

AGENDA ITEM 7

APPENDIX 5b

2013/0120/DET

REPRESENTATIONS
RECEIVED
TO ADDITIONAL
INFORMATION
SUBMISSION

From:Margaret Smith
Sent:25 Aug 2014 13:51:20 +0100
To:Planning
Subject:FW: Website (www.cairngorms.co.uk) Contact Form

-----Original Message-----

From: [REDACTED]
Sent: 25 August 2014 10:00
To: Mail Manager
Subject: Website (www.cairngorms.co.uk) Contact Form

From: [REDACTED]

2013/0120/DET LOCAL AUTHORITY NO. 13/01281/Ful

I do NOT think for one moment that whatever we say things will change. Far too many houses....access....
As for the affordable houses..near Crannich Park....will there be a clause stating that LOCALS will be offered them first as with the Boat of Garten scheme???? At CRANNICH PARK -
The access from those houses across the field will be a waste of money as we all know everyone will take the direct route as long as a pavement is supplied. In taking access across the bog to CRANNICH PARK we will loose all the deer, red squirrels etc. please consider this. Why are the affordable houses not integrated with the more upmarket homes and who are the people here can afford to buy them or is it just going to be second homes for city people Jane Weston. [REDACTED]

Lindisfarne
Inverness Road
Carrbridge
PH23 3AU

4th September 2014

Cairngorms National Park Authority,

Dear Sirs.

Application Number 2013/0120/DET

I refer to your letter of 21st August 2014 and my previous comments on the above application. Of the new information provided on your website I am particularly interested in the S I A S Transport Assessment as I hoped this would help allay my main earlier concerns.

I would like to make the following comments:

Para 3.2.1. Off- road walking route will be provided to Rowan Park. Unfortunately with no lighting and through woodland. This seems to be of little use, particularly in winter – dark mornings and afternoons, and does not get the children to school. When the development is completed many more children than at present will still have to walk along Carr Road to get to school.

The report has no answer to the request from HRC and yourselves to look at the potential for an off-road walking route to the north of Carr Road except to say that it cannot be delivered.

Para 9.1. Quotes Scottish Planning Policy para 169 as stating that personal travel should be prioritised with walking being the number one priority. This report does not seem to follow that advice.

Some of the photographs used in the report seem biased to show the result the consultants want!

Fig 8.2. Shows the road to the east of Carr Road with a vehicle in the roadway to highlight the narrowness of the road, and therefore its unsuitability for construction traffic.

Figs 2.4 and 2.5. taken in the built up area of Carr Road show the roadway without vehicles, giving no sense of scale and trying to give an impression that the roadway there is wide enough for passing vehicles, pedestrians and cyclists.

The report seems to look at travel flows over the next 4 to 8 years whilst the site is being developed but does not cover travel flows when the 72 houses are occupied, all having one or two cars, nor does it recognise the large number of school children from these houses who will be walking or cycling to the primary school or walking to the bus stop to catch the bus to Grantown.

On a matter of fact Para 3.2.3. states that there is a curtailed bus service at weekends, approx 50% frequency. That is true on a Saturday. On Sundays there is no service.

I do not feel that this report, in particular, and the others do anything to lessen my concerns expressed in my original letter and I wish my previous objections to remain.

Yours Sincerely

J.M Campbell

Comments for Planning Application 2013/0120/DET

Application Summary

Application Number: 2013/0120/DET

Address: Land Bounded By Crannich Park Rowan Park And Carr Road Carrbridge

Proposal: Erection of 96 houses, associated roads & footways

Case Officer: Katherine Donnachie

Customer Details

Name: Mr Andrew Kirk

Address: 2 Rowan Park CARRBRIDGE

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Further to your letter of 21st Aug 14 regarding additional information relating to this planning application -nothing in the additional documents changes my views expressed previously-I refer to my original comments of 4th May 2013-

Lindisfarne
Inverness Road
Carrbridge
PH23 3AU

9th September 2014

Cairngorms National Park Authority,

Dear Sirs.

Application Number 2013/0120/DET

I refer to your letter of 21st August 2014 and the new documents now available on your website.

Having read these documents I do not feel that my earlier concerns have been addressed in any meaningful way.

In particular the Transport Report does not seem to address the likely problem when the additional children from the new development are going to and from school. The proposed path to Rowan Park merely moves the problem a few hundred yards along Carr Road. The fact that the path will be through woodland and unlit merely makes it unusable at school times during winter.

The problem likely to be caused by the extra traffic from the 72 houses seems to have been ignored in the report which seems to deal more with construction traffic. Yesterday a house on Carr Road was having work done and four large vans were parked out on Carr Road most of the day, making passing difficult. Such problems will only increase when the vehicles from 72 extra houses are using Carr Road.

My concerns about the large increase in residents of Carrbridge and the possible effects on the spirit of the village have not been addressed or allayed.

For these reasons I wish my original objections to be reconsidered.

Yours Sincerely

J.E Campbell

From:TERRY DUDLESTON
Sent:16 Sep 2014 15:44:23 +0100
To:Planning
Subject:Application 2013/0120/DET

Application No: 2013/0120/DET
Local Authority No: 13/01281/FUL
Development Proposed: Erection of 96 houses, associated roads and footways.
Location: Land bounded by Crannich Park, Rowan Park and Carr Road, Carrbridge.

We are writing in response to your letter dated 21st August 2014. We would like to make the following comments with regards to the above proposed housing development in Carrbridge:

1. Carr Road is narrow with no footpaths or pavements which makes it very tight for two approaching vehicles to pass each other and to pass pedestrians. It is also already dangerous for parents with prams or pushchairs to walk along. Tradesmen and delivery vehicles cause bottlenecks when they park along the road; Carrmoor Guest house, near the junction with Main Street, is very busy and has guest cars parked along its frontage on Carr Road at any time of the day and any time of the year. Carr Road is already busy enough and is not suitable for an increase in traffic or an increase in the number of pedestrians.
2. At present the majority of children, both accompanied and unaccompanied, walk to either the Grantown School bus stop or Carrbridge Primary School. Creating more traffic both during and after building work on the new site would be a substantial safety risk.
3. Carr Road is not regularly snow-ploughed or gritted by Highland Council during severe winter weather. This would create many difficulties for extra residents. The sloping bend between Carr Farm & Carr Cottages is particularly hazardous.
4. There are a number of farms further along Carr Road. Large farm vehicles travel along it frequently during harvesting, silage/hay making, ploughing etc.
5. The Cairngorms National Park Authority was created to protect this area of great natural beauty and interest. It is extremely popular for tourism, field trips and outdoor activities. Carrbridge is an important part of this and any large development which spoils it, like the one proposed above, is undesirable.

Mrs. S. Dudleston and Mr T. Dudleston,
Rowan Park,
Carrbridge,
PH23 3BE




Cairngorms National
Park Authority
14 The Square
Grantown-on-Spey.
16/9/2014

Dear Sir or Madam,

Thank you for your letter of
21st August 2014 and for the additional
information enclosed.

With reference to my previous
comments I would like to say that
they are unchanged by the
additional information.

Yours faithfully


Hazel Moody
Carr Bridge.

In relation
to 2013/0120/PET
Carrbridge.

From:Randall Lesley (NHS HIGHLAND)
Sent:21 Sep 2014 17:04:14 +0100
To:Planning
Subject:Ref: 2013/0120/DET

Hello

I am writing re the above reference - planning for housing in Carrbridge.

I object to this planning for the additional reason that fuller wildlife surveys are needed on these sites, which are important for wildlife, habitats and amenity to ensure that proper, comprehensive assessment is undertaken at would be lost.

With houses being proposed in Aviemore is there really a need for additional housing in Carrbridge with all the issues that it will bring - many issues mentioned by many already!!

Regards
Lesley Randall
11 Carr Place
Carrbridge
PH23 3AF


Sent from my iPad

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Birchbank
Carr Road
Carrbridge
Inverness shire
PH23 3AD



Planning
Cairngorms National Park Authority
Albert Memorial Hall
Station Square
Ballater
Aberdeenshire
AB35 5BQ

21 September 2014

Dear Sir/Madam


**Planning application: Ref: 13/01281/FUL – Area of land bounded by Carr Road
Carrbridge**

I have already made comments on this application in a letter sent in May 2013.
Please still take these into account.

Yours sincerely

Alfie Roberts
(Age 10)

Birchbank
Carr Road
Carrbridge
Inverness shire
PH23 3AD



Planning
Cairngorms National Park Authority
Albert Memorial Hall
Station Square
Ballater
Aberdeenshire
AB35 5BQ

21 September 2014

Dear Sir/Madam

**Planning application: Ref: 13/01281/FUL – Area of land bounded by Carr Road
Carrbridge**

I have already made comments on this application in a letter sent in May 2013.
Please still take these into account.

Yours sincerely

Jack Roberts
(Age 12)

Paul
Hastings

From: Paul Hastings
Sent: 21 Sep 2014 22:22:43 +0100
To: Planning
Subject: Planning application Ref 13/01281/FUL

Dear Sir/Madam

Planning application: Ref: 13/01281/FUL – Area of land bounded by Carr
Road, Carrbridge

All my previous concerns still stand and I want my concerns to be addressed fully before the CNPA consider any response to the Scottish Reporters latest outcome. I reiterate, there should be no access to any development from Carr road.

Regards

Paul Hastings

Lynagarrie

Carr road

Carrbridge

PH23 3AD

From:Dave Randall
Sent:21 Sep 2014 16:56:53 +0100
To:Planning
Subject:REF 2013/0120/DET

Dear Sir or Madam

I would like to strongly protest, and make my objections noted about the proposed planning of 96 houses in Carrbridge opposite Carr place. This is a fantastic area of outstanding nature and wild life habitats, also for walking and riding bicycles, children especially benefit from this area, as it is safe environment free from vehicles.

Scouts use this field throughout the year, as it's a perfect spot to camp, and be close to nature, with it's diverse wildlife on hand.

This would all have to stop, depriving generations of children from enjoying this area.

Carr rd, does not have the capacity for all of the proposed development traffic, and will cause a real problem in this small village.

The proposed houses of 1.5 storey houses will overlook, and have views into the Carr place bungalows, and this is unnecessary. Carr place, and indeed Carr rd, has many small children who play in this area, enjoying the safe, quiet, beauty of the natural surroundings.

Please, can you reconsider this proposed development as lots more investigations are needed to asses the impact on the area, and a rethink on 1.5 storey houses, in an area of bungalows.

Thank you
Dave Randall

Sent from my iPhone
Dave Randall
Mr D Randall
11 Carr place
Carrbridge
PH23 3AF

From:paige robertson
Sent:21 Sep 2014 20:06:49 +0100
To:Planning
Subject:Planning Application 2013/0120/DET
Importance:Normal

Paige Robertson
12 Carr Road
Carrbridge
PH233af

Dear Sir/Madam

Planning Application 2013/0120/DET

I am writing in reponse to the changes made to the planning application on Carr Road.

I am still objecting to the application as stated in my earlier letter dated 6 May 2013. The inclusion of the path makes no difference, in fact it will add to my journey time to and from the school run, by taking the children through the woods it will endanger the children walking in the dark in the winter months to and from school. It still brings the children out onto a road where there are no paths and will put them in just as much danger.

The part of the road they are wanting to bypass is about the only part of the road that they are able to stand on the grass to get out the way of the traffic.

Yours Sincerely
Paige Robertson

From:John & Ruth Walker
Sent:21 Sep 2014 20:11:31 +0100
To:Planning
Subject:Application No. 2013/0120/DET

Sirs

I refer to your letter of 21st August regarding the planning application for housing in Carrbridge.

Referring to the Transport Statement prepared by SIAS for Tulloch Homes in particular, I find it inconceivable that "the proposed housing development of 72 houses can be satisfactorily accommodated on the existing road network with no detrimental traffic impact" as stated at para 9.2 of the report.

72 additional houses will outnumber those existing and **must** have a detrimental impact by significantly increasing traffic journeys at various times of the day.

The road may be capable of accepting the traffic with certain impositions, but surely not without a detrimental impact overall.

Consequently I believe the number of units planned to be excessive.

Regards

Ruth Walker
Woodside Lodge
Carrbridge

From:Ewan Buxton
Sent:21 Sep 2014 21:06:00 +0100
To:Planning
Subject:Objection to REF2013/0120/DET Carrbridge Housing
Importance:Normal

Dear Sir/Madam,

I OBJECT to application REF2013/0120/DET

I have previously written to the National Park stating an objection, this is still the case. I do not want any houses on an area of Carrbridge that I enjoy for its natural beauty. It is a great part of Carrbridge that many other people than me enjoy, the meadow for it's wild flowers and grasses and the woods for their tranquillity and wildlife.

I turned on the tv and there was an advert for a bee charity, existing because of the destruction of their environment namely wild flower meadows. Is it not crazy that in a National Park we are indeed even thinking about building on such a place?

I enjoy seeing many types of wildlife in this area and feel very upset that it is at risk of being destroyed. It is also upsetting that this area seems to be designated as a development area by the National Park!!

Please don't allow developers to build on this area and ruin a cherished and unique asset the village has. Please reassign this area as not for development, I, and I believe Carrbridge do not want these houses.

regards,

Ewan Buxton
Carrbridge resident

Sent from Windows Mail

rachel
williams

From:rachel williams
Sent:21 Sep 2014 21:46:35 +0100
To:Planning
Subject:Planning Application 2013/0120/DET

Dear Sir or Madam

The recent plans for the future development on Carr Road have highlighted even more concerns for myself.

