

AGENDA ITEM 5

APPENDIX 4

2019/0120/DET

OBJECTIONS

Planning Application 2019/0120/DET

As I have mentioned many times the effect of so much additional traffic on Carr Road will seriously affect the safety of those wishing to walk from that end of the village into the village centre including the school.

The safe route to school should be a prerequisite to any development taking place. Once building starts no-one will want to cycle or walk to school along Carr road. Indeed, the traffic calming proposals for Carr Road will make it even more difficult for cyclists and pedestrians.

My children walk or cycle to school most days and the road at present is unsafe with some bad corners and that is with such a low volume of cars, if the number of cars increases then the danger of something happening also increases.

The affect on the school also requires consideration, the increased number of pupils as the development progresses will put pressure on the existing premises. Plans need to be made to cope with this or we may have the same problem as Boat of Garten with the lack of capacity.

The timescale for this proposed development is also a concern, at the presentation in the village hall no-one was prepared to suggest a timescale which if the houses are being built on demand could take years.

In summary I wish to object to the housing along Carr Road.

A McInnes

10 Rowan Park
CARRBRIDGE
PH23 3BE

Cairngorms National Park Authority
Planning Department
14 The Square
Grantown on Spey
Moray
PH26 3HG

**Construction of 47 no. house/flats, associated roads and footways.
Application number: 2019/0120/DET**

Dear sirs

With reference to the additional information provided in the Transport Assessment (TA) I would like to make the following points.

- The Transport Assessment required under Planning rules should have been included with the original submission. The 'drip feed' of information is merely a technique used by the developer to push through controversial applications through the planning process.
- There are substantial discrepancies and misalignments between the baseline statistics of traffic movements shown from the traffic survey and those predicted after the development is complete. Particularly those relating to the timings and when children walk along the road going to and from our local Primary School and the bus to Grantown Grammar School.
- The suggested safer route away from the Carr road takes no account for those Grammar school children heading to or from the bus pickup/drop off point at the Village hall.
- The proposed traffic calming measures are inadequate and inappropriate given that for some parts of the road, traffic will more than double. Visibility along parts of the road will remain poor.
- All the additional traffic will travel the full length of Carr Road, whereas much of the traffic currently uses only part of the road. This means it is not an 'insignificant' increase as suggested in the TA.
- The proposed traffic calming measures will significantly change the character of Carr Road.
- The 20mph Speed limit mentioned as a control measure is already proposed by Highland Council and should not therefore be considered as part of this submission.
- No account is taken for construction traffic during the construction phase of the development. This will include, but not be limited to:
 - workforce vans and cars travelling to/from work at start and end of the day;
 - 20T HGV tipper lorries (GLW 36T);
 - articulated HGV lorries (GLW 40T?);
 - visiting management & supplier reps;
 - prospective buyers of the houses.

How will this traffic be controlled, particularly during the key periods for children going to and coming home from school? Typically, I note up to 3 movements per day of tractor or HGV traffic

/over

serving the local farms, but these are normally outside the times which would affect schoolchildren.

- What measures, if any, are proposed for the junction between Carr Road and the B9153? This is a tight junction even for cars. Has a Swept Path Analysis been carried out for 20T Tipper and Articulated HGVs for this junction?
- What analysis has been carried out on the impact on traffic through the rest of the village? The village centre already becomes congested with service buses, tourist buses, cars, HGVs serving the local hotels and shop, campervans and articulated lorries carrying timber and grain.
- For historical reasons, the footway at the side of the road opposite the village hall is a bullnose (dropped kerb) so pedestrians are already exposed in this location. Given the increase in traffic, what measures are proposed to mitigate the increased risk of HGVs leaving the road/mounting the footway?
- Has a survey been carried out on the existing condition of Carr Road? Any damage caused by the increase in heavy traffic should be made good by the developer in a timeous fashion. What leverage do the Planning Authorities have to ensure the Developer carries this work out?

I remain firmly of the opinion that the number of houses currently proposed by the developer is much too high. While I accept there is a shortage of housing in the area, the issues created by the road geometry and limited width of Carr Road make the proposed location unsuitable for a development of this scale.

Yours faithfully

David Brown

BSCG
info

From: BSCG info
Sent: 21 May 2019 23:51:35 +0100
To: Stephanie Wade; Planning
Subject: 2019/0120/DET

Badenoch & Strathspey Conservation Group

Fiodhag, Nethybridge, Inverness-shire PH25 3DJ

Scottish Charity No. SC003846

Email info@bscg.org.uk

Website bscg.org.uk/

Stephanie Wade
stephaniewade@cairnngorms.co.uk
CNPA

21 May 2019

Dear Stephanie Wade
2019/0120/DET Construction of 47no. houses/flats, associated roads and footways | Land
80M SE Of 2 Carr Place Carrbridge

BSCG wishes to object to the above application. We request the opportunity to address the planning committee when this application is determined.

The proposal site was one of the best flower- and fungi-rich meadows in the CNP, supporting a suite of both flowering plants and grassland fungi of exceptional conservation significance, until it was ploughed and reseeded relatively recently. It is of great concern to BSCG that in spite of the CNPA being aware of, and repeatedly reminded of the exceptional biodiversity importance of the site over many years, the Authority persisted in facilitating development on it through the planning process, by keeping a former planning application undetermined over a period of many years, and through maintaining an allocation on the site in successive local plans.

The planning history of this site represents one of the more extreme examples of the type of planning that undermines government goals of halting biodiversity loss and discredits the reputation of government. Such unwarranted sacrifice of a rare high quality habitat is particularly abhorrent and inappropriate in a National Park where effectively avoiding unnecessary conflict between natural heritage and development should be the rule not the exception. It is sad indeed that we have lost frog orchid, field gentian, purple coral, blushing waxcap, narrow headed ant and an exceptional assemblage of waxcap (*Hygrocybe*) fungi from this site.

We find it inexplicable that the CNPA can consider the loss of this field to development as in accord with any of the 4 aims of the NP.

It further concerns us that the CNPA has continued to facilitate development in spite of the high level of concern from Carrbridge residents about the development, which has been clearly demonstrated to the Authority.

The loss of an exceptionally high quality flower- and fungi-rich meadow to development contravenes the 1st aim of the Park, to conserve and enhance natural and cultural heritage.

Having only recently been damaged, this site has the potential to be restored and enhanced for biodiversity and public amenity alongside its former use of low intensity agriculture.

Permission is now granted for the development site opposite Landmark and construction work is underway; this site provides 10 affordable houses and a total number of 23 houses. The 70 additional houses of these two developments combined would add significantly to the number of households in Carrbridge.

Many Carrbridge residents have made it clear they do not want anywhere near this scale of development. The CNPA received an exceptional number of responses to the site allocation in the pLDP 2020 MIR, with a significant proportion of all responses to the pLDP MIR being objections to this single allocation. Many Carrbridge residents that objected indicated in their pLDP 2020 MIR responses that they considered 12 houses to be a desirable number of houses; and the local elected CNPA Board member, reiterated this view at a public CNPA meeting.

The pLDP provides a reduced proposal for the site with 36 houses and a significantly smaller footprint and the remainder of the proposal site excluded from the settlement boundary. This proposal accords with the CNPA's response to the high number of representations from the public objecting to this site.

A total number of 36 houses for this site also accords with the recommendations of the Reporter on the current LDP 2015 that was regrettably overturned in very questionable circumstances.

To allow this site, that has lain undetermined by the CNPA for years in deeply questionable planning circumstances, to be determined according to the present LDP 2015 when there has been such an exceptional level of concern about the site, would risk severely damaging public trust and confidence in the CNPA, the planning system and in the purpose of engaging in public consultations. It indicates that the CNPA weights the planning system towards development rather than towards communities.

A decision at this point in the LDP process on this particularly contentious and long-standing site is premature.

We do not consider there is any justification for determination and potential development of this site at this time in terms of local housing need and we consider this is supported by the community view against the site already referred to.

We also consider the CNPA has not demonstrated that it has any effective means of controlling who acquires, and for what purpose (air bnb, 2nd home, etc) affordable housing that is available on the open market.

The proposal site is adjacent to native woodland that is contiguous with woodland used by the annex 1 species capercaillie. The habitat close by the proposal site is suitable for capercaillie, with such habitat features as dwarf shrubs including blaeberry and canopy dominated by Scots pine. The CNPA will be aware that obligations towards capercaillie include restoring the population to favourable status, not merely maintaining it at its present low level.

Recreational disturbance limits capercaillie distribution through avoidance of disturbed areas.

Disturbance from people and their pets would increase dramatically with the addition of 47 households adjacent to this woodland. There is also the combined impact of the 23 new houses adjacent to and impacting the same woodland.

We refute the claim in the Ecological Survey provided by the developer that the development would “not impact” on woodland grouse; we consider the recreational disturbance to capercaillie of a further 47 households living at this location would be considerable and permanent.

We consider the statement “lack of open areas with raised areas” in the developer's Ecological Survey that contribute to the conclusion that there is no habitat suitable for lekking, as flawed.

We look to the CNPA to make accurate and verifiable claims in the Appropriate Assessment. We are concerned at demonstrable inaccuracies of fact in the earlier Appropriate Assessment for the 23 houses that are unacceptably misleading. At this stage the Appropriate Assessment is not available for public comment.

We do not share the view the CNPA has previously presented, that people follow the same routes as everybody else and that the number of people using woodland will not affect capercaillie use of that woodland. It is very widely recognised that informal desire line paths typically multiply with increased use of woodland in and around settlements, and there are a variety of reasons as to why people wish to avoid places that are regularly used by others. Assertions that fail to recognise these patterns lack credibility.

