

The new draft Cairngorms Local Development Plan 2020 – local communities need to check it carefully

Description

The new draft Cairngorms National Park Local Development Plan 2020 was launched for consultation on 25 January ([see here](#)) and we all have until 5 April 2019 to plough through the 228 pages and the myriad of supporting documents and make our comments. This document is the outcome of the Main Issues Report which was published ([see here](#)) for consultation last winter.

The CNPA was certainly thorough in ensuring I was aware of this consultation as I received both a letter, as my property shares a boundary with one of the proposed development sites, and an email, as I had commented on part of the Main Issues Report consultation. Excellent communication. However I started to have concerns on downloading the consultation documents and comparing the section on Grantown on Spey with the letter I received. Within minutes I was finding what I would call ‘schoolboy’ errors.

Labelling errors and omissions

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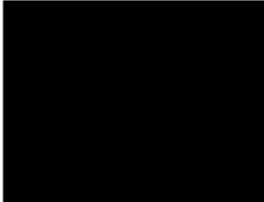
Fig 1: Granttown on Spey plan within the consultation LDP showing proposed development areas. W shows the settlement boundary in light blue, the same colour as the conservation area boundary

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The Occupier



To the Owner, Lessee or Occupier

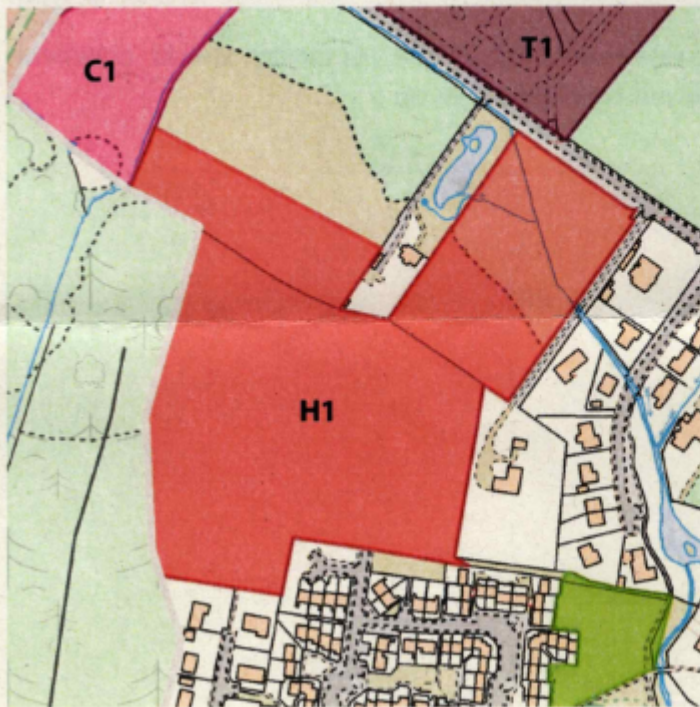
Notification of publication of Proposed Local Development Plan

Proposal for development at H1: Beachen Court, Grantown on Spey

Notice is given that the Cairngorms National Park Authority has published a Proposed Local Development Plan for the Cairngorms National Park area which includes a proposal for development of the above site.

You are being notified because you live within twenty metres of this proposed development site.


Description of the proposal






Site Reference: H1
Site Name: Beachen Court
Settlement: Grantown on Spey
Proposal: Housing
Indicative housing units: 53
Size in Ha: 5.1

Fig 2. Notification letter

1. My notification letter (Fig 2) labels the Community Use area (in pink) C1, but this is labelled C2 in the Plan (Fig 1).
2. Fig 1 shows two H1 areas (red/brown – housing allocation), but one of these should be labelled H2.
3. The section dealing with H2 (see Fig 3 below) is missing the site map (the empty grey box below)
4. The key in Fig 1 for the settlement boundary is in the wrong colour (pale blue instead of white). The conservation area is indicated with a similar dashed pale blue line, which is hard to see and the key for the conservation area boundary doesn't look anything like how it is depicted on the map. These inaccuracies/instances of poor design, though more minor, can easily lead to confusion.

