



Cairngorms Campaign



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www.cairngormscampaign.org.uk

Email: [REDACTED]

Telephone number [REDACTED]

Please find below our response to the Local Development Plan 2020 – 2025 Consultation.



We have concentrated most of our comments on the housing allocations, since these dominate the proposed plan, and in this context consider that the plan as proposed is unacceptable for a National Park whose first aim is “to conserve and enhance the natural and cultural heritage of the area”. We have objected to previous plans for the same reasons and have observed with dismay the continuing development of housing that is not sustainable and does not meet the needs of those that live and work in the Cairngorms National Park (CNP). It does not preserve enjoyment of the CNP for future generations to enjoy the natural heritage, instead it continues to erode it. By adopting a methodology for meeting housing needs by building where landowners are prepared to sell and developers are able to profit the result is the same as can be seen in pretty well all other parts of the country which is more and more housing, loss of habitat and further damage to the environment through climate change. The Proposed Plan perpetuates the destruction of the environment and the crisis of climate change by enabling and continuing the processes that have led to the problems we are facing today.

In the response below we have described what we consider are some fundamental flaws in the basis for the plan namely:

1. The definition of “Sustainable Development”
2. The definition of “Affordable housing”
3. That the CNPA has no process for evaluating the economic benefits of development and therefore cannot balance the aims of the National Park Act.

and following paragraphs on

4. An Camas Mòr
5. Hilltracks, Park Policy 5
6. Cumulative effects of Development - Impact on “dark skies”, visitor accommodation and signage
7. Details on the legends used for the settlement maps

1. Definition of Sustainable Development

References to sustainable development are found in two places, pages 6 and 222:

“However, if when carrying out any of our functions it appears to us that there is a conflict between the first aim (of the National Park) and any of the others, we must give greater weight to the first aim. This is a sustainable development approach in which conservation of the natural and cultural heritage underpins the economic and recreational value of the National Park.” and

“Development which uses the resources and special qualities of the National Park in such a way that they are used and enjoyed by current generations and that future generations can continue to use and enjoy them.”

There are a number of flaws in these “definitions” and the outcome is that NO LIMIT is placed on development at all.

In the second definition, which is in the Glossary, the use of the words “use” and “enjoyment” to describe what future generations can expect are too ambiguous and vague to mean anything at all as they can be interpreted to mean whatever you want them to be. This definition is bereft of any reference to enhancing the natural heritage, much of which is badly in need of protection. Continuing to use implies further degradation, more building, and more loss of habitat, more traffic and pollution.

In the first definition, as required by the National Parks Act, whenever planning applications are considered the only protections applied are those for the Natura sites which have legal protection apart from the Act, just as they would be whether the area is a National Park or not. Even with the Natura sites the CNP Planning Committee and Planning Department allow “mitigations” which at their best, assuming they are adequate, 100% implemented monitored and followed up on for eternity will only keep things neutral. **Every single building development within the National Park will displace existing flora and fauna so unless you provide replacement ground and ensure it provides identical linkages within the eco system now and into the future you are always subtracting from the natural heritage** of the National Park.

This is without giving any consideration given to net contribution of any development in terms of carbon emissions, waste throughout the construction and lifetime of the development, the effect of more people and their pets using the locale.

So our objection here is the superficial and lightweight use of the words “Sustainable Development”. The development plan is NOT sustainable - it uses land and deprives wildlife of use of that land, erodes the natural environment and continues the relentless pace of destruction of our natural heritage.

2. Definition of Affordable Housing

References to affordable housing appear over 100 times in the proposed plan with the definition in the Glossary on page 220, “Affordable housing: Broadly defined as housing at a reasonable quality that is affordable to people on modest incomes. It may take the form of social rented accommodation, private rented accommodation owned and/or managed by a private sector landlord to approved management and maintenance standards with equivalent registered social landlords

rents, shared ownership, shared equity, discounted low cost housing for sale including plots for self build, and low-cost housing without subsidy.”

Our objection to this is that other than social rented accommodation in perpetuity all other forms of “affordable” housing as defined above can and is likely to be lost to future generations and will be lost after the first sale of the property. It will naturally end up on the open market where it can be bought as a second home and its price be whatever the market will bear. The rationale for approving the application to begin with that is, that it meets local housing needs will be redundant. The inevitable result is a case for more houses to be built in the plans following the lifetimes of this one.

Private landlords could sell at any time. For shared equity to work very strict conditions must be implemented AND continued to stop the house being sold and the owner, whether it is a housing association or private landlord arguing that they use the proceeds after sharing the profit to build another “social house “elsewhere.

The process for a viability assessment (Policy 1 New Housing Development 1.5 and 4.23) whereby a developer, with the planning authority can reduce the amount of “affordable housing” is deeply flawed and undermines the whole case for the settlement plans described. It encourages the plan to be supported by a community under false premises. In order for a viability assessment to be acceptable it must be done up front and the arguments contained in the plan and planning applications. Currently it offers the opportunity for the developer to promote unrealisable promises and removes the pressure on the developer and the landowner to reduce their profit.