The inclusion of paths (2 are shown, but more may develop informally as desire lines) leading from the development, through the 20m hold back strip and into the woodland is not appropriate. This would encourage the spread of multiple paths. Also the woodland to the south and east of the proposal site is at present among the less-used areas of this general area of forest and consequently receives greater use by brown hares that would be likely to be displaced by dogs and walkers.

We reiterate our concerns, already repeatedly expressed to the CNPA, that a walkover survey for wildcats is inadequate as a means of providing information on wildcat presence. Wildcats are notoriously secretive and discrete and it is unrealistic to expect a walkover survey to reveal field signs that can be identified as wildcat.

We are concerned at the limited scope of the surveys and do not consider that a one day visit in winter provides an adequate field basis for assessing the potential ecological impacts of this proposal.

BSCG has repeatedly found badger signs on and around the site and consider it likely that the proposal would have some impact on badgers. As well as loss of habitat and potential disturbance, there is likely to be increased numbers of road kills of badger and brown hare through greater use of Carr Road especially going towards Dulnain Bridge.

The proposal will inevitably lead to an increase in traffic using Carr Road going towards Dulnain Bridge. This will impact of non-car users' enjoyment of this exceptionally scenic and wildlife-rich road. Increase in traffic is likely to result in increased numbers of birds, perhaps in particular waders and their chicks (e.g. lapwing, oystercatcher and curlew) killed on the road. Also increased traffic could over time lead to the road being widened with loss of verge habitat that is valuable for wildlife including invertebrates.

Yours sincerely
Gus Jones
Convener

CNP
Grantown-on-Spey
PH26 3HG

Hazel Moody
Log House
Carr Road
Carrbridge
PH23 3AE

20 MAY 2019

17/5/19

Dear Sir

Site H1 Carr Road Carrbridge.

With regard to the above planning permission I would like to raise a few concerns.

My first and major concern is Carr Road itself. It is a small narrow road with no pavement, used by residents, many who are children. I believe that such a large

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development and the increase in traffic would add to an already dangerous road. This would be especially so, when large lorries would be on the road during building, making it practically impossible to drive along and much more dangerous to walk along.

There have been suggestions that other paths be used but these would only be appropriate for about a quarter of the residents and must prove that the road is not fit for such an increase in traffic from 47 new houses.

My second concern is with the infrastructure of the village. Can we be sure that people's rights to

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Clean water, sewerage system, schools etc will be met with this new development. At present raw sewage has been found above ground in Rowan Park. In the past the water supply has failed, raising questions as to the size of the new development. A smaller development with a maximum of 15 houses in the whole field would be much more in keeping and appropriate for the area and safeguard the local infrastructure.

Finally there is also, to be considered the impact of more people on the wildlife in the area. There will be more rubbish, dog fouling and more people in the woods. |

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wonder what measures the Park Authority is going to put in place to counteract the negative impact of more people if such a large development is passed.

Yours faithfully,

A solid black rectangular redaction box covering the signature area.

Comments for Planning Application 19/01521/FUL

Application Summary

Application Number: 19/01521/FUL

Address: Land 80M SE Of 2 Carr Place Carrbridge

Proposal: Construction of 47no. houses/flats, associated roads and footways

Case Officer: Roddy Dowell

Customer Details

Name: Mr James Hunter

Address: 12 Carr Place, Carrbridge PH23 3AF

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I would like to object to the development on the grounds that there are too many houses in the proposal and the negative effect this will bring to Carr road in terms of safety.

Planning Application 2019/0120/DET

The only positive comment I have about this application is that the number of properties being asked for is neither 72 on the whole site or 36 on half the site.

Whether 47 houses on the whole site is still the right number is questionable. The impact on the village of 70+ houses on this and the recently approved development will still be considerable.

As has been mentioned many times the effect of so much additional traffic on Carr Road will seriously affect the safety of those wishing to walk from that end of the village into the village centre including the school.

The question of the safe route to school seems to have been passed to and fro between the developer and the authorities with little tangible progress being made.

The safe route to school should be a prerequisite to any development taking place. Once building starts no-one will want to cycle or walk to school along Carr road. Indeed, the traffic calming proposals for Carr Road will make it even more difficult for cyclists and pedestrians.

The affect on the school also requires consideration, the increased number of pupils as the development progresses will put pressure on the existing premises. Plans need to be made to cope with this or we may have the same problem as Boat of Garten with the lack of capacity.

The timescale for this proposed development is also a concern, at the presentation in the village hall no-one was prepared to suggest a timescale which if the houses are being built on demand could take years.

In summary I still feel that 47 houses are too many and would dwarf Carr Place and too little has been done to allay or answer the many concerns villagers had to the earlier plans regarding Carr Road, a safe route to school, and extra demands on the village, particularly the school.

J M Campbell

Comments for Planning Application 2019/0120/DET

Application Summary

Application Number: 2019/0120/DET

Address: Land 80M SE Of 2 Carr Place Carrbridge

Proposal: Construction of 47no. houses/flats, associated roads and footways

Case Officer: Emma Wilson

Customer Details

Name: Mr Jem Roberts

Address: Birchbank Carr Road Carrbridge

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am unable to cover all my areas of concern about this application in the 1,950 characters permitted for on-line comments. It equates to around 300 words! Such a limit is ludicrous, given the detail that developers are allowed to submit to you. There is absolutely no reason why objectors should be limited in the way you have done.

Please refer to the e-mail I have sent to planning@cairngorms.co.uk on 19 May 2019. If you DO NOT intend to refer to that e-mail, please advise me, as I will wish to take this up further with you.

From:Jeremy Roberts

Sent:19 May 2019 19:29:43 +0100

To:Planning

Subject:Planning Application 2019/0120/DET - Construction of 47no. houses/flats, associated roads and footways

Dear CNPA Planners,

I am e-mailing my comments on the above planning application because the 1,950 characters permitted for on-line comments is ludicrous, given the detail that developers are allowed to submit to you. There is absolutely; y no reason why objectors should be limited in the way you have done.

Once again, I am writing to respond to the CNPA's consultation on the proposed housing at the Bull Field along Carr Road, Carrbridge. I have literally lost count of the number of times I have commented on these proposals and made similar comments each time. It'll come as no surprise that many of the residents of Carrbridge have lost patience with this process, and are deeply sceptical that their views will be properly considered.

I am writing to OBJECT to the proposed development.

- 47 houses built in this location will **increase traffic to a dangerous and totally unacceptable level**. Carr Road is a narrow road, with barely sufficient room for two cars to pass, and few locations where pedestrians can step off the road. It is an important route to school for primary school children, and route to the bus stop for secondary school students. An increase in traffic, of the scale proposed, would pose a danger to these and other users. The Supporting Statement says (5.9) that a Transport Assessment is submitted with the application. I have been unable to find this in the application documents. Given the significance of this assessment, it would have been very useful if this assessment had been highlighted in the document list, for ease of reference.
- I am aware that previous proposals for housing here were based on access from the main road (B9153) on the southern approach to the village. This was proposed precisely because Carr Road does not have capacity to accommodate the traffic associated with such a development. Those development proposals failed because access from the B9153 is unacceptable on an environmental basis. For the planners to now be trying to put the traffic flow back onto Carr Road, as a 'fix' to enable the development to go ahead, demonstrates woeful disregard for the original judgements about the suitability of Carr Road to accommodate such a major increase in traffic flows.
- In line with the CNPA's woeful Development Brief (on which I have also commented previously), the developers have expressed a willingness to provide a pathway through fields to the north of Carr road, for use as a safe alternative by schoolchildren and pedestrians. I am unable to find any extant planning permission for this route. I question whether such a route, in winter months, away from the houses, is a safe alternative for children. Furthermore, were the developers to rely on such a route, it would need to be surfaced, maintained, and lit through the winter months. Given current cut backs to Local Authority spending, it is hard to see how such ongoing cost can be accepted by

Highland Council. The CNPA should require the developers to pay for this, in perpetuity.

- A development of 49 houses in Carrbridge is totally disproportionate and inappropriate. It will completely alter the scale and character of the village. I, and many other Carrbridge residents feel passionately that the character of where we live is very special, and - far from protecting this - the developers' proposals threaten the very nature of our community.
- I believe that an **appropriate scale of development in this location in Carrbridge is 12 houses. These would need to be 25% affordable housing, with the remainder as mid-range housing to meet local demand.** The development should also include some communal recreational space. This scale and pattern would be commensurate with the character of our village. I believe any development bigger than this, on Carr Road, would be against the interests of our community.
- I have heard the argument from developers that such a small scale and low-cost development is not worth their while; that, to be profitable for them, a development needs to be large, and comprised of expensive houses. I don't believe this is true, or in the local interest. Smaller developments, of lower cost houses are suitable for local building firms to take on, rather than this firm, which is based in . The CNPA should not be pressed into a development which is in the interests of big-scale building companies, and against the wishes and needs of local communities. Better-still, some members of the community would welcome the opportunity for self-build plots.
- In previous consultations, the Planning Department has received many letters from Carrbridge residents expressing our view that a large-scale development of this type on Carr Road is not appropriate. Many of us feel we have written on numerous occasions to express our concern about what is proposed here. When the CNPA Board came to see the site, 100 residents turned out to express our objection. As a community we have made our views clear and we have expressed them firmly.
- I also have concerns about the practicality of constructing a development along Carr Road, in particular the difficulty of access for construction vehicles, given the narrow nature of the road, and the difficulty large vehicles already have turning into Carr Road.
- With reference to Dr Eric Donnelly's 'Ecological Survey and Assessment Report', 28 Feb 2019, he notes "Only one habitat, improved grassland (B4), will be directly impacted upon by this development". Whilst this may now be the case, it is because a field that was permanent unimproved pasture (and had previously held some important plant species) was ploughed and sown, I suspect this was done to reduce its biodiversity value prior to development. I question whether the ploughing and sowing of this land was legal under the terms of The Environmental Impact Assessment (Agriculture) (Scotland) Regulations 2006. This states that permanent grassland and permanent pasture (together referred to as permanent grassland) that has not been included in the crop rotation of the

holding for five years or more cannot be cultivated without first undertaking an Environmental Impact Assessment (EIA). Given the findings of Dr Donnelly, and its relevance to this application, I urge the CNPA - with its statutory biodiversity remit - to determine whether such an EIA was conducted prior to cultivation.

