

**James Mitchell  
18 Seafield Court,  
Grantown on Spey,  
Moray,  
PH26 3LE.**

30th March 2009.

The Reporters,  
CNPA Local Plan Inquiry,  
Grantown on Spey.

Dear Madam / Sir,

**Statement of Case - CNPA Local Plan. (Ref. No. 051.)**

In line with the requests of this inquiry, I can confirm the following -

- That this statement of case contains my case to be made at the CNPA Local Plan Hearing.
- I wish to present my individual case by myself and will co-operate with the Reporters at the Local Plan Hearing.
- My current inconvenient dates are from the 6<sup>th</sup> to 24<sup>th</sup> July inclusive.
- I intend to refer to the following exhibits during my hearing -
  1. Photographs 1 & 2 - Grantown's Caravan Park.
  2. Economic Report - Grantown Caravan Park.
  3. Cairngorms National Park Plan 2007.
  4. A Strategy & Action Plan for Sustainable Tourism 2005. (CNPA Document).
  5. CNPA Local Plan - complete with first & second modifications.
  6. Extract of Scottish Planning Policy 7.
  7. Photographs 3 to 8 - Flooding on 'The Mossie'.

My objections refer to the area in Grantown on Spey described as H1 on the CNPA Local Plan map. More specifically, my objections relate to the area of land bordered by Grantown's Caravan Park, Seafield Avenue and Seafield Court. I shall refer to this area of land as, the Field.

I am aware that there is an existing planning application for the Field and my objections to the proposed CNPA Local Plan pre-suppose that, for whatever reason, this application fails.

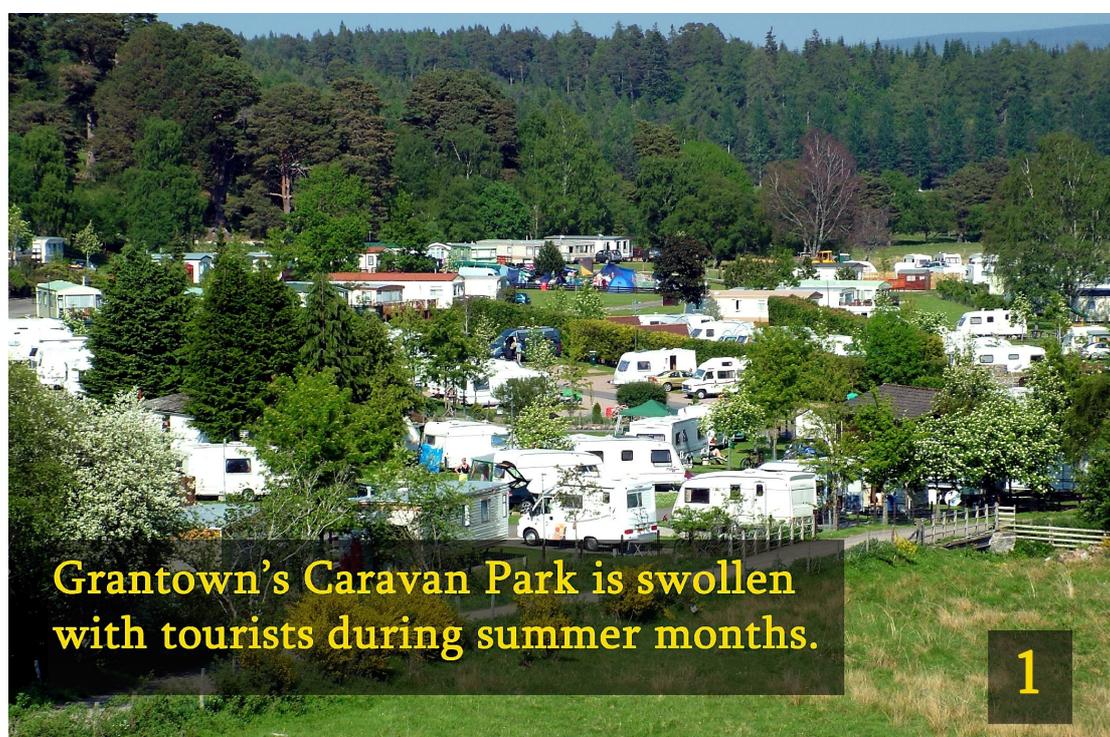
The CNPA Local Plan proposes that the Field be zoned for dwellings. I object to this proposal for the following reasons.