The CNPA need to work a different way round and provide high quality (not modest) rented housing at social rent values so that people want to live and work in the park in rented accommodation, and should not assume that people necessarily aspire to being home owners. To genuinely provide sustainable housing that residents can afford the CNPA needs to turn the commercial open market housing model on its head and provide homes that are needed AND retain them to remove the need to continually build new ones. The trap that the development plan has fallen into is the expectation that most people WANT to own a home. Often the reason for this is because the rental market is typified by high costs for poor quality housing and insecure tenancies. If you change this and provide good housing at social housing rents then older people can release capital (and houses) and younger people are not tied down with mortgages and having to sell in order to change jobs, it actually releases them from a burden. Houses designed for older people can enable them to live independently longer and reduce the cost of care while improving their quality of life.

3. That the CNPA **has no process for evaluating the economic benefits of development** and therefore cannot balance the aims of the National Park Act.

Gavin Miles Head of Planning has been quoted as saying that the planners have no responsibility for the economic case so where is the responsibility for the economic benefits within the CNPA? Within the planning department and at the planning committee no independent rigorous analysis is carried out on the claimed economic benefits. There seems to be a mind-set in the CNPA that building is a good thing to do because it brings money in. For business developments, not housing, one would expect the applicant to have done a fairly rigorous economic case for their internal risk and profit analysis, but for housing developments the applicants benefits are realised from sale of the land and the development of the houses. The applicant has no responsibility for the economic benefit to the local community (whoever “they” may be). There is no process within the CNPA for having that analysis carried out or anyone that can account for these rather intangible economic benefits. If the CNPA is to give greater weight to the first aim of the National Park then as a minimum it behoves the CNPA to have carried out a rigorous and independent economic analysis. This analysis should be comparable to the amount of factual detail that is contained in other aspects of the planning process. It should consider “end of life” of the development, a “what if” the development didn’t happen and what alternatives are available that would realise greater prosperity for equivalent investment. At the moment we see no evidence that the CNPA has this competence within its staff and we strongly recommend that you look further into this argument.

4. **An Camas Mòr**

As the CNPA are aware the Cairngorms Campaign has opposed the new town development of An Camas Mòr for many years and we welcome the thinking that has recognised that Communities can adapt to relatively small developments so long as they are planned, integrated and spread over long periods. However the arguments around the inclusion of LH1 and LH2 within the proposed plan are strange and confusing. When and how does the CNPA decide An Camas Mòr is not going ahead within the lifetime of this plan? What is there to stop both pieces of land being developed either in this plan or post 2030? The proposal to include LTH1 and LTH2 seem to add more land supply above and beyond the numbers already totalled. However to even identify new sites which have the potential to pollute the River Spey SAC and have a detrimental effect on capercaillie, a species facing extinction in the United Kingdom, one that attracts tourists and one that the CNPA have even included as a lovely illustration in the plan document, illustrates the underlying problem with the Development Plan. It reflects a process and presentation, the outcome of which concludes that it is acceptable to build houses that further erode the natural heritage, slowly but surely.

Mitigation measures do not work as we have explained elsewhere and here they will inevitably lead to more dogs and increased footfall resulting in more disturbance. Visit Glen Tanar in the summer months when the ranger has a person high picture of a capercaillie that says "ALL DOGS MUST BE ON LEADS" and count the number of dogs not on leads. Education and rangers is a positive thing to be doing BUT it is not sufficient to save the capercaillie when undermining it by building houses near where they live.

5. **Hilltracks (policy 5)**

We welcome the overriding principle in Policy 5 (5.1) that *"There will be a presumption against any development that does not conserve or enhance the landscape character and special landscape qualities of the Cairngorms National Park including wildness and the setting of the proposed development."*

As part of the LINKS Hilltracks Campaign we are a signatory to the consultation response submitted by them and will not take further time repeating the response here.

6. **Cumulative effects of Development - Dark skies, visitor accommodation and signage**

Dark Skies, Policy 5: We admire and support what Tomintoul have achieved with their International Dark Sky Park designation but there seems to be little encouragement from the Development plan to support communities in moving towards darker skies. We would like to see more content in the Policies aimed at reducing light pollution as at the moment it seems to be increasing.

There are an increasing number of sites with "glamping pod" and "chalet" type accommodation which individually are relatively low impact and obviously popular with visitors. However cumulatively they are becoming increasingly dominant and since they are not sympathetic to the built heritage (plus they have the potential to pull visitors away from existing hotels etc. which are often part of the built heritage) then there is potential for them to become a more significant influence. It is an area where the development plan could have more counter influence to protect the built heritage and carefully consider the cumulative rather than the individual impact.

Similarly, but already having an impact are the increasing numbers of signs along the open moorland roads, advertising and advising on a variety of diversionary activities, which do detract from the open feeling of the moorland. We would like to see some better planning around the siting of these signs to regain the feeling of openness along the moorland routes.

7. **Details on the legends used for the settlement maps**

The use of the term "New Open Spaces" on some of the settlement maps is misleading, if we have understood it correctly. In the legend it appears to have been called "protected". It is not actually new green space, as it already exists as green space, and secondly what does protected mean? Even the Natura sites have little protection when "mitigation" measures are used. How will it remain "protected"? At what level and how maintainable is that "protection"?

END