- In the Application Form, the applicants certifies that “None of the land to which the application relates constitutes or forms part of an agricultural holding”. This is hard to reconcile with the fact that the field is improved grassland, and has held livestock. Also, if the development depends on a ‘safe alternative route’ that crosses the field to the north of Carr Road, then this surely impacts on an agricultural holding. I therefore question whether the developer’s LandOwnership Certificate can be acceptable to the Planning Authority.
- Dr Donnelly’s document also states, with reference to Scottish wildcat “No signs of Scottish wildcat were located during the survey and so it should be concluded that the development will not impact on red squirrel [sic]”. Allowing for the typographical error, it would have been good if the text had acknowledged (a) that wildcats are notoriously difficult to observe, and that (b) Carrbridge is one of the remaining 7 wildcat hotspots in Scotland.
- Given the climate emergency, as declared by the Scottish Government, all houses with suitable roof alignment should be fitted with solar PV panels.

Finally, I am aware that previously, the CNPA has recognised the concerns of many in our community and sought to reduce the number of houses that has been proposed for site H1. The position of the CNPA was then overturned by the Scottish Government, which I consider an utter disgrace.

Yours faithfully,
Jeremy Roberts

Comments for Planning Application 2019/0120/DET

Application Summary

Application Number: 2019/0120/DET

Address: Land 80M SE Of 2 Carr Place Carrbridge

Proposal: Construction of 47no. houses/flats, associated roads and footways

Case Officer: Emma Wilson

Customer Details

Name: Ms Lesley Frew

Address: 11 Carr Place Carrbridge

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I've no objections to a few houses being built on this site if these meet village requirements. I have the following concerns:

*short and long term effect on the natural environment of such a project.

*47 houses are too many for the area, and I question whether there is a need for that much local housing in the village. I'm against the use of the site for second homes and instead would prefer a few affordable homes that would fit into the existing environment (Carr Place has only 12 houses).

*the increased vehicle use resulting from the new properties is being grossly underestimated. Most local homes have multiple vehicles and in the larger homes proposed there could be several.

*Carr Road is not suitable for the increase in traffic resulting from the new properties, and wouldn't be suitable for intensive construction traffic.

* much of the main access route from the village has no footpath, is narrow and would not provide a safe route to the school or village.

*driveways leading directly on to Carr Road would prove a hazard for pedestrians and cyclists and it would be better if properties faced, and were accessed from, inside the development therefore avoiding additional hazards on Carr Road.

*The text states 'stone walling to define and enclose the northern edge of the development' and 'create a positive frontage onto Carr Road' but it's a few bits of garden wall with driveways and roadways across them. The grass verges on the Carr Place boundary may be used for parking in the event of insufficient parking within gardens, and that would prove an additional hazard for vehicles and pedestrians. Given that some of the properties have several bedrooms, it's likely that their driveways may be insufficient for parking needs.

*The speed limit on Carr Road should be reduced to 20mph anyway.

*I'd like more information on how the construction would be managed to minimise discomfort for residents.

Application Number 2019/0120/DET

I am writing to object to the planning application above.

The previous time a planning application was submitted you contacted all previous objectors with the information on how to view the housing application. This time I did not receive one of these letters and feel that all these responses that we are having to make for the 2020 plan etc are just putting people off and they think that they have only just put in comments and think that these possibly count towards this planning application.

On the planning application there are far too many documents for anyone to be able to read through them all.

All my previous issues still stand:

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 47 more houses this is going to be far worse. I have two young children and we 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.

From what I can see of the application the previous small section saying that the Highland Council and the CNPA request that a path along Carr Road be investigated seems to have been removed. Is a safe route to school going to be a mandatory stipulation on this application?

Will it be looked into whether the school can take so many extra children from the current development opposite Landmark and the possible development of H1.

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

Yours Sincerely

Lisa McInnes

From: [REDACTED]
Sent: 6 May 2019 13:33:59 +0100
To: Planning
Subject: Carr Road development

Dear Sirs

As a resident at 11 Carr Place, Carrbridge, I would like to add my comments to those already received re the above development proposal.

Whilst I see the possible need for further housing in the area, I feel that Carr Road is not the ideal location for such a plan. A small development, around 12 homes, such as already exists at Carr Place would be an appropriate development, could satisfactorily be served by the road that exists out from the village, allowing for suitable access to the school for children. Anything larger would unbalance the community, given the nature of the road and the junction in the village.

The road just has the room for two vehicles, with no space for a pavement, so large traffic requires other vehicles to give way, & with more pedestrians this would cause flow problems.

I note that the land being muted for the development is being made available in two tranches, yet the only plans we have seen is for a single development of 47 houses covering the whole field. Whilst 47 is better than the proposal of 72 (a far too large figure), how would they plan to do that in two stages without a massive continual building plan over a long period of time?

Further, a development of 47 homes in this one field, is about the same as exists for the whole road currently, which sees almost all vehicles kept off the road. How would this happen here? The parking on offer for each house is substantially less than is used for existing properties, is it believed that most would manage with only one car this far out into the countryside?

Regards

Mike Corser

Comments for Planning Application 2019/0120/DET

Application Summary

Application Number: 2019/0120/DET

Address: Land 80M SE Of 2 Carr Place Carrbridge

Proposal: Construction of 47no. houses/flats, associated roads and footways

Case Officer: Emma Wilson

Customer Details

Name: Mr Charles Miller

Address: old police House CARRBRIDGE

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The location of this development is completely inapt.

While the land itself may be suitable for housing the access to and from it is extremely awkward and dangerous.

The location is part way down Carr Road which is a narrow and twisty road with no footpaths and no room to install any. Pedestrians and motor traffic will therefore be intermixed increasing at the risk of injury or death.

There is no direct access to the local primary school and village amenities and pedestrians will be obliged to use Carr Road on a regular basis. Any subsequent build of a footpath to the school will necessitate its users crossing Carr Road.

The proposal of 47 houses in an enclosed area will create a self contained development with no physical or social connection to the rest of the village. In effect, a ghetto.

Comments for Planning Application 2019/0120/DET

Application Summary

Application Number: 2019/0120/DET

Address: Land 80M SE Of 2 Carr Place Carrbridge

Proposal: Construction of 47no. houses/flats, associated roads and footways

Case Officer: Emma Wilson

Customer Details

Name: Mrs Alice Buttress

Address: Seafield Cottage Station Road Carrbridge

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: It is disappointing that developers continue to try to get planning permission for such a large development when so many residents have objected to all past proposals. The main objection is the access to the site via Carr Road which is a narrow road without a pavement for large sections and is therefore already a danger to pedestrians including children who use this road to walk to school, and with such a large proposed development the additional vehicles that will be required to use this access Road is a totally unacceptable risk to all road users, residents and their families. Regardless of planners resubmitting different housing layouts, there are no circumstances where this road can be made suitable for the volume of additional traffic, I therefore object to the proposed development.

Planning application 2019/0120/DET

I wish to object to this application, most of my points are the same as I had to the previous proposals.

Many of the points raised by myself and many other villagers have not been addressed in any positive way.

The problems on Carr Road will not be solved by the traffic calming proposed, in fact for cyclists and walkers I do not feel they will help at all. It may even be more dangerous for walkers.

A safe route to school seems to have been virtually forgotten with no definitive proposal. If this is not resolved and put in place before building is allowed to start then it will be totally forgotten by the authorities.

The number of houses is still high for a rural development on the edge of the village and the amount of additional traffic generated on Carr Road during building and continually after will always be a problem. The road is just not suitable for such a large number of vehicles.

Mrs J E Campbell

Comments for Planning Application 2019/0120/DET

Application Summary

Application Number: 2019/0120/DET

Address: Land 80M SE Of 2 Carr Place Carrbridge

Proposal: Construction of 47no. houses/flats, associated roads and footways

Case Officer: Emma Wilson

Customer Details

Name: Ms L Moe

Address: Rowan Park Carrbridge

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the proposed planning application for 47 new properties for the following reasons.

The number of properties is excessive for this part of Carrbridge and does not fit with the existing. The plans show that they are squashed into the space with little parking for the number of cars that each property will realistically have.

Increase in traffic from 47 properties would be detrimental to those already living in the area, in particular those whose properties border Carr Road. These residents will experience increased pollution from passing traffic detracting from their rights to enjoy their gardens. There will also be significant noise and disturbance from increased levels of traffic. This raises issues of environmental impact in the area.

Carrbridge can be reached from 4 directions, three of these on main roads with two way traffic flow and pavement on at least one side if not both sides of the road. New developments should be in these areas and not on Carr Road.

The proposed development is on Carr Road, the one road which is mostly single track, very narrow and has no pavement nor many suitable areas to step off to safety meaning that pedestrians must walk on the road as there is no other option.

Carr Road should not suffer as a result of any building of properties and as such should not be spoiled by any traffic calming or additional signage. It is currently a charming and unspoilt street in a highland village and should stay that way.

As a cyclist, driver and walker I have personal experience of using Carr Road at all times of year in all weathers. Currently nobody in our household will use a car if making a journey in the village. If the proposed development goes ahead this will dramatically change and I would anticipate using the car for all journeys as I would not consider Carr Road a safe place to walk or cycle.

It is not unusual to see children playing on Carr Road, this would stop if more cars.

