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To: Planning
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Local Development Plan 2020 MIR

Comments from Badenoch & Strathspey Conservation Group

Main Issue 1 Over-Archiving development Strategy

We are concerned at the growth-orientated tone of the strategy and the absence of any end point in sight. Elsewhere the CNPA has recognised that development land is limited in the CNP; yet in this strategy this is not referred to and in fact the opposite is implied. The CNPA states that new development is needed to “ensure” the “future sustainability” of settlements. The CNPA recognises that the built environment cannot expand indefinitely, but this strategy is silent on this crucial issue. In our view this tone can be counter productive to providing 'the right development in the right place to meet local needs'.

We do not support the statements that “there are clear opportunities for growth and development within and around existing settlements of the Park, both to maintain their status and to provide the new homes, businesses and other facilities that are needed to ensure their future sustainability”. There are not clear opportunities for growth. This is evidenced by the allocations made in the LDP 2015 and the MIR 2020, which include sites that support important biodiversity; are controversial on social/cultural grounds and conservation/biodiversity grounds; and are encroaching into special features of the CNP.

We do not support the view that growth is necessary for settlements to remain sustainable; on the contrary, we find much of the growth promoted by the CNPA through its allocations to be unsustainable. We find the view expressed to us by CNPA planners during the consultation process, that settlements will collapse if there is no growth, as unrealistic.

We welcome the recognition that “most of the land outside the Park's main settlements is farmland, moorland, forestry, woodland and mountain that is valued for nature, recreation and land management activities.” We support the statement that “the lack of development and the sense of wildness is one of the key characteristics which needs to be maintained in these areas”

We challenge the seemingly casual statements for which no back up is provided that refer to the existing LDP and are perhaps included to elevate the value of retaining the Development Strategy with only minor modifications. For example, such statements as:

“It [the development strategy of the current LDP] builds on the strengths of the area”. There is no indication what strengths the CNPA has in mind (except that infrastructure is not included), nor how the strategy builds them up. We consider the current development strategy could very justifiably be described as undermining the strengths of the area (such as landscapes, biodiversity and communities) through unsustainable development that is excessive in both scale and pace; and that fails to target housing that is genuinely affordable for people who have a reason to live in the NP.

“Providing appropriate opportunities for growth” - we consider many 'opportunities for growth' in the current LDP to be very inappropriate (e.g. c 100 houses in Carrbridge, c 300 in Kingussie, An Camas Mor, 15 houses in Ancient Woodland Inventory site in Nethybridge).

The above sentence continues with “whilst protecting and enhancing the NP's unique natural environment”. Growth of communities is taking place at the expense of the unique natural environment, e.g. 32 houses at Boat of Garten within one of the most important woodlands for capercaillie in the UK, that is placing yet more recreational disturbance impacts on capercaillie habitat so reducing the unique natural environment of suitable habitat; and for which the mitigation measures are unrealistic in terms of delivery. The CNPA's bold assertions about the effectiveness of the mitigation measures appear based more on hope than any hard evidence.

The phrase 'local needs' is used several times. It conveys a sense that housing is targeted at local people and that developments will deliver suitable housing at genuinely affordable prices that meet the needs of local people. However, to deliver such housing that is sufficiently targeted at local people and is realistically priced is very problematic, and the CNPA's approach to housing has not 'met local needs'. We are concerned that no indication is provided as to how the CNPA suggests it can be achieved. In general we support the approach that “The remainder of the 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”.

We do not support all aspects of the current overall development strategy. One of our concerns is over-development in the Aviemore area.

MI 2 Designing great places.

We are concerned about many aspects of this section.

We are concerned at the lack of ambition in this issue. No added value for being a NP is included. Every planning authority is required to support the Scottish Planning Policy's 6 qualities of successful places, and there is no indication that the CNPA is going beyond that.

We find the opening paragraph in Background so far from the reality of what design quality is delivered in built development under the CNPA as to be worthless. The CNPA has recently permitted a high profile development that did not conform to the Development Brief. To describe this as a 'significant asset' and inferring that this is helping to create a 'rich built heritage' makes it impossible to understand how the CNPA intends to achieve the targets referred to in this issue, and whether in fact the CNPA has any realistic intention of doing so.

