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POST MAIN ISSUES REPORT – NEW SITES
Comments from Badenoch & Strathspey Conservation Group

Overall Comment: We would welcome more information to have been provided.

Proposed Extension to ED1 Allocation: Dalfaber Industrial Estate

Proposal: To extend the existing allocation for Economic Development – ED1 at Dalfaber Industrial Estate – to the north. This limited extension is considered suitable for development and will make a small addition to the supply of economic development land.

BSCG does not support the northward expansion of the industrial estate. The triangle of land is outwith the settlement boundary in the LDP 2015-2020 and we consider should remain outwith the SB. We do not support moving the settlement boundary to accommodate this site.

We have emphasized to the CNPA in previous years, for former forward plan consultations, that the area to the north of the industrial estate is rich in biodiversity and of high landscape value. The triangle of land that is now proposed for development is a remnant of this once larger area (which has been developed as a result of the CNPA's decisions).

The proposal site continues to support flowers such as devil's bit scabious that is a species of biodiversity significance. It is also an area where neighbouring aspen stands could naturally spread into and so expand the area of very attractive aspen-birch woodland that is an important biodiversity and landscape feature of this part of Aviemore and this part of the Speyside Way Long Distance Route.

We consider the line of argument that this is a small area and therefore unimportant to natural heritage as fundamentally flawed. Small areas can make major contributions to biodiversity, landscape and views, as well as people's quality of life. We suggest that this small area would make a trivial contribution to the extensive industrial estate.

The closer the industrial estate comes to the Speyside Way the greater the impact of the estate on people's quality of enjoyment on the Speyside Way. Also, the closer it comes to the important water course that feeds into the River Spey SAC, the greater the risks of pollution incidents. In this respect, we note with

concern that the authorities have failed to secure water quality in tributaries feeding into the River Spey SAC at Aviemore this year.

Although a part of the proposed extension site has already been fenced and worked on, we consider that over time it is entirely realistic that this triangle could be reinstated to be a valuable site for grassland flowers and fungi, as recently existed in the wider area, as well as providing space for further natural aspen-birch woodland. This would make a positive contribution to landscape, views and people's enjoyment of the countryside, including on their doorstep.

We are concerned that it appears that a substantial part of the proposed additional site is already fenced with industrial fencing, the vegetation largely removed and the site is apparently already being incorporated into the ongoing, larger industrial development site.

We are concerned that the work already undertaken and the erection of industrial fencing possibly would have required planning consent. If this is the case, we are concerned that the LDP additional sites process may effectively be regularizing what may amount to a breach of regulations.

Comments on SEA

We do not support the SEA Statements 6a, 6b and 7 relating to biodiversity, woodland management and landscape. The statements are based on 'writing the site off' on the basis that it is in the existing industrial estate. In the LDP 2015 the triangle of land is outwith the settlement boundary. The damage that has already been done to the site does not impact on the entire site and nor does it preclude positive restoration work and positive woodland management that could reinstate the site.

Proposed Additional Economic Development Allocation: North Aviemore

Proposal: To identify an additional area of land incorporating the existing operational businesses adjoining the preferred North Aviemore economic development site (the North Aviemore site has already been consulted on through the MIR so we are not seeking further views on it at this stage). This additional area is considered to have capacity for some further business development and would add to the overall supply of economic development land in Aviemore.

We are concerned at the northward expansion of Aviemore. As presently proposed in the MIR this involves the transformation of land of high quality for biodiversity, landscape and views from significant locations, such as the road north of Aviemore, the main railway line and the Speyside Way. To turn such areas, that are special features of the national park into industrial estate does not collectively meet the 4 aims of the park.

We do not support the settlement boundary being altered to include the proposed additional economic development site. We consider that a settlement boundary around this site is indefensible. We consider such a settlement boundary would facilitate the extension of further development north of Aviemore. In addition we consider it would facilitate extending the proposed settlement boundary to include areas that are at present outwith any proposed settlement boundary.

We also consider that introducing a settlement boundary around the landfill etc area as proposed would facilitate what arguably amounts to ribbon development associated with the road north of Aviemore. Ribbon development north of Aviemore has been discussed as inappropriate, for example at the public inquiry into the last Highland Council Badenoch & Strathspey Local Plan.