 H2: Castle Road | Allocated for Housing
Indicative Residential Capacity: 50 units 3.6ha

The site is allocated for up to 50 dwellings. A masterplan for the whole site will be required as part of any planning application.

-  There are small watercourses on the boundary of the site and a Flood Risk Assessment will be required.
-  Landscaping and structure planting will be required to ensure integration of the development with the surrounding landscape and ancient woodland to the north of the site.
-  A Drainage Impact Assessment is required and should address existing surface water flooding issues. Enhancement of the small watercourses running through the site, which have been historically straightened, is encouraged.

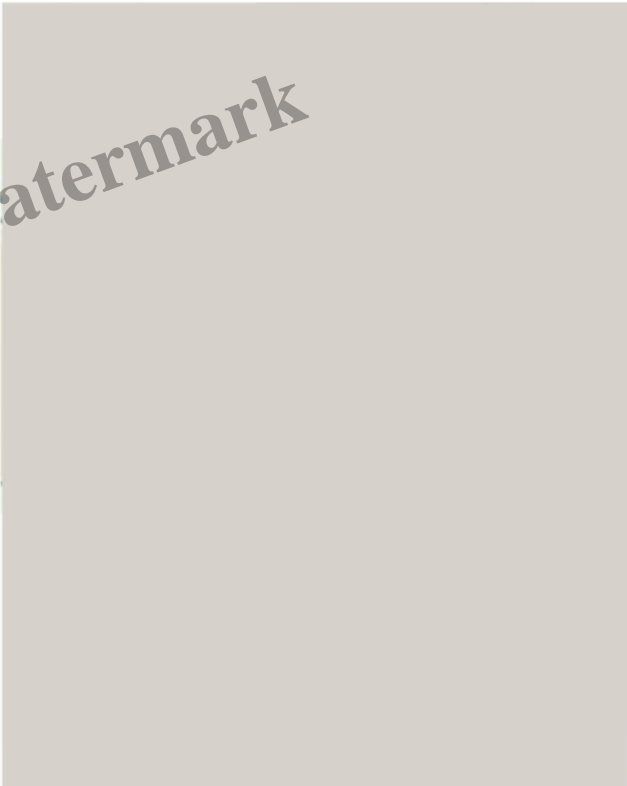


Fig 3: Grantown on Spey H2 proposed development area LDP (Page 112).

Other concerns

 **H1: Beachen Court | Allocated for Housing**
Indicative Residential Capacity: 53 units

The site has an approved Development Brief and an existing planning permission for 53 dwellings is currently under construction. Any future/amended development proposals should be in accordance with the principles in the Development Brief.