I feel the suggestion of a path which goes past Carr Cottages and through the woods to Rowan Park is an odd compromise to the traffic issues raised. The corner missed out by this detour is one of the few places where people can actually stand or walk off the road on the grass in safety. I cannot believe anyone will choose a longer more time consuming route into the village, particularly for the school run (which is the big concern).

I think therefore this will be even more disturbance and encroachment into our precious woodland and the species which are already being pushed further out. I feel this will also be a waste of time and resources which will lay unused and be utterly pointless.

I would also like to point out again that whilst I agree for the need for more affordable housing, the idea that 72 luxury houses can be needed in Carrbridge is absurd.

Yours faithfully
Rachel Williams

LYNAGARRIE
CARR ROAD
CARRBRIDGE
INVERNESS-SHIRE
PH23 3AD



19th September 2014

The CNPA
14 The Square
GRANTOWN ON SPEY
PH26 3HG

Dear Sir/Madam

APPLICATION REF 2013/0120/DET

I am writing to object to the above application.

Further wildlife surveys are needed at this location.

Your faithfully,

Scott Hastings



LYNAGARRIE
CARR ROAD
CARRBRIDGE
INVERNESS-SHIRE
PH23 3AD



19th September 2014

The CNPA
14 The Square
GRANTOWN ON SPEY
PH26 3HG

Dear Sir/Madam

APPLICATION REF 2013/0120/DET

I am writing to object to the above application.

Further wildlife surveys are needed at this location.

Your faithfully,



Janey Hastings

Comments for Planning Application 2013/0120/DET

Application Summary

Application Number: 2013/0120/DET

Address: Land Bounded By Crannich Park Rowan Park And Carr Road Carrbridge

Proposal: Erection of 96 houses, associated roads & footways

Case Officer: Katherine Donnachie

Customer Details

Name: Chairman Carrbridge Community Council Andrew Kirk

Address: 2 Rowan Park CARRBRIDGE

Comment Details

Commenter Type: Community Council

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Further to our original submission of early May 2013 nothing in the additions or amendments of this application change our views. We continue to be greatly concerned with Road Traffic issues particularly on Carr Road but with Crannich Park also. Furthermore as the Reporter has now recommended a reduction in the number of houses to be built and to exclude the area of woodland we await the impact of this on the planning process

Dear Sir or Madam,

22 September 2014

Application Number: 2013/0120/DET
Local Authority Number: 13/01281/FUL
Development Proposed: Erection of 96 houses, associated roads & footways
Location: Land Bounded By Crannich Park Rowan Park and Carr Road, Carrbridge

I refer to the above application and in addition not my **objection** emailed earlier today, I would like to take this opportunity to raise a concern related to the above application as well as large-scale applications in general.

I believe the CNPA should consider implementing a system whereby developers are encouraged to submit only realistic, demand-driven applications. This could happen in several ways. For example, changes in procedures could be made to the effect that major developments as the one referred to above, can only be submitted once in a certain time period (*i.e.* that if an application is rejected, a new application is not allowed to be submitted by the applicants for the same site in a certain number of months or years). What happens at the moment is that developers submit applications for an outrageous number of houses, and after rejection immediately submitting a second (or sometimes third) application for a lower number of houses. In doing so, developers hope (and often succeed in) wearing communities and organisations down. Another option would be to follow application procedures that are in place in other EU countries. I refer for example to the Dutch system where in the approval of an application it is stated that a certain percentage (often more than 70%) of the proposed build has to sold before being allowed to start the actual build and where the build has to be complete within a given number of years.

Changing regulations in this way will force developers to submit realistic, demand-driven applications. It would also prevent other parties (including but not limited to the community, conservation organisations, environmental agencies, the CNPA, etc.) to have to invest major resources into applications by developers who are 'just playing the game'.

If you have any queries about the above, please don't hesitate to contact me.

Yours Sincerely

Louise de Raad

1 Carr Place
PH23 3AF
Carrbridge

Comments for Planning Application 2013/0120/DET

Application Summary

Application Number: 2013/0120/DET

Address: Land Bounded By Crannich Park Rowan Park And Carr Road Carrbridge

Proposal: Erection of 96 houses, associated roads & footways

Case Officer: Katherine Donnachie

Customer Details

Name: - R Menzies Robertson

Address: Thornlea, Carr Road, CARRBRIDGE, Inverness-shire

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Supplementary to my comments dated 13 May 2014 -

the environmental study for the proposal should make comment on the implications of the resultant increase in detergents that would be flushed into the river system.

local freshwater mussel colonies are already under significant pressure from same.

Comments for Planning Application 2013/0120/DET

Application Summary

Application Number: 2013/0120/DET

Address: Land Bounded By Crannich Park Rowan Park And Carr Road Carrbridge

Proposal: Erection of 96 houses, associated roads & footways

Case Officer: Katherine Donnachie

Customer Details

Name: Dr David Gasking

Address: Seann Bhruthach Carr-Bridge

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: An addition to previous objections/comments on this application over the years, regarding the capacity of the Carr-Bridge sewerage system to cope with additional inputs.

On 28th July 2014 a heavy afternoon storm led to backing up in the Ellanwood Road sewer to such an extent that the inspection chamber at the front of my house filled up completely and sewage overflowed out into my garden. Similar problems were also noted by my neighbours in Bracklemoss and Ellanwood Court.

Over the years we have been used to back pressure forcing air/sewage back up the system during such storm events, but never before with sewage overflow, even during heavier and more prolonged storms.

On 28th July Scottish Water attended and cleared an accumulated blockage of the main sewer down Ellanwood Road, leaving the impression that the problem was now solved.

However, three days later during a further heavy afternoon storm, I once again had flooding back into my garden from the sewer.

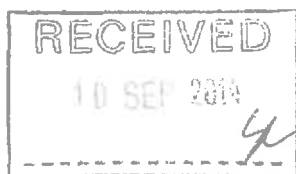
I learned also from the Scottish Water personnel that attended on that day that there had been similar back flooding at 7 Rowan Park, where there has been a history of even more serious sewage overflows in the past.

Since then we have had incidents of further heavier and more prolonged rain which have given rise to back pressure but no flooding. The difference, as I would identify it, is that on 28th and 31st July the rain came as sudden downpours later in the afternoon on otherwise hot sunny days, when

visitor numbers at the Landmark Centre were at a peak with the school holidays and Commonwealth Games.

Ten years ago Landmark had one car park and on a busy day there would be overspill parking out onto the Main Street. Now, with two car parks, on those two days in July they were still parking out onto the street.

My concern is that with existing development plus summer visitors the sewers are already overloaded without the capacity for additional inputs.



Weston Galloway
Dulnain Bridge
Grantown on Spey
PH26 3L2

8 September 2014.

Dear Sir,

Application 2013/0120/DET
Local Authority 13/01281/FUL
Erection of 96 hours in Cambridge

Thank you for your letter dated 21 August 2014 asking for comments on the new information submitted. I wish to restate my reservations expressed in my letter of 1 May 2013.

1. I note that the Transport Assessment of June 2014 by CIAS concludes that 72 dwellings will not generate traffic to exceed that for a 'quiet county lane'. However it is a section of road shared by walkers, runners, cyclists and motorised vehicles and a significant increase in traffic into Cambridge will have a detrimental impact.
2. The single track road to the east to Dulnain is also shared by walkers, cyclists, runners, cars and farm traffic. It has no parking places, soft verges and ditches. Inevitably there would be more traffic. It is not fit to carry extra traffic.
3. Cambridge, like other villages in the Park, has its own identity defined socially and by buildings. You know where you are when walking around Cambridge. This distinctive character

most benefit tourism. Diluting its character with so many new houses will have a detrimental impact on the character of Cambridge. In the meantime the proposed new town adjacent to Arisens will offer many new homes to those able to find employment in the area.

4. I note that some areas of the development site have not been surveyed in the ecology report. Is this material?

I note that although your letter heading refers to 96 dwellings, this application is for 72. This reduction may be a planning tactic. Thus if permission is given for 72, it should come as no surprise if a later application for a further 24 dwellings is received.

Yours faithfully,



R. W. SHORTER

From:Lis Urquhart

Sent:15 Sep 2014 18:31:22 +0100

To:Planning

Subject:App No 2013/0120/DET 13/01281/FUL Erection of 96 houses Carrbridge - Objection - additional comments

Dear Sirs

I refer to your letter of 21 August 2014 detailing further information available on the above proposed development.

The recent documents do not address the fundamental objection from all previous representations that this development is out of proportion to the size of the village, with all the attendant implications.

Traffic calming measures and 20 mile limit on Carr Road will not change the sheer volume of increased traffic or its detrimental effect on those using Carr Road and Rowan Park.

Additionally, the Traffic Assessment only deals with Carr Road and does not address the increase of traffic on the main road through the village.

Separate representation has demonstrated that the sewage and drainage infrastructure is already under strain.

This planning application remains an application for a development too large for this village.

Yours faithfully

Elisabeth Urquhart

Lilac Cottage

Carrbridge

Inverness-shire

PH23 3BX

Cairngorms National Park Authority
14 The Square
Grantown
PH26 3HG

Mr. D C Graham
7 Crannich Park
Carrbridge
Inverness-shire
PH23 3BD

Application Number 2013/0120/DET
Reference Number 13/0128/FUL
Proposed Development Erection of 96 houses, associated roads & footways
Location Land bounded by Crannich Park, Rowan Park and Carr Road, Carrbridge

Ref : Your letter dated 21st August 2014

18th September 2014

Dear Sir,

As a resident of Crannich Park I would like to raise the following concerns regarding some aspects of the above proposed development

- I don't see the need for 24 new low cost houses in Carrbridge. Where are the new residents coming from, Carrbridge or further afield ?, this could bring the problem of antisocial behaviour to Carrbridge from outlying areas. Also I would question the need for 72 new private houses particularly in the present economic climate, they could take a long time to find buyers for and therefore extend the duration of the building process with all the usual disruption and mess associated with the development dragging on for years.
- Why do the low cost houses have to be where they are proposed to build them, these would be the first thing anyone would see when entering the village, surely it would be better for the village if they were to be integrated with the private houses, it would look better and provide a more balanced social mix.
- Carrbridge is a traditional Scottish Village; **let's keep it that way** and not turn it into just another dormitory village to Aviemore and Inverness, there is very little work in Carrbridge so anyone seeking work will most likely have to travel, involving more traffic and pollution, surely in a National Park this should be discouraged wherever possible.
- The new footpath from the low cost housing which would enter Crannich Park would result in a lack of privacy for the existing residents in Crannich Park. It would be better if the footpath continued along the main road from where the existing footpath now terminates at the entrance to Crannich park to the entrance of the new development, the new residents may decide to take this route in any case as it would be shorter, and this would be dangerous if a proper roadside footpath wasn't provided, also the street lighting and the speed restriction sign would need to be extended to a point beyond the entrance to the new development.

I would therefore draw your attention to your letter to me ref Katherine Donnachie (Planning Officer) dated 3rd January 2013 in response to my letter to you dated 11th December 2012 in which you refer to your report

dated 9th March 2007 Paragraph 45 which you kindly provide an extract of. The report appears to address the above issues but I have not seen them incorporated into the new plans.

Paragraph 45

The existing 30 mph speed limit on the B9153 public road shall be extended southwards to an agreed location beyond the main access to the site. Existing signage and road markings shall be replaced or relocated as required. The developer shall bear all costs associated with the speed limit extension.

Street Lighting on the B9153 public road shall be extended southwards beyond the main access to the site.

A Continuous roadside footway. 2 metres wide shall be provided on the eastern side of th B9153 public road between Crannich Park and the main access to the site.

Paragraph 97 condition 8 is also suggested to cover this point.

- **Services** The development in general would put pressure on local services, school, shops, pub etc.
- **Traffic** There would be a considerable increase in traffic not just from the new residents, but also from visitors, deliveries etc.
- **Habitat & Environmental** Carrbridge is a small village surrounded by natural forest and bogland, which contains associated flora and fona, and an abundance of wildlife and insects, deer, red squirrels and woodpeckers to name but a few. The proposed development if it should proceed would destroy some of this habitat and at the very least would disturb the wildlife due to noise and disturbance whilst the building is in progress, also the increase in the numbers of resident's accessing the forest would also impact on said wildlife.
I therefore suggest that the above issues have not been properly assessed or addressed.
- **Nuisance** There will be the usual problems associated with building which will affect existing residents of Carrbridge: Noise, Mud, Dust, builder's vehicles and plant etc, probably ongoing for many years.

Yours Sincerely

Mr. D C Graham

Cairngorms National Park Authority
14 The Square
Grantown
PH26 3HG

Mrs. P Graham
7 Crannich Park
Carrbridge
Inverness-shire
PH23 3BD

Application Number 2013/0120/DET
Reference Number 13/0128/FUL
Proposed Development Erection of 96 houses, associated roads & footways
Location Land bounded by Crannich Park, Rowan Park and Carr Road, Carrbridge

Ref : Your letter dated 21st August 2014

18th September 2014

Dear Sir,

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- Why do the low cost houses have to be where they are proposed to build them, these would be the first thing anyone would see when entering the village, surely it would be better for the village if they were to be integrated with the private houses, it would look better and provide a more balanced social mix.
- Carrbridge is a traditional Scottish Village; **let's keep it that way** and not turn it into just another dormitory village to Aviemore and Inverness, there is very little work in Carrbridge so anyone seeking work will most likely have to travel, involving more traffic and pollution, surely in a National Park this should be discouraged wherever possible.
- The new footpath from the low cost housing which would enter Crannich Park would result in a lack of privacy for the existing residents in Crannich Park. It would be better if the footpath continued along the main road from where the existing footpath now terminates at the entrance to Crannich park to the entrance of the new development, the new residents may decide to take this route in any case as it would be shorter, and this would be dangerous if a proper roadside footpath wasn't provided, also the street lighting and the speed restriction sign would need to be extended to a point beyond the entrance to the new development.

