



Scottish Campaign for National Parks

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Don McKee Esq
Cairngorms National Park
Authority
Albert Memorial Hall
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8 June 2010

Dear Mr McKee,

09/155/CP – OUTLINE PLANNING APPLICATION FOR DEVELOPMENT OF NEW COMMUNITY (UP TO 1500 HOUSES; ASSOCIATED BUSINESS, COMMUNITY FACILITIES AND PROVISION OF INFRASTRUCTURE) AT AN CAMAS MOR, AVIEMORE.

Preamble

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

SCNP objects to the principle of this outline application and asks the Board's Planning Committee to refuse the proposal as being unworthy of a national park designation.

Having examined the Reporters' findings and the Authority's analysis and recommendations, together with the report accompanying this application, we recognize that the Board is strongly committed to this development. We have the following comments: -

1. The Board has sought to justify this large scale development by coupling it with Aviemore as a growth centre and stating that the settlement has little further capacity. We accept the views of the Reporters who rightly observed that the National Park Plan did not envisage significant population growth and, in regard to this site, the Board had not justified 'the allocation of so much housing in one place.'

2. Whilst each national park has its own set of circumstances, even at the accepted level of housing growth over the next five years of 950 units, this represents twice the average growth of the Peak District National Park, with a resident population of 38,000 and more than twice the growth of Loch Lomond and the Trossachs NP with a similar population to CNP, each with their own pressures for second home and commuting ownership of houses.

3. The capacity position of Aviemore is a function of poor planning decisions which the Board has inherited, and which has seen a large proportion of new build go to the second home market. Clearly this is an issue which will have to be addressed sooner rather than later.

4. There is no indication that even at this stage, with a large development



proposed, that there is any measure of control over second home ownership. The Board has to address the housing needs issue, particularly in respect of affordability, but given its duties to conserve the natural and cultural heritage, it should not be relying on planning gain to provide this. **The current approach is bankrupt. Special measures to deal with affordable rural housing provision in national parks should be a top priority in discussions with the Government.**

5. This scheme is at variance with the NPA's responsibility to promote sustainable development. The development principles accepted by the Board at its meeting on 14 May cannot, by definition, be enforced unless there is a clear strategy to ensure that the open market housing element is long-term residential and not the second home enclave which the principles reject. Furthermore, without guaranteed provision of local employment, the likelihood of the Park Authority being complicit in enabling a large increase in commuting journeys to the Inverness area is obvious.

6. The analysis offered by Board officers on May 14, described the urbanization of the Park's villages by new development as a problem which An Camas Mor would help solve, because it would reject the *cul de sac* tendency. We would be more accommodating to that argument if it were not for the fact that the analysis falls short of describing the true nature of the problem. The urbanization is a result of large developers maximizing the use of space to accommodate the affordable housing element and any additional infrastructure request by the Authority. Despite the aspirations we see a real danger of this development going the same way.

7. The Board has not articulated how it will ensure protection of the SAC and, in particular, the water quality of the River Spey, which according to the SNH submission will decline with this development. It has recognized that there will be negative environmental effects, but it has not made entirely clear how these will be overcome. Saying that it is satisfied it has met all regulatory provisions is not sufficient to safeguard the environment of a national park. If the development is approved, base lines will need to be set for monitoring environmental parameters, including biodiversity, and action taken to ameliorate subsequent damage.

8. Actions are being taken by Board officers to address the issues on local housing needs raised by the Reporters. We understand that the outcomes of this work will be available for the new Development Plan, but not before. In our view, a determination on An Camas Mor, given its lack of contribution to the revised Local Plan, should await the new Development Plan.

There are so many points where impossibility of performance beckons that we feel that approval of this application will put the credibility of Scottish national parks in question.

Yours sincerely

Bill McDermott
Chairman