/CP**

The Guide Dogs for the Blind Association's (Guide Dogs) vision is for a society in which blind and partially sighted people enjoy the same freedom of movement as everyone else. We deliver the guide dog service and other mobility services, as well as breaking down barriers – both physical and legal – to enable blind and partially sighted people to get around on their own.

Guide Dogs has been concerned that the shared space concept in streetscapes is being delivered by means of shared surface streets which are becoming increasingly common in our towns and cities. Although it has been recognised by Government, local authorities and designers that shared surface streets pose difficulties for blind and partially sighted people as well as those with other disabilities, currently there is no design guidance on how to achieve shared space in a way that delivers inclusive streetscapes. Consequently blind and partially sighted and other disabled people are being disadvantaged, with many schemes becoming 'no go' areas for blind and partially sighted people.

#### **Shared Surface Issue and background**

Shared surfaces are created when roads and pavements are built at the same level with little or no demarcation between areas for vehicles and pedestrians. In a shared surface, pedestrians, motorists and cyclists need to negotiate priority through making 'eye contact', which is impossible for blind and partially sighted people and places them, as well as other disabled and elderly people, and young children, at risk.

Blind and partially sighted people use the kerb as a key navigational cue so its removal has serious consequences. Shared surfaces also pose a threat to other vulnerable road users, such as those with physical, cognitive or hearing impairments. Wheelchair users have to share their space with intimidating vehicles and cyclists, and young children no longer have a kerb to safely stop, look, and listen.



Guide Dogs research <sup>(1)</sup> shows that blind and partially sighted people both in the UK and the Netherlands, often cited as a country where shared surfaces 'work', have their safety, confidence and independence undermined by these streets designs.

Guide Dogs believes that in introducing such schemes without due regard for the mobility and safety of disabled people, local authorities may be in breach of their duties under the Disability Discrimination Act 2005.

## Research and Government Guidance

Guide Dogs has carried out a series of research projects on this subject. The first established through focus group research <sup>(2)</sup> the issues that shared surfaces streets pose for blind and partially sighted and other disabled people. The focus groups were held across the UK and in Holland. This research revealed that blind and partially sighted people are experiencing great difficulty in these areas; in some avoiding them altogether. Several participants reported near misses as they had stepped out in front of vehicles without realising they had moved into the trafficked area as there was no detectable indicators demarcating these different spaces.

The second piece of research was 'Testing proposed delineators to demarcate pedestrian paths in shared space environments' Guide Dogs commissioned urban designers to consider how the 'shared space' approach could be implemented while taking account of the requirements of blind and partially sighted people, and other disabled people. The report prepared by Ramboll Nyvig <sup>(3)</sup> advocated the provision of a 'safe space' within shared space streets. The 'safe space' would be the area equivalent to the footway where vulnerable pedestrians can feel safe away from the traffic in the shared area. The key issue is how to delineate this 'safe space'. The report proposed several options for testing to delineate the pedestrian footway (safe space). The delineators tested were all those that had been used, or included in proposals, for UK street schemes. These alternative delineators were then tested in a third phase of the research in conjunction with the University College London at its Pedestrian Accessibility Movement and Environment Laboratory (PAMELA). Results published in February 2008 <sup>(4)</sup> demonstrated that none of the delineators tested were effective in terms of consistent detection and navigational use by blind and partially sighted people and in not providing an impediment to wheelchair users and people with walking difficulties.

<sup>(1)</sup> Shared Surface Street Design: Report of focus groups held in Holland, Guide Dogs 2006

<sup>(2)</sup> Shared Surface Street Design Research Project The Issues: Report of Focus Groups, Guide Dogs 2006

<sup>(3)</sup> Shared Space >>> Safe Space Report prepared by Ramboll Nyvig for Guide Dogs 2007

<sup>(4)</sup> Testing proposed delineators to demarcate pedestrian paths in a shared space environment Report of design trials conducted at University College London (PAMELA) 2008

In light of those findings, until an alternative delineation method can be shown to be effective, Guide Dogs and other organisations' position is that a traditional kerb (with associated dropped kerbs and tactile paving) needs to be retained. We have however, been looking at the minimum kerb height that is detectable and in that area we commissioned UCL to test different kerb heights to establish what the minimum kerb height was that could be reliably detected by blind and partially sighted people: we did not include mobility impaired people because we recognise that any kerb delineation will require associated dropped kerbs and tactile paving. This research, which will report shortly, indicated that for confidence that a kerb is detectable by blind and partially sighted people it is recommended to install a kerb of 60mm or greater, with a vertical or near vertical profile.

The testing was carried out in a controlled internal environment and the findings would need to be validated in an external environment but it provides us with a good indicator of what could be workable. This applies to kerb profiles approaching vertical.

Aside from Guide Dogs research no other body has yet published research which examines the issues for blind and partially sighted people. Earlier this year, the UK Government's Department for Transport (DfT) commissioned a two year research project on shared space and shared surfaces, to examine the benefits/disbenefits and to establish whether they can be made to work for all users, including blind and partially sighted people. Their aim is to produce design guidance. In the meantime, the DfT's Manual for Streets, refers to the need for a 'safe' and 'protected' space, and that is also reflected in the Scottish Government's draft Designing Streets.

### **An Camas Mor Village**

The plans for the An Camas Mòr village include shared surface treatments for the High Street and surrounding streets. Given the points outlined above, Guide Dogs is concerned that by adopting that approach the development will exclude many vulnerable pedestrians, including blind and partially sighted people. On that basis we would object to the shared surface proposals that have been presented.

There is, however, the opportunity for the An Camas Mòr plans to be informed by Guide Dogs recent research into the minimum kerb height that can be detected by blind and partially sighted people.