We recommend that a seventh quality specifically to apply to national parks relating to natural heritage and sustainability should be introduced.

Natural heritage and green spaces are an important part of 'Great places', and this would be naturally assumed to be particularly emphasised and valued within a NP. However the CNPA has demonstrated a lack of commitment to incorporating nature into the design of developments; for example, the loss of the lochan at the former Tesco site; and the loss of all trees and shrubs at the Boat of Garten 32 housing development.

We have major concerns over the Preferred Option. It is unclear whether the CNPA is intending to have higher standards or lower ones than in the current LDP. Our concern is that the CNPA is seeking to make it more compatible with their LDP 2020 to lower the standards.

We are particularly concerned about this as the CNPA has sought to describe as a 'masterplan' a document that did not conform to the requirements of a Masterplan set out in SPP (a development at Badaguish); and that the CNPA has abandoned the standards set in at least one Development Brief at the behest of the developer. Community interests have not been well served by this apparent willingness to reduce standards that have been established, following public consultation, in the LDP.

It is unclear how this approach of the CNPA has furthered the goal of designing great places.

We object to the CNPA reducing the requirements for masterplans and design briefs and reducing the standards and effectiveness of these tools. We value clarity but we are concerned that the CNPA's approach is simply going to lead to lower standards and confusion.

Our concern is that large scale developments will effectively be required to achieve a relatively lower standard than small developments.

We would like to see higher standards of design and resource use in terms of energy use, avoiding pollution and innovation such that the CNP is setting a higher standard.

Main Issue 4 Housing

We wish to emphasise that it is the provision of new housing to address local need and the affordability of housing that were frequently raised and were contentious during the NPPP consultation. Local need is rarely targeted and the CNPA's plans and policies so far have demonstrably failed to effectively address this need.

Table 1 Housing Supply Targets shows that in the 10 years 2020-2029 735 houses are needed.

Table 2 Housing Land Requirements shows that with a 10% uplift on 735, then 811 houses are required. We welcome the 10% uplift rather than a higher number.

Table 3 shows that the expected contributions from existing housing sites total 1153.

This is some 42% over 811 which is the number of required houses with 10% added.

When this was discussed by us with CNPA planners at the drop in sessions, they justified this high number because the large housing permissions given by the CNPA are difficult for a developer to build. So why did the CNPA provide these large scale, controversial, community unpopular applications when they are difficult to build out.

The CNPA were criticised in the 1st local Plan by the reporters because they sought to uplift the number of houses by 50%.

We do not consider that it is in the best interests of the NP to continue with these excessive allocations.

MI 5 Affordability of Housing

The CNPA needs to develop new solutions to the problems of providing genuinely affordable housing that does meet local people's needs.

The CNPA has failed to provide housing that is genuinely affordable for people living locally and is allocated to people from the area rather than the people at the top of the Housing list who are from other places and may have no particular reason for living in the CNP.

The present definitions of affordable houses are not all adequate.

We have concerns over the final statement on p 37 that "it is important that development remains viable." We regard building in flexibility to enable development viability to be taken into account is completely unjustified. This undermines the policy from the outset and it is hard to imagine a situation in which this does not encourage a developer to plead that their development is not viable. At Grantown the CNPA has recently demonstrated how readily they will agree to abandon their development brief because the developer claimed financial issues (apparently with no convincing evidence provided). And is it reasonable for the planning and enforcement authority to make judgments about a development's financial viability? Does the CNPA have that level of expertise compared to the developer? How can communities have any confidence in a policy that can readily be got around?

We welcome a higher level of affordable houses. We consider the present model of say 25% 'affordable' and 75% other is unsustainable.

The CNPA's attitude that without development communities somehow lose viability and collapse is unrealistic. The CNPA appears to start from the viewpoint that development must happen

We are very concerned at the inclusion of 'rural exception sites'. This allows for the development of locations that would not normally be permitted. This encourages landowners to propose sites that they would otherwise have little prospect of gaining planning permission. In a NP with exceptional biodiversity this is destructive.

We welcome that "all new affordable housing should be retained in perpetuity" and that "the new LDP will make this requirement clear". But we are very concerned that there is silence on the mechanisms of how this will be achieved and we are very concerned that it will not be achieved and will be yet more aspiration that is not achieved in practice.