### **Tourism & Economy.**

Grantown's Caravan Park is bordered by, and overlooks this Field. It is a thriving business, a major attractor of tourists to Grantown and the National Park, and has won numerous awards. It was named, 'Caravan Park of the Year' by Scottish Caravanner Magazine in 2007.

The Caravan Park offers Grantown's only five star tourist accommodation and in 2008 this Caravan Park provided over 90,000 visitor nights.

(Exhibit - Photograph No. 1)

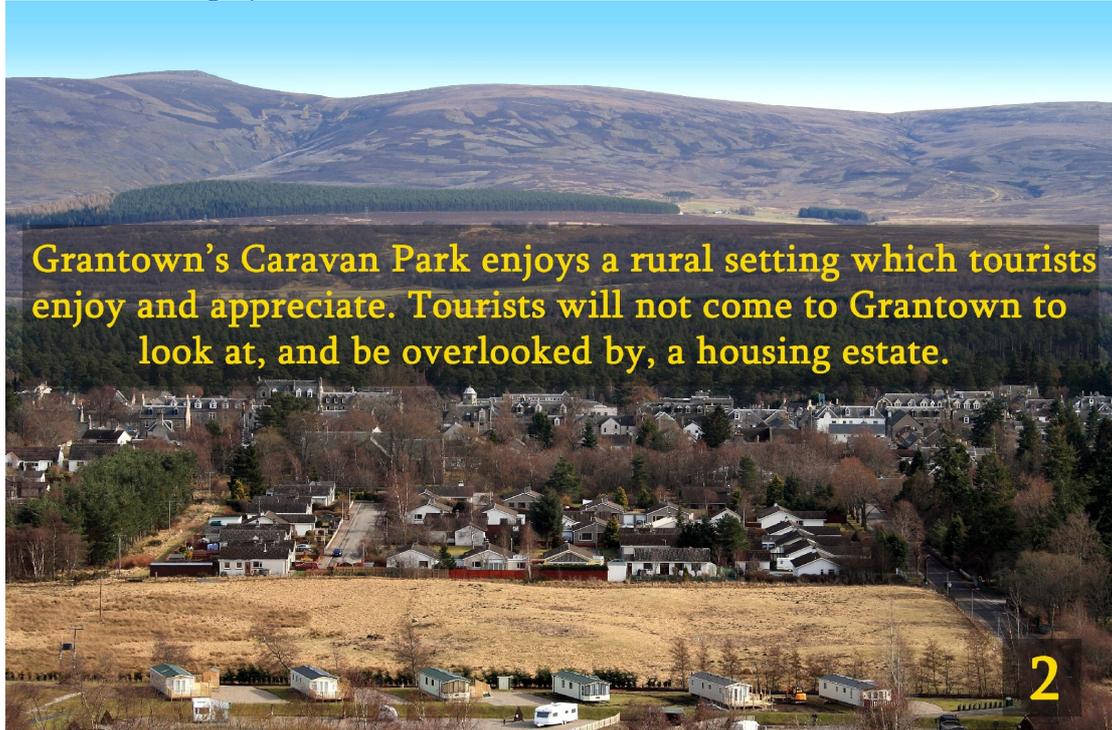


In January 2007, the Caravan Park's economic impact was assessed by consultants who concluded that it contributes £2.15m annually to the local economy.

The Caravan Park provides work for the equivalent of 7 full-time positions. With the Caravan Park's own spending, coupled with that of its visitors', the consultants concluded that it supports 48 jobs in the local area. (Exhibit - 'Economic Impact of the Caravan Park')

Grantown's Caravan Park is exceptional in that it is close to the town yet still in the country. It offers tranquillity, wildlife and a special ambience that only a rural caravan park can. Holiday makers enjoy views of the Cromdale Hills and Cairngorms from their own front doors. Tourists go caravanning and camping to be in the country and not to look at, and be overlooked by, a sprawling housing estate. Development of this field will ruin the rural feel, ambience and views from Grantown's Caravan Park.

(Exhibit - Photograph No.2)



Who would go on a camping / caravanning holiday to a National Park to look at, and be overlooked by, a housing estate? Of course, the five year building period of any housing development would only serve to worsen matters; who would holiday beside a building site?

This caravan park attracts many thousands of visitors to Grantown throughout the year. Without it, many local businesses will fail and the economy of Grantown will nose-dive.