We do welcome the fact that the Design Team have demonstrated an awareness of the need to make provision for blind and partially sighted people in the High Street area. We have reservations of the proposed use of 60mm high shallow ramped kerbs.

As part of the second phase of our research UCL tested a 50mm high by 200mm slope with 1:4 gradient and a 30mm by 200mm slope with a 1:7 gradient. The

steeper gradient was preferred by blind and partially sighted people, and the shallower gradient by mobility impaired people. It is worth noting that the An Camas Mòr design team have not specified the gradient that would be used.

As mentioned above, the results of the soon to be published 'Effective Kerb Heights for Blind and Partially Sighted People' informs us that, at least in the internal controlled environment of the PAMELA facility, that none of the participants failed to detect a vertical or near vertical kerb height of 60mm or greater and they had a high level of confidence and reduced level of perceived anxiety. Two different kerb edge profiles were tested, straight vertical face with chamfered edge, and straight face 15° to the vertical and a 20mm bullnose edge.

### **Recommendation**

Guide Dogs suggestion is that if the National Park wishes to adopt a shared space approach to the village then it should not do so by delivering shared surface streets that provide no effective delineation between a "safe space" and the trafficked area. We also recommend that the delineator should have visual contrasting features against its surroundings. This not only aids the identification of the delineator by partially sighted people but also other vulnerable pedestrians. At present, and unless and until an alternative delineator is identified, then we would strongly recommend that only a kerb is fit for purpose in terms of delineation, but on the basis of the most recent UCL research that a 60mm kerb height could be effective provided it is has a vertical or near vertical profile. Dropped kerbs with the associated tactile paving should be installed at strategic points for the benefit of mobility impaired people and wheelchair users.

### **Associated side streets to High Street**

The Plans only make reference to the High Street area having the notional carriageway kerbs for the safety of visually impaired people. The side streets around the High Street area are also shared surfaces. It is assumed that they too would have reasonable traffic flows, for example, to access proposed hotels, future supermarket, and public car parks, and it is in these areas that there is to be the high density residential accommodation which we would assume comes with associated off-street car parking facilities.

### **Residential streets**

Delineation of the residential spaces is also essential. We would point out that in the last few months Manchester City Council has announced that it will not have shared surface streets in its residential areas. They have come to this decision on health and safety grounds. We would urge the National Park to take a similar stance. The research 'Designing for Disabled People in Home Zones'<sup>(5)</sup> commissioned by the Disabled Persons Transport Advisory Committee (DPTAC),

<sup>(5)</sup> Designing for Disabled People in Home Zones report prepared by JMU Access Partnership for DPTAC. 2007

also established that shared surfaces cause problems for disabled people. They found in general, disabled people prefer to have the option of using a complementary delineated pedestrian area that is clearly defined and unambiguous.

### **Recommendation**

Given the level of pedestrian and vehicle activity, and that side streets are routes to and from the High Street area; we feel that consideration should be given for all areas to include the notional carriageway kerbs, and including dropped kerbs with the associated tactile paving where appropriate.

### **Pedestrian Crossings**

There is no mention within the An Camas Mòr master plan if there is to be provision for either signal controlled crossings or uncontrolled/informal crossing points. As An Camas Mòr is to be designed around the shared space concept, we would be concerned that, in common with other shared space schemes, only uncontrolled/informal crossings would be provided.

### **Recommendation**

The Design Team need to be clear about their plans for pedestrian crossing facilities. However, we would strongly recommend that provision is made for controlled crossings, with dropped kerbs and tactile paving, at the beginning and end of the shared surfaces, and at key points where people need to cross areas. Those crossings should be provided with both audible and tactile controls (rotating cone). Informal uncontrolled crossing points may also be provided at strategic points to supplement controlled crossings, but they should not replace them.

### **Outdoor seating and street furniture**

Across the town centre there is to be provision for outdoor seating areas, cycle parking facilities, and trees will be planted throughout the area. Although not mentioned within the Masterplan there is likely to be a variety of other street furniture, such as, planters, waste bins.

### **Recommendation**

All pedestrian circulation routes, both in the traditional streets and the shared surface streets, should be free from obstacles. Where potential obstacles are incorporated, for example, seating, waste bins, bollards, planters, posts, signs and trees, these should be carefully designed and sited out of the main pedestrian flow and their position should be clearly identifiable to all users, including blind and partially sighted people, by the use of visual contrast, surface level tactile indicators and tapping rails.

### **Vehicle Speed**

We welcome and support that all traffic would be limited to a maximum 20 mph speed throughout the development, and that the design of minor streets would encourage slower speeds of 10 mph or 5 mph.

### **Main internal bus and vehicle distributor route**

We welcome and agree with the need for this main distributor route having pavements separated from the road by full height kerbs. Consideration to locating crossing points should be provided at strategic points. Dropped kerbs with the associated tactile paving would need to be located near bus stops, for example.

### **Pedestrian and cycleway paths**

There will be pedestrian and cycleway paths throughout the development and in the surround areas linking to Aviemore and the National Cycle Network. What is unclear within the Masterplan is if these pedestrian and cycle paths are separated or if pedestrians and cycles are to be accommodated on the one path. People with sensory impairment find it difficult hearing or seeing a cyclist approaching; they cannot get out of the way quickly enough nor be sure which way to move to avoid a cyclist. Even the most considerate cyclist would find it difficult to avoid a pedestrian who stepped out in front of them because they did not see or hear them approaching.