I would therefore draw your attention to your letter to me ref Katherine Donnachie (Planning Officer) dated 3rd January 2013 in response to my letter to you dated 11th December 2012 in which you refer to your report

dated 9th March 2007 Paragraph 45 which you kindly provide an extract of. The report appears to address the above issues but I have not seen them incorporated into the new plans.

Paragraph 45

The existing 30 mph speed limit on the B9153 public road shall be extended southwards to an agreed location beyond the main access to the site. Existing signage and road markings shall be replaced or relocated as required. The developer shall bear all costs associated with the speed limit extension.

Street Lighting on the B9153 public road shall be extended southwards beyond the main access to the site.

A Continuous roadside footway. 2 metres wide shall be provided on the eastern side of th B9153 public road between Crannich Park and the main access to the site.

Paragraph 97 condition 8 is also suggested to cover this point.

- **Services** The development in general would put pressure on local services, school, shops, pub etc.
- **Traffic** There would be a considerable increase in traffic not just from the new residents, but also from visitors, deliveries etc.
- **Habitat & Environmental** Carrbridge is a small village surrounded by natural forest and bogland, which contains associated flora and forna, and an abundance of wildlife and insects, deer, red squirrels and woodpeckers to name but a few. The proposed development if it should proceed would destroy some of this habitat and at the very least would disturb the wildlife due to noise and disturbance whilst the building is in progress, also the increase in the numbers of resident's accessing the forest would also impact on said wildlife.
I therefore suggest that the above issues have not been properly assessed or addressed.
- **Nuisance** There will be the usual problems associated with building which will affect existing residents of Carrbridge: Noise, Mud, Dust, builder's vehicles and plant etc, probably ongoing for many years.

Yours Sincerely

Mrs. P Graham

Carol Turnbull,
An Bothan,
Carr Road,
Carrbridge,
Inverness-shire,
PH23 3AD.

Date; 21.09.14

To; ePlanning Centre,
The Highland Council,
Glenurquhart Road.
Inverness,
IV3 5NX

Ref; 13/01281/FUL, application no; 2013/0120/DET

Dear Sir/ Madam,

Having read the new information provided, I object to this application for the reasons stated in my previous letter, and would like to add the following points;

Transport Statement;

Report states that traffic flow will almost double; 449 existing plus additional 415. I fail to understand how Carr Road can handle double the traffic flow, and probably double the pedestrian traffic, without massively compromising safety, and the character of the neighbourhood.

The report does not take into account the following;

Junction of Carr Road with main road; radius is too tight; cars turning out left are forced onto wrong side of road, and cars turning into Carr Road from south find the corner too tight to do so if a vehicle is waiting to exit Carr Road. Vehicles will be forced to mount kerb to avoid collision, resulting in danger to pedestrians. All children from south end of the village cross Carr Road at this point on route to school, so at busy morning rush hour when traffic is at its maximum, there will be many school children waiting to cross, exactly at point where vehicles mount kerb.

Many existing driveways are blind, forcing cars to pull out a couple of metres into the roadway in a form of 'Russian Roulette', with double traffic the odds of survival will be halved!

With lying snow, the road is reduced to single lane due to walls and fences at road edge. With current traffic levels this creates congestion, double traffic flow will be chaos. Traffic regulations are based on average Scottish street; this street gets more than average snowfall!

Parked cars currently don't create a problem with current traffic, they will do with double the traffic flow. With no pavement there is not space for a moving vehicle to pass a pedestrian / pram / cyclist.

Introduction of 20mph roundels painted onto the road, and coloured road surface are not in keeping with Carr Roads existing rural character, speeding is not a problem .

Doubled traffic flow will have a noise impact on the existing homes which are fairly close to the road.

Also feel it is a huge loss of wildlife habitat!

Yours sincerely,

Carol Turnbull.

Neill Turnbull,
An Bothan,
Carr Road,
Carrbridge,
Inverness-shire,
PH23 3AD.

Date; 21.09.14

To; ePlanning Centre,
The Highland Council,
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Also feel it is a huge loss of wildlife habitat!

Yours sincerely,

Neil Turnbull.

From: Steve
Sent: 21 Sep 2014 19:39:29 +0100
To: Planning
Subject: 2013/0120/DET

Dear Sir/Madam

Application Number: 2013/0120/DET
Local Authority Number: 13/01281/FUL
Development Proposed: Erection of 96 houses, associated roads & footways
Location: Land bounded by Crannich Park, Rowan Park and Carr Road, Carrbridge.

I am writing in response to the letter that you sent dated 21/08/2014 regarding the proposed planning application as detailed above.

I am raising my concerns regarding the access along Carr Road for construction traffic. The developer has intimated that there are two access points to this site, one from the main road from Carrbridge village centre and the other from Balnain some 5 miles East of the proposed sites. The preferred option for the developer is via Carrbridge village centre. My concerns are the clear width of this road for safe passing of pedestrians, and 2 way traffic. During the winter this road becomes single track and can be almost impassable when traffic meet especially in the dipped area by Birchbank House. I feel that with several years of construction planned this road will become a danger to all those that use the roadway for assess. I strongly advise the second option of the Balnain Junction be used and suitable arrangements are made to secure the integrity of the road bridge that spans the Dulnain river. The only other suggestion is to restrict access along Carr Road in between the proposed site and the Main Road in Carrbridge at peak times for commuters and when children are travelling to and from school and nursery.

I am concerned at the size of the development. In principle I am not against the further needs to expand the village to provide future homes for families but I am very concerned with the development into the woodland area behind the site at Carr Road. The woodland itself is an amenity for all to enjoy

and must be safeguarded both for the flora and fauna but those residents that enjoy walking in these idyllic surroundings. The profits of the developer must not be their driving focus to develop this village over the local needs of future housing to meet the demand as required.

I look forward to your reply and happy to discuss these points further.

Your Faithfully

Steven Kant.

Birchbank
Carr Road
Carrbridge
Inverness shire
PH23 3AD

Planning
Cairngorms National Park Authority
Albert Memorial Hall
Station Square
Ballater
Aberdeenshire
AB35 5BQ

21 September 2014

Dear Sir/Madam

**Planning application: Ref: 13/01281/FUL – Area of land bounded by Carr Road
Carrbridge**

Thank you for your letter of the 21 August providing an opportunity to respond to the further documents that have been lodged on the National Park eplanning website relating to the above development. I made my original detailed comments about the proposed development in correspondence dated 7th May 2013 and assume that all of these still stand.

In addition to my original comments I have considered the Transport Assessment provided by SAIS (dated 18 June 2014) and have the following further comments to make. They are addressed in the order that they are mentioned in the Transport Assessment:

- The assessment discounts any additional use of the unclassified extension of Carr Road to Balnaan as being 'unlikely to provide an attractive option for travel to the east'. While this is a reasonable assumption it is not appropriate to assume that there will be no increase in travel along this section of road. The proposed new development will inevitably give rise to increases in traffic along this very narrow road with only informal and occasional passing places.
- The report fails to investigate the potential for an off road route from Rowan Park towards the village centre due to 'land being outwith the applicants' control'. This is not an acceptable reason for the developers to fail to demonstrate effort to investigate these options. The housing development will impact on our whole village, far beyond land which is within our individual ownership. With a development that will make such a major impact on the village it is the responsibility of the developers to make efforts

to take these issues into account regardless of who owns the land, and to provide evidence that they have done so.

- The report describes current traffic flow along Carr Road with reports of car journey numbers at 3 different locations. The report counts daily 2 way car journeys of 450 at point A (western end of Carr Road), around 250 at point B (half way along Carr Road after the Rowan Park exit) and 180 at point C (on the village side of the potential new development location). These numbers support my suggestion in my earlier submission that the vast majority of current traffic on Carr Road originates towards the western end of the road and not to the east from where all new traffic associated with the development will arise. The new development will therefore have a disproportionate impact on flows of traffic along the full length of Carr Road.
- The report estimates that the new development will generate 415 new 2 way trips within a 24 hour period. All of these trips will originate from the new development at the eastern end of Carr Road, beyond point C in the traffic survey. This means that, following the development, traffic flow will be around 595 2 way journeys per day at point C which represents a 330% increase in current traffic flow at this point. This is a totally unacceptable increase in traffic flow in such a quiet rural location and there is no way that, even with the proposed traffic calming measures, it could be accommodated whilst retaining the current character of Carr Road.
- The National Park Authority asks the developer to address how their proposed traffic calming measures could be accommodated 'without losing the very attractive rural character of the road'. The report then goes on to suggest that according to English guidance (issued by the Department of Transport and the Countryside Agency) 'quiet country lanes' can accommodate 1000 traffic journeys per day. I totally fail to see how guidance that applies in England and Wales can apply given the rural Highlands situation of the road in question.
- Notwithstanding the legitimacy of the Countryside Agency guidance to the situation in question, it is unclear from the developers' interpretation of the guidance as to whether the 1000 traffic journeys that are acceptable on 'quiet country lanes' are 2 way or single journeys. If single journeys then the new development will clearly result in excess of 1000 car journeys per day with total anticipated 2 way journeys at point A anticipated to be as high as 865.
- Proposals for traffic calming on Carr Road suggest changes in road surface colour and the painting of roundels on the road, surely these alone will change the quiet, rural character of the road.
- The report suggests that a road width of 4.1m is usually acceptable for an HGV to overtake a cyclist. This makes the assessment of traffic flow during

construction, which suggests that the best option is for HGV traffic to access the site from the east along Carr Road, seem ludicrous. Carr Road residents would be expected to endure up to 5 years of regular and heavy HGV traffic along a road where the space is only just adequate for an HGV to pass a cyclist. Carr Road is regularly used by children on bikes and scooters.

In my original letter I asked how a new development on this scale could possibly fit with National Park objectives. As with all of my original comments, I particularly stand by those. I totally fail to see how a development on this scale, which will provide economic benefits almost exclusively to a developer from outside the National Park, can be justified given the adverse impact that it is likely to have on environmental and social cohesion in this characterful National Park village.

I look forward to hearing the outcome of your consideration of this totally unacceptable development proposal.

Yours sincerely

Rebecca Badger

From:RONA KANT
Sent:21 Sep 2014 20:25:46 +0100
To:Planning
Subject:Pllaning Application Number: 2013/0120/DET

Application Number: 2013/0120/DET
Reference Number: 13/01281/FUL
Proposed development: Erection of 96 houses, associated roads and footways
Location: Land bounded by Crannich Park, Rowan Park, and Carr Road, Carrbridge

Dear Sir or Madam,
I am writing regarding the above planning application and would like to make note that my previous comments of 5.5.13 still stand.

I would also like to emphasize my concerns about increased traffic on Carr Road as I do not feel the proposed 'build outs' by the developers address these issues, as I also note in the new documentation that no accidents have happened on this stretch of road, however there have been several near misses!