From:Neil Doherty
Sent:20 May 2019 20:44:55 +0100
To:Planning
Subject:Application Number: 2019/0120/DET
Importance:Normal

Good morning,

In relation to the proposed planned build on Carr Road, Carrbridge, I like many residents have a number of concerns regarding the build.

This process has been going on for a number of years, and of course the last planning application was rejected. I have the same issues as before and safety is a huge concern. Myself and my family live at the junction of Main Street and Carr Road, in a Victorian style property, which has been in the village since the early 1900's. The back garden of our property is accessed from Carr Road, and this gateway is used on a daily basis. The gable end of our property is very close to Carr Road, just a few meters away. With this the issue of noise and vibration would be a concern for us, and of course trying to exit/enter our property safely.

The junction at Main Street and Carr Road is narrow, and is difficult to negotiate at the best of times. How are large vehicles going to manage turning in and out of this junction safely? I can not see how this is possible without putting people and property at risk. The amount of industrial vehicles and large HGV's potentially using this junction on a daily basis will be high, as it is the main access route to the proposed site from the Main Street. This junction is also a stones throw away from the car park and entrance to the primary school. The Main Street is used by all pupils and parents to access the school and I would have again grave concerns about the safety of members of the public walking and using this route.

If the proposed build were to go ahead then the increased traffic at this junction again would throw up questions of safety.

Also there are no footways for pedestrians on Carr Road as it is a single unclassified roadway so how on earth our large vehicles to travel up and down this road safely?

The number of proposed properties is questionable and will have an impact on the community without a doubt.

Submitted for your consideration.

Neil Doherty

Cairdeas

Main Street

Carrbridge

Sent from [Mail](#) for Windows 10

Comments for Planning Application 19/01521/FUL

Application Summary

Application Number: 19/01521/FUL

Address: Land 80M SE Of 2 Carr Place Carrbridge

Proposal: Construction of 47no. houses/flats, associated roads and footways

Case Officer: Roddy Dowell

Customer Details

Name: Miss Paige Robertson

Address: 12 Carr Place, Carrbridge PH23 3AF

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I would like to object to the current proposal of 47 houses.

1. There seems to be no plans for footpaths, and no ability to place a footpath along a small road.
2. The current road is not suitable for the increase in traffic. The usual home has 2 cars. That will add another 94 cars to the traffic flow, that is not including all the building vehicles and trucks that will be using the road while the building is going on.

As I have a son that walks to school, the increase in traffic will surely affect him and all the other children that live on Carr Road.

This is not including all the people that use the road as a way into the village.

4. There is approx less than 50 houses on Carr Road already. 47 new houses seems an excessive amount to build, almost doubling the houses on a road that is unsuitable for the traffic and pedestrian flow already.
5. 47 houses is excessive for such a small area.
6. There does not seem to be a specified time for the building going on. I would not like to be live opposite a building site for the next 10 years, as they build and sell to fund the next house that won't go to local people needing housing.

Comments for Planning Application 19/01521/FUL

Application Summary

Application Number: 19/01521/FUL

Address: Land 80M SE Of 2 Carr Place Carrbridge

Proposal: Construction of 47no. houses/flats, associated roads and footways

Case Officer: Roddy Dowell

Customer Details

Name: Miss Rachel Williams

Address: 2 Carr Cottages, Carr Road, Carrbridge PH23 3AE

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Having already objected to the major road safety concern all of the Carr Road residents have, I am disappointed to have to again raise my concerns.

Carr Road is a country lane with no potential for a footpath and there has been no attempt to reassure residents that a safe solution for pedestrians is now even being considered.

If the development was for an acceptable increase in traffic i.e. 12 new houses with the potential for 24 more cars (which is still a huge increase) Carrbridge residents would not be so against it. 47 properties will potentially more than double the current traffic volume (given that the whole of Carr Road hasn't more houses than that number currently).

This issue coupled with the increase in heavy vehicle use which the road is not wide enough to deal with is simply a time bomb regarding pedestrian safety. Even more concerning is that this increase in heavy vehicles and machinery may go on for up to 10 years, how can this safety concern not be a reason this application be thrown out altogether.

The next concern is why this many and on this plot.

Affordable housing is definitely needed in the village but would be better built in higher numbers somewhere with better, safer access, for example on the Main Street development the Woodlands.

47 properties on the Bull Field Plot will be overcrowded properties with little space for families living there, this suggests that the properties be of a poorer quality and that financial gain is the only driving force rather than necessary housing needs for our community.

I hope that this application be thrown out and only a small number of properties be allowed, 12 would mirror Carr Place and not raise the road safety risk too much.

Comments for Planning Application 2019/0120/DET

Application Summary

Application Number: 2019/0120/DET

Address: Land 80M SE Of 2 Carr Place Carrbridge

Proposal: Construction of 47no. houses/flats, associated roads and footways

Case Officer: Emma Wilson

Customer Details

Name: Dr Rebecca Badger

Address: Birchbank Carr Road Carrbridge

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I am unable to provide the comments that I have on this application in the 1,950 characters that is permitted for on-line comments so I have emailed them to you separately.

You should be aware that this character limit is absolutely ludicrous, given the detail that developers are allowed to submit to you and the complexity of the planning history on this site.

There is no reason why objectors should be limited in the way you have done.

From:Rebecca Badger

Sent:19 May 2019 20:01:39 +0100

To:Planning

Subject:Planning Application 2019/0120/DET - Construction of 47no. houses/flats, associated roads and footways

Dear Planners

I was unable to submit my comments on this application through the on-line system because of the character limit which it imposes. Please find them below.

The Carr-bridge community has provided its views about development at this site on multiple occasions. These include responses to the LDP consultation in 2018 (of which more than 100 related to this site); responses to the development brief consultation for the site (which took place in late 2016/early 2017); and responses to the last planning application for the site which was refused in 2015. On all of these occasions the majority of responses have suggested that there should only be 12 houses on the site to mirror the development opposite in Carr Place.

If there are a smaller number of responses to this planning application it is simply because the community feels unheard and overwhelmed by the complexity of the planning process. At present the H1 site in Carr-bridge is proposed in the LDP for 72 houses but the new LDP, which will be adopted in 2020 proposes just 36 houses for half of the H1 site. The community in Carr-bridge submitted a large number of responses to the LDP consultation requesting that the site be allocated for 12 houses, rather than 36, however the planning committee deemed that it knew better what was required for the village and allocated the site for 36 houses. The community does not feel listened to and I would not be surprised if you receive fewer comments on this application given that they have been worn down by consultation after consultation about this site. It would be disingenuous not to consider the comments that community members have previously submitted about development at this site in considering this planning application.

The current application has been submitted by the developer at this time, in spite of them sitting on this site for more than 10 years, because they clearly see their ability to develop it to be constrained if they wait until the next LDP comes into force.

A further reason why you may receive a reduced number of comments on this application is because residents on Carr Road have not received a neighbour notification about this development in spite of the fact that it proposes changes to Carr Road. I wonder if you can explain why this is the case?

The proposed development will require all access to be taken along Carr Road, this is a narrow road, which is single carriageway along most of its length, with no pavement. The increase in traffic that will arise as a result of this development will have a severely adverse impact on the character and safety of Carr Road. The road is regularly used by pedestrians to access the Carr Woods, by school children (on foot, skateboard, scooter and bicycle to get to the primary school), by secondary school children (to get to the bus stop) and by other people. All traffic arising from this development will move along the full length of Carr Road and most new properties are likely to have 1-2 cars. This will result in a substantial increase in car movements along Carr Road which is an issue that has been raised repeatedly by community members in previous consultations about this

site. The supporting information for the application suggests that a Transport Assessment has been submitted alongside the planning application but I can't find it on the website. Given that this is the biggest concern that has been raised about this site in the past, the Transport Assessment is absolutely essential for us to be able to make meaningful comment on this planning application.

The concerns that I have about access arising from new properties along Carr Road are magnified during the construction phase. Access for large construction vehicles is likely to be challenging and further compromise the safety of those who regularly walk along the road.

I have no doubt that there is demand for housing in Carr-bridge and particularly for affordable and mid-market housing of the type that this proposed development is largely comprised. However I do not feel that this is sufficient justification for the development to be given planning permission. If this demand did not exist the developer would not be submitting the planning application. As a planning authority it is your role to decide where development is and isn't appropriate. Development of the proposed scale on this site simply cannot be accommodated and will undermine the safety and quality of life of current residents on Carr Road. In Carrbridge there have been several affordable housing developments in recent years (at Dalmore and on the Main Road) and there is already a development underway for affordable housing (at site H2 adjacent to Crannich Park). We also have several other sites in the village, including the derelict Struan House Hotel site and the old saw mill site on Station Road. These would be much more suitable for development (and have much better access) than the proposed H1 site on Carr Road.

The developer is proposing that a lit footpath be provided along the side of the field to the school. As a last resort, if the committee decides to give this application planning permission, the ability to develop and maintain this footpath must be a pre-requisite. The CNPA should be taking care to listen to the concerns Carrbridge community given that it is trying to work with them as part of its current Heritage Lottery funded capercaillie project. Any further suggestion that the CNPA knows better could undermine its aspiration to work with the community on capercaillie conservation. I would like to address the planning committee about my concerns when it considers this application.

Yours sincerely

Rebecca Badger

From:Rona Douglas

Sent:20 May 2019 17:47:33 +0100

To:Planning

Subject:Application no 2019/0120/DET construction of 47 houses/flats Carr Road, Carrbridge

Dear Sir or Madam,

We are writing regarding the planning application for 47 houses on Carr Road in Carrbridge.

