

'Owl Wood'
Mossie Road,
Grantown-on-Spey,
Moray,
PH26 3HW.

25th April 2009

The Reporters
CNPA Local Plan Inquiry,
CNPA Office,
The Square,
Grantown-on-Spey

Dear Madam/Sir,

CAIRNGORM NATIONAL PARK AUTHORITY DEPOSIT LOCAL PLAN
OBJECTION REFERENCE 444

Listed below is a summary of my objections which will be expanded in the main body of the letter.

1. Letter 25th September 2007: Objection to excessive development in local communities and to the allocation of land for 475 second homes.
2. Letter 25th September 2007: Error in rate of development in Grantown-on-Spey GS/H1.
3. Letter 25th September 2007: Removal of area of land backing on to existing properties in Mossie Road, Grantown-on-Spey from Environmental category to Housing.
4. Letter 15th July 2008: No account taken of SEPA current objection to Developer's proposal to build on a flood plain.
5. Letter 15th July 2008: Insistence on allocating area between Grant House and Ian Charles Hospital for housing despite the existence of a protection clause in the current Local Plan.
6. Determination to include the whole of GS/H1 in Local Plan and survey specific areas as planning applications arise, despite having acknowledged that a number of areas require to be protected from development.

1. **Objection to excessive development and to the allocation of land for 475 second homes**

My objection is to the destruction of the character and culture of the existing communities in the Park, by allowing excessively large and totally unnecessary housing development which is completely contrary to the stated policy of the CNPA and the Deposit Local Plan which affirms time and again that the requirement is for affordable housing for those who already live in the community and work in the Park and obviously those who gain employment within the Park and consequently require to live there. As part of a National Park, Grantown-on-Spey should not be inundated with a large number of expensive open market houses which are beyond the means of the majority of families living and working in the Park. This type of development will lead to an increase in the number of second homes, which contribute very little to the local economy and only serve to artificially inflate local property values. The argument that, a large development will produce a significant number of much needed affordable homes for those working in the park, is misleading and blatantly dishonest, because the proportion of affordable houses allocated to local people will be very small indeed, while the great majority will be offered to those on the Highland Council waiting list.

On page 43 of the Deposit Local Plan, Table 2 shows a land allocation for 475 Second Homes and vacant property and states that "It is expected that demand for second homes in the National Park will remain higher than historical rates so a 50% additional allowance will be made to the household projection." In the first modification of the Plan however, this contentious item was thinly disguised by rewording the text to read Open Market Housing, while still retaining the figure of 475 units, in spite of Clause 5.35 of the Revised Deposit Local Plan stating that the aim of the Park is to provide enough effective land for market and affordable housing to meet the **economic and social needs of the Parks communities**, encouraging **proactive settlement growth** in the main settlements. This implies growth which is directly linked to employment availability within the National Park and not growth in an unnecessary number of homes to satisfy the aspirations of commuters working in Inverness, which will do nothing for the economic development, far less the economic sustainability of existing settlements. On the basis of Clause 5.35 the figure of 475 units is completely worthless since it is derived from past sales figures for second homes and therefore bears no relation to economic or social need and should be realistically revised or removed from the local Plan.

2. **Error in rate of development in Grantown-on-Spey GS/H1.**

On page 66 of the Deposit Local Plan, under the heading of Grantown-on-Spey – Proposals, it is stated that GC/H1 has a capacity of around 200 units and that this development would be required to be phased over at least a five year period. Table 4 on page 44 of the same document states that the Local Plan housing target for this same area is 75 houses in the first five years, followed by 90 houses in the next five years and the remainder in the medium to longer term.

I drew attention to this inconsistency in my letter of 25th September 2007 and the response which appeared in the First Modification, far from correcting the error and clarifying the current CNPA position on the development rate for GS/H1, once again cast a veil over the issue by changing the wording and stating that "A detailed planning application is currently with the National Park Authority for the development of this 9.6ha site." In the absence of any other reference to a rate of development for area GS/H1, Table 4, page 44, must represent the rate at which the CNPA expects any development of this area to progress, but this requires to be clarified because at these rates, the work could be undertaken by our local building firms, employing local labour and helping to sustain the local economy in accordance with the fourth aim of the National Parks (Scotland) Act 2000 section 1.

3. **Removal of area of land from Environmental category to Housing**

The CNPA response to my objection to the area of land backing onto the existing properties on Mossie Road, being transferred from a GS/Env to a GS/H1 category, states that the area of land designated for housing in the existing Local Plan (1997), encompasses the whole of the Deposit Local Plan area GS/H1 plus GS/Env and therefore there is no reason why the area in question should not be included in GS/H1. This appears to be a perfectly reasonable argument, apart from the fact that the 1997 Local Plan was in existence in 2005 when the CNPA Consultative Draft Local Plan Report was produced and at that stage the Settlement Map 7, produced for Grantown-on-Spey, showed the GS/Env area (designated E1 on Map 7) extending up to the boundary fence of the existing properties on Mossie Road which was to be expected since the majority of this area of land forms part of the moss or wetland.. The Site Map accompanying the Deposit Local Plan (dated 2007) however, shows an area of land removed from GS/Env and added to GS/H1, the shape and size of which bears a striking resemblance to the development area shown for this part of the site on the layout drawings submitted to the CNPA in 2006, along with a Planning Application for development of the whole of GS/H1. No explanation has been offered for this change of category and one can only marvel at the coincidence.

4. **SEPA's current objection to proposal to build on a flood plain**

SEPA has registered an objection to a Planning Application for this site, which is currently with the CNPA, on the grounds that it does not comply with SPP7 because of a proposal to extend part of the development onto a flood plain and despite the applicants efforts SEPA still maintains its objection. Although the CNPA is fully aware of SEPA's objection, which means that it has included a flood plain within the housing area, it still insists on retaining the whole of area GS/H1 in the Deposit Local Plan. This is an illogical approach and the offending areas should be removed from the site map.