I have attached photos taken from my car (when stationary with the engine off) and on foot showing the following:

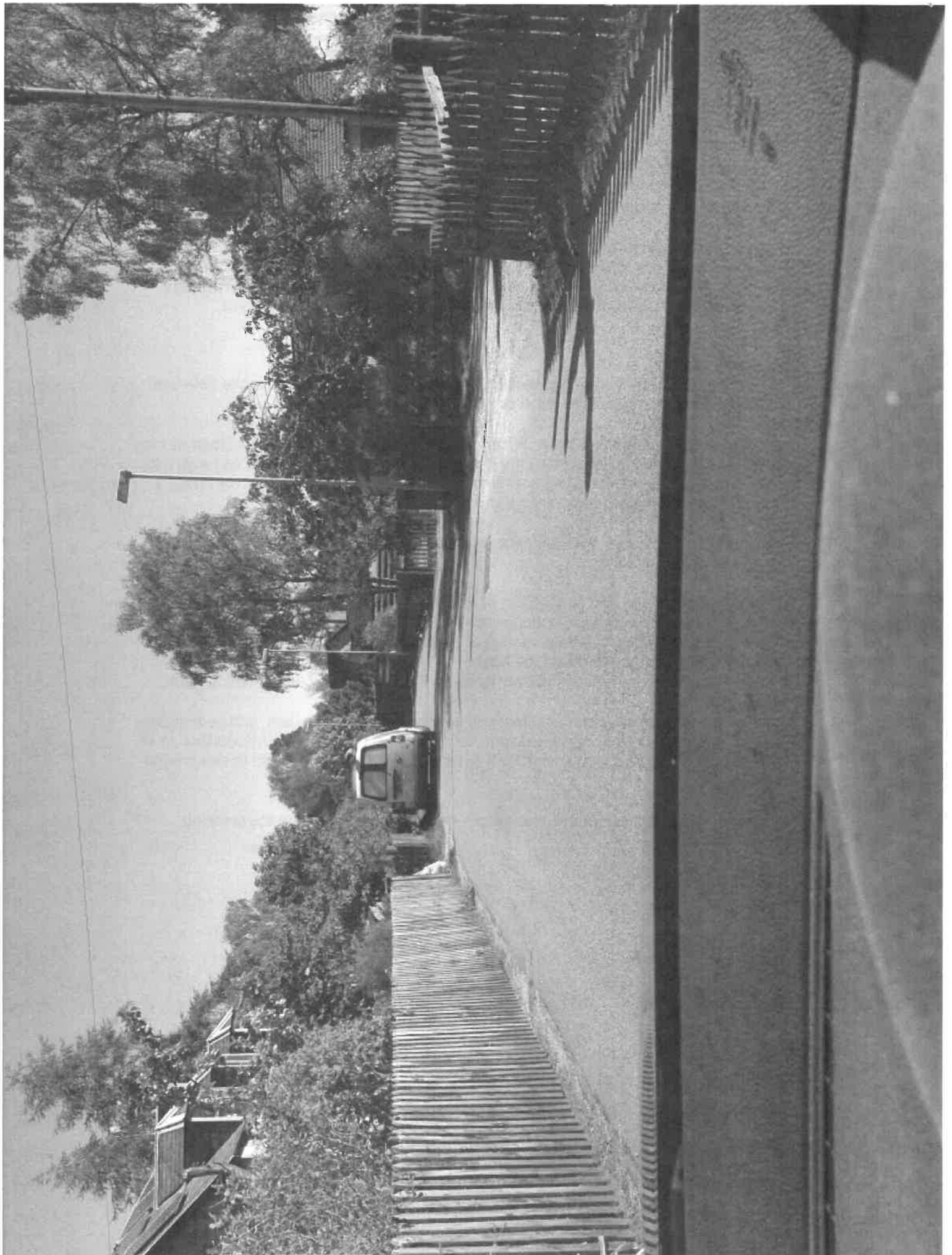
1. Poor site lines when you turn left out of Rowan Park onto Carr Road
2. Poor site lines when travelling along Carr Road just before the Rowan Park junction.
3. Poor site lines and narrowness of road at Birchbank on Carr Road, especially when there are vehicles parked outside the house.
4. Poor site lines at the junction of Carr Road and the Main Road when turning right.

I have personally experienced or witnessed near misses between cars and pedestrians, and cars and cars at all of these locations, as cars travelling along Carr Road tend to sit in the middle of the road and as can be seen from the photos are unable to see around these bends.

I hope you will take these points into consideration when considering the planning application.

Yours faithfully

Rona Kant









Birchbank
Carr Road
Carrbridge
Inverness-shire
PH23 3AD

The Planning Support Team
Cairngorms National Park Authority
14, The Square
Grantown-on-Spey
Moray
PH26 3HG

Dear Sir or Madam,

Application Number: 2012/00120/DET
Local Authority Number: 13/01281/FUL
Development proposed: Erection of 96 houses, associated roads & footways
Location: Land bounded by Crannich Park, Rowan Park and Carr Rd, Carrbridge

Thank you for your letter dated 21 August 2014, inviting comments specifically to the new information provided in respect of this development. Having studied the documents, I see no evidence that the concerns I raised in my letter of 8 May 2013 have been satisfactorily addressed. I therefore wish to sustain my **objection**. As before, I wish to stress that these are my own personal views.

Previous response

In my letter of 8 May 2013, I listed concerns under the following headings:

- Carr Rd
- The size of the development
- Questionable need
- Phased building
- Biodiversity impacts
- Capercaillie
- Low cost "ghetto"

I stand by all of those comments and – through this letter – ask that you consider this current letter as a reiteration of all of those points. Therefore this current letter is to be taken in conjunction with my 8 May letter as a further submission.

CNPA Capercaillie Framework

On the 21 August 2014 you gave me and others notice of the new information appearing on the Park Authority website. Since then, I understand the National Park Board has given favourable consideration to the Capercaillie Framework, developed by the CNPA.

For all concerned with this application it seems only right and proper that this application by the developers is considered and tested in the context of the Capercaillie Framework. I suggest

that it is incumbent on the Park Authority to advise all respondents to this further consultation, that the Framework has been developed, so they can amend their responses accordingly. It seems inappropriate to be consulting on this proposal only weeks before such an important document has been considered by the CNPA Board. Given the presence of capercaillie in the area around the proposed development, and the importance of Carrbridge to the Strathspey meta-population (and therefore the national population), I suggest the Park Authority should extend the consultation period further so local people can consider what this means for the proposal.

Response to new documents

I have outlined my comment on each of the documents that the developers have submitted, as follows. I have found it hard to distinguish the new documents from the previous set. It may therefore be that some of my comments are on documents on which I'm not entitled to comment. I apologise if this is the case.

Document : 2013_0120_DET-BRACEWELL_STIRLING_COMMENTS_ON_LANDSCAPING-100102409

In the undated letter (received by CNPA on 18 July 2014), Sam Sweeney implies that, felling an area of woodland for housing development is of little significance as plantation woodland "if left undeveloped is likely to be sought for harvesting at some future time". Felled plantation can be felled in such a way as to maintain continuous forest cover; it can be felled and replanted or it can be felled and left to regenerate naturally, as conditions permit. All of these post-harvest options are very different from removal and loss of the woodland to a housing development.

It is useful to note Sam Sweeney's comment that "most of the traffic approaching the development along Carr Road is likely to be inhabitants of the development", which highlights the substantial change that current residents will experience.

The reason why the majority of existing properties on Carr Rd have "frontage driveway access" is because the houses along Carr Rd have developed gradually over 100+ years, along "a quiet country lane". The proposed development will change this. It will make these frontage access locations less safe – whether for cars pulling out of them, or for children embarking on their walk to school.

Document: 2013_0120_DET-BRACEWELL_STIRLING_LETTER-100102411

In the letter dated 2 July 2014, Mr Sweeney appears to imply that the occasional use of HGVs for timber extraction suggests that the road is therefore OK to accommodate years of similar traffic for the purposes of constructing a housing estate. This is a wholly inappropriate conclusion or assertion.

The Safer Routes to school proposal – providing a formalised path linkage to Rowan Park will (a) result in increased numbers of people walking around the rear of some properties and (b) still result in more children walking along a substantial section of Carr Rd, which will have been made much busier by virtue of the development. Thus the developers have still failed to satisfactorily address the fact that this development will result in significantly more cars using a currently quiet lane at a time when children are walking to school. This is a vital issue, and the developers and CNPA ignore it at their peril.

It is inappropriate for the developers to highlight a conclusion that more houses means more teachers. The under-funding of schools is a separate issue. An additional teacher will only result from more children. It won't significantly alter the teacher:pupil ratio. If the developers want to make a genuine point here, they should:

- Estimate the number of dwellings that will be occupied as first homes, rather than holiday houses.
- Estimate the number that are likely to have children of primary school age.
- Estimate what this will mean for the pupil roll at Carrbridge.
- Establish what ways, if any, this will alter the teacher:pupil ratio.

I suspect the conclusion at the final bullet point will be “not at all”.

In my previous correspondence, I said:

Low cost “ghetto”

- The developers have proposed complete segregation of low cost housing (beside the noisy and busy main road) and commercial housing (in the more secluded & (currently) quieter Carr Road). This is certain to give the developers the highest return on their investment, however the ghetto-ism that will result will not help the social structure of Carrbridge. In making such a judgement the developers have either demonstrated supreme ignorance in considerations of social integration or have decided that their profits are more important than the social structure of the village they are using for commercial gain. Either possibility does not instill much confidence in their capabilities in any aspect of the proposal – apart, of course, from the objective of making money!

The current letter from Mr Sweeney states, with reference to the low cost housing: “The Highland Council indicate they accept a single location for these dwellings”. Given that we have specifically raised a concern about this, the developers, and perhaps Highland Council, should be called upon to justify their rationale more fully. Currently they have said nothing that effectively contradicts what I have previously written.

With reference to capercaillie, Mr Sweeney's letter fails to give assurance that there will be no adverse impact on capercaillie that live in and make use of the adjacent wood. If SNH & CNPA consider this proposal is indeed a "plan or project" in the terms of the EU Birds Directive, then my understanding is that they need to be satisfied that the developer's assurances (meagre as they are!) are adequate to approve the development.

With regard to the Boys' Brigade's use of the field, the developer's conclusion appears to be that the BB group should move into the wood. The consequence of this would be more widespread damage and disturbance than is proposed by the current development. If this is a genuine proposition, the developers should detail exactly what this will mean, so the community can consider it.

At a (revised!) minimum of 18 houses built per year, Carr Road will experience continuous construction work and associated construction traffic for at least 5 years. If the housing market drops and the developers revert to 10 built per year, minimum, we will experience continuous building for around 9 years. Any claims that the "quiet country road" character of Carr Rd will remain are clearly unrealistic and a misrepresentation.

Document: 2013_0120_DET-CARR_ROAD_SITE_LAYOUT-100102403

In a number of locations on this map, the symbol denoting the location of squirrel dreys is concealed beneath the symbols denoting trees. This creates a visual under-representation of the records for red squirrel dreys. The developers should be required to redraw the map, placing the symbols on top of the tree cover symbol.

Squirrel drey "3 rating" symbols are the same colour as that used for the trees. Again this gives a visual under-representation of the occurrence of dreys. These symbols should be redrawn with a different colour.

There should also be a map predicting the impact on drey distribution post-development.

The proposed path route from the housing estate to Draig passes what appears to be a consistent red squirrel drey location. What impact to the developers suggest this path will have on the use of this specific location by red squirrels?

Document: 2013_0120_DET-CNPA_ECOLOGY_RESPONSE-100102532

This summary from the CNPA confirms that the ecological information that has been gathered, continues to be inadequate. The developers do not seem to grasp the environmental importance of the area, which casts doubt on their capacity to treat it with due respect.

In the section titled "Interests affected by proposal", the text notes "There are no designations, either national or international, that cover either of the development areas". Whilst this statement is correct, it would be useful for decision-makers to be made aware that sites that are not designated as SPA, but which support features of nearby SPAs, e.g. capercaillie, need to be considered as if they were SPAs, when assessing a plan or project in the terms of the Natura Directives. It is my understanding that any site which can be shown to be used by capercaillie, has potential to affect the integrity of the SPA network that supports the capercaillie meta-population.

Document: 2013_0120_DET-CNPA_ECONOMICS_RESPONSE-100103249

This document is in stark contrast with the objective approach taken in the CNPA Ecology Response. This account of the potential economic impact is deficient in site-specific facts, analysis and balance.

Appraisal of impacts: For this point to have any significance, it needs clarification of the retired population in Carrbridge compared with other communities of similar size in Strathspey. Likewise the same analysis for unemployment, second home proportion and house prices.

House prices and sales/Employment: There is evidence of a "high demand to live within the CNP and a high number of second homes in the area". Neither of these is a sound reason to build 74 expensive houses in Carrbridge, unless you happen to be the developer. The rationale in subsequent sections relates to low cost housing, which is better argued.

This assessment must be re-written to make a very clear distinction between the socio-economic benefits of the proposed low-cost housing, vs the socio-economic benefits of housing outwith this category. Without such a distinction it comes across as pro-development and without balance.

Concluding advice: There is nothing here about:

- The likelihood that the construction work will be awarded to local (Strathspey? Inverness? Highland? Scottish?) contractors. It must be possible to determine where the labour has come from for recent phases of house-building in Aviemore.
- Potential negative impacts - it's as if it's inconceivable that they exist. If that is genuinely the case, then this summary should state that the assessor has identified no negative economic benefits. What might such impacts be? How about: impacts on house prices in general; difficulty of people selling houses when there will be 5-10 years of continuous construction activity along Carr Road, or the creation of a new path behind otherwise secluded properties; and impacts on the popularity of B&Bs etc along Carr Rd. I'm not

an economist and even I can come up with three negative impacts that could have been assessed!

- The social consequences of the proposed work. Has it been forgotten? Is it not considered relevant? Or is it too inconvenient to mention it? There needs to be an assessment of the social consequences – both positive and negative.

Without such analysis I cannot see how this report can be considered decent evidence to be submitted to any decision-making body.

Document: 2013_0120_DET-RESPONSE_FROM_CNPA_LANDSCAPE_-_CARR_ROAD_SITE-100091020

I may have missed it in the plethora of documents, but the absence of a detailed description of proposed works along Carr Road, makes it very difficult for residents to comment on the extent to which such additions will impact on the character of our village. As pointed out in this document, the developers must provide such designs. This must be done in such a way that Carrbridge residents are able to comment ahead of any decisions being made by the National Park Board.

Document: 2013_0120_DET-SITE_MANAGEMENT_PLAN-100102382

Delivery times. The High School bus arrives in Carrbridge at around 4.30pm, so these timings will affect school children walking along Carr Rd and crossing the Main Street at that time.

There is no estimate of the number or frequency of deliveries along this road. With experience from other locations, it must be possible for the developer to detail, for a given number of houses per year, and for each aspect (site prep, building, landscaping):

- The total number of HGV and other vehicle deliveries along Carr Rd.
- The frequency of those deliveries – will they be weekly, daily or hourly?
- The duration of those deliveries – number of days, weeks, months, years?

Without this information it is difficult to see how any decision making body can make an informed decision about the acceptability or otherwise of 5-10 years of disruption along a “quiet country road”.