Development of the Field next to the Caravan Park would surely see the demise of the largest single attractor of tourists to Grantown.

Tourism is part of Grantown's cultural heritage. The CNPA and many others recognise that tourism and recreation are vitally important to Grantown, a unique town which offers a base to explore the surrounding countryside. The CNPA recognise that a good range of quality accommodation is vital to a healthy tourist industry.

To allow large-scale and inappropriate development of the Field contravenes the National Parks, (Scotland) Act 2000, the first aim of which is to -

- Conserve and enhance the natural and cultural heritage.

Section 9(6) of the National Parks (Scotland) Act 2000 directs that where there is a conflict between this and the other three aims, **greater weight must be given to this, the first aim.**

The CNPA has outlined its aspirations for tourism. Page 7 of the **Cairngorms National Park Plan 2007** states that, 'The CNP will be an internationally recognised world-class sustainable tourism destination that consistently exceeds...visitors' expectations in terms of quality of environment....and experience'.

More of the CNPA's visions are explained on Pages 78 & 79 of the same document where, amongst other objectives, we are told that it is hoped to improve and maintain the quality of experience in the Park for all visitors. It states, 'Quality of experience is key to the long-term sustainability of tourism'. ([Exhibit - CNP Plan 2007.](#))

In 2006, the CNPA published a report, '**A Strategy & Action Plan for Sustainable Tourism**'. ([Exhibit as described](#)).

Para 1.1 of the consultant's report states, 'Tourism is central to the area's economy .....many people agree that it is the quality of the landscape that underlies the reason for most visits'.

Para 2.1 states, 'Tourism related businesses are estimated to account for 80% of the economy'.

Para 2.10 mentions a CNPA Survey in 2004 which asked, 'What are visitors looking for?' The report states that 40% of visitors expected a tranquil, unspoilt area where conservation is the key aim.

In this same survey, when asked, 'What do visitors like most about the CNPA area?'

- 46% highlighted 'beautiful views and scenery'.
- 27% highlighted 'hills and wide spaces'
- 25% highlighted 'peacefulness and easy-going pace of life'.
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Grantown's Caravan Park currently enjoys all of these qualities which are why it is so special. Development of the Field will destroy all of these virtues; this will lead to its certain demise and a consequential blow to Grantown's economy.

This same action plan states, 'It is apparent that the National Park's natural environment is absolutely central to its touristic appeal. Visitors are being attracted by....the areas environmental qualities'.

In accordance with this accepted action plan and CNPA policy, the Caravan Park must be protected and enhanced. The Field in question is barely 150 metres wide. Surely the Caravan Park needs and deserves this space.

## **Flooding.**

The '**CNPA Local Plan - complete with first and second modifications**', unhelpfully pre-judges the existing planning application for this Field. This document makes a presumption that this existing application will succeed and provide housing. There is no provision in this plan for the failure of the current planning application or mention of arrangements to take place should this occur. ([Exhibit as described](#))

