## Badenoch & Strathspey Conservation Group

# STATEMENT OF EVIDENCE Hearing Session

#### Provision of the Local Plan

**An Camas Mor** 

### Summary of objection(s)

A new town in the CNP and wholly in a National Scenic Area is entirely inappropriate. It conflicts with the 1<sup>st</sup> aim, as well as the principle of a NP and a NSA. To make such an allocation downgrades the reputation of NPs and NSAs in Scotland.

The statement that ACM will be a 'sustainable' community is incorrect. We note that energy efficient housing is proposed. However, irrespective of this, there are major carbon emissions predictable. In terms of transport, there does not appear to be any realistic option of a new vehicle road crossing of the Spey linking ACM with Aviemore. Therefore vehicular access is via the B970 and the ski road, a round trip of approx 5 miles or 2.5 miles, depending on the road option. Even if there is a bus service, inevitably ACM residents will frequently choose to use their cars to access facilities etc in Aviemore.

One logical road option has the potential to directly impact on a Natura site.

Sewage treatment arrangements are also likely to add significantly to carbon emissions, one option being pumping to the Aviemore treatment plant, which we understand would have a major carbon footprint.

An Camas Mor will have significant effects on the environment. The important habitats on the ACM site include a substantial area of vigorous natural regeneration of the priority habitat native Caledonian pine woodland. The site also includes land on the Ancient Woodland Inventory. No survey information is available from the developer as yet. A full invertebrate survey is required.

ACM would impact on, for example, Badger and Black grouse, which are both protected species.

When Cambusmore was included in the HC Local Plan it was before the R Spey was designated an SAC. The Scottish government (and UK authorities) have an obligation to protect the integrity of the R Spey SAC.

The statement that ACM could not have a significant impact on the overall integrity of the NSA is incomprehensible. It is not clear what the CNPA considers would have an impact on the integrity of the NSA if an entire new town does not.

The access onto the B970 and proposed realignment of the B970 would impact adversely on the Sustrans National Cycle Route 7.

ACM is premature given the realities of the economic climate and the considerable investment in infrastructure required. We note that the economic downturn has halted work at High Burnside, and is potentially impacting on the AHR project. A full appraisal of economic displacement that development of this site could cause is reuired.

One of the adverse impacts of development of the ACM site is on views from the High Burnside site.

We understand the applicant may include a hotel near the B970 in Phase 1. This could impact adversely

on local businesses struggling in the present economic climate.	

## Recommendation.

Omit entire allocation from LP.

Exclude land on AWI from allocation.

Secure a generous buffer zone around the R Spey to protect the natural qualities of the environs of the river, and exclude recreational infrastructure.