### **Recommendation**

We would strongly recommend that pedestrian and cyclist paths should be separate. Where a shared path is proposed it must be incorporate the standard tactile paving arrangements as set out in "Guidance on the use of tactile paving surfaces" with clear signage to cyclists warning them to give right of way to pedestrians. A shared route with a flat white line down the centre is never acceptable.

### **Summary**

Guide Dogs appreciate that An Camas Mòr will be a major development within the Highlands providing housing, retail and office accommodation. It will be prestigious for the area and potentially influence similar developments elsewhere. We share the Design Teams aims of creating a framework for a village in which generations of residents would be able to live full, happy and healthy lives and being 'A Good habitat for People'. Blind and partially sighted and other disabled people should be able to fully participate within the village environment.

We appreciate that this application stage is for Outline Planning, and if granted further design details need to be developed. Poorly designed shared surfaces street schemes have a significant impact on the ability of blind and partially sighted and other disabled people to travel independently and safely. The use of

untried and untested design features as a solution to delineating a 'safe space' could result in these areas becoming 'no-go' environments for blind and partially sighted people if the proposed solutions prove unworkable. We believe that this issue is of such significance to the overall success of the An Camas Mòr development that it should be addressed at the outlined planning stage.

Whilst we welcome the Design Team's foresight in recognising the needs of blind and partially sighted people, we are not aware of any research that would support their proposal to create a notional carriageway defined by a 60mm high shallow ramped kerb. Our position is that until a delineator is shown to be effective, through appropriate research, then a kerb is the only effective means of delineating a safe space. The recently completed research at UCL (mentioned previously) has shown a minimum 60mm kerb height could be effective provided it is has a vertical or near vertical profile. Dropped kerbs with the associated tactile paving should also be installed at strategic points for the benefit of mobility impaired people and wheelchair users. We would also recommend that the same approach should be taken to the treatment of the side streets of the High Street areas and in the residential areas.

We also recommend that the during the design detail stage that the views of Guide Dogs and other organisations involved in access provision for disabled people should be sought, and that an Access Consultant should be brought in to advise on the scheme.

## **References**

There are several guidance documents on inclusive design which provide information on how streets should be designed to be safe and accessible.

**Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure** (Department for Transport, 2002)

**Guidance on the Use of Tactile Paving Surfaces** (Department for Transport, 1999).

**Planning, buildings, streets and disability equality** (Disability Rights Commission, 2006).

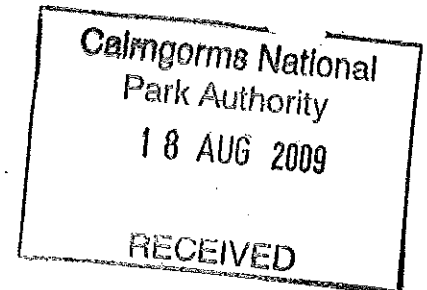
**The Principles of Inclusive Design** (Commission for Architecture and the Built Environment (CABE), 2006).

**BS8300: The design of buildings and their approaches to meet the needs of disabled people – Code of practice** (British Standards Institute, 2009).

<b>Cairngorms National Park Authority</b>	
Planning Application No.	09/155/CP
<b>REPRESENTATION</b>	
* ACKNOWLEDGED	18/8/09

3 Coylum Road  
Aviemore  
PH22 1QG  
17<sup>th</sup> August 2009

Mr Don McKee  
Head of Planning & Development Management  
Cairngorms National Park Authority  
Albert Memorial Hall  
Station Square  
Ballater AB35 5QB



Dear Mr McKee

**An Camas Mòr - Outline Planning Application Reference: 09/155/CP**

The new development at An Camas Mòr with its proposed layout to provide access to countryside and wildlife while limiting exposure to traffic flow is one which I am very happy to support. However I strongly oppose the idea of realigning the B970 at Coylumbridge to run very close to the backs of existing houses to the north east of Coylum Road and to the established area of SSSI.

The close proximity of the proposed realigned B970 will destroy the quality of life for people living nearby, with a huge increase in noise and disturbance and will have an adverse affect on the wildlife which frequent the area – deer, red squirrel, pine marten, badger are regular visitors to gardens. In the course of building a new housing area at An Camas Mòr with attractive amenities, the established community at Coylum Road and other roadside communities through to Inverdrue will have these same amenities taken away.

The increased disruption and noise from heavy construction traffic and other vehicles using the road all the way through from Inverdrue to An Camas Mòr via Coylumbridge will have a marked affect on local communities while at the same time adding extra mileage and cost to development companies through to 2018 when another access to An Camas Mòr is proposed at Inverdrue. I would suggest this access should be built at the outset thus saving on building costs, maintenance on the existing road due to the extra wear and tear of heavy construction traffic, and reducing the adverse impact on the environment and the wildlife.

I hope that the CNPA Board will tell the developers of An Camas Mòr that they should build the new road from Inverdrue to An Camas Mòr at the start of the project and thus avoid the adverse effects on the people and wildlife in Coylum Road and nearby.

Yours sincerely

A large, solid black rectangular redaction covering the signature area.

Mrs P Green



<b>Cairngorms National Park Authority</b>	
Planning Application No.	09/155/CP
<b>REPRESENTATION</b>	
ACKNOWLEDGED	18/8/09

**3 Coylum Road  
Aviemore  
PH22 1QG**

17<sup>th</sup> August 2009

Mr Don McKee  
Head of Planning & Development Management  
Cairngorms National Park Authority  
Albert Memorial Hall,  
Station Square  
Ballater AB35 5QB

Cairngorms National Park Authority
18 AUG 2009
RECEIVED

Dear Mr McKee

**An Camas Mòr - Outline Planning Application Reference: 09/155/CP  
Objection to realignment of the B970 at Coylumbridge  
and its use as the main access route to An Camas Mòr**

I refer to the above planning application and to my "holding objection" of 25<sup>th</sup> May 2009 sent to Highland Council and now wish to add the following letter.

