

4th July 2013

Cairngorms National Park Authority
Albert Memorial Hall, Station Square
Ballater AB35 5QB

Dear Sirs

Comments on Proposed Cairngorms Local Development Plan

Ramblers Scotland welcomes the opportunity to submit comments on the proposed Local Development Plan for the Cairngorms National Park. There is much within this document which we support, but we will restrict our comments to those aspects of the consultation which are relevant to our interests and where we have additional points to make.

Central purpose of the Local Development Plan

Para 1.3 states:

The Scottish Government believes that the planning system is essential to achieving its central purpose of *sustainable economic growth* (our italics). This involves promoting and facilitating development in the best places for it while protecting and enhancing the natural and built environment. The Local Development Plan is the main tool to deliver that.

In fact, the Scottish Government's stated central purpose is "*to make Scotland a more successful country, with opportunities for all to flourish through increasing sustainable economic growth.*" We are concerned that by shortening this statement, undue emphasis is being given to economic growth, above environmental and social elements, all of which are essential to sustainable development.

In addition, Section 4, Supporting Economic Growth, continues to use the terminology of 'sustainable economic growth' and yet this is not a term which is widely understood, or is interpreted in different ways by different people. We would prefer to see 'Sustainable Development' used as a term which is already used in legislation at a Scottish and an international level.

It is of particular concern to ensure that within a National Park any potential economic benefits of development do not take precedence over the protection of the National Park's special qualities. We recognise that there will always be a tension between change and development within the National Park and the need for conservation of the very special qualities for which the area has been designated, and this is a difficult balance for the National Park Authority (NPA) to achieve. However, we believe these special qualities and the subsequent different management of any development which ensues are not always made clear in the Plan, and should be given more weight in this document.

For example, in para 1.20, bullet point 6 states that this Local Plan will ensure:

The special qualities of the Park are enhanced by new development where possible and protected from new development that would significantly erode or harm them.

It is not clear from this whether the NPA would actually reject development which would 'significantly erode or harm' the special qualities of the Park. In addition, we query whether a development which

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would erode or harm the special qualities in a way which may not be significant, but which would nevertheless have an impact on these qualities, would be stopped.

Housing

We objected to the establishment of An Camas Mor as a new settlement within the Park and our view has not changed subsequently. However, we do welcome the majority of the Housing policy in terms of new housing developments being contained within settlement boundaries, etc. Nevertheless there is a need to recognise that too concentrated a level of housing development within settlements can lead to a loss of green space and opportunities for public enjoyment of the outdoors and we hope this can be reflected in the Local Plan.

Landscape

We welcome this policy and the direction in which it will be applied. However, we remain extremely concerned about the issue of certain permitted development rights which mean that landowners can continue to construct new hilltracks or erect deer fencing (often with an accompanying track infrastructure) over large tracts of land without the need for planning permission. While planning permission is required within National Scenic Areas, the remaining areas of the National Park are without this protection, and this policy will not have any influence over these permitted developments. While we recognise that the NPA is not able to amend national planning policy, we would welcome a statement in the Local Plan policy which discourages landowners from using their permitted development rights and encourages them to consult the NPA in advance of any proposed development, recognizing that they are within a National Park and therefore should act accordingly when they may be creating a significant impact on the Park's landscape.

Renewable Energy

We fully support this policy, in particular the statement that only single turbines less than 30m in height would be appropriate within the Park, or outside it where development would affect its landscape setting.

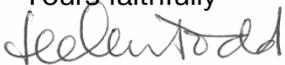
Sport and Recreation

This policy does not appear to include fieldsports, such as stalking and shooting, within its scope. We believe such recreation activities should be included as the land management practices which support such sports can have significant impacts, such as grouse moor management, deer fencing and the loss of tree and vegetation cover due to grazing pressures.

In addition, there is no mention of the role recreation can play in helping the Scottish Government to achieve a lasting physical activity legacy from the 2014 Glasgow Commonwealth Games. One aspect of this legacy is the establishment of Community Sports Hubs which can provide a focal point for sporting activities within communities around the Park.

We trust these comments are helpful and would be happy to discuss any aspect of this response in further detail at your convenience.

Yours faithfully



Helen Todd
Campaigns & Policy Manager

Ramblers Scotland is the representative body for walkers in Scotland and recognised by **sportscotland** as a governing body of sport. We have 6,400 members across Scotland and 55 local walking groups, including 4 groups which between them cover the area of the Cairngorms National Park. Our aims are to promote walking, secure and facilitate public access to land and to protect the countryside.

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