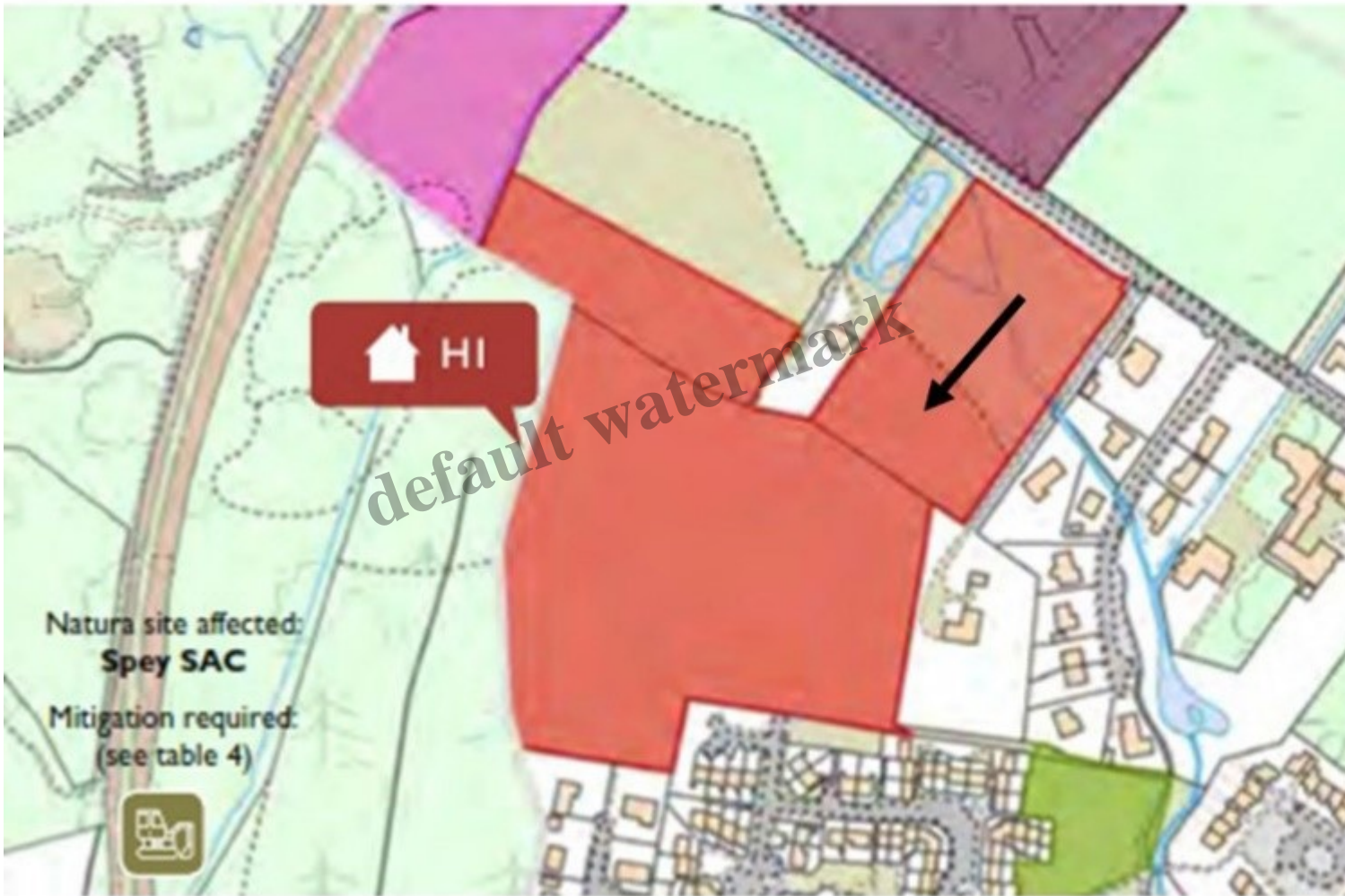



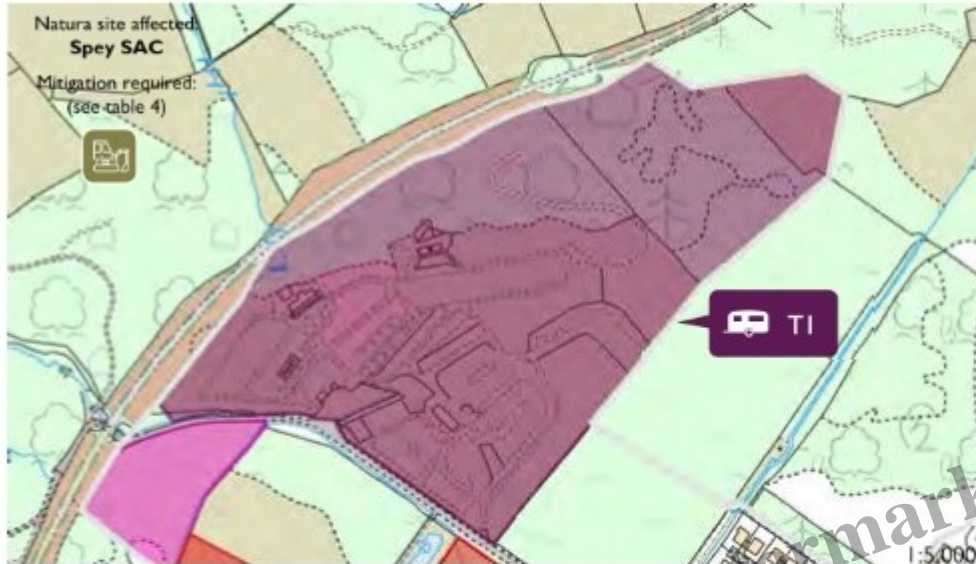
Fig 4: Grantown on Spey H1 Housing area from consultation LDP with arrow added