I do not object to the proposal for development at An Camas Mòr.

I strongly object to the proposal to realign the B970 road at Coylumbridge, and then to use the realigned B970 as the main access route for all traffic to and from An Camas Mòr at least until 2018.

My objection to realignment of the B970 and its use as the main access route to An Camas Mòr is based on the following points:-

- There is a much more appropriate alternative route

The planning application shows that the developers intend to use a realigned B970 as the access route to An Camas Mòr from 2011 until at least 2018. Sometime after 2018 the developers intend to construct a new direct road into An Camas Mòr starting from near the electricity sub station at Inverdrue. **I strongly suggest that the direct route from Inverdrue should be constructed at the outset of the project and that the B970 should not be realigned at Coylumbridge.** In that way the monies saved on the realignment would be available for funding the direct route, the disruption to the Coylumbridge and Inverdrue communities would be avoided and the damage to the environment in the Glenmore corridor would be avoided.

- No justification has been provided for realignment of the B970 at Coylumbridge

The planning application provides no justification for realigning the B970 at Coylumbridge and using it as the main access route to An Camas Mòr. The application just states that the realignment has to be

carried out because it was included in the Highland Council Local Plan which was published in 1997. My perception is that the developers do not want to realign the B970 at Coylumbridge and would prefer to use the Inverdrùie route from the outset but they feel forced to include the B970 realignment in their application solely because it appears in the 1997 Local Plan.

The 1997 Local Plan was drafted in the late 1980s and Highland Council has not been able to provide me with any documentary justification for inclusion of the B970 realignment at Coylumbridge.

Coylum Road is not laid out as envisaged in the 1997 Local Plan. The houses and gardens are all sited much further to the north east and some of the houses and gardens are situated on top of the route of the proposed realigned road as shown in the Local Plan. The Local Plan shows a large buffer of trees between the housing areas and the proposed route of the realigned road. This buffer of trees does not exist.

The soon-to-be-adopted CNPA Local Plan makes no mention of the B970 realignment and requests a detailed Transport Assessment which “should examine the various access issues facing the site, including the impact of the development on the trunk road and local road network”. The Transport Assessment included with the planning application for An Camas Mòr is based on only one scenario – no other options are suggested or evaluated. The Transport Assessment concentrates on the forecast situation in 2028 and interpolates for intermediate years. It makes no attempt to estimate the volume of construction traffic and its phasing of the development is at odds with the Masterplan included with the application. The Transport Assessment offers no justification of the realignment of the B970 at Coylumbridge. Instead, it just states that Highland Council requires it.

**I suggest that inclusion of the B970 realignment in the Highland Council 1997 Local Plan, first drafted in 1989, is not sufficient justification for carrying out the realignment in 2011.**

- The severe loss of amenity for Coylum Road

Coylum Road is a group of 21 houses set in a very quiet forest clearing. The proposed route of the realigned B970 runs right alongside the garden fences of the houses on the north east side of Coylum Road and it passes within 9.5 metres of at least one house. The proposed route is squeezed between the gardens of the houses and the North Rothiemurchus pinewoods SSSI.

At present, the proposed route of the realigned B970 is a quiet wooded footpath used by the residents and visitors at Coylum Road. It is not used by vehicular traffic. Thus to convert this footpath into a busy road used by all traffic from Nethybridge and Boat of Garten plus all the traffic (lorries, buses, vans and cars) to and from An Camas Mòr

represents a massive change for the residents of Coylum Road – the change is from a footpath with no traffic to that of a busy road. All the construction traffic from An Camas Mòr will use the road and Coylum Road will become a traffic island bounded on two sides by busy roads.

The quiet enjoyment of the Coylum Road environment by the residents will be destroyed by traffic noise, vibration, fumes and headlight glare.

The potential loss of amenity of Coylum Road residents has been almost totally ignored in the An Camas Mòr planning application. The Transport Assessment has made no attempt to estimate the volume of construction traffic which would flow to and from An Camas Mòr on the realigned road close to the houses in Coylum Road. Even without construction traffic, the Transport Assessment suggests that the B970 towards Aviemore would see a 508% increase in traffic volume between 2011 and 2016. All this increased traffic volume would flow on the realigned road close to the houses in Coylum Road.

**I suggest that use of a realigned B970 as the main access route to An Camas Mòr would result in significant disturbance and permanent loss of amenity for Coylum Road. I further suggest that use of the realigned B970 will provide no benefits over the immediate construction of a proper access route from Inverdrurie to An Camas Mòr and any short-term savings in cost would not justify the permanent loss of amenity for Coylum Road residents.**

- Disturbance to other communities near to the B970

If the B970 were to be used as the main access route to An Camas Mòr the additional traffic would flow both north and south. Thus the communities of Coylumbridge, Inverdrurie, Street of Kincardine and Boat of Garten would all experience increased traffic flows with the concomitant disturbance from noise, vibration, fumes, dust and headlight glare. The customers of the commercial properties in Coylumbridge and Inverdrurie would experience increased difficulty as they try to join the B970 with its increased traffic volumes.

It is also important to note that the proposed route of the realigned road runs close to some of the houses on the Nethybridge Road in Coylumbridge. The route seems to be raised considerably as it passes some of the gardens there and it is apparent that the residents could be looking upwards at the traffic passing on the realigned road.

