

## Response to Main Issues Report Local Development Plan 2020

### *Overarching Strategy*

The existing Development Plan states that the lack of development and the sense of wildness outwith the main settlements are key characteristics of the National Park which need to be maintained. Its landscapes are one of its most important assets. It also states that most development should be directed to the strategic settlements. This strategy is reaffirmed in the Main Issues Document (MID) and I would strongly support it.

### *Settlement Boundary/landscape impact*

With regards to Kincaig, an intermediate settlement where any development is required to meet local needs, the MID is suggesting that the settlement boundary is amended considerably with areas of land on the western side of the village between the B9152 and the newly dualled A9 identified for potential economic development. The B9152 currently forms part of the existing and effective settlement boundary. Site THC046/054, which is part of an active farming unit, acts as an important buffer from the A9 corridor and effectively provides, strengthens and protects the setting of the village. This is important in landscape terms from a short/medium and long distance perspective. It also serves to protect the amenity of the village particularly the amenity of residential areas. In addition, any release of part of this land at this location could set a precedent for further release to the south.

The CNPA will be well aware of the threat to this buffer, to the setting of the village and to the landscape as a result of the recently completed A9 dualling project. Rather than extend the carriageway to the west of the original A9 carriageway which would have had the lesser impact on Kincaig, the decision was taken by the Scottish Government/Transport Scotland to 'bring' the carriageway closer. In addition, the carriageway was elevated to supposedly design (or over design) for vehicular accesses to adjacent estates. This has impacted considerably on the residential amenity of the village – particularly at the northern end. No mitigation measures have been implemented to address the noise and/or screen the carriageway and related traffic.

The MID highlights that landscapes can change when there are major land use changes and that there is a need to maintain and enhance the landscape character. It recognises that the site provides a buffer between the A9 and the village and recognises that it allows the setting of the village to be clear and discrete. This enhances and strengthens the setting of the village with the B9152 identified as a natural boundary of the village. The document further accepts that the site is highly visible from the roads, railway and hills beyond the village. Consequently, it will impact on short, medium and long distance landscape views. In the site assessment (under landscape), it states there is little potential for mitigation and no potential to complement or enhance. The MID also recognises the need to protect communities from inappropriate development. The suggested allocation of even part of this site for economic development would appear to contradict these objectives.

The site assessment states that the principle of development has been established on the northern part of the site because it has been used as a compound for the A9 dualling. I consider, with respect, that this is flawed. It is well established that the use of the site for a compound associated with the A9 construction project was done through permitted development rights under the appropriate legislation. There was no public consultation on the proposal. The use was temporary – for the

length of the contract - and the site requires to be reinstated to its original form and use. This includes the removal of all hardstanding and services and requires the landform to be reinstated. This has still to be implemented. The principle of development therefore has not been established and is a wrong premise on which to support its development. Further, its development I would argue, 'does not limit likely landscape impacts to an acceptable level'.

The site, if developed, would impact considerably on the amenity of the adjacent residential areas. Economic development uses by their nature generate noise through operational activities and traffic movement within the site and accessing the site, (including HGVs) and also create light pollution. This has been evident in the last 3-4 years during the life of the compound.

#### *Land Supply for Economic Development*

In terms of the land supply, MID states that there is 9.91ha of industrial land undeveloped in Highland- I presume this is an effective land supply (this figure excludes the preferred hospital site in Aviemore). Most of this is located within strategic settlements throughout Highland (Badenoch & Strathspey). This, given transport links and supporting services, is the sensible and preferred strategy. Looking forward over the plan period, MID states a number of times, that there is little empirical evidence to identify and consequently support a specific land supply over the plan period. Any projection is based largely on anecdotal evidence. I fully agree with the need to allocate land for economic development. It is a requirement of any Local Development Plan and it would be negligent of the CNPA not to do so. Any such new allocations however must be justified. Given the amount of land currently allocated for economic development and not yet taken up and the new potential allocations in the southern part of the Strath, I do not understand how the identification of any part of the site (THC046/054) and its area for economic development can be justified particularly when the MID suggests that it is required to meet local needs. I consider that further justification for the potential release of this site is needed and should be made available to the public and other interested parties as part of this consultation exercise.

#### *A9*

MID appears to link the potential for development with the A9 improvements. I fully support the dualling of the A9. It is a major infrastructure project which will benefit the national economy and the local economies along its corridor. Its construction however, cannot automatically lead to a presumption in favour of the development of sites within its corridor. One of the objectives of the dualling programme, which I hope has the support of the CNPA, is to ensure that the landscapes and communities are protected. Ad hoc allocation of sites adjacent to the A9 corridor does not meet this objective. On the assumption that any access to the potential development site is taken off the existing B9152, and not from the A9, the A9 cannot be used to justify its development. The traffic generated by any new development would require to travel south from the Aviemore junction along the B9152 and north coming off the A9 at the northern end of Kingussie. Both these stretches of the carriageway already pose dangers because of their geometry – well evidenced on a regular basis but particularly so during the construction of the dualling. Perhaps more critically, is the safety of the community and the impact this increase in traffic would have on the village. Throughout the construction of the dualling, the number of and speeding of vehicles was dangerous as was the number of HGVs which used the route. The Safe Routes to School for pupils going to Alvie Primary School runs through Macbean Road and comes out on to the public footway at the junction with the access to the underpass (and possibly any development site?). Most of these pupils walk or cycle to school which is the key objective of the Safe Routes to School initiative. The potential threat to their safety is of concern.

Kincraig has no railway station, has a poor bus service which has deteriorated further in the past few years. It could be argued that the site is not sustainable given that everyone would require to travel by car to it.

### *Summary*

I would not support the potential development of the former compound site (or the larger area) for economic development for the following reasons:

- It would be contrary to the overarching strategy of directing most development to strategic settlements, maintaining the sense of wildness and protecting the area's landscapes
- It would destroy the buffer which the site(s) provides between the village and the A9. This buffer strengthens and enhances the village setting and consequently protects the views from within the village and beyond
- It would impact on the residential amenity of the adjacent housing
- There is no justification for the release of any part of this site for economic development on the basis of the current supply and demand of land for economic development in Highland area set out in MID
- The A9 dualling should not lead automatically to a presumption in favour of development of sites which lie adjacent to the transport corridor