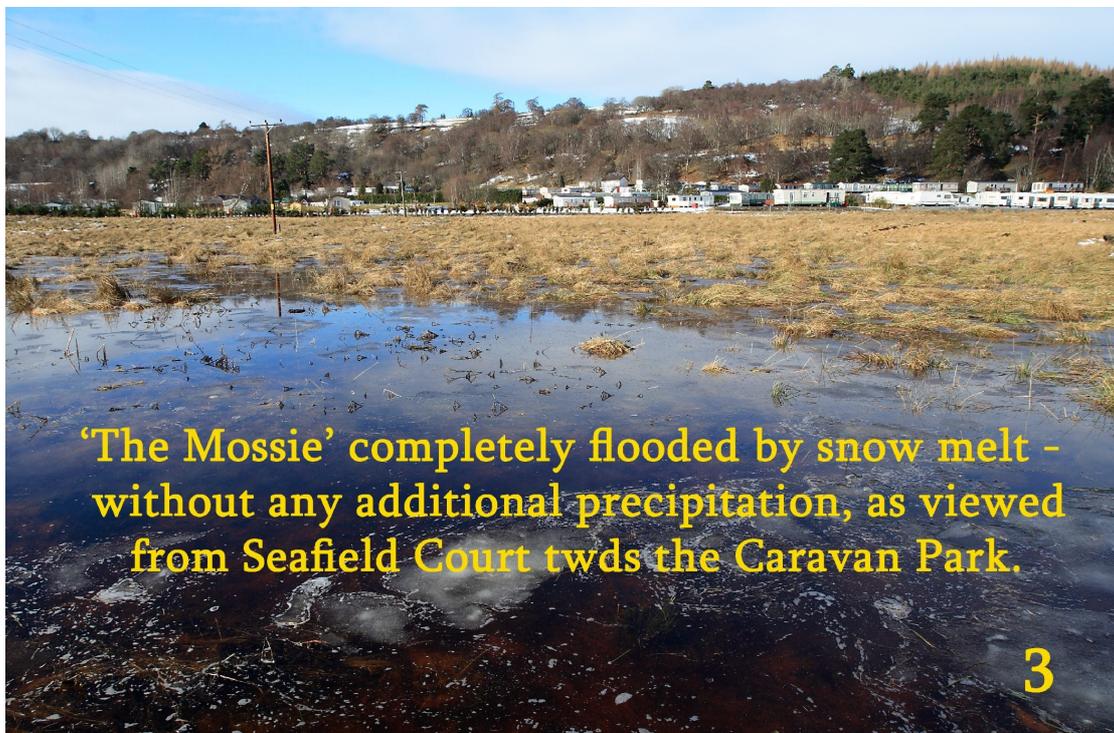
Recent information suggests that this Field is not physically capable of withstanding development.

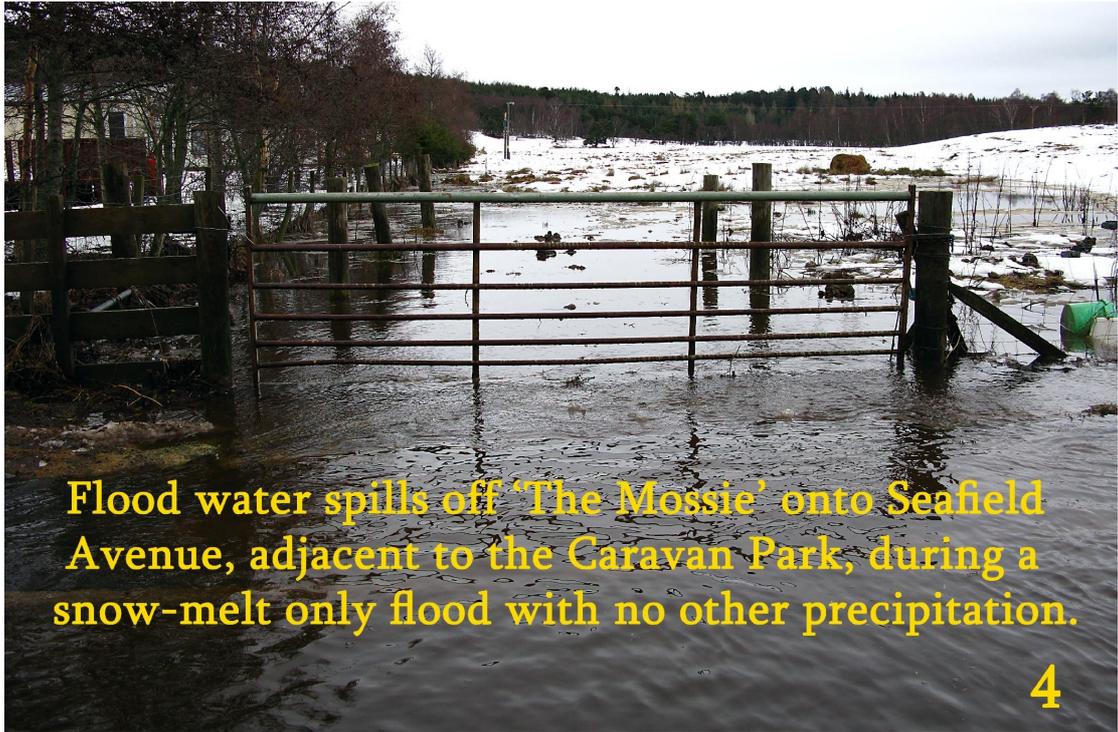
The Field is part of an area of wetland known locally as 'The Mossie' which acts as a sponge for precipitation run-off from the surrounding hills.