If a new access road to An Camas Mòr from the Inverdrurie electricity substation is constructed at the outset of the development, the bulk of the traffic will not flow through the communities of Coylumbridge and Inverdrurie. It is also likely that ease of access via the new road will encourage traffic not to use the northerly route through Street of Kincardine and Boat of Garten.

**Use of the B970 as the main access route to An Camas Mòr will cause unnecessary disturbance to the communities of Coylumbridge, Inverdrue, Street of Kincardine and Boat of Garten.**

- Effect on the environment

The proposed route of the realigned B970 at Coylumbridge is squeezed between the gardens of houses in Coylum Road and the North Rothiemurchus Pinewoods SSSI. Coylum Road and its adjacent SSSI are fortunate to be rich in wildlife including, Red Squirrels, Pine Martins, Roe Deer, Badgers, Woodpeckers, and Crested Tits. The proposed route of the realigned road is a quiet footpath bordered by woodland and natural shrubs. The intrusion of a busy road will threaten the wildlife of the area. The Environmental Statement included with the planning application for An Camas Mòr seems to have ignored the impact of the realigned road on Coylum Road and its adjacent SSSI.

Use of a realigned B970 as the main access route to An Camas Mòr will have the effect of taking the traffic (including heavy construction traffic) further up the Glenmore corridor than is needed. I believe that others have used the Transport Assessment traffic estimates to show that use of the realigned B970 would result in over one million extra vehicle miles per year being travelled and this does not include construction traffic.

If the direct route into An Camas Mòr from Inverdrue is constructed from the outset of the project it will remove the need to realign the B970 at Coylumbridge. This course of action would avoid unnecessary road construction, reduce the need for future road maintenance, reduce the length and area of roadway and remove the potential loss of habitat near to the SSSI.

**I request that more weight should be given to the potential environmental damage which could be caused by realignment of the B970 at Coylumbridge.**

- Inconsistency of approach to An Camas Mòr and Coylum Road.

The design methodology described in the Masterplan Report for An Camas Mòr lays great stress on creating a, "Good Habitat for People" and suggests that, "People who chose to live in the Highlands do so because they love the countryside ..." Of An Camas Mòr the Masterplan Report suggests that, "To achieve a unique sense of place, the settlement is envisaged as a cluster of buildings in the forest ..." It suggests that the presence of cars results in, "...noise pollution, risk of accidents, ..." With regard to separation from the B970 the Masterplan Report suggests that, "The entire settlement would be contained within a woodland setting, which would be a minimum of 30 metres deep" and the FAQs on the An Camas Mòr website suggest that, "...houses will be set back 30 metres from the B970 road behind trees ..."

The philosophy described above for An Camas Mòr seems to have been suspended when it comes to considering the realignment of the B970 at Coylum Road where the proposed route of the road runs adjacent to the garden fences of the houses on the North East side and within 9.5 metres of at least one house. No 30 metres separation between houses and road here !!

Coylum Road was in many ways a prototype for An Camas Mòr and images from Coylum Road are used in the Masterplan Report. It is very difficult to understand why the developers and designers of An Camas Mòr could now adopt such differing and inconsistent standards between the two developments.

**I request that the same philosophy of “a good habitat for people” should be applied to Coylum Road as well as An Camas Mòr.**

- The concern that developers may never build the new road

I have a major concern that if the developers are allowed to realign the B970 at Coylumbridge in order to use it as a “temporary” access route to An Camas Mòr, the “proper” access route from Inverdrue may never be built. Once the developers have made the initial investment on the lower cost route through Coylumbridge and the principle of its use for access has been established, it is highly likely that by stonewalling, obfuscation and delaying tactics they might put off the construction of the Inverdrue route indefinitely. If this becomes the case the destruction of Coylum Road’s peaceful environment will continue in perpetuity.

**I request that construction of the proper access route to An Camas Mòr from Inverdrue at the outset of the project should be made a condition of granting planning permission for the whole development.**

I should be grateful if you and your officials will give favourable consideration to the points made in this letter and to those points made by the many other people and organisations who also object to the proposal to realign the B970 at Coylumbridge.

I hope that you and your colleagues will recommend to the CNPA Board that from the start of the project, the main access to An Camas Mòr should be via a new road from Inverdrue and that the B970 should not be realigned at Coylumbridge.

Yours sincerely



Dr Richard L Green

Cairngorms National Park Authority  
Planning Application No. 09/155/CP  
REPRESENTATION  
ACKNOWLEDGED 14/8/09

Cairngorms National  
Park Authority  
14 AUG 2009  
RECEIVED by email

Friday, 14 August 2009

Mr D. McKee,  
Head of Planning  
The Cairngorms National Park Authority  
Albert Memorial Hall  
Station Square  
Ballater  
AB35 5QB

Re: Road access to An Camas Mor  
An Camas Mor planning application 09/155/CP

Dear Sir,

I would like to elaborate on my objections to the proposed access route through Coylumbridge to An Camas Mor. This supplements letters I have written to the Highland Council, The National Park Authority, Mr Fergus Ewing MSP, Mr Danny Alexander MP and my local councillors.

Firstly I would like to thank you in anticipation of your time and your consideration of my objection. Whilst I appreciate it is extraordinarily difficult to make the right decision in planning applications, I urge you to appreciate this development will be your legacy and it will be remembered as such for many years.

The following are my main objections at this time but I reserve the right to supplement this list based on further information and other developments.