It is our understanding that there is extremely limited mechanism by which this can happen at present.

We have concerns over the use of self build plots which are provided for a set amount of time, say 6 months, at a discounted price and then put on the open market.

Q1 We consider the model of building significant numbers of open market houses in the CNP as being unsustainable and unacceptable. Obviously a higher percentage affordable is better than a lower percentage, but the CNPA is promoting unsustainable development. The CNPA believe that the scale of development is not a problem because it only covers a small area of the lower lying land (i.e. the land that could be developed). But there is no analysis of how much of this land should be used for development at the expense of all the other competing uses to be made of this land, e.g. for amenity, forestry, agriculture, transport, infrastructure, economic activities. The CNPA has no stopping point in mind for development.

Q2. This is too simplistic because it depends on how it is done. It is a given that older people who need smaller houses are increasing as a proportion of the population. So we need more smaller houses that are also suitable for older people. We are worried about the continual reference to "a greater mix of house types and sizes". What range of bedroom numbers does this refer to? We consider there is limited value in very large numbers of bedrooms. We need smaller houses to be built but not a greater mix of sizes.

MI 7 Impacts on Natura Designations

We are concerned that there is no added value of the NP status. The wording in the Background about no adverse effect on European protected sites and species simply reflects the law, which is a requirement common to every planning authority.

We are concerned about the constrained scope of this MI. We suggest that wider concerns over loss and degradation of habitats and loss of biodiversity, which are under increasing pressures due to climate change and other pressures, should be included. The Park's "unique environment" will not be protected if the only significant focus is on capercaillie and freshwater pearl mussel.

We do not have confidence in the effectiveness of the CNPA's approach to capercaillie conservation. We are concerned that the CNPA are placing too much weight on their expectation of the value of creating new habitat for capercaillie that is more distant from settlements and the CNPA argue will therefore receive less recreational disturbance. We are concerned that new forest habitat may prove of less value to capercaillie than the CNPA anticipates, for example: there are issues of uptake of afforestation opportunities by landowners and time lags involved; potential new afforestation sites are not necessarily very much more distant from settlements than existing capercaillie habitat; a walk or cycle to new forested areas can readily become a preferred longer route; a greater range of bikes, including electric bikes, encourages covering greater distances, as does the popularity of running; the emphasis on active lifestyles and enjoying the outdoors all promote getting to new, outlying forests; increase in numbers of people accessing the outdoors in the CNP (for example, as a result of the A9 upgrade and substantial ongoing new house building in and around the CNP).

We are very concerned that the CNPA is not doing enough to restrict development in the vicinity of existing capercaillie habitat, but instead is relying on mitigation. Major concerns have been raised by ourselves and others about the inadequacy, unreliability and unrealisticness of the mitigation measures required by the CNPA, supposedly to mitigate the recreational disturbance impacts of developments.

Capercaillie are at a very low population level at present and their range has been continuing to contract. The CNPA need to facilitate their numbers and range becoming restored to former levels. Therefore the CNPA needs to consider disturbance and other factors in woodland that has the potential to support capercaillie, but in which they are absent at present. We are concerned that the CNPA resists the argument that because capercaillie are presently absent from a site, they do not need to be taken into account.

In relation to freshwater pearl mussel we are concerned that the CNPA is not setting a high enough standard in proposing to do no more than aim to adhere to legal limits. It is reasonable to consider that this may well fail to maintain the integrity of the R. Spey for FPM. In spite of the present legal standards, freshwater pearl mussels have undergone a 50% decline in the Spey over recent years.

Juvenile FPM are known to be more sensitive than adults. In the absence of critical scientific information on the requirements of immature FPM, it is unreasonable of the CNPA (the competent authority) to assume that legal limits will secure the integrity of the R. Spey for FPM.

The CNPA also needs to make allowances for more extreme river conditions, such as low water levels (associated with higher pollutant concentrations and higher water temperature, both of which can favour growth of *Ranunculus* which is a serious threat to mussel beds) and floods (which can be destructive on FPM beds) anticipated with climate change. The CNPA needs to make allowances for the fact that a very brief spike in conditions can readily prove fatal to FPM. We also note that the monitoring process for establishing the limits can readily fail to detect brief spikes.

