



Grant Moir
Chief Executive
Cairngorms National Park Authority
14 The Square
Granttown on Spey
Scotland
PH26 3HG

1st March 2018

Dear Grant,

Response to Main Issues Report from the Scottish Campaign for National Parks

"**The Scottish Campaign for National Parks (SCNP)** 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. "

The Main Issues Report

SCNP congratulates the CNPA on the approach that has been taken in the Main Issues Report. We welcome the clear links to the National Partnership Plan and to evidence, like how the issues have been presented and believe the Report itself provides good evidence for why Planning Authorities should continue to produce Main Issues Reports as the CNPA advocated to the Scottish Government in your response to the draft Planning Bill currently going through the Scottish Government. Having said this, we believe the alternative options to the main recommendations are not well articulated which gives the impression the CNPA has already decided what proposals should be included in the forthcoming Local Development Plan. We believe this is unfortunate and in this response highlight a number of alternative options we believe should be considered as well as refinements/further articulation of the preferred options.

Main Issue 1 Overarching Strategy

While we are generally supportive of the spatial plan, which basically directs development to existing settlements/communities in order to protect the landscape and natural heritage of the National Park and promote its use for public enjoyment, we do think that as worded it is too restrictive: "Small-scale development which adds to existing groups of buildings in rural areas would also continue to be permitted. The remainder of the National Park would be subject to a more restrictive approach to development, which aims to support the use of land for conservation, forestry/woodland expansion, agriculture and recreation use." In the past there were settlements in many glens which are now uninhabited and while we would not want to see any development in any of the core areas of the National Park, there are plenty

of glens around the mountain core which would not be adversely affected by the development of further housing, for example, if carefully situated and well designed. We note that depopulation associated with grouse moor management has continued – with many buildings on the fringes of moorland areas being abandoned – and think there should be some scope to reverse this. While it may be the case that few people want to live permanently in these places, due to their relative remoteness, this could also make a small contribution towards addressing the shortage of holiday accommodation in the National Park (in suggesting this we are not advocating mass tourist facilities in the countryside).

Taking this into account we believe the National Park could usefully consider developing the concept of zoning (see below Issue 10) with a view to developing more detailed spatial plans that covered more than settlements. The core zone would be where no development could take place and such a zone could form the basis for an application by the National Park for World Heritage Site Status in future. We would like to see that option on the table and for the National Park to assess all its plans in terms of whether they meet the criteria for becoming a world heritage site.

Main Issue 2 Designing Great Places

We agree that the new Local Development Plan should produce guidance on designing great places and that the 6 qualities of such places now incorporated into Scottish Planning Guidance is a good place to start. We note though that none of those six qualities are specific to National Parks and would like to see the CNPA provide additional guidance on what is appropriate for the Cairngorms National Park, building on the fine legacy of Victorian buildings and emphasising use of natural materials local to the area.

We note that many of the new larger housing schemes in the National Park have a suburban feel and add to sprawl and, with so much open space round about, believe in some places denser housing might be appropriate (as is found along the main streets in some of the main villages in the National Park (Kingussie, Grantown etc). Denser housing would help relieve pressure on land important for the natural heritage.

Main Issue 3 Impacts and Opportunities of A9 dualling and Highland main line railway upgrades

We support the efforts the CNPA has made to date to reduce impacts of A9 dualling on landscape and recreation and are surprised that this is not explicitly referred to in the Main Issues Report. If developed or operated, in the case of the railway, inappropriately there could be a serious detrimental affect on outdoor recreation along the A9 corridor. Conversely, if the dual carriageway was designed with appropriate laybys, underpasses and stopping off points it could help promote enjoyment of the countryside while the upgrading of the railway could enable far more people to enjoy the National Park. We hope that the CNPA will make arguments for the number of train stops NOT to be reduced to improve journey times and will also back bus connections from railway stations to promote more sustainable transport. We therefore believe that impact of these developments should not just be considered from a jobs/employment perspective, which is how the Main Issues Report reads at present, but also in terms of conservation, public enjoyment and sustainable use of resources.

The area of the National Park most likely to be affected by an increase in commuting is Aviemore and we believe this increases the argument for new development to be directed to the north side of Aviemore rather than An Camus Mor which could lead to a significant increase in traffic through the village.

Main Issue 4 Housing

We welcome the work that the CNPA has done to assemble data about housing in the National Park and to project future demand. We also agree that these should be treated with caution – population planning is not an exact science and is easily affected by factors such as migration which in turn is affected by wider economic factors. Having said this the information from the Housing Need and Demand Assessments seems a reasonable place to start at present, agree with the CNPA's approach to the amount of housing land required (which takes account of the natural heritage interest of most of the National Park) and that existing sites should be sufficient to meet most of the projected demand.

As well as the identification of new sites, there is a small but significant amount of derelict housing within the National Park which could be renovated and put back into use.

We agree with the proposal to allocate land on the north side of Aviemore for housing in the event that An Camas Mor does not go ahead within the next few years and note that if it does go ahead that will produce far more than the National Park is projected to need. In our view the site to the north of Aviemore is far more suitable for a housing development in terms of the objectives of the National Park.

