

**Archived:** 09 October 2018 12:44:18

**From:** Dot Harris

**Sent:** Mon, 17 Sep 2018 09:11:20 +0100Content

**To:** [REDACTED]

**Cc:** Planning

**Subject:** RE: CAIRNGORMS LOCAL DEVELOPMENT PLAN 2020 - NEW SITES CONSULTATION

**Sensitivity:** Normal

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Dear Gordon,

We have received your comments and they will be considered with others as the CNPA prepares the LDP.

Kind regards,

**Dot Harris**

Planning Support Officer

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Before printing, think about the environment

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**From:** Gordon Bulloch [REDACTED]

**Sent:** 14 September 2018 23:25

**To:** Planning

**Subject:** CAIRNGORMS LOCAL DEVELOPMENT PLAN 2020 - NEW SITES CONSULTATION

Thank you for informing me about this consultation. I have some comments for CNPA.

1. This supplementary consultation to the Main Issues consultation appears to have been poorly publicised. As I had commented on the Main Issues consultation, CNPA kindly sent me an email informing me about this supplementary consultation. Without this email, I would have been totally unaware of this consultation on additional sites to be included in the draft LDP. I therefore suspect that the vast majority of members of the public who did not comment on the Main Issues will be totally unaware of this further consultation. The process by which this supplementary consultation carried out is therefore unsound. In addition workshops were set up during the Main Issues consultation to attempt to engage with interested members of the public. No attempt has been made to do something similar for this consultation. I appreciate that there will be a consultation on the draft LDP, however, this consultation smacks of a back-door way of getting extra sites into the draft LDP. Once in the draft LDP, it is much more difficult to get a site removed.
2. I note that this consultation was in response to proposals submitted as part of the Main Issues consultation for additional sites to be added – presumably by the landowners of these areas. There is no indication that any sites included in the Main Issues consultation have been removed as a result of the consultation process, so it would appear that CNPA is only listening to the landowners and not to conservationists and other members of the public. If, I'm wrong, and one or more of the "preferred sites" are being considered for removal in the draft LDP, then these sites should have been included in this consultation.
3. I recognise that CNPA will justify what it has done with this consultation, by quoting Circular 6/2013, however, this consultation demonstrates a broken process which gives too much credence to landowners' submissions and smacks of tokenism in its approach to consultation.
4. It would appear that all of these new sites are now considered to be "preferred sites". I have assumed this, but the consultation is not clear on this matter.

The following comments are all specific to the extension of the Granttown-on-Spey caravan site and collectively present some compelling reasons for not

including this site in the draft LDP.

5. This consultation omits to make it clear that this proposed extension to the caravan site involves land which is outside the settlement boundary. This is a major change which has in no way been justified in this very brief section of the consultation document. Proposals to extend the settlement boundary should not be included in this 'back door' consultation, but should have been made very clear during the Main Issues consultation..
6. Circular 6/2013 para 80 requires that "Planning authorities should be able to demonstrate the underlying reasons for their preferred development locations and policies. This stage should not be used to 'test the water'". For CNPA to use the words "it is considered appropriate" as the only reason for inclusion of this extension (especially when the land is outside the settlement boundary) is no justification and thus inclusion of this land in this consultation is in breach of Circular 6/2013. I therefore request that this site is not included in the draft LDP.
7. There has been a longstanding objective (going back decades) to preserve the setting of Grantown-on-Spey with a focus on protection of the boundary land surrounding the settlement. The current LDP states as an objective for Grantown-on-Spey, "To ensure that development contributes to a clear definition between settlement and countryside". The original area covered by the caravan site was limited to the low level areas and thus caravans and associated buildings were not prominent and there was a clear definition between settlement and countryside. The permitted extension of the caravan site up the hillside has gone against this objective. A further extension to the north (as proposed in this consultation) will further contravene this objective and present an extended 'shanty town' effect on the hillside to the west of the settlement. Again, I stress, that no justification has been provided for this extension to the caravan site.
8. The extension site has currently been trashed by the current landowners by using the site for temporary and permanent storage of waste materials and storage of equipment and materials associated with the neighbouring caravan site. Additionally, the site has been and is being used to store equipment and materials associated with the owner's civil engineering contracting business. The storage of waste materials on this land contravenes waste management legislation. This land was open woodland and rough pasture before being sold to the current owners and consequently to permit storage of equipment and materials (including items not connected with the caravan site) the owners are in breach of planning legislation. To enable such storage a change of use planning application is required to Class 6 (Storage and Distribution). Regrettably, there has been no enforcement of this legislation by either Highland Council or CNPA, despite these issues having been brought to their attention. Given the trashing of this site by the current owners, they should be required to fully clean up the site, rather than being 'rewarded' by considering the site for zoning in the draft LDP as an extension of the caravan site.
9. This site had (and could be returned to a site of) considerable ecological benefit in its own right as well as bordering on the Mossie, another area of considerable ecological merit. This fact is not even mentioned in the consultation or the need for ecological reports before the site could be considered for any different use.

I hope CNPA will give full consideration to all the points I have raised and reject this site for inclusion in the draft LDP. Please acknowledge receipt of these comments.

Regards

Gordon Bulloch



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