Document: 2013_0120_DET-ECOLOGY_AND_NATURE_CONSERVATION_REPORT-100098533

1.6.3 and 3.4.5 - As above, this section fails to mention the relevance of undesignated sites, when they are of significance to the integrity of nearby Special Protection Areas. This suggests a lack of understanding of the Natura Directives.

3.8.2 – There is some evidence that fungi can be affected by nutrient enrichment caused by repeated dog defecation along track-sides – particularly for tooth fungi. The report should assess whether this is a likely impact with the addition of 74 houses in the area.

3.9 – Unlike the botanical assessment, which drew on information from a National park context, the ornithological assessment appears to be entirely reliant on the survey undertaken by the consultant ecologist. There is no evidence of a desk exercise to determine records from any of a number of sources, including Breeding Bird Atlas data, or national survey data. For example, what might be known about use of the site by Scottish crossbills. Was the site surveyed in the National Crossbill survey? If so, what was found, if not can anything be concluded from nearby sites that were surveyed?

3.9.6 – These conclusions are all based on survey. There is no evidence of the consultants having sought data from Capercaillie National Survey, or from the RSPB.

3.9.7 – This paragraph is contradictory and therefore misleading. On the one hand it states “no evidence of raptor species was found”, then it states “evidence of buzzard and tawny owl and likely breeding is reported in the breeding bird survey”. In which case the first statement is not correct and the conclusion must be that there is evidence of buzzard and tawny owl breeding in the location.

3.11.4 – As bats are protected, it is inadequate to state – with respect to the BB huts – “it is unlikely that they would contain roosting bats but this can never be completely ruled out in any building. No evidence of any bat roost presence in any of the huts was found.” There is no account of the efforts taken to assess the presence of bat roosts. Were 360 degree counts undertaken at a suitable emergence time? Without this, bat use cannot be ruled out. Given the known presence of bats in the area, the developers should be required to undertake this assessment.

3.11.14 – The statement here is that there was no evidence of pine martens being resident. Was there any evidence that the area is used by pine martens? If so, to what extent?

4.2.5 – It is incorrect to use the phrase “design mitigation” to represent the fact that developers had one option (a road across a bog) rejected, and have had to come up with a new design and access route. This is not mitigation. Mitigation implies some agreement or concession that means a specific effort is made to replace or restore something that will be lost. It implies an agreement or positive relationship. The first proposal was not approved because it failed required standards. The new approach is a wholesale shift from that first proposal. In my view, the developers have not given anything up here.

4.2.6 - The need to undertake a full bat survey of the BB huts is not mitigation, it is a requirement if the developers wish to avoid risk of an illegal act.

To what extent are the surveyors satisfied that their records of tooth fungi in one survey represent the full extent of this species' occurrence?

**Document: 2013_0120_DET-ENVIRONMENTAL_STATEMENT_-_APPENDIX_3-100102357
– birds**

3.6.5 – The document states “The Carr Plantation area within and close to the Carr Road proposed development does not provide good quality breeding habitat for capercaillie. They prefer older, open conifer woodland, which is a habitat not present within the survey area“. This suggests a lack of awareness of the importance of plantations for capercaillie in Strathspey. This report should be amended to include a reconsideration of this sort of habitat in Strathspey and the relative importance of Carrbridge to the Strathspey population and thereby to the National population. As it stands, this statement is not an accurate reflection of the importance of young woods, around Carrbridge, for capercaillie.

The emphasis of this document on the impact on the immediate footprint, and the 200m or so buffer around the development, is not consistent with the way in which such developments are being assessed and considered in Strathspey, particularly with respect to capercaillie. The approach is out-of-date and ill-informed. It forms an inadequate basis for decision-making.

Yours sincerely,

Jeremy Roberts

From:tim ransom
Sent:22 Sep 2014 00:15:10 +0100
To:Planning
Subject:Objection to Carr-bridge Ref: 2013/0120-DET
Importance:Normal

Sir,

Re: Carrbridge *REF 2013/0120-DET*

I would like to object to the planning recommendation for both sites outlined in this proposal.

I have serious concerns over the loss of these sites within a National Park where natural history should be of paramount consideration.

As an entomologist who has surveyed both these sites on numerous occasions over many years, I am very concerned over the potential loss of these habitats, which even the developer's ecological report rated as medium to high in conservation value for invertebrates.

When surveying these sites I have been very impressed by the diversity and rarity of the species found there and it would be a disgrace for the Cairngorms to purposefully lose such important invertebrate habitats.

The Crannich Park site holds a wide variety of rare and notable species as well as being an important wetland site in its own right for species reliant on such habitats for their survival.

Wet fens and mires such as at Crannich Park are a declining habitat due to development and drainage and the loss or degradation of such sites should not be allowed to occur especially within a National Park.

The unimproved neutral grassland area of the site off of Carr Road is an important pollination station for many insects due to its rich flora content and I have seen countless species of hoverfly and bee using this area and again it is often habitats such as these that get lost and so contribute to the increased continual decline of important pollinator species.

Both of these areas need to be protected and enhanced and not lost to development.

I respectfully request that serious consideration is given to the impact such losses will have not just on a local level but also on a national level as while it may seem that the loss of some small area of fen or grassland will not really impact in the greater scheme of things but when seen from an insect point of view such losses are a major impact as many species do not travel far and are totally reliant on these specific sites alone and any loss would have serious implications for feeding, nesting and breeding of important invertebrate species and we, as humans, should do all we can to assist in their long-term

survival and to not destroy their vital habitats for our own ends, if for no other reason than that our own lives are very dependent on their survival and so it is in our own interests to ensure suitable and important invertebrate habitats are protected.

It is exactly this piece-meal, small scale destruction of important invertebrate habitats that are seriously contributing to the decline in insect diversity across the globe and it would be a travesty for a National Park to be contributing to those losses.

I hope you will seriously consider the serious and long-lasting impact this development proposal would have, if allowed to go ahead, on the insect natural history of the Cairngorms which should be protected under the First Aim of the National Park.

Yours,

Mr Tim Ransom, BSc.

Flat 8,
1, St Saviour's Crescent,
St Saviour,
Jersey,
JE2 7XN



The Cairngorms Campaign

22 September 2014

2013/0120/DET Erection of 96 houses, associated roads & footways | Land Bounded By Crannich Park Rowan Park and Carr Road Carrbridge

Dear Madam,

The Cairngorms Campaign **objects** to this application. The Cairngorms Campaign formerly objected to allocations in the LDP for housing at this site.

The Cairngorms Campaign requests the opportunity to address the Planning Committee when this application is considered.

- The findings of Scottish Government Reporters (December 2009, August 2014) have consistently been unable to support allocations for development, at least in woodland, at this site at Carrbridge and an earlier Reporter (February 2005) acknowledge that SNH had identified the sensitivity of bog woodland that was not identified in the Highland Council local plan that first allocated land for development in this part of Carrbridge.
- The present application would destroy long established flower rich grassland at two sites as well as native Scots pine woodland. The integrity of pinewood and bog woodland habitat at and adjacent to this site are highly sensitive.
- We note that with respect to the bog woodland habitat, the current proposal refers to a Safe Route to School, which has significant implications for the priority habitat of bog woodland. This appears not to have been taken into account. The Safe Route to School would have to cross land that SNH has identified as bog woodland. This European Priority Habitat is vulnerable to changes in hydrology, surface water, pollution (including that from litter), and other disturbance.
- The Appropriate Assessment for capercaillie only became available on the website on 22nd September. This provides insufficient time to make a detailed response and we therefore reserve our position. However the CNPA will be aware that the cumulative impact upon capercaillie of recreational disturbance, including those of other proposed developments as

at An Camas Mor where 1500 houses are proposed, is a growing and serious issue. European law requires that cumulative impacts are considered.

- The mycological survey associated with the application is inadequate and fails to provide a meaningful assessment of the value of the exceptional importance in particular of the Boys Brigade field. This importance has been well known since 2009.

The Cairngorms Campaign commissioned mycological survey work within Strathspey, including at the Boy's Brigade field, by recognised fungi expert Liz Holden. In addition, in 2009 Liz Holden accompanied the Grampian Fungus Group to the Boy's Brigade field, where on that single visit 12 species of waxcap fungi were recorded, including a number of species of high conservation weighting (see Table below) .

Extract from a table in the CC commissioned report by mycologist Liz Holden (see also Holden L 2013 'Can higher plant survey be used to pick out important waxcap grassland sites in conservation assessment projects?' Field Mycology 14(1) pps120-123, 2013.)

Fungal species of conservation interest on development site or recently proposed development sites

Site	No of <i>Hygrocybe</i> species recorded in single visit	Species of conservation interest and 'weighted species'
Carrbridge: Boys Brigade field (visited in 2009 by the Grampian Fungus Group)	12	<i>Hygrocybe aurantiosplendens</i> (Orange Waxcap) <i>Hygrocybe fornicate</i> (Earthy Waxcap) <i>Hygrocybe ovina</i> (Blushing Waxcap) <i>Hygrocybe punicea</i> (Crimson Waxcap)

In view of the discrepancy between the fungus survey associated with this application and the reality of the presence of the waxcap species revealed above, the Cairngorms Campaign considers that a further survey is required to adequately assess the fungal importance of the Boys Brigade field.


It is our view that high natural heritage value of the grasslands the presence of the high conservation interest wax caps (and not limited to those species) acting as indicator species make this site unsuitable for built development and any other activities that interfere with the grasslands and the underlying hydrology/drainage.

Yours sincerely,

On behalf of the Cairngorms Campaign

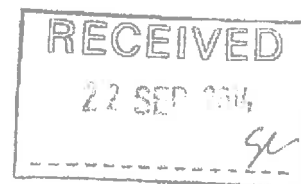
Helen Geddes,

Letterbea,
Boat of Garten
PH24 3BD



Badenoch & Strathspey Conservation Group
Fiodhag, Nethybridge, Inverness-shire PH25 3DJ

Scottish Charity No. SC003846
Email [REDACTED]



Katherine Donnachie
CNPA

22.9.14

Dear Katherine

Ref 2013/0120/DET Erection of 96 houses, associated roads & footways Land Bounded By Crannich Park
Rowan Park And Carr Road Carrbridge

I am writing a further letter to object to the application for 96 houses etc at Carrbridge. This letter is in addition to the previous letter BSCG sent. As already stated in our former letters, BSCG wishes to address the CNPA committee at the meeting when this application is discussed.

BSCG's additional reasons for objecting in the light of information only recently made available, including the AA released today, include the following:

Reporters Recommendations LDP August 2014

BSCG understands from the CNPA that the Reporters recommendations provide a strong steer to the CNPA and that their recommendations are a material consideration prior to the adoption of the LDP early in 2015.

The reporters recommended against allocation for housing in the woodland and that the woodland should be outwith the settlement boundary.

In addition to this recommendation, BSCG is concerned that a buffer area between the woodland edge and built development in the fields is essential to effectively conserve the woodland biodiversity. In this respect, BSCG supports the CNPA's Ecology Response recommendation that there should be a 'stand-off' between the proposed development site and the boundary of the field which adjoins woodland on the AWI. However, we consider 2m inadequate, even to protect tree roots.

Interests Affected by Proposal

The list of interests affected that are considered in the CNPA Ecology Response omits significant interests, including the European Priority Habitat bog woodland, water quality of the River Spey SAC, and capercaillie an Annex 1 species. Yet we note that the HRA identifies 'Likely Significant Effects'.

NVC Survey

We note that the CNPA requested an NVC survey in 2011. However, the developer's NVC information has significant shortcomings to the extent that we consider to be unacceptable by any reasonable planning authority. The developer's NVC maps refer to crude descriptions that are not communities identified in the National Vegetation Classification. For example, the NVC has some 38 mire communities, none of which are called "acid/neutral flush"; and 25 woodland communities none of which are called "mixed semi-natural woodland"; and has 36 Open habitat communities, none of which are called "bare ground". It is also inadequate that no NVC sub-communities are identified by the developer. Had the developer undertaken a credible NVC survey then the CNPA should have received target notes referring to noteworthy species, e.g. *Viola canina*.

Reptiles

The survey for the developer states that no reptiles were found. However, the CNPA has already been informed in response to previous proposed development on approximately the same site of a dog having been bitten by an adder on the Snakey Bridge. Common Lizards are well known in the area and for example one was photographed by BSCG basking on the nest of a Narrow-headed ant in the bog woodland.

Brown Hare (Priority species)

BSCG notes that the grassland and woodland on the site is important for Brown hares in at least a local context. However survey appears to have been inadequate for any meaningful assessment of impacts. Cumulative impacts on brown hares also appears to be being ignored.

Bog Woodland (European Priority habitat)

SNH identified the importance of maintaining the bog woodland at Carrbridge, which they point out is an "unusual and scarce habitat in Scotland and one which the Habitats Directive identifies as a priority for safeguarding – both within and outside designated sites" (Letter from SNH to HC Area Planning & Building Control Manager 5.9.2002). SNH also pointed out that "Badenoch & Strathspey is a core area for this habitat" in (Annex A 12.9.2003). In the same document SNH describes bog woodland as "Scattered Scots pine trees on wet area of heather, with Sphagnum mosses". The CNPA and the developer's agent also referred to the bog woodland in written documents relating to a previous planning proposal over a broadly similar site.

We are concerned that in spite of the CNPA having been fully aware of the presence and importance of bog woodland in the recent past, neither the CNPA Ecology Response nor the developer's information makes any reference to this Priority Habitat.