Main Issue 5 The Affordability of Housing

The current crisis in affordability of housing is not unique to the National Park but we welcome the clear comparative analysis of wages against house prices in the National Park and the desire of the CNPA to tackle this. While, increasing the proportion of “affordable” housing in developments in some of the villages to 40% is commendable in its intention, it will not be sufficient to address the issue and unless the low wages in the National Park can be tackled, we believe there needs to be more emphasis on social housing. We also believe that with improvements to the A9 and Highland Line, a wider look should be taken at where higher proportions of affordable housing should be required as it should become easier for people working in the tourist industry in Glenmore to commute there to work.

We agree with the analysis about the under provision of smaller homes and the proposal to increase the proportion of smaller homes in housing developments.

Main Issue 6 Economic Development

While there is a need to consider allocation of sites for commercial and industrial use, we do not believe this is the main issue facing the National Park. The key challenge in the National Park should be about land-use, sustainable use of the natural resources in the area and how these could be used to support more jobs whether in conservation or recreation. Jobs have been lost from the land, as for example grouse moors have employed ever fewer people, and at present there is no clear strategy for alternative uses which would promote the National Park's statutory objectives. While land-based jobs do require industrial spaces – in other countries there are many local sawmills for example – these tend to be required in the countryside NOT in business parks.

We would like to see the CNPA to be working not just with HIE but bodies such as FCS to promote alternatives models of economic development.

Main Issues 7 – Natura Sites

We agree with the main question which is about protecting the natural environment but disagree that this has been reduced first to natura sites (what about SSSIs, Ramsar Sites etc) and then focusses only on capercaillie and fresh water pearl mussels. While we understand and appreciate the wish of the CNPA to reverse the decline of the Capercaillie, and that protecting woodland habitats that could be used by capercaillie would benefit many other species, it would make more sense to develop a policy which presumes against further large-scale development. in woodland and to require developers to assess the impacts of developments for all species, and not just freshwater pearl mussel and capercaillie.

While we appreciate the need in principle to compensate for developments such as that proposed at An Camas Mor, we suspect that in large scale developments it will be impossible to control impacts without serious implications for the right of people to enjoy the countryside which in turn is likely to result in major disputes for the National Park. It would be far better to ensure the developments are in the right place and of the right size so this issue does not arise and to focus on the creation of new suitable habitat (as is happening for example at Kinveachy).

Designated sites also face other threats, most notably from unlawful creation of tracks and use of All Terrain Vehicles which destroy habitats – with notable examples on both sides of the Drumochter. While off road use of vehicles at present falls outwith the planning system, SNH can control such activities through its powers to specify “Operations Requiring Consent”.

Main Issue 8 – Essential Facilities

While this is titled facilities and starts off discussing issues such as schools it ends up talking about how planning obligations could be put on developers to improve infrastructure. We believe infrastructure is a far better term, note that this section makes no mention of paths, cycle tracks or indeed bus stops, and would urge that both active travel and outdoor recreation are incorporated into the proposed policy development in this area. We agree that infrastructure requirements should be set out on a settlement by settlement basis allowing account to be taken about existing infrastructure and what the priorities are for new infrastructure.

Main Issue 9 – Flood Risk and Climate change resilience

We agree that the main issue in terms of flood prevention is land-use and that unfortunately, even in the National Parks, much land-use is outwith the planning system and therefore there is little that the Local Development Plan can do to address the impact that intensive grouse moor management for example has on flooding. Within these constraints we welcome the suggestion that developments could contribute to natural flood management (which is dependent on landowners agreeing to this) and also to strengthen requirements to use SUDS.

Main Issues 10 Land Management in Upland Areas

We again note the limitations of the planning system to control land-use in upland areas and can understand why this issue is mainly concerned with hill tracks which do now come under the planning system. While we welcome the intention behind the recommendation that there should be a presumption against any new track in open moorland, we believe this needs to be refined and developed for the following reasons:

- a) Given the experience at Cairngorm Mountain, where tracks have been created in breach of planning requirements, we believe the current proposal should be widened to include all hill tracks, including those associated with ski developments.
- b) We also believe the term “open moorland areas” is far from clear – what happens if a landowner wants to plant woodland on an open moorland area, will the area be treated as moorland and no tracks allowed or will it be treated as woodland, which comes under the Prior Notification system? There are similar issues with some areas of moorland being used for agricultural purposes.
- c) We also believe the presumption against any new track could prevent some of the worst tracks at present being replaced. While we believe that some tracks in the National Park should be removed entirely, following the NTS precedent at Beinn a Bhuid, in other cases it might be acceptable for a track or several tracks to be replaced by one which is designed and situated better. This is in effect what Glen Feshie is trying to do at present and we do not think this should be ruled out.
- d) We therefore believe there would be merit in exploring a zoning approach with there being a presumption against ANY tracks in certain areas (e.g. the Cairngorm Plateau, areas of high landscape value) while potentially allowing tracks in other areas so long as they met certain criteria. The implication of this would be that the CNPA should develop a specific policy and standards which it would apply to any proposal for a new hill track.

We hope these comments are perceived as constructive and positive. Do come back to me if you wish to discuss any of the issues raised.

Yours Sincerely,

