

aviemore & vicinity
community council

"Stand fast, Craigellachie"



Tel. No. [REDACTED]
Email. [REDACTED]

1st April 2019

Cairngorms National Park Authority
14 The Square
Grantown on Spey
Scotland
PH26 3HG

Dear Sir,

**CAIRNGORMS NATIONAL PARK LOCAL DEVELOPMENT PLAN 2020
PROPOSED PLAN**

I refer to the Cairngorms National Park proposed Local Development Plan and must inform you that Aviemore and Vicinity Community Council wish to comment as follows;

1. STRATEGIC SETTLEMENT – AVIEMORE: While not disagreeing with the proposals, except for proposal LTH1 and LTH2, we are disappointed with the standard of the settlement maps for Aviemore that are included in the Plan. The maps are out of date and inaccurate.

- a) The map shows the remains of the old Santa Claus Land. This site is now a retail park with six outlets and includes a large carpark and has been there for over a year.
- b) An area of ground in the Horse Field (Land north of Scandinavian Village) Aviemore which has planning permission, 05/306/CP is not shown on the map at all. This site still has around 100 houses to be built. This is a

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serious omission from the map. It begs the question, if such a large development is missing from the map, were the 100 houses included in the calculations for housing need?

- c) The map for ED3: does not show the 'Cart Track'.
- d) The map for C1: is inaccurate as is the description. The description says that the land at Dalfaber Drive between the Bowling Green and Main Railway Line provides an important community resource. There is an ATC/AC Hall (2013/0209/DET) not shown on the map that has been on that site for at least 3 years.

This map is not, we feel, fit for purpose in its present form. This forms part of an important document which is there to inform and not misinform. The maps in it should be accurate and up to date. As a planning authority, the Park should have the most recent data available to hand.

2. POLICY 1: New Housing Development – Support in part;

- a) Para 1.5(a) Affordable Housing -The Community Council objects to the increase in provision of affordable housing to 45%. We question if this is achievable given the high land cost compared with elsewhere. We are concerned that such a jump, so quickly, would have an adverse effect on the market. Developers are already squeezed tightly by developers' obligations and further squeezing by increasing the affordable housing level could make the development unprofitable and then where will we be? Better some affordable housing than no housing.
- b) The Local Development Plan should include a Policy to restriction to make affordable housing affordable in perpetuity.
- c) Para 1.11 Long term designations - With regards to LTH1 and LTH2, the Community Council maintains its objection to both sites being included. In any case we do not agree with any development at the north end of Aviemore. It would be a further lengthening of the town and is unsustainable. Local facilities, such as the school, would be unable to cope. The school is near capacity now and this will worsen with the building of houses that have already been allocated. The site is next to a refuse dump, a 'cart track' and a sewage farm, all of which were situated there to keep them away from the housing. There are complaints now about the smell at the Robertson's Development and on the Speyside Way. The situation would be much worse for any development north of the settlement

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boundary. In previous correspondence with CNPA planners we were informed that the boundary should be one which sets a clear end to the built settlement. This is land out with the settlement boundary. To make a settlement boundary work well it must clearly identify the limits of the built form and be defensible. Designating the site for potential future development destroys the purpose of a settlement boundary. There are other policies that can deal with it if the need arises, so it does not need to be included in the Local Development Plan.

The Community Council fully support An Camus Mor.

3. POLICY 2: Supporting Economic Growth - Support

4. POLICY 3: Design and Placemaking - Support

5. POLICY 4: Natural Heritage – Support in part

- a) Para 5(1) - We contend that Policy 5.1 (b) is contrary to the 1st Aim of the Park ‘to conserve and enhance the natural and cultural heritage of the area’. If it appears that there is conflict between the conservation and enhancement of the natural and cultural heritage and other National Park aims, then the Park Authority must give greater weight to the 1st aim. Therefore, significant adverse environmental impacts cannot be outweighed by other social or economic benefits and this should be removed from the Policy.

6. POLICY 5: Landscape - Support

7. POLICY 6: The Siting and Design of Digital Communications Equipment - Support

8. POLICY 7: Renewable Energy – Support in part:

- a) Para 7.4 Biomass - There should also be a requirement to ensure public safety with the storage of biomass fuel, and, in particular, wood pellets. Health and Safety Executive Bulletin No. OPSTD 3-2012 spells out the dangers of wood pellet storage. Pellets should be stored in such a way that the public do not have easy access to the storage facility.
- b) Para 7.6 Heat Networks - Unlike most UK homes with independent heating systems, the running costs/ maintenance district heating schemes are not regulated. The homeowners are tied into contracts. As a result, customers have no opportunity to switch heat suppliers and have a very limited right to redress should the service they receive fail to meet expectations. Such a Policy will reduce choice for the customer. There are networks in Aviemore and Kingussie where customers have a standing

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charge of £1.00 per day, and then they have an electricity standard charge on top of that. Encouraging heat networks will remove customers choice and put an extra burden on people purchasing the housing.

It is noted that in the section on ‘applying the policy’ it says that heat networks will be supported. We submit that the word ‘encouraged’ in the Policy at Para 7.6 should be changed to ‘supported’.

9. POLICY 8: Open Space, Sport and Recreation – Support

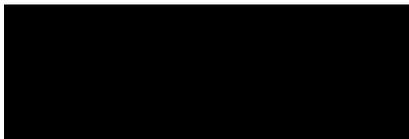
10. POLICY 9: Cultural Heritage – Support

11. POLICY 10: Resources – Support in part;

- a) Para 10.6(b) Minerals – We contend that Policy 10.6(b) is contrary to the 1st Aim of the Park ‘to conserve and enhance the natural and cultural heritage of the area’. If it appears that there is conflict between the conservation and enhancement of the natural and cultural heritage and other National Park aims, then the Park Authority must give greater weight to the 1st Aim. Therefore, significant adverse environmental impacts cannot be outweighed by other social or economic benefits and this should be removed from the Policy.
- b) Para 10.7 (c) Carbon sinks and stores – The Policy concentrates on carbon dioxide (CO₂) emissions and misses other sources that affect carbon sinks and store. Methane (CH₄), which is also found in peat is more effective greenhouse gas. Scientific studies vary but all agree that methane is at least 25 times more potent as a heat-trapping gas than carbon dioxide.
- c) There is also no mention of Radon gas. A large part of the Park comes within a Radon prone area and there should be something in Policy for management of house design to reduce the concentration of Radon in buildings.

12. POLICY 11: Developer Contributions – Support

Yours faithfully,



Chairman.

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