The Crannich Park site boundary is extremely close to bog woodland and the Safe Routes to School path would have to cross bog woodland.

There does not appear to be any assessment of the potential impacts of the proposals on bog woodland habitat.

Field gentian *Gentianella campestris* and some other plants

Field Gentian is described on the BSBI website as "A Vulnerable Red Data List species (Cheffings & Farrell 2005) added to the list of UK Biodiversity Action Plan priority species in 2007 ... It is apparently extinct in many counties [in England]".

The CNPA Ecology Response Report refers to this gentian as '*Gentianella arvensis*'; however this is not a recorded synonym for the nationally scarce *Gentianella campestris*.

Field Gentian has been documented from both grassland sites (Crannich Park site and Boys Brigade field) over many years and is currently most evident in the Boy's Brigade field.

The CNPA do not appear to have accurate information relating to this species of conservation importance, which is quite widely distributed on the site (see photos).

It is reasonable to look to a planning authority to apply a consistent approach. BSCG notes that in 2009, referring to a proposal for 12 dwellings, the CNPA planner stated (CNPA Planning Paper 2 of May 1st 2009) "Should the development lead to the destruction of protected species such as ... Field gentian then this would compromise the duties of the National Park towards the protection of its biodiversity". The CNPA planner pointed out that "the development of the site would lead to the destruction of an acid, semi-improved grass land of a type that is under threat and makes a significant contribution to the matrix of habitats that supports a biodiversity that renders the Cairngorms of great importance in a national context.... This would breach the duty of the CNPA under the nature Conservation (Scotland) Act 2004 to further the conservation of biodiversity and

would be contrary to the first Aim of the national Park under the National Parks (Scotland) Act 2000.”

The Decision Notice (written by Head of Planning) states “UK BAP species on the site would be destroyed and the scope for recovery of the grass land and its support for UK BAP species of considerable rarity and found in the area, would be lost”.

The CNPA’s refusal decision was subsequently upheld by a Reporter, who reported that the field was “outwith the national park’s network of protected areas for nature conservation. Nevertheless, it is semi-improved acid grassland and contributes to the matrix of habitats in the area. It is host to field gentians and possibly other valuable species ... the significant grassland habitat would be disturbed by the development ... this would run counter to the aims of conserving and enhancing the natural heritage of the national park.”

With respect to the biodiversity significance of this site for which planning permission was refused, BSCG notes that the rarity frog orchid *Coeloglossum viride* (growing on the Boys Brigade field) has apparently been overlooked in the ecological surveys for the developer and the list of waxcap fungi recorded by the Grampian Fungus Group on a single visit in 2009 was both lower (9) and with fewer species of weighted conservation significance (2) than was recorded in the Boys Brigade field for which corresponding totals were 12 and 4.

The CNPA Ecology Response states that field gentian are considered to be ‘common’ in the CNP. This is misleading. Field gentian is classed as ‘Frequent’ in the Cairngorms Rare Plant Register, which means that it occurs in 76 to 150 tetrads in the CNP, whereas ‘common’ means a plant occurs in over 150 tetrads. A tetrad is 2km x 2km and there are 1251 tetrads wholly or partially within the CNP (1025 wholly).

BSCG notes that the CNPA Ecology response makes no reference to *Viola canina* that has been found on both fields. This species is classed as ‘Local’ in the Cairngorms Rare Plant Register and occurs on 51-75 tetrads, and is of national conservation concern.

The CNPA does not appear to have considered the cumulative impacts on destruction of field gentian populations due to developments or land management in the CNP in Strathspey. For example, Field gentians have or are being lost on the horses field by Scandinavian Village, Aviemore; will be lost at An Camas Mor; will be lost due to upgrading of the A9 north of Carrbridge; and have declined at the Mossie and been apparently lost at one site in Nethybridge near the river Nethy due to unfavourable land management.

BSCG does not consider it is realistic to ‘replace’ the existing long established grassland habitat with its high biodiversity value, by provision of a wildflower meadow. BSCG has been told that most of the field is believed to have never been cultivated, and we note that in the map data provided by MBEC the field has existed since the 1st edition OS map of the 1860s/70s in spite of being relatively flat. This adds to the exceptional nature of this field.

Mycology

BSCG has major concerns at the inadequacy of the mycological information that the CNPA has considered for the grassland and the woodland sites. The Grampian Fungus Group with fungi expert Liz Holden recorded the high total of 12 species of waxcap on a single visit in 2009 on the Boys Brigade field, including 4 species of conservation interest and weighted species. Waxcaps are sensitive to habitat changes, are easily and rapidly lost from a site if conditions become unfavourable and most species are very slow to colonise. A site as rich as this field is exceptional even in the context of the outstanding biodiversity of the Cairngorms.

Fungal species of conservation interest on development site or recently proposed development sites (Extract from Field Mycology 14(1) pps120-123, 2013.)

Site	No of <i>Hygrocybe</i> species recorded in single visit	Species of conservation interest and 'weighted species'
Carrbridge: Boys Brigade field (visited in 2009 by the Grampian Fungus Group)	12	<i>Hygrocybe aurantiosplendens</i> (Orange Waxcap) <i>Hygrocybe fornicata</i> (Earthy Waxcap) <i>Hygrocybe ovina</i> (Blushing Waxcap) <i>Hygrocybe punicea</i> (Crimson Waxcap)

BSCG notes that the Crimson waxcap, which is fruiting on the site this year, is a short list CNAP species.

The MBEC mycology report only reports finding one species of tooth fungus (*Hydnellum*) at one location in the woodland. For years BSCG has repeatedly recorded *Hydnellum peckii* (including in 2013, the year of MBEC's survey) and *Sarcodon* spp both on and close to the proposal site (see photos). The Carrbridge woodland can be considered as outstanding for *Sarcodon*s, which are UK Priority species, and in most years appears to support good numbers of *Hydnellum peckii* also a UK Priority species.

In addition to tooth fungi BSCG has for some years recorded other species of interest, such as *Lactarius musteus* that in the UK has a local distribution in pinewoods in the Cairngorms.

Safe Routes to School Path

BSCG does not object to the principle of a safe route to school. However we do object to the current proposal due to significant natural heritage impacts not apparently having been considered and an unacceptable absence of design and construction information. The path route involves crossing bog woodland, which is a Priority Habitat and is significantly vulnerable to changes in water quality and quantity; both these impacts could readily occur, over the short, medium and long term, as a result of the current proposals. The route could impact on rare fungi, invertebrates including wood ants and other wildlife. The creation of this promoted path across the bog woodland could result in trampling damage off the path, e.g. at times when the bog is drier or frozen; in freezing conditions wood ant nests within the bog woodland can be highly vulnerable to damage, whether accidental or intentional. There could also be impacts on a range of natural heritage interests from lighting on the path.

Comments on HRA Appropriate Assessment

BSCG considers the analysis of usage is flawed. For example the text in Table 3 ignores users who do not work, or who work irregular hours and at weekends, who are therefore not working during the day on weekdays.

Table 3 "Therefore usage likely to be medium and long distance walking in evenings and at weekends and by those choosing to arrive by car."

We disagree with the screening conclusion of 'no effect' from occupancy of the houses. The ongoing disturbance from occupancy within this part of the wood is likely to impact adversely. We consider that this area of the wood is little used by caper due to human disturbance. The proposed development would extend and increase disturbance further into the woodland.

Further, the claim that an area of woodland is little used at present and can therefore be lost without any effect on caper fails to take account of the exceptionally low level of the caper population at present. The area is most likely to be low habitat quality for caper for reasons of human disturbance. Such features as Scots pine and understorey vegetation can be viewed as providing highly suitable habitat.

"Disturbance is not likely beyond 200m of development. This area is low habitat quality for caper and infrequently used by the birds."

BSCG does not accept the interpretation of small increases in mountain bike use in large trackless areas as being reasonable ("projected small-scale increase of mountain biking in large trackless areas where capercaillie occur").

Mountain biking is a growth area and one with a significant following that seek more extreme and informal opportunities.

Further, we consider the opinion that disturbance from mountain biking is unlikely to result in significant disturbance to caper is unreliable through potentially significantly underestimating the impact on caper.

Of further concern to us is that the CNPA apparently assumes this situation will not change over time, yet significant changes in caper use of forests in recent years have been observed and further such changes can be anticipated.

The CNPA is placing significant emphasis on the importance of refuge areas for caper, where they are distant from human disturbance, to ensure their future survival in the face of an increasing human population and associated disturbance pressures. The large trackless area associated with Kinveachy face is compromised in this respect by the activities of mountain bikers.

BSCG does not accept that Baddengorm Woods and Tom a'Thornaidh Mor are "unattractive for recreation use and this is unlikely to change." On the contrary, we see the locations of these woodlands, the presence of some tracks in them and the access they provide to attractive, open moorland areas beyond with fine views, as all reasons that favour their use.

BSCG agrees that "a small increase may have a disproportionate effect which may be significant" and that "an increase in recreational use ... of the Docharn and Deshar Wood areas which are used by capercaillie, could result in disturbance".

We consider the use of Docharn and Deishar by cyclists as well as dog walkers and walkers as potentially resulting in significant disturbance.

BSCG is concerned that no account appears to have been taken of the dynamic nature of caper use of woods. For reasons that are not clearly understood, the relative importance of woods in Strathspey has shown considerable fluctuation over recent years.

Impacts on River Spey SAC

BSCG notes that the present levels of pollutants such as phosphates appear to be causing major impacts on freshwater pearl mussels, which have declined in the Spey by over 50% in the last 15 years.

The CNPA has international responsibilities with regard to FPM that is globally critically endangered. A significant proportion of the world population is in the River Spey.

BSCG understands that in Badenoch & Strathspey sewage is considered to be a very significant source of pollutants damaging to FPM, that SEPA's permissible discharge levels are considered to be too high, and that these discharge levels are already being exceeded at times. BSCG understands

that discharge from the River Dulnain is already considered to be impacting on water quality of the Spey.

BSCG notes that the AA refers to monitoring - "Phosphorous levels will be monitored as part of standard process by SEPA". However, we also understand that the present level of monitoring is insufficiently frequent to effectively record spikes in pollutant levels, yet such spikes are crucial in terms of impacts on FPM. Similarly, the present monitoring regime cannot pick up all low water events, which can cause FPM beds to be exposed, and that such exposure is likely to be fatal within 30 minutes.

BSCG is concerned that increasing the human population will add to pollutant levels as well as resulting in more abstraction, both of which impact negatively on FPM. In addition, lower flow levels and enrichment favours growth of Ranunculus, that is also considered to be highly damaging to FPM. In view of the above, BSCG considers that significant impacts on FPM would be likely to result from this proposed development. We do not agree with the CNPA that monitoring will be effective in identifying pollutant and water level problems, nor do we agree that it is acceptable to continue to discharge at current pollutant levels. We note that safe levels for juveniles have not been established. BSCG is concerned that the CNPA should adopt a precautionary approach.

BSCG welcomes the CNPA's acknowledgement that discharge levels may alter. At present the FPM population in the Spey appears to be in rapid and major decline and this is a situation that the CNPA should address urgently.

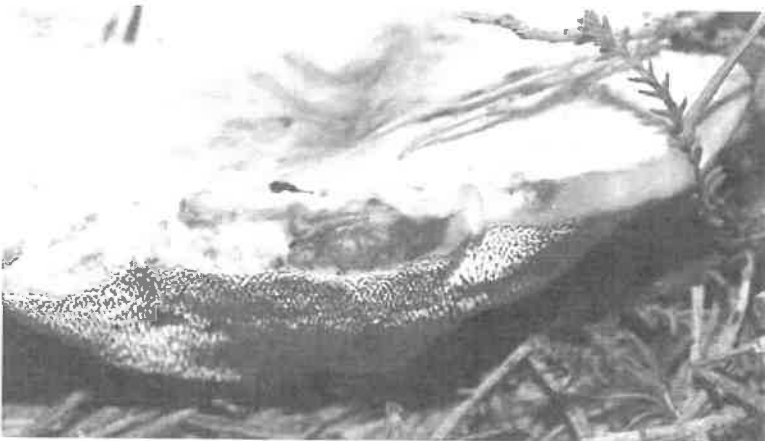
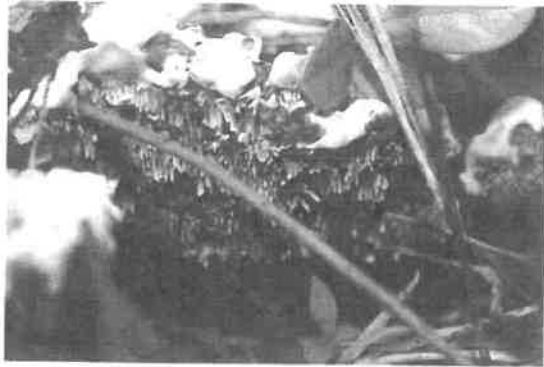
"SEPA has confirmed that the WWTW has capacity for increased loading without discharging higher levels of pollutants such as phosphates into the river Spey SAC. Arrangements have been confirmed by email from SEPA 1/8/13. However discharge levels may be different at the time of construction and so it must be ensured that the WTW can manage waste water to this level."