We have nothing against more houses being built in Carrbridge, however we have great concerns regarding the access with a development of this size in this location, and have written previously regarding these issues. Carr Road is a single track road with no pavements and poor sight lines from the roads and lanes leading off it, and as a result, we are greatly concerned regarding the safety of pedestrians using this road with any increase in traffic. If this development goes ahead it could mean an increase of 90 plus cars using the road with associated deliveries, services etc.

The road is currently used by lots of pedestrians but namely by children going to and from the primary school and from the bus stop for the secondary school, and an increase in traffic will put them at risk, especially when the housing is under construction, with all of the associated construction vehicles.

We would have thought it is of paramount importance to provide the children with a safe route to school.

The junction from the main road into Carr Road is also a very tight junction, where we have seen grid lock situations with large vehicles trying to get out onto the main road when other vehicles are trying to turn into Carr Road, there is just not the room to accommodate this type of traffic, in addition to this when there are cars parked outside the church it makes the junction even tighter. We have also had many near misses at this junction with people cutting the corner when turning into Carr Road as once again space is tight.

We are aware there are other sites being considered with better access in Carrbridge, namely the old Struan Hotel and the old Saw Mill site, these in our opinion do not have the same access issues for a development of this size.

We really hope you will take our views into consideration.

Kind regards

Rona, Jamie (14) and Ruby (12) (pupils at Grantown Grammar School)



Cairngorms Campaign
The Firs
Crathie
Ballater
AB35 5TJ

www.cairngormscampaign.org.uk
email: cairngormscampaign@gmail.com

Objection to Planning Application 2019/0120/DET Carrbridge, Carr Rd, 47 houses

On behalf of our members we object to this application for the following reasons:

The number of houses proposed is too many for the site and will present significant safety issues on the access road, which is narrow. The Development Plan for 2020 – 2025 indicates 36 houses suitable for this site. Local residents have suggested 12 houses would be acceptable. Please listen to them.

With the existing permission at Crannich Park this would mean well over 10% increase in the number of houses at Carrbridge. Houses in the Cairngorms National Park should be limited to meeting housing needs for people that live and work in and around the Cairngorms and not as holiday homes. How many of the Crannich Park and Carr Road residences will still be occupied by people that work locally in 15 years time? How will the CNPA ensure that future generations do not have the same problem of not being able to afford to live near their place of work? Or will the CNPA just keep approving more and more houses?

This development will further erode the natural environment taking more land away and increasing disturbance to the non-human species around the site. The attitude to this can be found on page 5 of the Ecological Survey and Assessment report where reference is made to lapwing, a red list species, being seen on the site and dismissed because of the small number. This attitude is why we have red list species – with human intrusion destroying their environment. This development will also add yet more disturbance to the capercaillie in the area when again we should be reducing such. The CNPA should be protecting and enhancing the natural environment not enabling its destruction.

Susan Matthews

For the Cairngorm Campaign

Tony
Burley

From: Tony Burley
Sent: 21 May 2019 01:00:17 +0100
To: Planning
Subject: Objection to H1 Carrbridge

I have completed the planning objection process twice only to be told on completion that my comment had 'timed out due to inactivity'. This is not the case as I was working on it both times without a break.

I would like to register my objections to H1 Carrbridge.

I object to the number of 47 houses. On the consultation for the 2020-2025 LDP there were a total of 400+ objections of which at least a quarter were about this proposed site. We suggested 12 houses to complement the development opposite of Carr Place. The result was 36 in half the field; a veiled threat to build a further 36 in the other half later. Once again you are not listening to the local community who have to live with your decisions.

Carr Road is narrow and has no pavement and is used by primary and secondary school children as they walk to the school/bus encouraged by the Government's own health agenda. How will they cope with the extra heavy construction traffic during the construction phase and then between 50 and 90 extra vehicles when completed? If an alternative footpath is proposed then it must be accessible to all users, lit at night and fully serviced in winter conditions of snow and ice.

The exit from Carr Road onto the main road currently has poor visibility lines, particularly for people moving onto the main road. This must be improved before the extra traffic is realised.

The unclassified road that passes between the H1 site and Carr Place is used by drivers as a more direct route to Dulnain Bridge via Balnaan. This road is narrow and in poor condition to support the extra 50-90 cars expected from this site.

I wish to register these objections and would like an acknowledgement of my concerns and my questions answered.

CNPA have a habit of not listening to the community and riding rough shod over peoples genuine concerns. I would like to think this time is different.

As a community we have had this Capercaillie project thrust on us at a phenomenal cost to the tax payer with little consultation. It would be good if this time you listened to our objections.

Yours aye!
Tony Burley
3 Carr Place
Carrbridge



--

Yours aye!
Tony

ADDITIONAL COMMENTS

FOLLOWING SUBMISSION OF ADDITIONAL INFORMATION

Gus
Jones

From:Gus Jones
Sent:31 Jul 2019 16:56:07 +0100
To:Planning
Subject:BSCG Comment

Badenoch & Strathspey Conservation Group

Fiodhag, Nethybridge, Inverness-shire PH25 3DJ



Scottish Charity No SC003846

Email info@bscg.org.uk

Website bscg.org.uk

CNPA Planners
Grantown

31 July 2019

Thank you for providing the opportunity to make further comments on this application. BSCG would like to request the opportunity to address the committee when the application is determined.

Comments on HRA

It is stated in the HRA that some tracks go close to areas used by capercaillie. Tracks are associated with disturbance to capercaillie, from dogs and people; and more heavily used tracks cause

more disturbance, which can extend as far as 235m from tracks, depending on track use and habitat

(Moss et al. 2014). This evidence rebuts the HRA conclusion that “there would be no additional disturbance arising from the development” “because people’s recreational needs would

be met by the existing network of high quality paths”. In addition, increased use of an area, especially in the vicinity of a settlement, tends to result in an increased density of informal desire paths. Entrances to forests are characterised by heavy use of formal paths and high densities of desire paths, with the result that capercaillie are inhibited from using the ground up to a distance of 800m from entrances.

A fallacy in the HRA document is that more people (and dogs) would not cause extra disturbance to capercaillie because they would confine themselves to the existing network of tracks. To the contrary, heavier use of existing tracks would itself cause more disturbance, and increased use of the area would be likely to result in an increased density of informal desire tracks, which would spread the disturbance more widely.

The blue paths shown on the HRA map show round trips from the proposal site of a few hundred metres at the shortest to little more than 2km at the longest. Many people will want to walk or run longer distances, such as 5km routes, on a very regular basis, such as several times a week.

The disturbance to capercaillie from people using bikes, including using a bike to walk dogs, does not appear to have been assessed. Cyclists are likely to cover substantially longer distances than walkers, and the faster access to a wider variety of places is one motivation for using a bike. E-bikes are gaining in popularity and give easier access to a wider range of locations and for a wider range of fitness levels of users. The use of woodland by mountain biking is not referred to. It is a short and easy bike ride from the proposal site to the steep hill within the woods south of the proposal site, where use of the hill for downhill MTB activities has grown. We note that the CNPA Capercaillie Framework states, under the heading 'Threats', that outdoor activities are growing, and that the increasing popularity of mountain biking is predicted to continue along with the demand for more trails.

We consider it is beyond reasonable doubt that the proposal will increase disturbance in habitat used and suitable to be used by capercaillie; that the geographical reach of frequent disturbance will penetrate far into habitat that is currently used by capercaillie, or is suitable habitat and therefore has potential to be used; and that there are many reasons why people are motivated to leave existing paths, and that the higher the number of path users, the higher is likely to be the number of people motivated to leave a path.

The HRA refers to habitat near the proposal site being unsuitable. We consider that the woodland and bog/bog woodland and other wetland habitats in the vicinity of the proposal site all provide suitable capercaillie habitat. We also note that capercaillie use of open agricultural land has in the past been well documented in Scotland, and that on the continent capercaillie are also recorded in meadows with nearby trees. No reasoning is given (other than human disturbance) as to why and which habitats are unsuitable.

Regarding the distribution of capercaillie, we disagree with the claim made in the HRA. We consider that the 3km distance from Kinveachy SPA to the proposal site is not too far away for there to be sufficient disturbance to realistically affect capercaillie distribution within the SPA. We note that the mainline railway that runs between much of Carrbridge settlement and Kinveachy SPA can be safely and conveniently crossed by underpass/bridge.

We do not agree with the conclusion that “people's recreational needs would be met by the existing network of high quality paths”. This statement is unsubstantiated and we note that new desire lines are created (as many people observe) both in and around Carrbridge and in other local woodlands. The creation of new paths is not an exceptional event, and the growth of once very narrow and discrete woodland paths into well established, broad and very obvious paths is a well established and common process in local woods in the district. We are further concerned that the reference to recreational “needs” may be inappropriate, because needs may not reflect behaviour.

The HRA does not indicate whether the continuous woodland between the proposal site and Docharn Wood functions as a stepping stone (as does Baddengorm Wood, as SNH has reasonably emphasised in a previous HRA).

The HRA provides no information on how the proposal may impact on Baddengorm wood. SNH has identified in a previous HRA that Baddengorm wood is believed to receive little recreational usage. However, it is known that it is used for recreation, as the paths through it testify and from personal familiarity with the wood. SNH identified the importance of Baddengorm wood for capercaillie and its significance for the SPAs.

Climate change has many impacts on capercaillie, as identified in the Capercaillie Framework. Scotland has declared a climate emergency and this is a material planning consideration. This issue is not adequately addressed in the HRA.