SEPA recognise The Mossie as a flood plain and, of the current planning application, has emphasised Section 7 of Scottish Planning Policy which states that built development should not take place on functional flood plains. ([Exhibit - Extract of SPP 7](#))

SEPA has also stated that much of The Mossie is shown to be at risk of flooding which raises serious concerns regarding acceptability of developing this site for residential use.

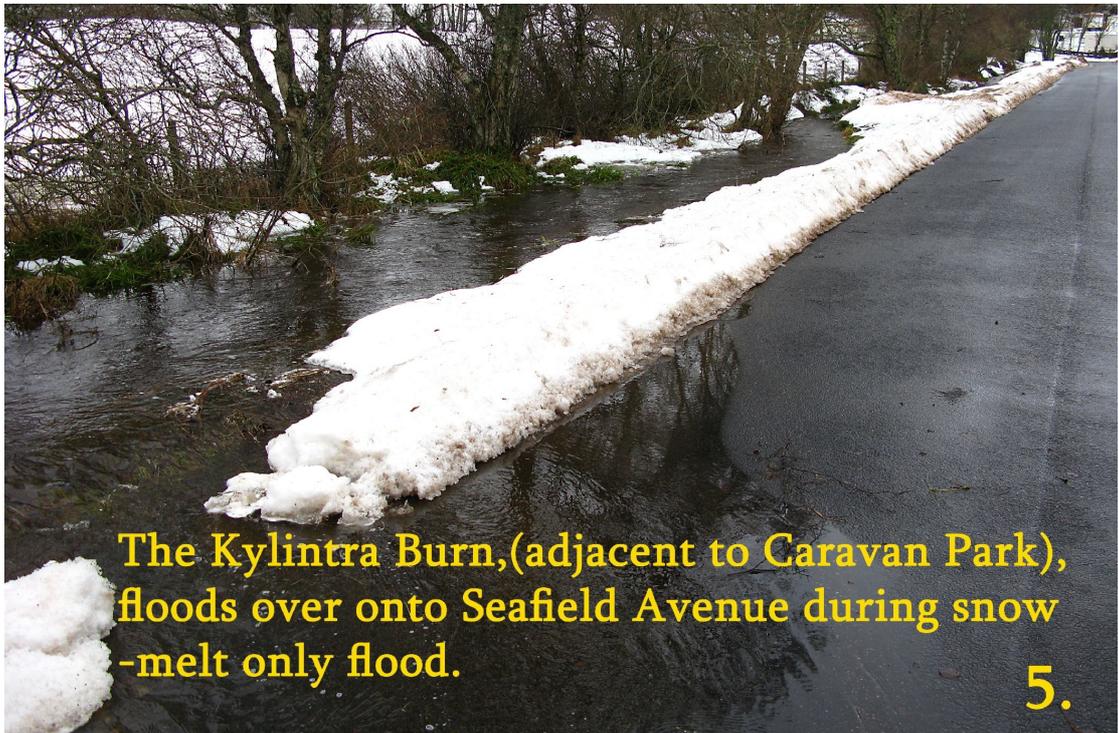
In early February 2009, approximately 15 inches of snow fell on Grantown. Much of this snow melted on the 16<sup>th</sup> and 17<sup>th</sup> of February. During this thaw, there was no other precipitation whatsoever. However, the melting snow alone caused flooding of the Field and parts of the immediate area. ([Exhibits - photographs 3 to 8](#))





