



Scottish Council for National Parks

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D. McKee
Head of Planning
Cairngorms National Park Authority
Albert Hall
Station Square
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Dear Mr McKee,

Thank you for the opportunity to respond to your consultations on the Draft Cairngorms Local Plan and its accompanying Strategic Environmental Assessment. It is recognised at this stage that there remains work to be done on aspects of the Plan before certain policy areas, notably housing issues, can be finalised. Our response then is very much a first look at the principles and philosophy underlying the Plan and we will welcome further opportunity to discuss and contribute to this strategic document. We will only comment on our concerns. You can take it that where we make no comment we are generally supportive of your approach.

We would like to begin with some general comments.

Overall impressions of the Local Plan

The Plan is well organised and is generally very positive, even bold in its approach to protection of the Park's heritage assets. We note that it is an early draft which will be influenced by the objectives of the authority as laid out in the National Park Plan (not yet available). It is vital to ensure that all the aims of the national parks legislation are contained within the development strategy. We would prefer the development strategy (Para. 1.11) to reflect more closely the sequence of aims as laid out in the original legislation.

General Policies

These are worthy of support. However we are concerned to some extent that the topic policies will not catch many of the subtler issues which combine to define the essence of a national park. General Policy 1 areas, for instance, are considerable in extent. Protection of heritage assets within these areas could be secured technically, but yet the policies may fail in respect of ambience or sense of place. We strongly feel that spatial planning in this context will have to make considerable allowance for buffer zones (not just a landscape issue) and we would suggest that the Strategic Environmental Assessment should be based on tiered surveys of heritage interest to ensure that only the least valuable sites are considered for development, all other things being equal. The alternative to a proactive approach at this early stage is to hand the initiative to developers who will bring pressure to bear on the authority, even with Environmental Impact Assessments in your



armoury.

Topic Policies

Landscape

The proposal to review permitted development rights is a crucial marker and statement of intent by the NPA. We welcome it. We suggest that the Cairngorms Landscape Character Assessment becomes a fundamental reference point for developers.

Water

The river systems of the Cairngorms are one of its prime environmental assets, invariably reflected in SAC and SPA designations. Great care should be taken in **Policy 12** to ensure that everything possible is done to avoid build up of phosphates and nitrates and occurrences of organic pollution through necessary intercepts and processes.

Peat

Scotland holds a significant proportion of the World's total peat resources. It is dynamic in nature and can be influenced in ways other than straight forward extraction. Reference should be made to the need for restoration as a result of a range of activities which may affect it.

Waste Management

It is noted that the three waste management authorities have three different sets of targets. The CNPA should be proactive in ensuring its own targets are produced in collaboration with these authorities, especially if there are knock-on consequences for landfill sites or waste management sites within the national park. Additionally however, it should be part of the NPA's role to secure involvement of Park communities in recycling and composting. Encouragement should therefore be given to this in partnership with the waste authorities.

Energy

The undergrounding of cabling in a national park should be a presumption, based on a targeted amount each year. We recognise there are arguments to be had in respect of its overall benefit where deep peat is concerned but where cabling cannot be undergrounded because of this it should be re-routed.

Transport

We would like to see much more by way of initiatives to secure safe walking/cycling/riding routes within the Park. 'Quiet enjoyment' may not be stipulated in the national parks act, but it is the essence of recreational use of a national park. We feel that provision should be made for regional and local recreational links avoiding traffic. The proposed study to rationalize existing road signage must also include all the design issues associated.

Upland Vehicle Tracks

Perhaps in your policy statement you should consider an initiative to undo the damage which has already been done. The National Trust for



Scotland has successfully achieved this at Mar Lodge.

Agriculture and Crofting

The present thrust of CAP policies is to seek environmental gains, food production having been secured. This should be reflected in the preamble and brought out in the development proposals.

Diversification should be subject to the farm enterprise remaining as the major activity, unless there are environmental gains.

Recreation and Access

As previously stated in the section on transport, we would like to see the NPA being much more proactive in this area, whilst not conflicting with heritage assets.

In respect of Large Outdoor Recreation Centres, we recognise the possible effects of climate change on skiing opportunities and will be supportive of sustainable improvements to recreational opportunity at these sites. We suggest however that '*...best practice in terms of sustainable design and business*' does not cover the situation adequately. The wording should be changed to secure the need for **sustainable environmental use by the business, economically viable proposals and good design.**

Tourism

Given the pressure for development, perhaps the 'sustainable' nature of tourism in the European Charter should be explicit.

Housing

Clearly this topic area has most potential in current circumstances to affect the heritage assets of the Park deleteriously. We welcome the detailed consideration given to it and recognise that it is a work in progress. Nevertheless we have some views you may consider helpful.

The proposals for affordable housing and housing within defined settlements should be offered in the context of producing landscape masterplans for key settlements (not just Aviemore). There are already examples, including recent examples of poor setting of housing developments e.g. Kincaig.

Important characteristics of the setting of Cairngorm settlements are – views of the mountains, landform features [cliffs moraines etc] and mixed Scots pine/birch woodland. These features should be protected and enhanced within a masterplan context, which will enable new development in settlements to be integrated properly with the surrounding landscape.

For example: should the proposed expansion of Inverdrue be allowed to coalesce with the Coylumbridge Hotel complex? Should expansion at Inverdrue be allowed to penetrate pine/birch woodland north of the road or be allowed on the open fields to the south of the road? To what extent should the formal grid pattern of Grantown-on-Spey be perpetuated in new developments?

Consideration is being given to the proportion of open market housing allocation in the Plan. We feel that while this will change from



settlement to settlement, there should be a robust means of assessing this, even amounting to a presumption against open market, speculative housing in some cases. As a general principle any housing development should be small scale and in character with existing settlements.

In regard to housing outside of existing settlements, the granting of permissions for single house plots should be conditional on permanent residence and a need to live on-site as a requirement of business etc.

The policy on conversions of existing non-residential buildings (Policy 40) is a hostage to fortune by being too generous with extensions to footprints. This should be pitched at 25%-30% to allow existing vernacular building styles to predominate.

Cambusmore

We recognise the sensitivities and pressures you are under here, but we have to state firmly that a proposed development such as this should have no place in a national park. It was first mooted as a 'new town/new village' proposal by Highland Regional Council in earlier plans. The justification for this was based on the need for local housing. Yet on examination, its location and scale bear no relationship to local needs. Indeed, developments such as Dalfaber in Aviemore gave the lie to answering the local housing need when a significant proportion of them went into the second home market.

A further justification was that it balanced the settlement pattern on both sides of the Spey, little recognising the fact that all Speyside settlements in this part of the Park are contained on one side of the river.

Our view is that Cambusmore is required as a buffer zone in landscape and ecological terms to offset the expanding settlement of Aviemore. We recognise that the SEA confirms the highly deleterious effects of the Cambusmore proposal and no amount of enhanced bio-diversification elsewhere could possibly compensate for its effects.

We look forward to engaging in further consultation as the Local Plan develops.

Yours sincerely

Robert Maund
Chairman.