MI 8 Planning Obligations

We would like to see green infrastructure included as an item for which planning obligations can be sought.

MI 9 Flood risk and climate change resilience

We support SUDS in new development. However we would like to see a clear requirement that SUDS should not impact on existing wetlands. We note that SEPA's has indicated that "existing wetlands are rarely suitable for a variety of reasons, not least of which is disturbance of the natural balance that has evolved within the system" and "Only specially constructed wetlands should be use to treat surface water".

The destruction of two areas of existing marshland for SUDS ponds at the Beachen Court development in Grantown demonstrates where a new development incorporates SUDS but detracts from, rather than contributes towards, natural flood management.

MI 10 Land Management In Upland Areas

We support a presumption against new hill tracks in open moorland areas but consider the scope of the proposal should be broader and made more clear. We make the following recommendations: all hill tracks subject to the planning system should be included; tracks associated with ski development should be specifically included; the term 'Open moorland areas' and any other terms used in the final wording need to be clarified. It could be helpful if the CNPA provided a policy and standards to be applied to new proposals for tracks within the planning system, which could include construction methods that would assist future reinstatement. This might also help improve the standards achieved for tracks outwith planning.

SETTLEMENTS

There are two generic issues common to many settlements that we include here rather than repeat under each settlement.

An issue and objective common to many settlements relates to provision of affordable housing to meet local needs. The CNPA needs to better address the problematic issue of how to provide housing that is

genuinely affordable, is effectively targeted at people who live and work in the area, and is retained as affordable housing in perpetuity. None of these three factors is successfully delivered by the CNPA's models of providing affordable housing at present. The unsatisfactory current situation is unsustainable. It fails to meet local housing needs, whilst using up valuable land at the expense of natural heritage, amenity and the special features of the park.

We welcome the provision of proposed open space allocations.

An Camas Mor

We do not support the CNPA's misleading assertions that ACM will be “sustainable”, will deliver “consistently high standard of design”, and will be “inclusive, vibrant and demographically balanced”. We find no credible explanation or justification to support these statements. At this stage of the development many options are open to the applicant, and at the final stage the permitted detailed plans may not reflect any of these aspirations that the CNPA is depicting misleadingly as facts, without providing any credible evidence, and failing to take account of past performance.

We do not agree with the proposed objectives.

We have consistently contested the claim that ACM would “relieve pressure” for housing. ACM would inevitably increase the population. We can see no obvious route by which demand for more housing would be relieved by expanding the population. The CNP will still be likely to be a relatively desirable place to live, or have a 2nd or holiday house.

The CNPA indicate that ACM will reflect the NP's special qualities and incorporate the highest standards of design, demonstrating innovation and sustainable construction. We regard this as unrealistic. There are many constraints, including financial ones, to which ACM will not be immune. The CNPA fails to insist on highest standards and a common justification is apparently financial constraints faced by developers, as was evident at the recent planning meeting that determined Beachen Court.

We consider the mitigation measures required by the CNPA to reduce recreational disturbance as unrealistic, undeliverable and ineffective in reducing recreational impacts. We (and others) have already explained our serious concerns on these matters to the CNPA, but our concerns seem to have been brushed aside without justification.

We do not support the delivery of ACM through partnership working, which we consider would be seriously problematic. We consider the proposal would set an inappropriate and damaging precedent.

We disagree with the preferred site option owing to its exceptional natural heritage value and sensitivity.

We note that the preferred site does not include the proposed community park area for Aviemore and ACM. We have repeatedly been told that the ACM development would without doubt involve having a community park near the Spey. The location of this park was pointed out to us again on a site visit in February 2018, when the agent for the developer elaborated how this park area would draw recreational activity away from sensitive forests. The community park has been emphasised as a major benefit of ACM. There has been a lack of adequate baseline ecological survey and assessment of the park area. This

is especially concerning, given the sensitivity and importance of this area and the scale of habitat loss and alteration.

The developer's agent pointed out the approximate location for the bridge, which we note is also not included in the allocation. We are concerned at the lack of integration that this indicates and consider that this piecemeal approach undermines the CNPA's assertions that the highest standards will be achieved.

We continue to view the lack of transparency relating to the park and bridge as reflecting an unacceptable approach to this major development. Informed public debate continues to be frustrated by this lack of transparency.