Traffic impact on me and my family

1. The Coylum Road development is currently a very healthy environment for the nine permanently resident young children to grow up in. The increased traffic, noise and pollution can only negatively affect this.
2. The application provides some sort of traffic analysis. I question the validity of the figures used, the simplistic modelling and the impossibility of accurately predicting traffic movements. There are just too many unknowns in how self sustainable the An Camas Mor development will be in 20 years time.
3. The routing through Coylumbridge will cause additional vehicular mileage over the alternative route through Inverdrue fish farm route. This additional mileage incurred will be significant for both the construction traffic and for future residents and visitors. This will produce significant and un-necessary

environmental pollution which will negatively affect the government's carbon and environmental targets.

4. The noise pollution footprint for the Spey Valley will spread from the A9 corridor to a much larger area up towards the prestigious and economically valuable tourist areas up the Ski Road. This will detrimentally affect not only the residents of Coylumbridge but also visitors to the area who are looking for peace and tranquillity. This superb area is beautifully quiet and unspoiled at this time.
5. The additional traffic will increase the danger to the significant number of young children living in Coylumbridge. They will have increased difficulty accessing the National Cycle path which provides safe access to Aviemore. They will also have their ease of access to the healthy activities at Loch Morlich and beyond, affected. Is it not true the government, Chief Medical Officer and electors in general are concerned about the obesity of children in part due to lack of exercise.
6. Many of the children at Coylumbridge use the school bus. Even if it is redirected to 'pick up' in Coylum Road there is increased danger from the increased traffic volumes even if significant traffic calming measure is taken to reduce the speed of the fast traffic on the Ski road.
7. Turning out of Coylum Road onto the ski road is risky for the residents and visitors. The risks will be exacerbated by additional car volumes due to traffic accelerating and overtaking on the Ski road heading east towards Cairngorm Mountain. This traffic is travelling at speed often close to the national speed limit of 60mph by the time it reaches the proposed new junction at Coylum Road.
8. Any increase in traffic within the bounds of the National Park affects the quality of this unique and special environment and whilst the remit of the Authority is to cater for all needs, the proposed Coylumbridge routing increases the vehicle miles unnecessarily.
9. The environment of Coylum Road is unique and special. The proposed traffic routing can do nothing but spoil this area and detrimentally affect it and the adjacent SSI.

#### Electoral Support

10. The realignment of the B970 at Coylumbridge can only be designed to maximise disaffection from this Coylumbridge community with the Planning Authority, the applicant and our elected representatives in government.
11. I can only think that residents at Boat of Garten and Street of Kincardine will also consider themselves detrimentally affected by this application, again a significant number of electors disillusioned with their representative governance.

General Points

12. When the original plans were accepted for the Coylum Road development, higher quality consideration should have been given to the placement of the houses if this route for access to An Camus Mor was needed. It should have been possible to provide a significant barrier of trees between the houses and the road.
13. If the applicant does achieve access through Coylumbridge, I contend it is probable that this significant investment in infrastructure will result in this 'temporary access' remaining as the primary route or at least a significant access route. Surely the financial pressures on governmental departments for many years to come will mean the pragmatic and easy decision of delaying development of the alternative Inverdrue route.
14. Whilst I have heard it argued by the applicant that An Camus Mor will be a self contained entity, no development in the 21st Century is an island to itself. Indeed I have seen it documented there should be close links with Aviemore and of course access to the Railway and the A9 trunk road. I do not believe the significant impact on the infrastructure is understood. History shows that any new development evolves and it is therefore extremely difficult to anticipate the future of An Camus Mor. It is very possible that the traffic will be worse than any current projections. If access via Coylumbridge is passed, additional un-necessary miles will be driven.

I do not understand why the planning application proposes such a poor solution for access to An Camus Mor. I can only conceive that it minimises the infrastructure cost to the developer who will gain significantly financially from this development. To me it clearly minimises the applicants initial cost of infrastructure development by proposing a sub optimal solution. I can only conceive the objective is to transfer as much cost to the taxpayer, local or national at a future date. I urge you to reject the B970 realignment at Coylumbridge and force the applicant to change the access route to An Camus Mor.

Would you please note my continuing objection and keep me informed of any developments. I would also appreciate any opportunity to further present my family's objections and that of my Mother residing at 8 Coylum Road.

Sincerely,

Mark Munro

5 COYLUM ROAD, COYLUMBRIDGE, AVIEMORE. PH22 1QG



Washington National  
Park Authority  
10 AUG 2009

RECEIVED

REF NO 09155/CP  
Planning Application No. 09/155/CP

Central London Park Authority

REPRESENTATION

11/8/09

Dear Head of Planning

C.N.P.A.

As a resident of Coylum Bridge, I wish to oppose the new realignment of the B970, East of Coylum Road.

This wooded area is a sanctuary to wild life such as Red Squirrels, Pine Martins - Caper - Redstarts - Badgers, woodpeckers and many ant hills.

This would certainly affect the wild life with both traffic to An Camas Mor by residents and construction traffic. The Government are trying to encourage Red Squirrel

KINTAIL

Coylum Bridge  
P122 1QU  
6-8-09

where there is less wild life makes a more suitable proposal. I hope these points will be taken into consideration.

Yours Sincerely

[Redacted Signature]

population this would certainly cut down the numbers in this area.

The Construction Route via The Sub Station Route at Inverdrain

Caingorms National  
Park Authority  
10 AUG 2009

Mr & Mrs J. Gordon  
"Kintail"  
Coylumbridge  
Abermore DD22 1091

RECEIVED

Caingorms National Park Authority

Planning Application No. 09/155/CP

Head of Planning

REPRESENTATION

C.N.P.A.

ACKNOWLEDGED

6TH Aug 2009

U/8/09.

Ref No. 09/155/CP.

I wish to lodge an objection to the proposed Coylum-Bridge By-Pass on the following grounds.