Cumulative Impacts

There are cumulative impacts from increased human disturbance from growing populations at Aviemore including Higher Burnside; Boat of Garten (32 new houses approved), Kingussie (300 houses), Newtonmore, An Camas Mor and Carrbridge (this proposal). The CNPA does not appear to have taken cumulative impacts properly into account.

Yours sincerely

Gus Jones
Convener



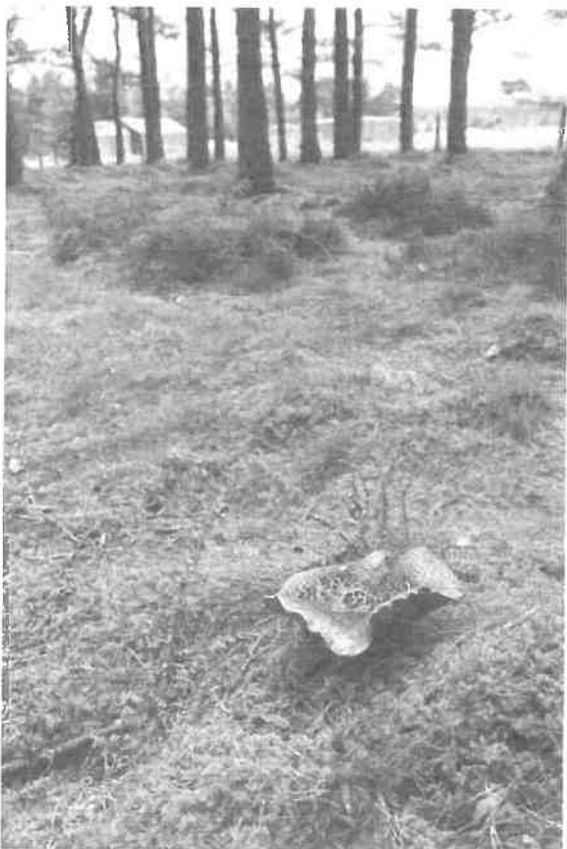
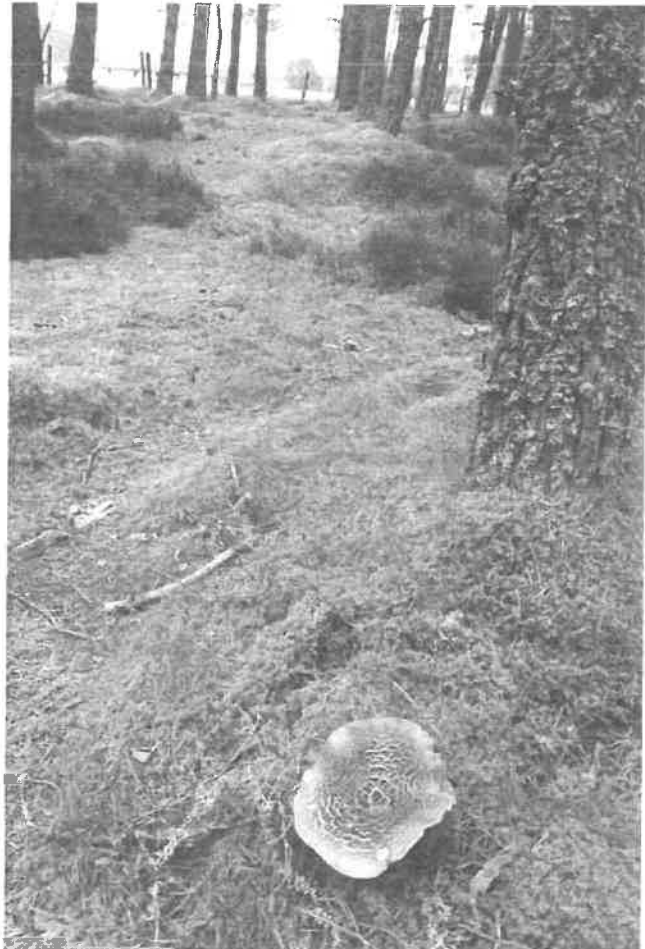
Devil's tooth *Hydnellum peckei*

(Sept 2014)

A species of tooth fungi overlooked completely in the mycological survey

Despite being present within the footprint since c 2007





Another example of a large tooth fungus (*Sarcodon*)

Completely overlooked in the mycological survey for the application (photos Sept 2014)

Field Gentian *G. campestris* are widely distributed at the Boy's Brigade field (photos Sept 2014) Their status appears to have been understated in the surveys for the application.





Frog orchid a rare and notable species recorded for years on the Boy's Brigade field photod August 2014 on the Boy's Brigade field. This is one of a number of orchids apparently overlooked in the botanical survey for the application





Examples (Sept 2014 Boy's Brigade field) of crimson waxcaps *Hygrocybe punicea* (a CNAP shortlist species) . The largest *Hygrocybe* and one of numerous waxcap species not recorded in the mycological survey for the application



Nowellia curvifolia an example of a notable woodland bryophyte (associated with *Buxbaumia viridis*) within the proposed footprint (Photo sept 2014). This species was apparently overlooked in the bryophyte survey

From:Margaret Smith
Sent:23 Sep 2014 14:35:36 +0100
To:Planning
Cc:Murray Ferguson
Subject:FW: Development at Carr Road

From: Clare Lake [REDACTED]
Sent: 22 September 2014 13:51
To: Mail Manager
Subject: Development at Carr Road

Good afternoon

Our Primary 5/6/7 class had a meeting to talk about the proposed new development on Carr Road and the things that concern us. We have attached a picture of our issues and would like the opportunity to discuss them further.

A large number of children have to cross Carr Road or go up it to get home and at the moment it can be dangerous due to cars driving too fast and the fact there are no pavements. What will it be like with more traffic?

These are their main concerns;

- Unsafe
- No pavements
- Worried it will be too busy
- Worried about big lorries
- Scared
- Worried about little ones (nursery) having to use it

- Worried if it's a snowy winter there is nowhere to go to get out of the way of cars. (they only plough one strip in the winter, so cars can't pass each other!)
- Concerned about the junction with the main road as cars come round there really quickly, and they can and have been in the road, as there are no pavements
- Concerned about cars speeding.
- 20mph speed limit.

Kind regards

Clare Lake

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Mura h-eil na beachdan a tha air an cur an cèill sa phost-d seo a' buntainn ri gnothachas Chomhairle na Gàidhealtachd, 's ann leis an neach fhèin a chuir air falbh e a tha iad, is chan eil iad an-còmhnaidh a' riochdachadh beachdan na Comhairle, no buidhnean buntainneach, agus chan eil am post-d seo na phàirt de chunradh sam bith mura h-eil sin air innse.

Listening * Open * Valuing * Improving * Supporting * Partnering * Delivering

Èisteachd * Fosgailte * Luach * Leasachadh * Taic * Com-pàirteachas * Libhrigeadh



18th September 2014

Cairngorms National Park Authority,

Dear Sirs.

Application Number 2013/0120/DET

I am writing in regard to your letter dated 21st August 2014, informing people with previous objections to the planning on Carr Road of the new information available to view about the housing application. I firstly find it strange that this information was not available to view in Carrbridge and that the CNPA eplanning website was out of use for at least a week when the letter first came out. I feel that this will hamper replies as people may have thought to go back to do a response and may forget as the information was not available at the time of reading the letter.

My main issue with the development on Carr Road is not that I am against the houses but that I feel Carr Road is unsafe for the use of pedestrians at present and with 72 more houses this is going to be far worse. I have a young child of 2 years old and walk from Carr Place to Main Street and back at least once a day and there are three points at which the road is very dangerous as there are corners where the cars coming along cannot see. I have to take him in his buggy but he would far rather walk along the road but this is too unsafe.

In the Transport Statement, 3.2.1 states that an off road route for pedestrians will be provided through to Rowan Park with no street lighting – this in no way covers a pathway along the whole way to school but just a small way from the new houses over bog land to Rowan Park but I would not allow my children to use this as access to get to school as especially in winter with the dark mornings and nights I feel it would be unsafe.

3.2.1 there is a very small section saying that the Highland Council and the CNPA request that a path along Carr Road be investigated and this report clearly states that this could not be delivered and does not even attempt at other options. This is a dangerous road for pedestrian at present and with the cars and school children and other pedestrians from 72 new houses also using the road the problem is just going to get far worse.

The photos that have been used to show the widths of Carr Road are very deceiving, it seems that when the report wants to show the road is too narrow they use a vehicle in the picture to help visualise this but when they want to show the road as being wide enough for two cars to pass comfortably they have used a wide angled lense with no vehicles for proportions and also used area with either the pumping station parking area (figure 2.4) or the Rowan Park junction (figure 2.5) to give a deceiving sense of width to the road.

The data given in Table 4.1 is from April 2010, is this information not a bit dated to be using, as the type of people living along Carr Road has changed considerably since then, there are far more families and young people which means more pedestrians and also more people driving to work on a daily basis. Would it not be better to get more up to date figures.

Section 8.1.2 recommends that Carr Road be used for the construction traffic and uses an example that 'Carr Road is already used by HGVs, so its use by construction traffic would be in line with current activities that take place' I have lived in Carr Place for over two years and have never seem a logging lorry on Carr Road, to my knowledge Carr Plantation has not been logged for maybe 10 years?? If this photo (figure 8.4) is even a picture of Carr Plantation then I would like to know when this was taken as the area looks nothing like the photo now. There

are HGVs that use Carr Road but they are very infrequent and tend to be heating oil deliveries or smaller parcel delivery lorries.

As well as my points above I would still like the objections in my previous letter to stand.

Yours Sincerely

Lisa McInnes

Dear Sir or Madam

Application Number: 2013/0120/DET
Local Authority Number: 13/01281/FUL
Development Proposed: Erection of 96 houses, associated roads & footways
Location: Land Bounded By Crannich Park Rowan Park and Carr Road, Carrbridge

I refer to the above application. I have reviewed the additional information provided relating to transport, footpath links to Rowan Park, ecology, drainage, landscaping and revised layout. Despite this additional information provided, concerns raised in previous objection letters from the community have not been sufficiently addressed. Examples are that Carr Road remains unsuitable for traffic that would result from the proposed build and the junction of Carr Road with the main road is extremely narrow and visibility is very poor. In addition, (new) wildlife surveys carried out do not address the points raised by various conservation organisations. I therefore wish to maintain my **objection**.

Please note that I am specifically not asking for further studies to be carried out or documentation to be provided. I strongly believe that the applicants have been given the opportunity to address the points raised and have not done so satisfactorily.

I would also like to raise an additional issue that has been highlighted in numerous objections, but has not been addressed by the applicants. The scale of the development is completely out of proportion for Carrbridge village. It is not in line with the CNP Plan which calls for small-scale development to preserve the character of a small woodland village.

There has been no evidence provided for demand of the 72 luxury houses that have been proposed. As other developments in the village have not even been sold, there might not be any. I am not saying this out of concern for the applicant, instead my thoughts go to the community (and especially close neighbours) who will be living near a building site and all the disturbances it brings, for what could be many (many) years. In other EU countries, developers have to sell a percentage (usually at least 70%) of the proposed build in advance (*i.e.* from the drawings) before being allowed to start the build as well as there being a maximum term in which the build has to be complete. The reasons for this are clear: 1) developers are forced to make feasible, market-driven applications and 2) surrounding inhabitants are not forced to live near a building site with all the disturbances it brings.

I do not believe a phased development is the answer; in fact it will have the opposite effect, as it will allow the applicants to draw out the building process without having to bear any losses. It would be much better to set a maximum term in which the build has to be complete (even better would be to demand a percentage is sold in advance). In this way there is an 'end-point' for the community to live near a building

site and an end-date at which the 'benefits' to the existing community, such as landscaping and play parks, will be build. Please take note that these won't be built until the entire build has been completed.

This is likely not be in favour of the applicants (as they might be forced to build houses that aren't sold, or will not sell, which would indicate the application is not realistic or market-driven), but the CNPA has to put the needs and wishes of the National Park and that of its communities first, not those of the applicants.

Please note the above points made about lack of evidence of a demand-driven application and reason against phased development (but rather enforce a maximum term in which the entire build needs to be completed) and add these to my **objection**.

If you have any queries about the above, please don't hesitate to contact me.

Yours Sincerely

Louise de Raad

1 Carr Place
PH23 3AF
Carrbridge

From:Lorraine Anderson
Sent:22 Sep 2014 12:47:10 +0100
To:Planning
Subject:CNP Authority,
Attachments:CNP Authority,,one

22 September 2014
10:19
CNP Authority,
Planning Support Team,
14 The Square,
Grantown on Spey.
PH26
3HG

21st September 2014

2 013.1020/DET Carrbridge Housing - New
Information Submitted for Public Viewing.

Dear Sir/Madam
Regarding the above new information I should like some points clarified.

Carr Road

It is not clear if there are to be 2 vehicle entrances as we were led to believe or, as in the drawing, the houses which back onto Carr Road appear to have an entrance. This I feel would not be appropriate.

The dip in the road at the bend near Carr Cottages has not been mentioned and either needs to be raised or straightened before construction starts.

Although some traffic calming measures have been shown on the map it still does not make Carr Road suitable for the extra volume of vehicles, cyclists, pedestrians, wheelchairs and disabled motorised buggies incurred by an additional 72 houses.

The path from the development

connecting with Rowan Park will give a nice summer walk but will it be cleared of snow and ice in the winter and leaves in the autumn. Even with lighting it would not be a pleasant experience and pedestrians would revert to walking the full length of Carr Road. Will it be suitable for wheelchairs, disabled motorised vehicles etc.

