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Development Planning  
Cairngorm National Park Authority  
Grantown-on-Spey  
PH26 3BR

**Turnberry**

Our ref: CNPA. 21.09.18. ACM

Your ref: -

21 September 2018

Dear Sir/Madam,

**CNPA Local Development Plan 2020  
Post-Main Issues Report: New Sites Consultation**

This representation has been submitted by Turnberry on behalf of An Camas Mor Development LLP for the above consultation, which runs until 21<sup>st</sup> September 2018. In addition to **OBJECTING** to the additional sites document, we must protest at the inaccurate reporting of our comments to Committee, which are prejudicial to our involvement in the development of a new spatial strategy.

It is understood that this consultation is the second to be conducted by the Cairngorms National Park Authority's (CNPA) as part of their Local Development Plan 2020 process. It concerns the inclusion of new site allocations which were not consulted upon in the Main Issues Report (MIR) but CNPA intends to include in their Proposed Plan that is expected to come forward later in 2018.

We are confused by the CNPA's process as it has now raised a new issue, which was not in the original Main Issues Report: namely the decision to change the status of An Camas Mor from a new strategic settlement to a '*planning consent*' [sic]. Opinions were not sought on this specific issue and nor do they feature in this 'focussed consultation'. ACM LLP have therefore been discriminated against in being consulted on this sudden decision, which has not been based on any evidence, save that of objectors. By changing the Settlement Hierarchy in this way, the

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CNPA has changed direction from the Adopted Local Development Plan on this point without full and proper consultation and consequently, the current process is therefore unfair and defective.

The defective nature of the process is further evident in that our comments to the original MIR are misrepresented in the Report to Committee dated 29<sup>th</sup> June 2018. While it continues to be true that An Camas Mor Development LLP consider North Aviemore is not needed to replace An Camas Mor and that North Aviemore would not obviate or solve CNPA's responsibilities on protecting *natura* sites, the absence of a clear link in the committee report as to why this is the case – i.e. because this site (and indeed all sites within the National Park) will involve increasing recreational pressures – has not been expressly stated or even alluded to by CNPA. In effect, recreational pressures on *natura* sites are true of all potential development sites, but this has been ignored with North Aviemore's inclusion as a preferred option in the MIR and in the committee report which does not make the link.

CNPA did not expressly highlight *natura* sites as a challenge to delivery for An Camas Mor in the MIR, instead citing infrastructure costs associated with its development, when North Aviemore was put forward in the MIR. Given the subsequent inaccuracy in the committee report, highlighted above, and the fact that An Camas Mor and North Aviemore would present comparable recreational pressures, the continued inclusion of North Aviemore as the plan progresses would be unjustified.

At this point, it is important to remind CNPA of the environmental credentials of An Camas Mor. With 58.89 hectares of green space provision, inclusive of: suitable alternative green spaces (SANGs) calculated at 8Ha per 1000 population, segregated dog exercise areas, countryside routes and open access areas, the masterplan provides recreational outdoor space that is close to the development area.

It is these factors, amongst others, which led to An Camas Mor's endorsement by CNPA's planning committee back in August 2013. To quote the minutes from that meeting:

*"The application is well thought through, there are comprehensive recommended conditions, the proposal has been in the public domain for 25 years, and the*

*fundamental public interest in terms of environment, economy and culture is overwhelmingly in support.”*

We would again encourage CNPA to engage seriously with An Camas Mor Development LLP on producing a coherent strategy for mitigating the effects of recreational pressures on *natura* before it allocates different sites which pose comparable long-term issues that threaten the National Park. The CNPA's requirement to meet its housing land requirement can only be achieved by doing so.

Moreover, the plan-making process should be placed on a sound legal footing by properly and fairly consulting on new Issues concerning proposed changes to the Settlement Hierarchy in the adopted Local Development Plan.

The current consultation reaffirms our belief that the Board should be fully briefed on the latest thinking around An Camas Mor so that they make fully informed decisions when presented with the various papers associated with the LDP process.

I look forward to hearing from your Local Development Plan Team directly so that An Camas Mor is treated fairly through this process.

Yours sincerely,

Chris Pattison  
Director, Turnberry Planning Ltd