The proposed By Pass would destroy a stronghold of red squirrels which are abundant in this area, also

there are families of Redstarts and great spotted woodpeckers who breed regularly in these trees,

and meads are common on the ground all over the proposed area.

and every summer evening bats are always seen around the same trees.

Pine Marten's are night visitors to our garden, this by pass would destroy their route from Drumis to our garden.

So, Members of the Planning Committee can be respectful to our year to consider an alternative route for this By-Pass.

Many thanks

[Redacted signature]

# Coylum B970 Action Group

1 Coylum Road

Aviemore

PH22 1QG

5<sup>th</sup> August 2009

RECEIVED

10 AUG 2009

Mr David Green  
Cairngorms National Park Authority  
14 The Square  
Grantown on Spey PH26 3HG

Cairngorms National  
Park Authority

11 AUG 2009

RECEIVED

Dear Mr Green

You will be aware of the outline planning application (CNPA Reference 09/155/CP) for the development of An Camas Mòr. The application is a large and complex document and therefore you may not be aware that, if the development goes ahead as proposed, it will have a devastating effect on the small community of Coylum Road and will adversely affect the communities of Coylumbridge and Inverdrue also.

This "collateral damage" to Coylum Road arises because the developers of An Camas Mòr are proposing to realign the B970 to run very close to the houses at Coylum Road and then to use this route as the primary access route for all traffic (including heavy construction traffic) into and out of An Camas Mòr until at least 2018, and probably longer. Coylum Road is a collection of 21 houses set in a clearing in the forest and it is

bounded by the Ski Road on one side and the North Rothiemurchus Forest SSSI on the other. The proposed route of the realigned B970 is now a quiet wooded footpath and it runs alongside the garden fences of the houses on the north east side of Coylum Road.

The proposed route from An Camas Mòr to Aviemore is shown in red in figure 1. You can see that Coylum Road will become a traffic island bounded on two sides by busy roads.

The developers of An Camas Mòr offer no justification for the realignment the B970 other than to say that such a realignment was mentioned in the Highland

Council Local Plan published in 1997 but first drafted more than 20 years ago. It is apparent that Coylum Road was not laid out as envisaged in the 1997 Local Plan and that the houses were moved much closer to the route of the realignment. In fact some houses are located on top of the proposed route. The 1997 plan envisaged a large area of trees between the houses and the realigned road, but no such area of trees exists.

Coylum Road is a very quiet and peaceful place with traffic noise only from the Ski Road. Thus the construction and use of a new road adjacent to the garden fences of the houses and only 9.5 metres from at least one house would represent a massive loss of amenity in terms of volume of traffic, traffic noise, vibration, dust and headlights at night. The residents will no longer be able to enjoy their peaceful surroundings, as they do at present.

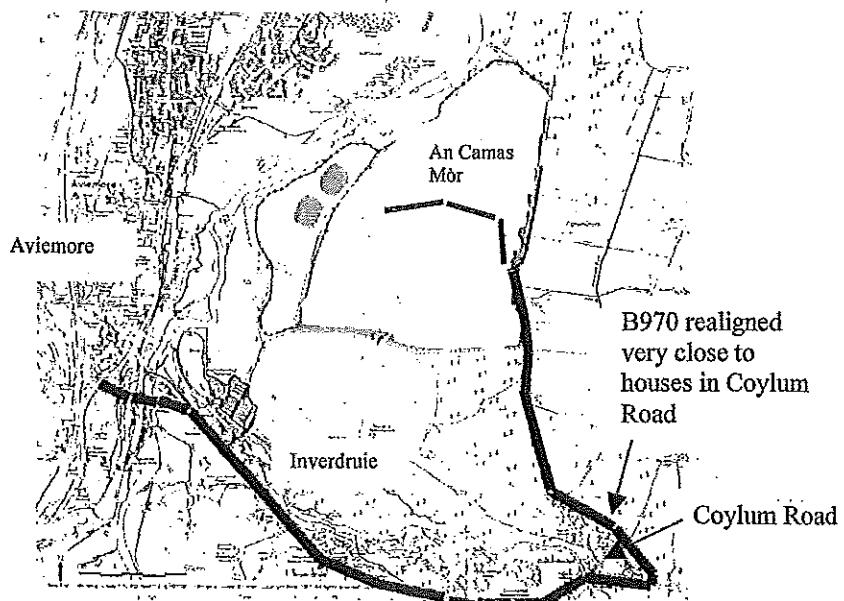


Figure 1 showing the proposed realignment of the B970 close to Coylum Road. The red line shows the main route from An Camas Mòr to Aviemore

# Coylum B970 Action Group

The developers are suggesting that, some time after 2018, they will construct a new access road into An Camas Mòr from close to the electricity substation near to the fish farm in Inverdrue. This road is shown in red in figure 2. You can see that it is shorter than the realigned B970 by Coylum Road and it does not affect the residents of Coylumbridge or Inverdrue.