The Scottish Planning Policy para 169 states that personal travel should be prioritised with walking being the number one priority. Doesn't appear to be happening in this case. At present Carr Road does not have snow clearing facilities. This should be addressed.

Play park

In very faint letters, the ground base proposed is bark which would be unsuitable for the amount of housing. A spongy maintenance free surface would more appropriate in this modern age.

I also feel that for 72 houses they could do with more than one play park especially as the children from Carr Place and Rowan Park will wish to use these facilities.

Crannich Park

As far as I can see there is no facility for a play park in the Crannich Park development which is very remiss considering the plan is for young families to reside there.

I do not feel that the proposed path connecting the development to Crannich Park in order to connect pedestrians to the main road will be obsolete and most people will take the direct route along the B9153. Therefore a pavement along this road with more traffic calming measures would be more appropriate.

Village Roads

Nothing has been mentioned as to the effect the volume of traffic created by 96 houses will have on the roads throughout the length of the village to the 30mph signs at all entrances.

It is well known that we have a bottle neck situation at the Hotels, Cafe, Shop, Garage and Old Bridge.

HGV vehicles and Buses regularly use the roads and there is a problem with speeding with all types of vehicles completely disregarding the 30mph signs.

Should this development go ahead more traffic calming measures will have to be put in place for the whole village.

Carrbridge is not a suitable village for an additional 96 houses and I stand by my previous objection to this development.

Yours L Anderson (Mrs)

Tighcarr,
4 Bogroy,
Carrbridge.
PH23 3BX



Ms. Katherine Donnachie
Cairngorms National Park Authority Planning
Office
Albert Memorial Hall
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Ballater
AB35 5QB

Balallan House, 24 Allan Park
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Telephone: 01786 447 504
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22 September 2014

Dear Ms Donnachie

Application reference: 2013/0120/DET. Erection of 96 houses, associated roads & footways at Land Bounded by Crannich Park Rowan Park and Carr Road Carrbridge.

Buglife - the Invertebrate Conservation Trust is the national charity that conserves endangered and declining invertebrate species and populations. We wish to comment on the revised planning application and maintain our objection.

We welcome that an invertebrate survey has been carried out as it provides vital information about the wildlife within the development area. Standard survey guidelines state that for an average site, three to seven days of field work should be carried out between March and October. Whilst a number of visits have been made these are restricted to early June, late July and late September. This has left out a large and significant part of the survey season and consequently rare species will have been missed.

Despite these significant survey gaps the site is clearly of high value. The Invertebrate Survey recorded 698 species with 36 of these of conservation concern and two on the Scottish Biodiversity List. Local recorders have also found Kentish glory, Small pearl-bordered fritillary, Small heath, Northern brown Argus and *Diploena torva* (only known at a few sites in Scotland) on the site, all on the Scottish Biodiversity List too.

The development site contains a variety of habitats including woodland, scrub and acid fen amongst others. Many invertebrates have specific requirements depending on the stage of their life e.g. a certain food plant or nesting site. Combinations or mosaics of habitats are more able to meet these needs and as a result may be of extremely high value ecologically.

The invertebrate survey identified the parts of the development site (Appendix 4 identified as areas 1A, 2A and 2C) of medium to high ecological value and the development would result in the loss of around 90% of these areas. This application includes minimal measures to mitigate and compensate the loss of these areas. Part of the suggested mitigation includes redesign of the development layout and whilst this would help to avoid loss of the more valuable areas of habitat, plans need to be revised to confirm this in advance of permission being granted so that impact can be accurately assessed.

The main Ecological Statement mentions compensation through management of the Carr Plantation but does not include detail on this. Whilst it is positive to secure long term management of woodland this will not compensate for the loss of other types of habitat such as open, scrubby fen and pools or open grassland. Without mitigation and compensation of these losses there will be a net loss of biodiversity which is contrary to national and local planning policies.

We also note that the recent Local Plan Inquiry has recommended that the allocation at Carrbridge site is reduced on landscape and amenity terms (Report – Cairngorms Local Plan Report page 380). This application does not meet this requirement. The reduction in development size would help to reduce the impact of the development on native woodland but will not address the potential biodiversity impact from the loss of areas 1A, 2A and 2C, this would still need consideration.

Please do not hesitate to contact us if you would like further information on any of the points raised.

Yours sincerely

Alice Farr
Planning Manager

About us - Buglife is Europe's largest charity working to protect invertebrates - our animals without backbones. Invertebrates may seem small and unimportant to many but they actually play a crucial role in life as we know it. Not only do they clear away waste and rubbish, such as rotting vegetation and dung, they pollinate flowers and crops – providing us with food to eat and flowers to look at. They are themselves food for birds, reptiles and mammals; they supply us with the raw material for medicines and eat the pests that try to eat our crops. Despite this crucial role many species are close to extinction, with many populations being put under threat of survival due to loss of habitat.

Bugs and The Cairngorms - one of the best places in the whole of the UK for invertebrates, especially for species associated with mountains, woodlands and cooler climates. Increasingly the Cairngorms is the last stronghold for many invertebrate species that are becoming rare or extinct elsewhere in Britain. Despite this some are suffering declines and others may be at risk of extinction. We must prioritise the protection of many of these species to protect some of Scotland's special wildlife. Find out more [here](#).

Firwood
Nethybridge
Inverness-shire
PH25 3DE

Planning Office
Albert Memorial Hall
Station Square
Ballater
AB35 5QB

21/09/2014

Dear Sir or Madam,

Proposal: Erection of 96 houses, associated roads & footways - Land Bounded by Crannich Park Rowan Park & Carr Road, Carrbridge

Planning application: **2013/0120/DET**

I write in reference to the planning application above, and wish to object for the reasons given below.

My objections are based on the MBEC Ecology and Nature Conservation Report and the Arboricultural Assessment by Scottish Arboricultural Services.

Comment on Forestry survey.

I feel this report has been written with a lack of understanding of the woodland habitat comprising the survey area.

3.3 Compartment C

I think the suggested management for this compartment shows a complete lack of understanding of the habitat present. This area comprises bog woodland. The following quote has been taken directly from the European Union's LIFE-Nature Programme report on Wet Woods the habitat comprising this compartment (see http://www.wetwoods.org/wtype_bog.htm). "It is a rare habitat in the United Kingdom and only occurs where a specific combination of physical circumstances allow its development. It has the appearance of open woodland with scattered trees occurring across the surface of a bog in a relatively stable ecological relationship, without the loss of bog species". Trees occur naturally in this habitat and are a very slow growing component of a forest bog. Tree removal, as suggested, would be damaging to this rare habitat. Maintaining the correct water level in the bog should be the recommended objective for this compartment.

All Compartments where Scots pines are present.

Life expectancy is given throughout for Scots pines as 20-40 years which isn't correct. If left to their own devices most Scots pines could grow on for 100-200 years.

A little like the Ecology Report this assessment appears to have been written as though trying to put a positive case for the housing proposals.

Comments on MBEC Ecology and Nature Conservation Report

Technical Appendix 2: Mycology Study

Despite the CNPA requesting this survey be undertaken following the developers failure to take this important component of the Carr Road site into account during the first planning application, the results and methods employed leave a lot to be desired.

1.3 Competence

MBEC state that "The surveys were all undertaken by fully qualified and experienced ecologists. All the mycological surveys and reporting was completed by full time MBEC ecologists. The surveyors were also full members of the Institute of Ecology and Environmental Management". What isn't stated is whether the person or persons on the ground were experienced and qualified mycologist, and I suggest this is reflected by the reports contents. Elsewhere in the report it is stated that a botanist did the survey.

2.3 Survey Timescales

Fungi surveys cannot be undertaken in just one growing season as admitted in 2.6.1. The report admits that 2013 was "late, dry, mild" all conditions which affect fruiting. 2013 was a very poor years for Stipitate hydroids (tooth fungi) in Abernethy and Rothiemurchus as experienced during my own survey work with this group of fungi.

In 2.5.3 the report states that "Fungal species which required further identification and/or double checked were sampled and stored in paper with their location grid reference for later laboratory checking. Spore prints were done, where necessary during the fieldwork on fresh samples. In addition to this a range of photographs were also taken of more complex taxonomic identifications to allow further follow up checking to be undertaken. Photographs were taken on both a compact camera ...etc.". A little later in the report there is mention of identification problems for a few species, however, if the methodology above was followed there shouldn't have been any problems in making positive identifications. If photos were taken of the problem species, why have these not been included in the report?

2.6 Study constraints

Confirmation that a botanist undertook this survey. "2.6.2. A qualified and experienced botanist undertook all these surveys and where such complexities and uncertainties were experienced they are all specifically noted within the results section". Whilst an

“experienced” botanist might be fully experienced, possibly over many years of survey work, to identify plants, similar experience is required over many years to identify fungi and on a site as important as the Carr Road field and adjacent woodland, a fully qualified mycologist should have been employed. This is reflected in the following reporting particularly with the “problem” species. This starts to be reflected earlier in the report at - 2.5.4 where the report writer (possibly different to the person undertaking the survey) states “Mycology nomenclature is complex and changes frequently for particular taxa. However, the following principle sources of taxonomic information were followed: the Scottish Fungi Website (2013) for the recommended English names for fungi in the UK; Latin names largely according to Legon and Henrici (2005) but also some that have been updated are according to Buczacki et al. (2012). Identification keys used were numerous but many of these are available on the Scottish Fungi Website and the British Mycological Society Website, both accessed in 2013.” The mind boggles! To undertake the survey properly an experienced mycologist would have access to various handbooks from Britain and Europe and be experienced in their use. They certainly wouldn’t be relying on Buczacki et al (2012), good though it is, it only covers a percentage of the British species. The use of this guide is stated in - 3.1.2. A fully competent mycologist would know which species are rare or of conservation importance without resorting to guide books.

3.1.3 States “An unconfirmed record (as far as MBEC are aware) of the violet coral fungi (*Clavaria zollingeri*) was noted recently (date unknown)”. This fungus can fruit in October and November so survey period might not have been long enough.

Table 3.1: Identification of Difficult Specimens

I think this section sums up the poor quality of this report, undermining it so badly that the survey should be undertaken again employing a fully experienced mycologist. The CNPA Planners should read this section of the report and I’m sure they will come to the same conclusions. Three “difficult” specimens are covered and for the first time in my experience of biological recording a “perhaps they are or perhaps they are not” method of identification has been employed. Thankfully Charles Darwin didn’t have this problem. I will deal with just one of the fungi listed in the table, the one I have most experience of seeing and recording – *Hydnellum ferrungineum*. This is one of the rarer tooth fungi in the Strathspey area but in some places can be quite numerous. An experienced mycologist would have no trouble identifying it, yet, we have a record in the report where the surveyor is 95% certain it’s a *Hydnellum* but only 70% “sure” that it is *ferrungineum*! It either is *Hydnellum ferrungineum* or it isn’t. This species doesn’t grow from tree roots and I would make a guess that the surveyor has encountered *Heterobasidion annosum* (root rot) or less likely *Phaeolus schweinitzii*. If, as stated earlier, a small sample of the fungus had been taken so that spores could have been checked then there would have been no problem with identification, even resorting to Buczacki, Shields and Ovenden (2012).

Fungi Recorded - 3.2.3

“A total of seventy two species of fungi were found in a fruiting state during the surveys at Carrbridge”. I would suggest that this is quite a short list considering that it covers both planning application sites and would indicate either species were missed or 2013 was a very poor fruiting season.

During the last month myself and a colleague have visited the two application sites and have found many fruiting bodies of tooth fungi, some possibly within the Carr Road Scots pine woodland application site (not too sure of boundary) comprising *Hydnellum scrobiculatum*, *Hydnellum peckii*, *Sarcodon glaucopus*, and these three plus *Phellodon melaleucus*, *Phellodon tomentosus* and *Sarcodon squamosus* in the wider woodland area. Location details can be supplied if necessary.

In 2010 Mycologist Liz Holden undertook a survey of waxcaps in suitable fields within Badenoch and Strathspey and the “Boys Brigade” field, covered by this planning application adjacent to Carr Road, was visited (included in report but surveyed in 2009). 12 species of waxcaps were identified from this field, making the field important in national terms. Waxcap fields indicate sites which have probably never been ploughed or fertilised and it is widely accepted that these grasslands, as a habitat, are threatened across Northern Europe (ploughing, re-seeding, fertilising, housing developments etc). During the 2009 visit *Hygrocybe punicea* and *H. ovina* were found, both being scarce UK species. *Hygrocybe punicea* was seen today on the same “Boys Brigade” field along with a minimum of six other species (I’m not a waxcap expert so can’t provide you with all their names) and it begs the question why, during the MBEC survey last year, not one waxcap appears on their list for this area of the proposed development site. In addition, *Clavaria acuta* and *Clavulinopsis helvola* were seen during my visit two species not found during the 2009 visit. *Hygrocybe pucinea* is also one of the 26 action plan species covered by the Cairngorms Nature Action Plan 2013-2018, once again putting one of the action plan species under threat from continuing development applications.

For the reasons given above I recommend that this planning application is refused.

Yours sincerely

Stewart Taylor

Selected fungi related to Carr Road planning application site

Hygrocybe punicea Boys Brigade field September 2014



Hygrocybe psittacina Boys Brigade field September 2014



Sarcodon glaucopus Carr Road Scots pine woodland September 2014