Aviemore

The CNPA identifies that “there is a need for affordable housing for people who live and work in the area”, but this is reduced in the issue to “provision of affordable housing” which fails to refer to significant factors. The CNPA needs to address the problematic issue of how to provide housing that is genuinely affordable, is effectively targeted at people who live and work in the area, and is retained as affordable housing in perpetuity. None of these three factors is successfully delivered by the CNPA's models of providing affordable housing at present. We are concerned that to only refer to “provision of affordable housing” does not address these factors and perpetuates the unsatisfactory situation that exists at present.

We do not agree with the preferred site options. We do not support THC 045 and 059 and North Aviemore due to the high natural heritage and landscape importance of these sites and their value for amenity. We do not see a development 'solution' being provided by sacrificing these important sites to development. We see this as perpetuating an ongoing problem. We have no confidence in the suggestion that the North Aviemore allocation can be allocated but nevertheless only used if ACM is not delivered. Within the 5 years of this LDP it may well not be apparent whether, or to what extent, ACM is going to be delivered. But there is very likely to be pressure to develop the North Aviemore allocation and the CNPA may find itself in a weak position to defend refusing development.

We do not support the AHR allocations 007-014 for mixed uses. This large site has scope for more imaginative uses more appropriate to a NP. The 'horses' field' is of considerable value for natural heritage, landscape and amenity and this should be retained. The open grassland supports e.g. field gentian and waxcap fungi; the area with open birch woodland towards the A9 is a very attractive landscape feature as well as a valuable extension of the important birch habitat provided at Craigellachie NNR and Milton wood; and the area towards the Milton Burn should be retained as natural flood management and to enhance the landscape value and considerable natural heritage importance of the burn.

We support the protected open spaces and recommend that the horses' field should be allocated as protected open space too in recognition of its value to landscape, amenity and natural heritage. This would provide some compensation for the loss of valuable areas to the A9 upgrade, the new retail site, developments already built within AHR and the future hospital site. We also recommend that the open space between EP2 and EP3 should be extended in the SW corner to include the rough grassland and scrub ground that provides valuable habitat and has supported *Andrena marginata*. This ground is not

proposed to be built on and should be clearly protected from any knock-on impacts of development by being allocated as protected open space.

We do not agree with the proposed settlement boundary. The settlement boundary should not cross the A9. The A9 provides a firm and defensible settlement boundary. Higher Burnside should remain outwith the settlement boundary and should not provide a catalyst for further development on the west side of the A9. If the settlement boundary extends across the A9 it would be difficult to defend. It would be an invitation to developers and landowners to put forward further sites for development that the CNPA may well find irresistible. Further development west of the A9 would increase

pressures on Kinveachy. We continue to disagree with the settlement boundary at the north extremity of ED1. We have objected to this consistently due to the high natural heritage, landscape and amenity value of the land that remains between the industrial estate and the fence above the burn.

Grantown on Spey

We do not agree with the issues and objectives and would like to see them modified. We have concerns about the potential major damage to valuable habitats and species that the development of the Strathspey railway could cause. We recommend that this is referred to in the issues and objectives so that it can be genuinely satisfactorily addressed to give the best chance we can of enabling important wildlife and the railway development to coexist.

We do not agree with the preferred site options. We do not support THC 039 and H2 nor the alternative sites THC038, 039 and 040 due to the value of the Mossie and the 038 site for natural heritage, landscape and amenity. We do not support the extension to H2 nor the increase in scale from 20 to 50 houses.

The alternative site THC055 is of considerably less value for natural heritage than the sites on the Mossie.

We recognise that there are cogent reasons for allocating C2 for the Strathspey railway. However we do not support C2 in its entirety because parts of the allocation are very valuable habitat for natural heritage including otter (a European Protected Species). We recommend that C2 is redrawn. We recommend that the size is reduced to take account of natural heritage in the vicinity of the burn and associated wetland and near the southern boundary.

We do not support C1 until more indication is provided as to what the intended use is. This is an important location. It could provide valuable amenity, landscape and natural heritage benefits. It currently supports UK red listed species.