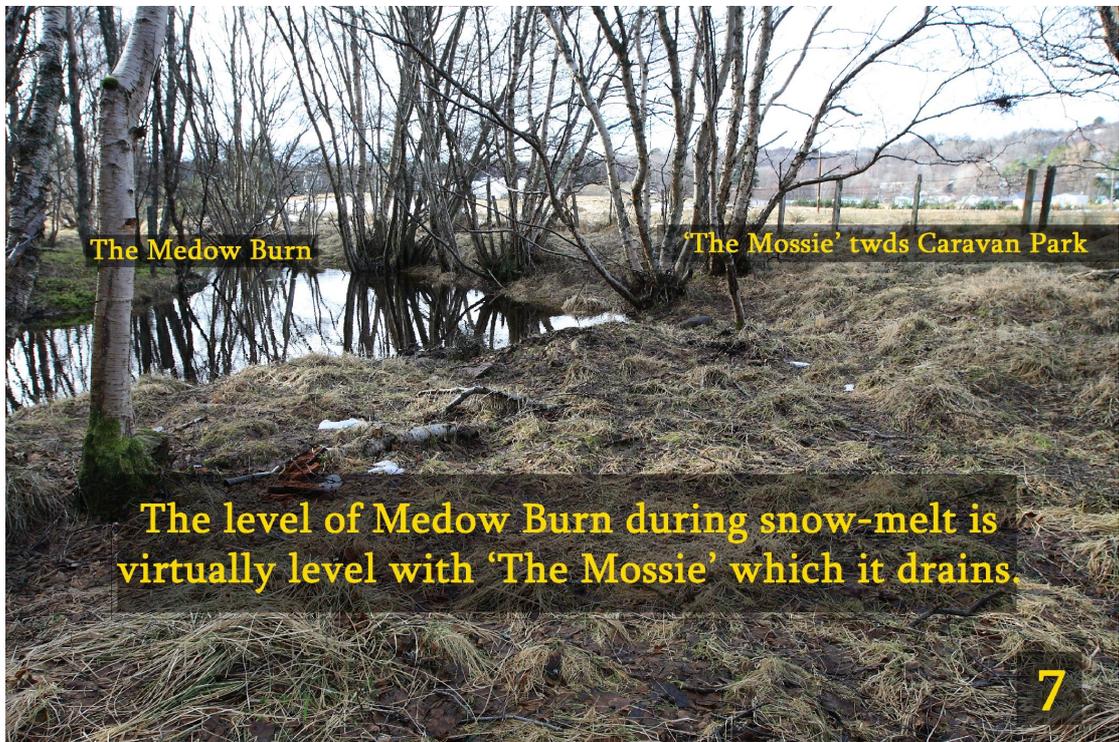
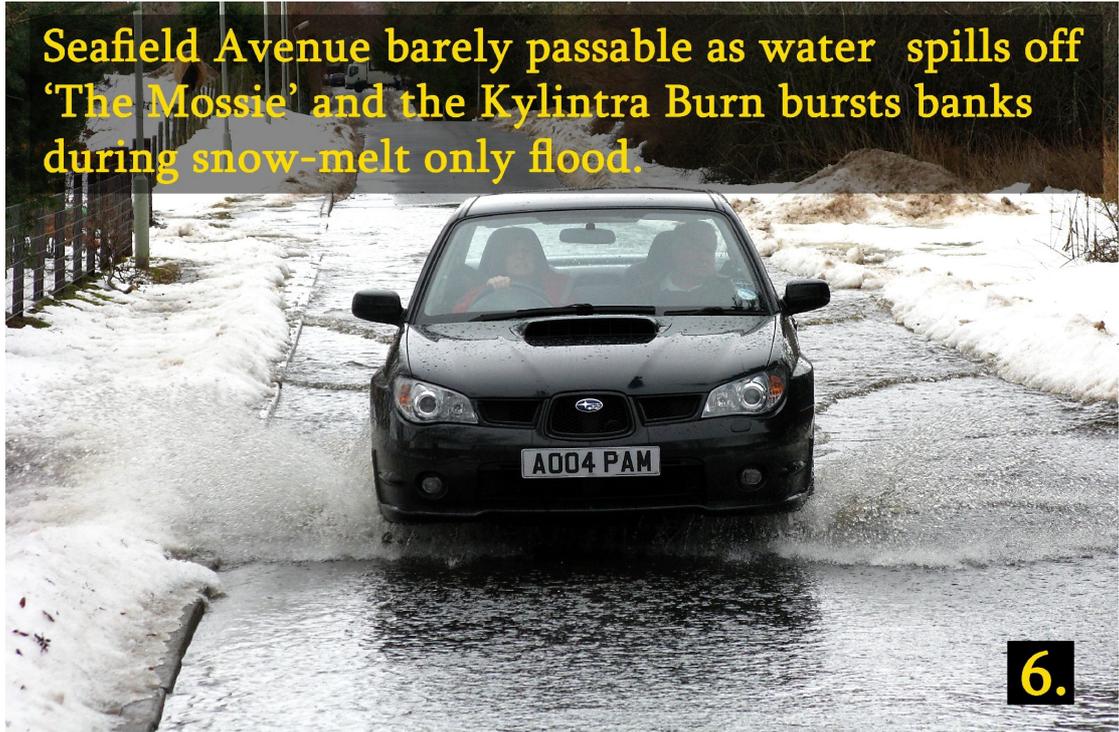
Flood water spills off 'The Mossie' onto Seafield Avenue, adjacent to the Caravan Park, during a snow-melt only flood with no other precipitation.