Both an increase in the population of Carrbridge and associated increased human outdoor activity, favour generalist, opportunistic predators (e.g, through supplementary feeding and discarding food in the countryside). Such potential capercaillie predators include birds such as crows, and mammals such as pine marten, both of which can predate capercaillie at various life stages. The CNPA Capercaillie Framework notes that “Predators can significantly reduce capercaillie productivity” and in this context mentions crows and pine marten among other common predators. It appears that the HRA doesn't mention these effects, despite much published literature relating to the grouse family

The Capercaillie population in Scotland is currently low and has a markedly reduced distribution (compared to only some years ago). There is a recognised international responsibility to bring this Annex 1 species back to favourable status. In the longer term, it is anticipated that there will be forest expansion in the future that could provide habitat for capercaillie. However, for recovery in the immediate term, capercaillie numbers need to increase and their distribution expand. The CNPA needs to encourage the expansion of capercaillie distribution into areas that this UK red listed species is making little use of at present or is absent. However, information appears to be lacking as to where capercaillie can be reasonably expected to expand into, both currently and in the immediate short term. This issue needs to be addressed, partly through planning. We note that the Framework states “the report identifies the need for better spatial targeting of management measures – in particular coordinating measures across habitat, recreation and development management at the metapopulation scale. In practice this means spatial planning and co-ordination across Strathspey as a whole, and similarly at a National Park scale, for example in targeting woodland expansion, managing recreation networks, siting and mitigating development. This should aim to deliver more and higher quality habitat, through both woodland expansion and enhancement, and reducing fragmentation due to disturbance.”

Gus Jones
Convener

Impacts of Human Disturbance on Capercaillie *Tetrao urogallus*

Distribution and Demography in Scottish Woodland

Authors: Robert Moss, Fiona Leckie, Amanda Biggins, Tim Poole, David Baines, et. al.

Source: Wildlife Biology, 20(1) : 1-18

Published By: Nordic Board for Wildlife Research

URL: <https://doi.org/10.2981/wlb.12065>

From:Epc
Sent:13 May 2019 15:37:23 +0100
To:Planning
Subject:FW: Comments for Planning Application 19/01521/FUL

From: eplanning@highland.gov.uk [<mailto:eplanning@highland.gov.uk>]
Sent: 09 May 2019 12:37
To: Epc
Subject: Comments for Planning Application 19/01521/FUL

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 12:37 PM on 09 May 2019 from Mr James Hunter.

Application Summary

Address: Land 80M SE Of 2 Carr Place Carrbridge
Proposal: Construction of 47no. houses/flats, associated roads and footways
Case Officer: Roddy Dowell
[Click for further information](#)

Customer Details

Name: Mr James Hunter
Email: [REDACTED]
Address: 12 Carr Place, Carrbridge PH23 3AF

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Planning Application
Reasons for comment:
Comments: I would like to object to the development on the grounds that there are too many houses in the proposal and the negative effect this will bring to Carr road in terms of safety.

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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 chunntadh sam bith mura h-eil sin air innse.

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

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

Application 2019/0120/DET

As with my previous comments on this and previous similar applications my concern is primarily with the appropriateness of Carr Road to accommodate such a large number of additional vehicles.

The use of February figures for the transport assessment seems rather strange, out of the holiday season, dark mornings and evenings and generally not much traffic.

If traffic calming measures and speed restrictions are to be put in place would this take place before any construction work is allowed?

Similarly, would the footpath/cycleway be provided before construction work starts?

Provision of traffic calming measures and a safe route to school should be a requirement before any work on site is allowed, otherwise access for pedestrians and cyclists along Carr Road will be severely compromised.

Other factors; such as whether 47 houses are the right number or indeed required. The adequacy of the village infrastructure particularly the school, to cope and the timetable for any development are still a concern.

J M Campbell

To:
Planning Support Team
The Cairngorms National Park Authority Planning Department

From:
Jeremy Roberts
Birchbank, Carr Road, Carrbridge, PH23 3AD

Ref: Construction of 47 no. house/flats, associated roads and footways.
Application number: 2019/0120/DET

Date: Sunday, 28 July 2019

Thank you for your letter of 10 July 2019, advising me that the developers at The Bull Field in Carrbridge have now submitted additional information. I ask that you consider the following points from me:

Community Consultation

1. Many people that I speak to in Carrbridge have commented on the proposals at the Bull Field, more times than they can recall, without any apparent influence on the fate of this site or of the surrounding community. Many on the CNPA Planning Committee are new, and will be unaware of this. I would encourage the Planning Team to summarise the occasions of proposal, consultation and response that this community has had to endure, and for which it has shown extraordinary patience in response, over the last 20 years, and to summarise the balance of response from the community over that period. By way of illustration here are images taken at the last CNPA Board visit to the site, in March 2015:



2. In response to the MIR, over 100 Carrbridge residents wrote to express concern over these proposals, and recommended 12 houses as being acceptable. Given the scale of concern expressed, I suggest that the Planning Committee needs to be aware of the scale of opposition that has been expressed by many people in this community, previously.

Transport Assessment - general

3. In the previous consultation (for which the developers have now submitted supplementary information), I searched for a Transport Assessment, not least because this is the element of the development that has caused consistent concern for respondents from Carrbridge about this development. I failed to find the Transport Assessment (TA), yet it appears now, on the list of documents, as having been previously circulated. It may be that I missed the TA on that occasion, but I don't think so. If the first draft of the TA was omitted from the previous set of documents, then I feel the Planning Department should make the Planning Committee aware of this, and should account for it.

Transport Assessment - specifics

4. The Transport Assessment includes proposals for in-road traffic-calming infrastructure on the road adjacent to properties on Carr Road. If these proposals are a constituent element of the application and are therefore subject to consultation, there should have been neighbour-notifications of these proposals to everyone along Carr Road, as part of this application. I ask that the Planning Department clarifies this to the community and/or at the Board/Planning Committee meeting.
5. The front cover of the SYSTRA Transport Assessment (TA) includes the logo of the CNPA. I am unclear what status this confers on the TA. Does this mean that the TA has been partially written by the CNPA? Does it mean that it has been wholly endorsed by the CNPA? Does it mean that it has formal approval of the CNPA? I ask that the Planning Department clarifies this to the community and/or at the appropriate Planning Committee meeting.
6. Page 9:

The TA takes into account scoping comments received from The Highland Council's (THC) Transport Planning team in an email dated 22nd March 2019, and the Transport Planning Team's consultation response dated 30th May 2019.

There is no indication that the views of Carrbridge residents, as expressed in over 100 MIR responses has been taken into consideration. Had the report done so, it would have realised that there are significant local concerns about the feasibility of these proposals, expressed by a large number of local people.

7. Page 21, paras 3.6.12 & 3.6.13 - these paragraphs state:

3.6.12 The drawing in **Appendix A** demonstrates that a 2.4m x 90m splay can be achieved at the junction. This means that if this were a new junction, a relaxation of the 'x' distance (the distance back from the stopline) would be required. Although typically applied to major or trunk roads, DMRB TD42/95 'Geometric Design of Major/Minor Priority Junctions' states that:

"In difficult circumstances, the 'x' distance may be taken as a Relaxation from 9.0m to 4.5m for lightly trafficked simple junctions, and in exceptionally difficult circumstances, to 2.4m back from the nearer edge of the major road running carriageway"

3.6.13 Given the characteristics and volume of traffic at the B9153 / Carr Road priority junction, SYSTRA considers that a relaxation of visibility requirements to 90m x 2.4m is acceptable, especially given the low recorded traffic flows at the junction (See **Section 3.7**), and the limited level of predicted uplift as a result of the proposed development (**Section 6**).

Is it correct that the consultant advisers to the developer should state that a relaxation of the guidance is acceptable? Surely this is the role of the Transport Authority. Furthermore, SYSTRA say that this relaxation is acceptable given the “low recorded traffic flows... and the limited level of predicted uplift as a result of the proposed development.” This seems a bold assertion, given:

- That the level of vehicle use on Carr Road (outlined later in the report), is predicted to double - and even this is an underestimate, and is based on a dubious interpretation of the figures.
- That nowhere in this report is an account given of the predicted increase of use - including by large vehicles/trucks - of Carr Road, and this junction, during the construction phase. If the current x distance is not really adequate for current levels of use, what risk is there of injury and/or property damage during the construction phase?

The community and Planning Committee will need to see a more objective assessment of these risks than has currently been offered by the developers.

8. Page 22, para 3.7.4 -

The peak hours are identified as:

AM - 0800-0900 PM - 1615-1715

These are inadequate,

- The High School bus leaves at around 0800, so High School students are walking along Carr Road before 0800. On Fridays, the High School bus returns to the village at 1400.
- The Primary School closes at 1450 for younger pupils; 1530 for older pupils on Monday to Thursday, and at 1245 on Friday, so any assessment needs to evaluate risk at these times too.