1. It is unclear why there are two shades of red/brown for the H1 housing area (see Fig 4). In particular the darker red/brown area (arrowed).
2. The dashed white line in Fig 1 which is intended to show the indicative line of the long awaited steam railway is in the wrong place. Persons knowing the area could interpret this as a re-alignment of the proposed railway – through mature woodland to get to the proposed terminus at C2 rather than following the existing disused track line.
3. Fig 5 (below) shows the page covering the Caravan Site. Again, the meaning of the two different colours of purple shading is unclear particularly when there are two separate blocks of dark

 T1: Caravan Park | Allocated for Tourism

11.3ha

An existing established caravan and camping site continuing to support the provision of tourism accommodation and should be protected from adverse development. There is some capacity for further development, particularly in the north eastern part of the site. Any future development on the site must be for tourism uses and compatible with the existing operational business.



Medium to high probability of flood risk adjacent to the site. Further development or any proposed increase in caravan numbers will require a Flood Risk Assessment to identify the functional floodplain and developable area.



Landscaping and structure planting will be required to ensure integration of the development with the surrounding landscape and ancient woodland on and adjacent to the site.



Enhancement of the small watercourses running through the site, which have been historically straightened, is encouraged.

Fig 5: Granttown on Spey T1

Caravan Park from consultation LDP (page 113)

- Both maps showing the H1 and T1 sites (Figs 4 & 5) have the attached words, “*Natura site affected Spey SAC Mitigation required (see table 4)*” and a yellow/brown icon of a digger. The meaning of the digger icon is not explained and it is unclear where table 4 is in the document [Ed. a five minute word search found several references to Table 4 in the plans for local communities and eventually located it on page 86 – not easy!].
- The second page of my notification letter (which is not reproduced here) states, “*The site was identified as a Preferred Site in the Main Issues Report or during its consultation..... All sites have undergone a site assessment process. Our full assessment is set out in the Site Assessment Report, which we have published for consultation alongside the Proposed Plan*”. I have checked

through the 3 part Site assessment reports and cannot find the assessments for Grantown on Spey H1 or T1 sites. In particular, the proposed extension of the Caravan Site (T1 – see Fig 5) is onto land which forms part of the ecologically sensitive Mossie area, but there is no mention anywhere I can see of the need for ecological reports on flora and fauna. As an aside it is sad to see the current state of the land proposed for the Caravan Site extension. This has been used for several year now as a storage and dumping area by the operators, without any enforcement by Highland Council or CNPA.

Advice on reading and commenting on this consultation LDP

Despite these errors and omissions, or maybe because of them, it is important that community groups and individuals living and working in the CNPA, and other parties interested in the wellbeing of the Cairngorms National Park, take time to read and understand what is being presented in this draft local development plan, which will cover proposed developments over the next 5-10 years. So far I have only read through a very small part of the consultation document and I have found numerous errors, omissions or unclear presentation of facts. What confidence can there be in the accuracy of rest of this weighty document?

Clarity is important so the meaning of the LDP is absolutely clear. If you read the post last week on the Balavil road ([see here](#)), you will see how the CNPA planners have twisted the meaning policy 5.2 of the draft LDP – which creates a presumption against new roads – to support a new one into a Wild Land Area. It is these acts by planners (and there are numerous others) that bring the Local Development Plan and associated planning processes into disrepute. Plans should mean what they say.

I recommend that this consultation document and the supporting documents are closely scrutinised over the consultation period and that comments, concerns and support where applicable are sent to CNPA. There is also the opportunity to participate in drop in events – see <https://cairngorms.co.uk/consultation/proposed-plan/#events>.

Category

1. Cairngorms

Tags

1. CNPA
2. Local communities
3. planning

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