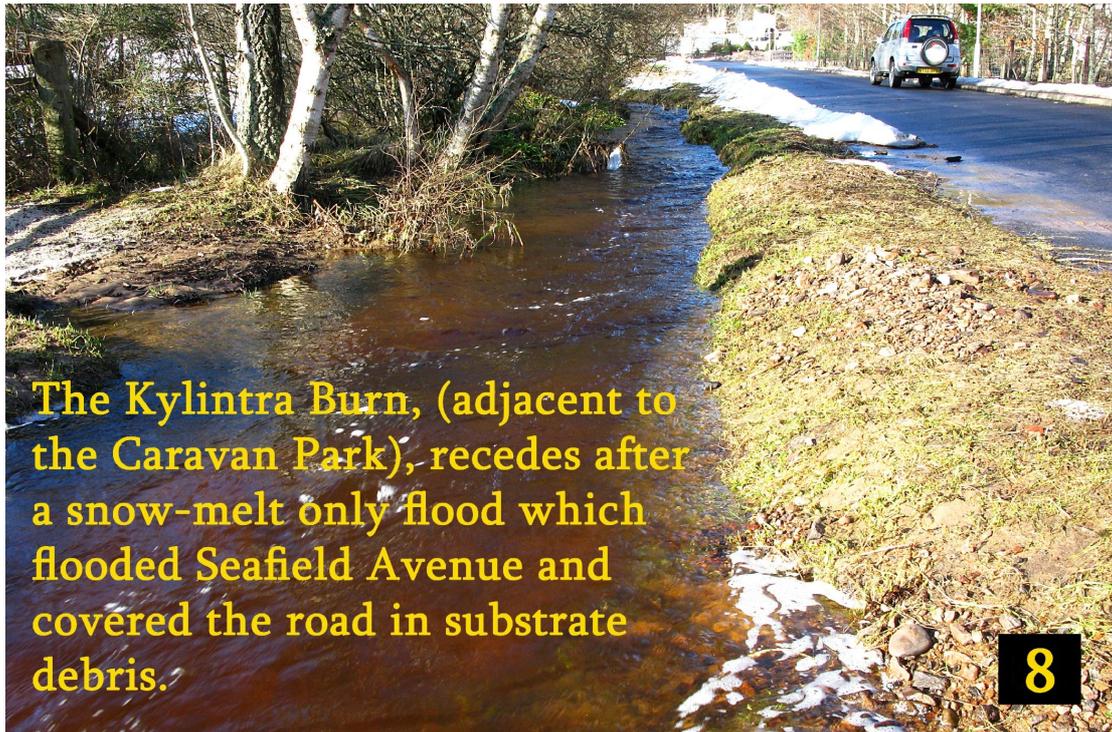
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The Kylintra Burn, (adjacent to Caravan Park), floods over onto Seafield Avenue during snow-melt only flood.

5.





This flooding of the Field was not unusual but was nonetheless serious. If this thaw had been accompanied by just an inch or two of rain, this would have been a significant event.

The 1997 Grantown Local Plan appears to have failed to consider any flooding implications whatsoever. Of course, if this was a legal matter, this omission/failure would nullify the whole proceedings and the plan would be void. Instead, the flawed 1997 Local Plan has been validated and risks untold damage on Grantown's community and economy.

The CNPA Local Plan is naively complacent about flooding and does not make any attempt to right the wrongs of the 1997 Plan. This has been compounded by the failure to learn from comments made by SEPA about the existing planning application. Furthermore, the CNPA has made no active engagement with Grantown's Community Council from which there has been absolutely no input.

The Field is currently owned by Seafield Estate and has only ever been used for grazing. It is, by itself, visually unremarkable. It may benefit from some planting and landscaping but there are compelling reasons to save it for the benefit of Grantown.