We recommend that additional protected open space should include:

The undeveloped part of the field beside H1 west of Revoan;

The part of C2 in the vicinity of the burn and associated wetland and near the southern boundary (i.e. the part of C2 that is not allocated for the railway, as described in our recommendation above);

The new care home should be properly represented on the map.

We do not agree with the settlement boundary being extended to the north to accommodate 039.

We support the position of the settlement boundary at T1.

We recommend that the Mossie should become a Local Nature Reserve and note that in the past this has been suggested by the community council. The CNPA need to do all they can to encourage Seafield Estate (as owners) to agree to an LNR. Clearly the estate is unlikely to agree if the CNPA provides any indication that development may be an option. Amongst many benefits, an LNR designation could facilitate conservation action to reduce the serious and unnecessary ecological degradation of this site that has take plae in recent years.

Newtonmore

We do not support H1 insofar as it is too large. The CNPA has identified problems of delivering large allocations and permissions in the MIR. Due to these problems the CNPA is recommending yet more development allocations to take account of large sites not being delivered within expected time scales. We do not support this approach.

Boat of Garten

We do not support any of the alternative sites owing to impacts on natural heritage, landscape and amenity.

Carrbridge

We do not support the scale and location of the H1 and H2 housing allocations proposed. We do not support the issues nor objectives as we are concerned that those referring to housing serve to justify H1 and H2. We consider there should be no housing allocations made for Carrbridge in order to allow for a root and branch review of housing provision that takes proper account of such factors as scale, location and affordability. We view the allocations of H1 and H2 as examples of exceptionally poor planning. We welcome that part of H1 is proposed for removal. We do not support the alternative sites due to impacts on important natural heritage, landscape and amenity.

Cromdale

We do not support the alternative sites. There are problems of the scale being too large (as described for Newtonmore) and impacts on natural heritage and landscapes.

Dalnain Bridge

We are concerned that within EP1 the wetland area with alder towards the east should be protected from development and should not be impacted by SUDS.

We do not support the alternative sites due to impacts on natural heritage, landscapes and amenity. We support the removal of part of H1.

Kincraig

We do not support the alternative sites 046 and 054 due to impacts on natural heritage, landscapes and amenity. We support the removal of part of H1. We are concerned that the wetland near the centre of H1 should be protected from development and enhanced, and should not be impacted by SUDS.

We support the Knoll being allocated as protected open space and very much hope that the CNPA will make it clear that this allocation puts an end to further development on the Knoll.

Nethybridge

We do not support the issue and objective to ensure that new housing can be delivered. There have been substantial numbers of new houses built in the village in recent years. We consider the CNPA's suggestion that the community needs help to remain sustainable and that housing would provide such help as unjustified and unrealistic. We find the objective of housing that meets local needs as far too vague as to what is meant by local needs. We are concerned that the issue and objective could be used to help justify inappropriate housing.

We do not support the alternative sites due to impacts on natural heritage, landscapes and amenity.

We do not support THC 002. It would develop an exceptionally attractive landscape. There are natural heritage features including grassland fungi, and issues of cumulative impact.

We support the removal of H1.

We do not support the extension of the settlement boundary to the east to accommodate 002.

Glenmore

We are concerned that too much activity may readily be focussed on Glenmore, which does not 'enhance the visitor experience'.

Inverdrue and Coylumbridge

We do not support the settlement boundary at T1. It extends beyond the licensed area at the south and the west. The extension of the settlement boundary beyond the licensed site could be construed as circumventing due process of unregulated development. There is a TPO covering all the existing caravan/camp site.

The extension of T1 beyond the licensed site to the west includes sensitive riparian habitat likely to be used by European Protected Species like otter and important assemblage of tooth fungi of which all species are on the Scottish Biodiversity List.

The southern extension of T1 takes the settlement boundary adjacent to the Natura site in the vicinity of the ruin of Larig Ghru cottage beside the core path. The most recent breach in planning has been the creation of tracks and stances without planning permission, plainly as a tourist development rather than for forestry or agriculture. This breach remains unresolved despite a withdrawn 2013 application.

We are concerned that it is completely inappropriate for unauthorised development to be rewarded by acting as a basis for altering a settlement boundary, as happened in this case thanks to the Reporters making an understandable error apparently due to lack of diligent planning enforcement securing any reinstatement of the unauthorised development.

Yours sincerely

Gus Jones

Convener