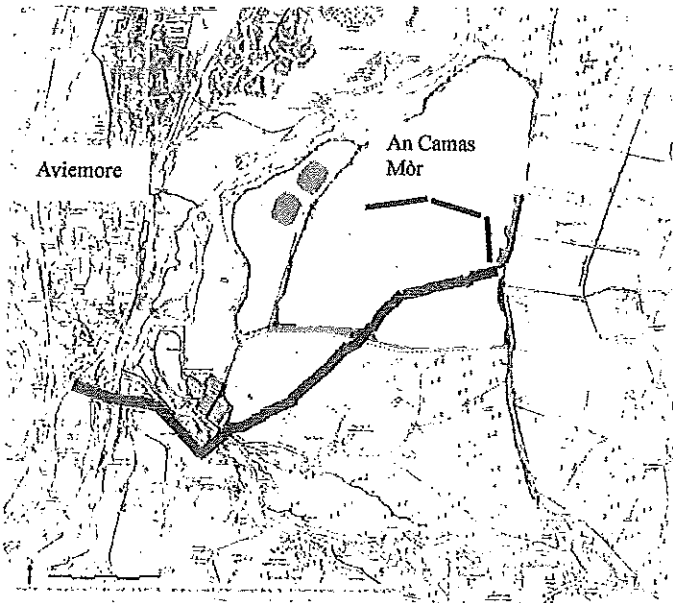


Figure 2 showing the preferred main route from An Camas Mòr to Aviemore via the electrical sub-station at Inverdrue

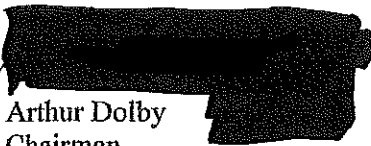

Camas Mòr and that mention of the route as a possibility in the 1997 Local Plan is not sufficient justification to perversely and wilfully destroy the quiet environment of the community of Coylum Road.

We do not object to the An Camas Mòr development and we hope that the innovative ideas included in the application do come to fruition. However we strongly object to the realignment of the B970 past Coylum Road and its use as the main access route to the An Camas Mòr.

We hope that after reading this letter you are now more aware that the An Camas Mòr development as currently proposed would have disastrous effects on Coylum Road and surrounding areas.

We realise that you are not able to offer an opinion but we would welcome the opportunity to meet you and answer any questions you may have on the issues we have raised.

Yours sincerely

  
Arthur Dolby  
Chairman  
Coylum B970 Action Group  


We believe that this route from Inverdrue should be constructed from the start of the development project and that the monies which would be expended on the B970 realignment should instead be applied to the Inverdrue route.

There are many other reasons why the realignment of the B970 and its use as the main access route to An Camas Mòr are inappropriate. These reasons are laid out in the representations sent to the CNPA and, in particular, in the representation prepared on behalf of the residents of Coylum Road by Halliday Fraser Munro.

We believe that the developers have made no attempt to consider and evaluate other options for access to An

The Coylum B970 Action Group represents all home owners in Coylum Road and many of the home owners in Coylumbridge.

The proposal to use the B970 as the main access route to An Camas Mòr is of great concern also to residents of Street of Kincardine and Boat of Garten

<b>Cairngorms National Park Authority</b>	
Planning Application No.	09/155/CP
<b>REPRESENTATION</b>	
ACKNOWLEDGED	6.8.09

<b>Cairngorms National Park Authority</b>	
05 AUG 2009	
RECEIVED	

ROWAN HOUSE  
10 COYLUM ROAD  
COYLUMBRIDGE  
INVERNESS-SHIRE  
PH22 1QG

Head of Planning  
CNPA  
Albert Memorial Hall  
Station Square  
Ballater  
AB35 5QB.

4 August 2009.

Dear Sir,

**An Camas Mor planning application: 09/155/CP**

This letter is an objection to the proposed realignment of the B970 contained in the above planning application. The objection is made on grounds of: sustainability, cost, environmental impact, and an unacceptable increase in traffic.

The later access route from Inverdrue substation proposed in the planning application is recommended as a solution from the outset.

As a sustainable development, An Camas Mor has been required, by CNPA (and others), to demonstrate a close association with Aviemore. The increase of over 1M extra miles of vehicular travel from realigning the B970 and the initial development of east An Camas Mor does not fit with the desired sustainability. Adoption of the Inverdrue substation route would eliminate the need for extra miles traveled and allow west An Camas Mor to be developed, supporting a close association with Aviemore from the outset.

From day one, realigning the B970 would have a damaging affect on the communities of Coylumbridge, Inverdrue, and the wider communities of Street of Kincardine and Boat of Garten. A realigned B970, supporting a dramatic increase in traffic (over 500% according to the developer's own Traffic Assessment), meeting the Ski Road at a point where traffic travels at considerable speed, would create potential problems for other traffic entering the Ski Road on the many junctions towards Aviemore.

The junction with Coylum Road is a potential bottleneck. The present B970 junction at Coylumbridge would become more hazardous. Traffic, often slow moving, from Rothiemurchus Camp Site would have little warning of oncoming vehicles. Hilton, Coylumbridge feeds significant volumes of traffic onto what would become a dramatically busier road. Residents of Inverdrue would experience much greater volumes of traffic as they try to enter the Ski Road. Rothiemurchus Centre entrance/exit

and the junctions for Insh and Dell of Rothiemurchus would have a major impact on traffic flow. The junctions for Bothy Bikes/Tennis Club and St John's Church would also be affected. This section of road towards Aviemore includes a number of school bus stops and is crossed by the recently constructed cycle way to Glenmore.

Adoption of the Inverdrue substation alternative from the outset would mean travel between An Camas Mor and Aviemore did not need to pass all these junctions.

By using the B970 towards Nethy Bridge as the principle access for An Camas Mor for a number of years, traffic traveling north would be encouraged towards Boat of Garten leading to a dramatic increase in traffic along a country road subject to severe icing in winter and traffic volumes through Strathspey villages.

The Inverdrue substation route is included in the planning application as the feed for services to An Camas Mor. Building of this route would appear to be required from day one and realignment of the B970 an expensive and unnecessary project.

The established boundaries of properties along Coylum Road brings into question whether there is sufficient land available to build the proposed realignment of the B970, with cycle/foot path, without impacting the designated SSSI towards Drumintoul.

Yours faithfully,

A black rectangular redaction box covers the signature of M J Cottam.

M J Cottam.