**James Mitchell.**

## List of Exhibits

As per statement of case by -

**James Mitchell,  
18 Seafield Court,  
Grantown on Spey,  
PH26 3LE**

### Exhibit Description -

1. Photographs 1 & 2 - Grantown Caravan Park (included)
2. Economic Report - Grantown Caravan Park. (attached)
3. Cairngorms National Park Plan 2007
4. A Strategy & Action Plan for Sustainable Tourism 2005. (CNPA Doc.)
5. CNPA Local Plan - complete with first & second modifications.
6. Extract of Scottish Planning Policy 7. (attached)
7. Photographs 3 to 8 - Flooding on The Mossie. (included)

**Items 3, 4 & 5 (above) to be provided by the CNPA.**

March 25, 2009

## Economic Impact of the Caravan Park

- The Caravan Park contributes £2.15 million to the area economy through Park and visitor spending (Neil Sutherland Report, January 2007).
- The Caravan Park contributes, directly or indirectly, 55 jobs to the area economy (Neil Sutherland Report, January 2007).
- The Caravan Park brings over 90,000 visitor nights to Grantown (Internal Park figures, 2008). That is more than twice the number of a 100 room hotel having 60% occupancy (averaging 2 people per room) year round.
- The Caravan Park is open year round except for six weeks in November and December, thereby contributing to the local economy for 10.5 months each year.
- The Caravan Park's visitors are predominantly from higher socio-economic groups, are well behaved, and have money to spend (British Holiday & Home Parks Association, January 2006).
- Trade groups are forecasting a major increase in caravan holidays in 2009 because economic conditions are keeping more people at home in the UK (National Caravan Council and others).
- The National Caravan Council has a website and study that show that using touring caravans for travel is "greener" (has a smaller carbon footprint) than flying or rail travel, so caravanning is better for the environment. Please see the site below. <http://www.tourerinfo.co.uk/gogreen.html>
- The Caravan Park has wide support in the Grantown community because of the important economic benefits it provides to the area.

The excellence of the Caravan Park's site, management and operation was recently recognized by its being chosen Caravan Park of the Year for 2007 by Scottish Caravanner Magazine.

## **EXTRACT of SCOTTISH PLANNING POLICY 7.**

### **THE GENERAL PRINCIPLES**

15. The policy in this SPP is based on the following principles:

- Developers and planning authorities must give consideration to the possibility of flooding from all sources.
- New development should be free from significant flood risk from any source.
- In areas characterised as 'medium to high' flood risk for watercourse and coastal flooding and the new development should be focussed on built up areas and all development must be safeguarded from the risk of flooding.
- New development should not:
  - materially increase the probability of flooding elsewhere;
  - add to the area of land which requires protection by flood prevention measures;
  - affect the ability of the functional flood plain to attenuate the effects of flooding by storing flood water;
  - interfere detrimentally with the flow of water in the flood plain;
  - compromise major options for future shoreline or river management.
- Flooding from sources other than watercourses and on the coast must be addressed where new development is proposed, if necessary through a drainage assessment. Any drainage measures proposed should have a neutral or better effect on the risk of flooding both on and off the site.
- Alterations and small scale extensions to buildings are generally outwith the scope of this SPP provided they would not have a significant effect on the storage capacity of the functional flood plain or affect local flooding problems.

The policy applying these principles is set out in the relevant paragraphs of this SPP.

### **DEVELOPMENT ON FUNCTIONAL FLOOD PLAINS**

16. Functional flood plains store and convey flood water during times of flood. These functions are important in the wider flood management system. New development on the functional flood plain will not only be at risk itself, but will add to the risk elsewhere. Cumulative effects will arise from proposals which individually may seem of little consequence. For planning purposes the functional flood plain will generally have a greater than 0.5% (1:200) probability of flooding in any year.

17. Built development should not therefore take place on functional flood plains. Piecemeal reduction of the flood plain must be avoided because of the cumulative effects on storage capacity. There may be exceptions for infrastructure if a specific location is essential for operational reasons or it is incapable of being located elsewhere. In such cases, it should be designed to remain operational in times of flood, not impede water flow and the effect on the flood water storage capacity should be kept to a minimum.

## **Photographs.**

As per statement of case by -

**James Mitchell,  
18 Seafield Court,  
Grantown on Spey,  
PH26 3LE.**

### **Photograph subject.**

1. Grantown Caravan Park in May.
2. Caravan Park's situation beside the Field with views.
3. The Mossie completely flooded.
4. Flood water spills off The Mossie beside Caravan Park.
5. The Kylintra Burn floods Seafield Avenue.
6. Seafield Avenue barely passable.
7. Medow Burn, (*spelt Medow*) & The Mossie - levels compared.
8. Kylintra Burn recedes leaving substrate debris.

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