It is far from obvious where in the proposal site there is free space for further economic development. We are critical that no indication of this available space has been provided to the public at this stage in the forward planning process. One of our concerns is that the existence of an economic development site here provides a significant and very real impetus to propose industrial development that would require a bit more land than what is available in this already well used, and arguably at capacity site. If this area is specifically allocated for further economic development and has a settlement boundary, it will be problematic for a planning authority to argue against extending the site bit by bit and moving the settlement boundary accordingly to accommodate developments.

There has already been extensive habitat destruction associated with the current activities and we are extremely concerned that establishing a settlement boundary at this site would present a threat that is greater than it is now, of development creeping into the surrounding ground with the settlement boundary being extended bit by bit to accommodate it. We also note with anxiety that the settlement boundary would cover both sides of the railway line and include the only bridge nearby over the railway line. There is no obvious reason why the CNPA would not see fit to extend industrial development on both sides of the railway line, and perhaps especially the east side where there are no obvious barriers to development for considerable distances.

We are concerned that further development at the proposal site will not mix well with the visitor experience at the new caravan site to the west.

The land surrounding the proposal site (and the proposal site itself prior to development) includes land of high biodiversity value. If it is to retain its value and particular features of interest it requires connectivity for wildlife with the wider countryside. Already significant areas of this have been lost recently, on both sides of the main road (B9152).

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.

We recognize the value of the Landmark Centre as a major attraction and one that is appropriate in the Cairngorms National Park and is compatible with aims of the park.

The proposal site is a large area of woodland that is currently available for responsible public access and is strategically placed in terms of recreation and the network of routes in and around the village. We are concerned that any potential restrictions on public use of the woodland (e.g. if part of the woodland is incorporated into the paid for attractions of Landmark) should be kept to a scale and design that minimizes impacts on people's access to the wider woodland site.

We are also concerned that the scale of car parking in this significant and largely native woodland should not become excessive.

We are also concerned that important habitats and sites within the woodland, and the habitat connectivity provided by the woodland, should be carefully retained.

Proposed Extension to T1 Allocation: Grantown Caravan Park

Proposal: To extend existing T1 allocation for Grantown Caravan Park to the north east. There is an existing planning permission on the Caravan Park which extends beyond the existing allocation. It is considered appropriate to extend the T1 allocation to cover the area of this existing permission as well as a limited additional area to the north east.

We do not support the proposed extension of the T1 designation beyond the existing licenced area; nor do we support the extension of the settlement boundary beyond the boundary in the Local Development Plan 2015. Our concerns about impacts of development on the proposal site include biodiversity loss and loss of habitat connectivity and habitat permeability. The proposal site is the remaining link on the north side of the railway

bridge between the grassland/ open deciduous woodland/ scattered trees on the Mossie and the broadly similar habitat on the west side of the former railway line. We note that further habitat loss and reduction in habitat connectivity and permeability will occur as a result of the C2 allocation in the MIR for LDP 2020 associated with the extension of the steam railway, as well as the reinstatement of the railway on the south side of the railway bridge. Accordingly, the proposal site provides a significant area of habitat that can be viewed as playing a significant connecting role, and a role that is likely to increase in importance when the steam railway is extended.

In landscape terms the proposal site is in an elevated and prominent position as viewed for example from other parts of the Mossie and parts of the town. The currently developed site impacts negatively on landscape and visual amenity and it is reasonable to assume that any extension to the T1 site is likely to have comparable visual impacts.

We are concerned about the loss of amenity on the Mossie that the proposed extension would result in. The Mossie is a valued green amenity space within the town and public access on it has a long history. Within this area of Grantown there has been significant recent development, including at Beachen Court and the care home site. We are concerned that this means there are larger numbers of people taking recreation on a reduced green area. We are also aware that increasing use of other areas around Grantown for recreation has potential adverse impacts on sensitive wildlife, such as capercaillie in Anagach SPA.

We understand there may be unresolved issues relating to drainage and waste water infrastructure on the existing T1 site and these could also apply to the proposal site.

We understand there appear to have been longstanding and repeated enforcement problems at this site involving THC, CNPA and SEPA. We are concerned that chalets on the existing site are inappropriate for this part of Grantown and inappropriate in an area zoned for tourism use. We are aware that there can be practical enforcement challenges associated with establishing whether a dwelling is being used as a permanent residence or is used as tourism accommodation. There is potentially scope for such challenges to emerge if there is an extension to the T1 allocation.