

5. Proposed Extension to T1 Allocation: Landmark Forest Adventure Park

Proposal: To extend the existing T1 allocation for Landmark Forest Adventure Park to the west and south. Landmark is an existing and established business and it is considered appropriate to include this extension to accommodate increased parking and future expansion of the business.

Comments on this proposal

The geographical scale of the proposed addition is such that it is not appropriate for consideration outwith the MIR consultation process. The reach of the consultation being carried out for the additional sites including this is very likely to be less effective than the MIR consultation (being a secondary consultation) and therefore creates an unacceptably high likelihood of reduced opportunity for public engagement and response. I believe the process therefore fails to meet the National Standards for Community Engagement good-practice principles specifically in relation to Methods. To emphasise this I raise the fact an 'additional sites' consultation is not described as being part of the process set out in the Development Plan Scheme for the 2020 LDP hence there is no expectation of a further consultation on sites. The point I make is that, in relation to the scale of the proposed change, there is an overly high risk of insufficient engagement with local interests.

The proposal has the potential to result in an increase in the size of the Landmark operation on a scale which is disproportionately large relative to the size of the village. The existing T1 allocation caters for a circa four-fold increase in the size of the Landmark operation which appears proportionate and reasonable in the circumstances. The new proposed additional allocation increases the T1 allocation at least three times again – effectively representing the operational size of Landmark being potentially **12 times the size of the current**.

Given this, insufficient rationale for the scale of the increase has been given and why it is considered appropriate or fitting that such a huge increase be necessary. Concerning the Strategic Environmental Assessment Environmental Report Addendum carried out I take serious issue with some the findings as follows:

- i. 1a – reduces greenhouse gas emissions- minor positive effect.

This is inconceivable given the proposed additional area is partly towards car parking and visitors to Landmark reach it almost entirely via private transport. It is wholly misleading to suggest the effect of a large expansion in the Landmark operation will result in what is being suggested as a reduction in CO2 impact. At best the impact will be minor adverse, arguably major adverse given the proposed scale of expansion.

- ii. 1b – increase resilience to climate change- no effects.

This is false and again completely misleading. Removal or loss of existing woodland cover, removal of vegetative ground flora, disturbance or loss of peat based soil, creation of new areas where natural run-off or absorption of rainfall (soil sealing) is impeded cannot result in no effect. Development over the scale proposed, if appropriate at all, should in fact be demonstrating clear positive effects in this area rather than none or what would in fact be an adverse impact.

- iii. 2 – protect and enhance air quality - minor positive effect.

False and again completely misleading largely due to the issues outlined in respect of 1a above. In fact the only way a minor positive effect could be achieved in this area would be through clearly identified direct intervention (such as use of or switching to new technologies) or mitigation targeting pollution or air quality. It is plainly ridiculous to suggest that the proximity of the site to public transport or ‘local facilities and housing’ will result in protected and enhanced air quality.

- iv. 5 - Sustainable use and reuse of material assets – no effects

Loss of existing valuable woodland cover and habitat to create car parking is commonly recognised as being a poor model for sustainability and if we are to extrapolate CNPA’s findings under this heading for the ED1 Aviemore additional site the following is true – ‘The use of a mostly greenfield site represents the unsustainable use of land, which is a finite resource.’ There cannot be ‘no effect’ in this area.

- v. 8a – protect health and wellbeing - minor positive effect.

Increased reliance on car based transport, increased levels of local traffic and car- based visits, loss of woodland, increased vehicular pollution and noise, loss of local woodland cover and habitat, and loss of local existing recreational opportunities cannot be offset by ‘within easy walking distance of public transport, community and other local facilities and housing.’ Again there is insufficient basis to realise a positive effect in this area.

Aside from the disproportionately excessive scale of the additional area I believe the proposals to be inconsistent with the following subject areas highlighted in the current Local Plan in respect of Carrbridge:

Section 23, Carrbridge, Living in Carrbridge - *‘Residents are keen to hold on to the community’s strong identity and protect the special qualities of the village. Natural and organic growth is seen as the way forward.’* The scale of the proposals do not accord with this aspiration, instead risking erosion of identity from a small, varied, mainly residential highland village towards a large scale tourist entity. Despite the undoubted economic value rightly attributed to Landmark it is not appropriate that unfettered expansion smother the wider identity of the village.

Section 23.4, Objectives - *‘ensure that development contributes to a clear definition between settlement and countryside.’* The proposals do not achieve this, clearly having the opposite effect by compromising the definition and extending the village envelope in an unbalanced fashion well beyond the current.

Section 23.10, Landscape priorities and opportunities - the proposal does not contribute positively towards the following topics, presenting an increased risk of eroding each :

- settlement form
- landscape setting
- sense of arrival
- immediate settlement edge

Section 23.5, Guidance - *'Add to and improve community facilities, including improving pedestrian connectivity and achieving a more pedestrian and cycle friendly environment'*. I do not consider a more cycle friendly environment will be achieved through the proposals which at a conservative estimate could see four times the number of vehicles visiting Landmark throughout the tourists season all which will be using the local road network including most notably the B9153 which also comprises NCN Route7 being the key active travel link to Aviemore and beyond.

Section 23.5, Guidance - *'ensure the quality of surrounding woodland, and sensitive valuable habitats is not compromised. This should include improvements to the woodland setting and woodland structure..'* The resulting loss of a potentially large area of existing woodland cover and varied habitat is at distinct odds with this statement.

Conclusion

The process of consultation on the proposed additional sites is deficient being separated from the MIR consultation yet forming an important part of the main issues outcomes.

The proposed additional allocation is disproportionately large and no evidence is presented that properly justifies it or substantiates it.

For the foregoing reasons the additional allocation should be discounted and the existing T1 allocation retained in the form set out in the current Local Plan.

Jacqueline Rice

21/09/18