

**James Mitchell
18 Seafield Court,
Granttown on Spey,
Moray,
PH26 3LE.**

21st April 2009.

The Reporters,
CNPA Local Plan Inquiry,
Granttown on Spey.

Dear Madam / Sir,

Response to CNPA Local Plan Statement - Ref. No. 051.

Thank you for the CNPA response to my earlier statement of case for which I am most grateful. I have now had the opportunity to study this document.

In response to my comments concerning the Granttown on Spey Caravan Park, the CNPA state that the caravan park 'will be protected from adverse development'. However, it suggests that a new housing estate and the existing caravan park would make a good match. Furthermore, we are informed that this would be similar to existing Caravan Parks at Boat of Garten and Ballater.

The Boat of Garten Caravan Park was established in 1964. The only dwellings which overlook the Park are located in Grampian Crescent; these were built in 1939. If not already clear, it should be understood that the short row of homes that form Grampian Crescent pre-date this caravan park by nearly 30 years.

Boat of Garten C/P does not benefit from open and uninterrupted views. Its only open aspect is north towards the busy A 95 Aviemore to Granttown road. It is a flat and largely enclosed park without the open space which the Granttown Park enjoys. Corroboratively, Boat of Garten C/P's website does not contain any images of views inside or from its park.

Ballater Caravan Park enjoys open and uninterrupted views across and beyond the River Dee. It also benefits from additional open aspect up the Dee valley towards Balmoral. A mere handful of mature houses are located near one of its boundaries but, as with the Boat of Garten C/P, these pre-date this facility. Ballater C/P is designated a 3 star tourist facility by Visit Scotland, is owned and run by Aberdeenshire Council and is closed for more than 5 months of the year.

Neither of the aforementioned parks is award-winning and neither has had to suffer the noise, dust, mud and general inconvenience of large adjacent building site for five years, or more.

The Grantown Caravan Park is multi-award winning, is designated a five star tourist facility by Visit Scotland and the AA, is spacious and enjoys a sheltered southerly aspect at the foot of Dreggie Hill. It benefits from, and is special because of its views across and beyond 'the Field' towards the Cromdale Hills. This Park is sheltered and enclosed from the north by Dreggie Hill. It has been in existence for more than 50 years and was created by the local council to bring tourists to Grantown.

Just a little research has shown that Ballater and Boat of Garten Caravan Parks are incomparable to Grantown's; it is unhelpful and misleading that anyone should suggest otherwise. Why this was done?

The initial motivation to zone this area for houses is because it was identified by, and formed part of, the 1997 Grantown Local Plan. Of course, we now know that this plan was flawed having taken no regard of flooding, tourism or biodiversity.

The more recent stimulus to zone this area for housing comes from a commissioned report, 'Cairngorms Landscape Capacity for Housing - Final Report - August 2005'. Great emphasis is placed upon this study - this can be deduced from the CNPA statement. **This study represents the views of three architects only and advocates the removal of Grantown's Caravan Park.**

As is hinted at in the CNPA statement, this study tells us that it is Grantown's Caravan Park which spoils the views in the area and that it is the Caravan Park which should be screened-off. The study states, 'It is recommended that the caravan park be replaced by a more sympathetic development....'

Astonishingly, the study suggests that foreground development could screen the caravan park. In its final recommendations the study states, 'Relocation of the caravan site should be undertaken as the opportunity arises with the aim of improving the setting to any new housing development'.

Scrutiny of this report reveals that, **'the study addresses landscape, architectural and visual issues only and does not take into account other planning considerations'**. Of course, it was not in the architects brief, and I can see no evidence to suggest that they were qualified, to consider the implications for Grantown's Caravan Park or the CNPA Tourism Strategy.

I am prepared to stand corrected but am unable to find specific information about any CNPA study which deals with the considerations given to creating a housing estate next to Grantown's thriving rural caravan park and the research which was conducted into this matter.

The Park's statement says, 'there is no evidence to suggest that the proximity of an allocated housing site toa caravan park would impact on the economic prosperity of the facility'. Again, I am prepared to stand corrected but would respectfully suggest that **there is no evidence because the CNPA has not sought to seek any.**

In the interests of a fair, open and honest hearing, I respectfully request that the inquiry be provided with information surrounding the circumstances, **and specifically when**, the CNPA has proactively engaged with, and sought specific information from, all three aforementioned Caravan Parks in connection with its Tourism Strategy. Such evidence might lend some credibility towards the attempts to compare these caravan parks and the reasoning for wishing to sanction building in front of the Grantown Park, **and not elsewhere**. If such evidence already exists, I would be most grateful to receive a copy of it, or be directed to where I may inspect it.

Although we are told that Grantown's unique caravan park will be protected from adverse development, all current evidence suggests that the CNPA is working towards the recommendations given in the aforementioned study. Once again, I will stand corrected but I can see no evidence to the contrary. What does 'adverse development' mean?

Development of the Field is likely to reduce Grantown Caravan Park's ability to sustain the high level of business and tourism spending it now generates for the area by harming the rural ambience that is so attractive to Caravan Park visitors.

The CNPA Strategic Objectives of 2007, Sustainable Tourism (5.3), tells us that 'Tourism accounts directly and indirectly for a significant part of the area's economy'. The same report states, 'Everyone involved in tourism should minimise negative impacts and support positive enhancement....' The 2030 vision states that, 'The CNP will be an internationally recognised world class sustainable tourism destination that exceeds expectations...'

As is known and recognised by the CNPA, the Mossie is an ecologically significant area of wetland. The CNPA publication, 'Parklife', Issue 12, Spring 2009, ([Exhibit as described](#)), tells us that work is underway to develop a '**Wetland Vision**' for the CNP. The following is a quote from this article which speaks volumes and requires no further comment.

'The Park holds internationally important wetland sites. However, habitats have been considerably reduced by drainage through past land management practices, and both existing and historic wetland sites are in need of enhancement or restoration. Wetlands can bring a number of benefits apart from their nature conservation value, such as buffering against flood events, possible climate change mitigation, diffuse pollution, improvements to landscapes quality, educational value as well as tourism benefits'

I am a supporter of the Park but one can be forgiven for thinking that the Park's housing policy has taken precedence to the exclusion of all else. **At best**, it appears that the failure to consider protection of Grantown's Caravan Park and The Mossie is an oversight. To assist in the decline of tourism in Grantown will only add to local unemployment. In turn, this will lead to further migration and will further destabilise the indigenous population.

Was the National Park formed to protect and improve our area?

James Mitchell.