9. Page 31, para 5.1.3

The conclusions in this section raise **a number of significant concerns about SYSTRA's interpretation of the data...**

- The paper claims that the increase in vehicle numbers will effectively double - in itself an unacceptable increase. This is derived from the TRICS database (http://www.trics.org/trip_rate_calc.aspx), which calculates mean average trips. From this analysis SYSTRA initially states that there will be 572 person additional trips arising from the development, in a 12 hour period, then reduces this - assuming many people will use buses/minibuses/trains/walk down to **395** - a reduction of 177 person trips a day, which seems highly unlikely. It would have been possible to have asked people in Carr Place and Cottages about the proportion of journeys they make by these other means. However, let's run with that 395 figure...
- This figure is based on TRICS data derived from other sites, and is a mean average predicted increase in traffic. The figures presented in table 5 are not broken down by day, so we have to assume that these are means across a week.
- SYSTRA then compared this mean predicted average increase in traffic across a week with a current maximum traffic count on the busiest day (Counter Site 1 on a Friday) of around 400 current person trips, so implies that the number of person trips will almost double - in itself alarming. However, it is incorrect to compare a mean with a maximum. A mean figure should be compared with a mean figure.
- Estimating the figures available in Figure 18 (Monday max 310; Tuesday max 350; Wednesday max 295; Thursday max 345; Friday max 395; Saturday max 300; Sunday max 205), this gives **a current mean average of: 314**, significantly less than the 395 that SYSTRA is using. The comparison of means with maxima in the report, conceals an even bigger increase in vehicle numbers, arising from the development, against the current number.
- Furthermore, for their comparison SYSTRA have used the current trips of 395 as measured at Counter Site 1, the distal end of Carr Road from the development. Yet, all of the predicted 395 new vehicle movements will travel the length of Carr Road from the development. Therefore the comparison should be more accurately be made with current traffic flows at the proximal end of Carr Road, i.e. at ATC 3. At ATC 3, the current maximum count is approx 190 (Thursday). As above, if comparing with the TRICS (mean) values, we really should use the mean of the counter values at this location, not the maximum...
- Again, estimating figures at ATC 3, available in Figure 18 (Monday max 170; Tuesday max 190; Wednesday max 160; Thursday max 155; Friday max 180; Saturday max 170; Sunday max 135), this gives **a mean average of: 165**. **Thus, the number of cars travelling from ATC 3, along the length of Carr Road would increase from a mean of 165 to a mean of 560. The outcome is therefore a 230% increase in the number of cars along the length of Carr Road!** Not the 100% increase (already massive!) that we are being led to expect.

- Either I have misunderstood the data as presented, in which case clarification would be welcome, or the report is inaccurate, or perhaps the proponents have been incompetent or worse still deceitful - none of which is acceptable.
- I ask that the Planning Department clarifies this to the community and/or at the appropriate Planning Committee meeting.

10. Based on the comment above, I challenge the SYSTRA assertion that:

5.4.18 The proposed development is not expected to increase traffic significantly on either Carr Road or the B9153.

5.4.19 Whilst traffic flows on Carr Road (at its junction with the B9153) are expected to approximately double as a result of the development, the absolute increase in vehicle movements is expected to be less than one vehicle per minute in both directions.

11. Page 41, Section 6

Whilst this is being suggested as a suspensive condition of the development, it would seem an essential requirement for all neighbours to this element of the 'development' (anyone resident adjacent to Carr Road) to have been notified as a neighbour at the earliest stage of the planning process.

12. Page 44, Figure 31

This design will push children on bicycles into the centre of a narrowed and busier road.

13. Page 45, section 6.2

Many Carr Road residents expressed concern about this proposal at the Development Brief consultation, and (once again) no heed has been taken of those concerns. In winter, these routes will mean walking to the Primary School in the near dark, away from oversight of the houses that line Carr Road. Furthermore, this provides no safeguard to children walking along Carr Road to catch the High School bus at 8am on a winter morning; some of these children will be 11 years old. This proposed safe route to school is farcical, wholly unacceptable and it is extraordinary that - despite critical comments from the community - it has been adopted within the development brief.

14. Nowhere in this document does the report evaluate the likely impact of construction traffic:

1. What is the estimated number of HGV movements required for this development, for the duration, and phased at different stages through the development? Developers and Highland Council must be able to provide such information.
2. What proportion of the HGVs will access the site from the west to the east along Carr Road?
3. What will be the duration of the working period on the development?
4. What controls will be in place to limit impacts of this traffic on school children and on others at both peak and quiet (weekend and evening) times?
5. How will this HGV use impact on normal traffic use? Will traffic lights be used, or is it expected that HGVs/residents will need to reverse significant distances along Carr Road?
6. What impact will this have on the farm business?
7. What are the anticipated impacts on the road junction at the distal end of Carr Road from the development?
8. What are the anticipated impacts on the road surface of Carr Road, and if damage occurs, will the developers be obliged to repair it?

From: Lesley Frew

Sent: 31 Jul 2019 12:29:40 +0100

To: Planning

Subject: Application 2019/0120/DET. Construction of 47 no. houses/flats associated roads and footways located SE of Carr Place, Carrbridge

I am writing in response to your letter of 10 July regarding additional information you have received for the project.

My comments mainly relate to the Transport Assessment, which I would have liked to have been available from the outset, given the historical concern about road safety amongst the residents and users of Carr Road in the event of potential development.

Increase in traffic volume

I think the estimated figure of 395 additional trips has been underestimated. The traffic movement figures taken from the survey earlier this year do not adequately reflect the true traffic flow. The survey times did not take into account the increased use by school traffic and the days/dates did not take into account tourist traffic. Also the traffic at the Western junction of Carr Road is bound to be much higher than those traffic assessment points and I haven't noticed any adjustment for this.

Increased risk at junctions with main roads

I haven't seen any information on the effect of an increase in traffic flow from the Eastern junction, which is a narrow road with a risky junction. The Western junction is also narrow with limited visibility. I am concerned that both would prove more difficult with increased volume of traffic - in particular large construction vehicles.

Change of character of Carr Road

Despite an increase in traffic use over the years, Carr Road has been able to retain its character as a quiet road shared by all users: motorised vehicles/ bicycles / pedestrians/ prams/ scooters etc. However, I am concerned that this will become impossible with a large increase in traffic flow and inevitably pedestrians and cyclists will have to give way to motorised vehicles.

Traffic calming effects

Traffic calming measures may slow the flow of motorised vehicles in places, but I am concerned that it could move the other categories into a dangerous position in the middle of an even busier road. Where a 20mph speed limit would generally be acceptable on Carr Road, with the traffic calming interventions, I think this would be too high.

Given that the traffic calming measures will affect everyone living on Carr Road, I think it would be useful for comments to be solicited from all residents along the road and not just around the development site itself.

Safe route to school

I don't consider the proposed route to the primary school to be suitable for young children in daylight, and in dark winter months there would be additional risk.

Construction traffic

I would like to see information on the estimated volume and nature of construction traffic, how it will be managed to avoid disruption to residents/users and the duration of the work.

Lesley Frew
11 Carr Place
Carrbridge
PH23 3AF

Application 2019/0120/DET

I am writing to once again object to the housing proposed along Carr Road.

I have had a look at the documents and the main one of interest to me is the Transport Assessment. This report looks like it is for the housing company as the client is Tulloch Homes, but the report holds the logo of the Cairngorms National Park Authority – why is this?

The figures used in the traffic survey were taken in February and both sets taken on a Thursday. Surely out of holiday periods is going to be quieter and to do both on the same day does not seem appropriate. What about weekend traffic?

The travel to work mode split – this seems a strange thing to be able to calculate as I cannot see 13% of the people in the 47 new houses been able to work locally enough that they can walk. Surely there is not enough employment in Carrbridge for this. I would also think that the working from home figure will be a lot lower. If this data is true, then it states that the number of extra vehicles using the road at peak times will be above 40. Carr Road is dangerous as it is, let alone with that many more cars.

The safe route to school – I had previously thought that to be classed as a safe route to school it had to be overlooked by houses and be well lit. This proposed route for a path would not be safe for young children to be walking on their own. Also, in winter months it would possibly be unusable.

As Carr Road is classed as a shared space I feel that to allow 47 more houses would restrict the access to Carrbridge for the current residents who live there.

L McInnes

From: [REDACTED]
Sent: 31 Jul 2019 14:01:09 +0100
To: Planning
Subject: Application No 2019/0120/DET

Hi

With reference to the additions to the new documents with respect to the development of houses on Carr Road, Carrbridge.

The main concern seems to be the build up of traffic along the road, it seems as though not all users of the road have been contacted with respect to the changes which are being proposed. The proposed developments will see an increase in properties similar to the amount already in existence along the road, in an area much less in size. With a 15 minute walk to the one shop in the village, or a 15 minute drive to Aviemore with many more shops (or 30 minutes to Inverness) this will see many more car trips increasing traffic along the road. The traffic calming measures proposed will make this more difficult.

Is another survey to be completed to assess summer traffic levels? It seems as though quite some objection is present with relation to the survey that was completed in February this year, quite a quiet time of the year.

Has the increase in children been investigated with a view to whether the village school can actually cope with the increase. If the numbers are higher than the school's capabilities what will be done with the children who exceed the school's numbers? Or will the builders increase the size of the school before the houses are finished?

I hope that all the residents of the Carr Road area were contacted with these additions so they can also make any feelings known.

Regards

Mike Corser

11 Carr Place

Carrbridge

PH23 3AF

2019/0120/DET

Having looked at the revised documents recently submitted I feel that few if any of my previous concerns have been addressed.

The problems on Carr Road will not be solved by the traffic calming proposed, in fact for walkers and cyclists I do not feel they will help at all.

A safe route to school seems to still be a long way down the agenda. If this is not resolved and put in place before building is commenced, then it will be totally forgotten about by the authorities.

The number of houses is still high for a rural development on the edge of the village. The amount of additional traffic during construction and continually thereafter will always be a problem. The road is just not suitable for such a large number of vehicles.

Mrs J E Campbell

Mr and Mrs Doherty
Cairdeas
Carrbridge
Inverness shire
PH23 3AD

Cairngorms National Park Authority
Planning Department
14 The Square
Grantown on Spey
Moray
PH26 3HG

31st July 2019

Dear Planning Support Team

Application 2019/0120/DET, Construction of 47 houses/flats, associated roads and footways,
80m SE of 2 Carr Place, Carrbridge

We are writing in response to the additional information that has now been provided In regards to the above development. My comments relate to the 'Transport Assessment' which has now been provided.

We are extremely disappointed that this assessment was not provided alongside the original planning documents as, we believe it is fundamental to the consideration of this planning application which has a long history of community concern particularly associated with transport issues and access along Carr Road.

We are disappointed that we didn't receive a 'neighbour notification' about this planning application .