5. **Insistence on allocating area between Grant House and Ian Charles Hospital for housing despite the existence of a protection clause**

My objection to the land between Grant House and the Ian Charles Hospital being zoned for housing in the Deposit Local plan is based on the fact that the current Local Plan for Badenoch & Strathspey (1997) incorporates a clause which specifically

provides protection against development of this area. Clause 3.3.9 states that *“The Ian Charles Hospital and Grant House, recently refurbished for the elderly, occupy neighbouring sites on the northern fringe of the town. Land adjoining these properties will be safeguarded from development for amenity purposes and to retain scope for expansion of facilities should the need arise.”* The Settlement Map which accompanies the 1997 Local Plan would appear to have been produced by a draftsman who had no knowledge of the site and little or no knowledge of the Local Plan and as a result the map indicates housing in the middle of the wettest part of the moss and also in the area safeguarded by Clause 3.3.9, but ironically he/she has actually attached the clause number (3.9) to the site of Grant House and the Ian Charles Hospital. The Settlement Map is not drawn to any stated scale, incorporates no dimensions and shows the housing development area in a very rough representational style, which serves to emphasise the fact that it has no credible value beyond outlining the location of a proposed housing area. In accordance with standard practice, precedence must be given to the printed word, which emphasises the importance of Clause 3.3.9.

I am aware that a number senior staff members of the CNPA support the spurious argument that Clause 3.3.9 does not specify the area of land to be safeguarded, but if the clause is read with a modicum of common sense and a rudimentary understanding of the English language, the intention is perfectly clear and if those concerned were genuinely in any doubt they could and should have referred to The Oxford Dictionary where the meaning of the word “adjoining” is clearly and unambiguously explained as joining or uniting. In the context of Clause 3.3.9 the two neighbouring properties are joined by the safeguarded land, or in other words the land separating the two properties is safeguarded. If these senior staff members remain unconvinced, they should perhaps follow my example and talk with some of those who were involved in the development of the current Local Plan, because they are in no doubt that the wording of Clause 3.3.9 means the whole area of land between the two properties.

It is regrettable that CNPA officials have decided not to continue this safeguard in the Deposit Local Plan, particularly as they are well aware that expansion of both of these properties is currently under discussion and while the present economic situation may well delay the progress of the talks, the Local Plan is supposed to look to the future. However their approach should come as no surprise when it is realised that they have also chosen to completely disregard Clause 3.3.9 in considering a Planning Application currently before them, which is being evaluated under the present Badenoch & Strathspey 1997 Local Plan, which of course contains the clause in question.

The CNPA response to the objections raised to the Deposit Local Plan lists my objection as follows:-

444 objects to the allocation of the land between Grant House and Ian Charles Hospital, on Castle Road East, for residential development and states that it should be protected for future expansion.

I realise that this is a summary of my objection, but it completely misses the point and allows the response statement to deflect attention to The Cairngorm Landscape Capacity for Housing Study, the value of which I have no reason to question, but it is only an academic study and does not over rule Clause 3.3.9 of the current Local Plan and consequently the CNPA response avoids justifying its action in discontinuing the protection clause for expansion of the health and care facilities in Grantown.

6. **Determination to include the whole of GS/H1 in the Local Plan**

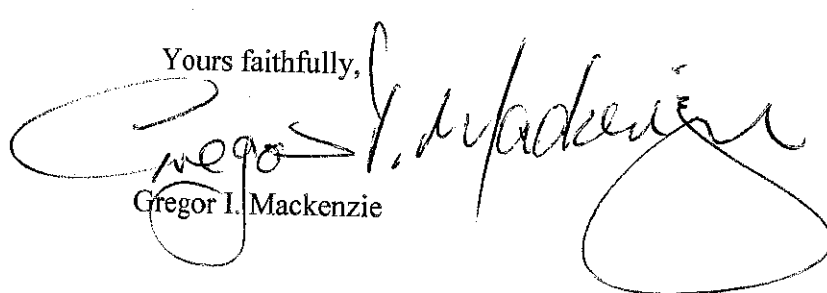
I object to the CNPA's determination to include the whole of area GS/H1 in the Deposit Local Plan for the following reasons:-

- a). The SEPA objection has revealed that part of GS/H1 is a flood plain and therefore development on this section would be contrary to SPP7.
- b). The Cairngorm National Park Authority Response to Objections (4.1) acknowledges that information recently received, shows the increased significance of the site to the natural heritage of the National Park and that consequently the full housing allocation area may not be suitable for development which will mean additional surveys are likely to be required.
- c). The area of land between Grant House and the Ian Charles Hospital to which Clause 3.3.9 refers is still very much in contention and is therefore wrongly allocated for housing at the present time.

The situation regarding GS/H1 is somewhat unclear at present, because the area is the subject of a current Planning Application and consequently the surveys referred to in (b) above are not "likely to be required", they **are required now** and similarly the extent of the flood plain (a) requires to be determined now. The task before the CNPA is not to determine if these features exist, but to establish the full extent of the site which is unsuitable for housing development as a result of their existence. The issue of Clause 3.3.9 and the land safeguarded for the expansion of the hospital and the care home also requires resolution and this whole process could be accelerated if the CNPA properly addressed all of the issues involved instead of trying to evade them.

It is my contention, that until all of these matters have been properly investigated the area GS/H1 should not appear in the Deposit Local Plan, because its inclusion will mislead potential developers and this in turn will lead to members of the local community having to devote even more of their time to scrutinising Planning Applications for this area.

Yours faithfully,


Gregor I. Mackenzie