We understand that the Transport Assessment reports a survey of traffic flows which was carried out on two Thursdays in February. One in the morning(between 07:00 and 10:00) and one in the afternoon (between 16:00 and 19:00) in February, which is a very quiet time of year in Carrbridge, it falls outside any holiday season and traffic flows are inevitably going to be fairly low at this time of year. The afternoon transport assessment failed to capture the primary school closure times (of 14:40 and 15:30 Monday to Thursday and 12:30 on Friday) which is an issue.

There are a number of inaccuracies and misleading statements in the Transport Assessment. We believe the CNPA planning team is best placed to put some time into evaluating and verifying the report content. For example, in para 5.2.5 it suggests that the new development will generate an additional 395 trips over the course of a 12 hour day along Carr Road and that 89 of these trips will be concentrated during the peak hours of 08:00 to 09:00 (41 trips) and 15:00 to 16:00 (48 trips). The report then goes on in para 5.2.7 to describe an average increase in traffic flows (of less than 2 cars a minute) which assumes that the new traffic flow is spread evenly over the day. This is in direct contradiction of their earlier statement about car movements being concentrated at peak flow times.

Our main concern however is the statement that the development will result in (para 5.4.19) an approximate doubling in traffic flows on Carr Road. This is inaccurate because it compares the anticipated increase in traffic flows (395 per day) from the development with current traffic flows at the western end of Carr Road where it joins Main Road. Our house sits directly at this junction. All the new traffic associated with this development will travel the full length of Carr Road, and flows will much more than double further east along Carr Road. For example, at site 3 (for the ATC survey) current traffic flows are approximately 167 per day (averaged from the graph shown in Figure 18). A further 395 traffic movements at this location will constitute a 237% increase in traffic flows. At site 2 where current flows are approximately 266 per day it will constitute a 148% increase in traffic flows. It is very misleading for the Transport Assessment to suggest that there will 'only' be a doubling of traffic flows on Carr Road associated with the proposed new development.

Notwithstanding the inaccuracies and misleading statements contained within the Transport Assessment. We have the following further comments to make.

The anticipated increase in traffic flows on Carr Road that will arise from the development cannot be described as 'insignificant'. Carr Road is a quiet residential road along which people walk, cycle, scooter and skateboard to the village and to the school. In our view this level of increase in traffic cannot be safely accommodated on Carr Road and the size of the proposed development should be reduced.

The installation of the proposed traffic calming measures will have a significant impact on the character of Carr Road and proposals need to be agreed with current residents before the development is allowed to go ahead.

The proposal to initiate 20mph speed limits on Carr Road as part of the traffic calming for this development is disingenuous given that we understand Highland Council has proposals to initiate 20mph speed limits across all villages anyway.

The Transport Assessment gives no consideration to traffic that will arise during construction of the new development. This is a significant omission, already trucks, farm and delivery vehicles struggle to pass cars on Carr Road. Any Transport Assessment need to assess what level of

construction traffic is expected, over what time period and how will it be accommodated (both on Carr Road and at the junction with the Main Road) if the development is given the go ahead.

Finally we are concerned with the obvious increase in pollution which will be caused by the increase in volume of traffic along Carr Road and at the junction with the Main Street. Our house looks onto this junction with bedroom and living area windows opening onto this area.

Yours sincerely

Neil & Deborah Doherty

Comments for Planning Application 2019/0120/DET

Application Summary

Application Number: 2019/0120/DET

Address: Land 80M SE Of 2 Carr Place Carrbridge

Proposal: Construction of 47no. houses/flats, associated roads and footways

Case Officer: Emma Wilson

Customer Details

Name: Miss Paige Robertson

Address: 12 Carr Place Carrbridge

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Dear Sir Madam,

Following the additional information submitted on the transport assessment of the Carr Road application, I see no change in my objection the proposal.

1. Why gather the data on the road in 2 days in February, when this is not a true representation of the traffic levels along Carr Road throughout the year. The traffic is going to more than double along Carr Road, more like triple.
2. Calming measures seem inadequate and inappropriate. And has not has taken into consideration the High school children travelling at different times along Carr Road.
3. Has the assessment taken into consideration of all the HGV and building vehicles that will also be using the Carr Road over the period of the building. And the difficulty of Carr Road visibility.
4. Why with all these changes to Carr Road was there not a neighbour notification sent to everybody along Carr Road and not just 6 houses? When everyone along Carr Road is going to be affected.

Yours Sincerely

Paige Robertson

Comments for Planning Application 2019/0120/DET

Application Summary

Application Number: 2019/0120/DET

Address: Land 80M SE Of 2 Carr Place Carrbridge

Proposal: Construction of 47no. houses/flats, associated roads and footways

Case Officer: Emma Wilson

Customer Details

Name: Miss Rachel Williams

Address: 2 Carr Cottages Carr Road Carrbridge

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Dear Sir/Madam

I am writing in response to the recent addition of a 'Transport Assessment' which has finally now been provided.

Firstly, why was this not included in the original information given on the planning development, my assumption is that most people would simply miss this addition and not then get the chance to object.

Secondly, why did only residents to Carr place and Carr cottages received a neighbour notification, when the added vehicle traffic and heavy machinery traffic will affect all the residents on Carr Road.

Thirdly, the assessment was undertaken at a quiet period in February, this is absolutely not a true representation of potential traffic flow on average for this road. Given that the initial building works will inject large heavy duty traffic flow and once houses are built potentially triple the average, how is this assessment even relevant or relative.

I would again like to point out that currently there is no path and residents already face risks with current traffic flow when walking down Carr Road. A small addition of maybe 12 properties built over a short time frame would be acceptable at most. The proposal suggested with absolutely no regard to residents and/or pedestrians shows a major disregard to the local population.

Yours sincerely

Rachel Williams

Birchbank
Carr Road
Carrbridge
Inverness shire
PH23 3AD

Cairngorms National Park Authority
Planning Department
14 The Square
Grantown on Spey
Moray
PH26 3HG

28th July 2019

Dear Planning Support Team

Application 2019/0120/DET, Construction of 47 houses/flats, associated roads and footways, 80m SE of 2 Carr Place, Carrbridge

I am writing in response to the additional information that has now been provided about the above development. My comments relate entirely to the 'Transport Assessment' which has now been provided.

It is extremely disappointing that this assessment was not provided alongside the original planning documents as it is fundamental to consideration of this planning application which has a long history of community concern particularly associated with transport issues and access along Carr Road. Although the list of documents associated with the application suggests that a 'superseded' transport assessment was provided on 24th April, I specifically looked for this document when I submitted my original comments on the application, and am fairly certain it was not available then.

I am unclear about the status of the Transport Assessment. If the proposals contained within it, specifically for build outs along Carr Road, are a component of the planning application then I think that all residents on Carr Road should have received a 'neighbour notification' about this planning application and this is not the case.

The Transport Assessment reports a survey of traffic flows which was carried out on two Thursdays in February. One morning assessment (between 07:00 and 10:00) and one afternoon assessment (between 16:00 and 19:00). February is a very quiet time of year in Carrbridge, it falls outside any holiday season and traffic flows are inevitably going to be fairly low at that time of year. The afternoon transport assessment failed to capture the primary school closure times (of 14:40 and 15:30 Monday to Thursday and 12:30 on Friday) which is an issue.

There are a number of inaccuracies and misleading statements in the Transport Assessment. Though I don't have the time or expertise to identify these in detail I think the CNPA planning team needs to put some time into evaluating and verifying the report content. For example, in para 5.2.5 it suggests that the new development will generate an additional 395 trips over the course of a 12 hour day along Carr Road and that 89 of these trips will be concentrated during the peak hours of 08:00 to 09:00 (41 trips) and 15:00 to 16:00 (48 trips). The report then goes on in para 5.2.7 to describe an average increase in traffic flows (of less than 2 cars a minute) which assumes that the new traffic flow is spread evenly over the day. This is in direct contradiction of their earlier statement about car movements being concentrated at peak flow times.

My main concern however with the analysis in the Transport Assessment is the statement that the development will result in (para 5.4.19) an approximate doubling in traffic flows on Carr Road. This is inaccurate because it compares the anticipated increase in traffic flows (395 per day) from the development

with current traffic flows at the western end of Carr Road where it joins Main Road. All the new traffic associated with this development will travel the full length of Carr Road, and flows will much more than double further east along Carr Road. For example, at site 3 (for the ATC survey) current traffic flows are approximately 167 per day (averaged from the graph shown in Figure 18). A further 395 traffic movements at this location will constitute a 237% increase in traffic flows. At site 2 where current flows are approximately 266 per day it will constitute a 148% increase in traffic flows. It is very misleading for the Transport Assessment to suggest that there will 'only' be a doubling of traffic flows on Carr Road associated with the proposed new development.

Notwithstanding the inaccuracies and misleading statements contained within the Transport Assessment. I have the following further comments to make.

The anticipated increase in traffic flows on Carr Road that will arise from the development cannot be described as 'insignificant'. Carr Road is a quiet residential road along which people walk, cycle, scooter and skateboard to the village and to the school. In my view this level of increase in traffic cannot be safely accommodated on Carr Road and the size of the proposed development should be reduced.

The installation of the proposed traffic calming measures will have a significant impact on the character of Carr Road and proposals need to be agreed with current residents before the development is allowed to go ahead.

The proposal to initiate 20mph speed limits on Carr Road as part of the traffic calming for this development is disingenuous given that I understand Highland Council has proposals to initiate 20mph speed limits across all villages anyway.

The Transport Assessment gives no consideration to traffic that will arise during construction of the new development. This is a significant omission, already trucks, farm and delivery vehicles struggle to pass cars on Carr Road. Any Transport Assessment need to assess what level of construction traffic is expected, over what time period and how will it be accommodated (both on Carr Road and at the junction with the Main Road) if the development is given the go ahead.

Yours sincerely

Rebecca Badger