

1 March 2018

Cairngorms National Park Authority Grantown-on-Spey PH26 3BR planning@cairngorms.co.uk



Dear Sir or Madam

## Cairngorms National Park Local Development Plan Main Issues Report

Ramblers Scotland welcomes the opportunity to comment on the Cairngorms National Park Local Development Plan MIR. Our comments are restricted to those areas where we have an interest.

Ramblers Scotland is the representative body for walkers in Scotland and recognised by **sport**scotland as a governing body of sport. We help everyone, across Scotland, enjoy walking and protect the places we love to walk. We are a membership organisation with 54 local walking groups in Scotland, including a number of groups based in and around the Cairngorms NP, while many of our other groups and individual members enjoy visiting and walking in the national park.

## Main Issue 4 - Housing

We have consistently opposed the An Camas Mor housing development, and in particular our opposition has strengthened since the NP planning committee meeting of 18 August 2017 when the significant impact that the development on informal outdoor recreation activities within the surrounding area was highlighted in the committee papers.

We acknowledge comments in the MIR that there is a potential likelihood that the An Camas Mor development may not go ahead due to the difficulties in delivering this project in a highly sensitive area. We note an alternative proposal for 500 houses in North Aviemore. While this is also a significant development, we believe it would have less impact on the natural environment and on outdoor recreation than An Camas Mor, and therefore we are cautiously supportive of this plan when compared to the An Camas Mor proposal.

We recognise that the North Aviemore development is close to existing facilities within Aviemore and is also connected to existing recreation opportunities such as the Speyside Way and Aviemore Orbital Path. Kinveachy forest is also within easy reach and while this development would require efforts to ensure capercaillie habitat is not additionally affected by an increase in recreational activities from the residents of these new houses, we believe that the hilly topography of Kinveachy would provide some natural protection. If An Camas Mor fails to be delivered by the end of the current planning approval period, we would like to see this planning approval lapse and not be renewed.

## Main Issue 10 – Land management in upland areas

We have been acting as co-convenor of the Scottish Environment LINK Hilltracks campaign group since 2013 and are aware of the environmental damage that tracks can cause, as well as the lack of democratic oversight given that they are generally carried out under permitted development rights. Therefore we are very supportive of the proposal that the Local

Development Plan should include an amended policy to reflect the Partnership Plan's presumption against development of any new tracks in open moorland areas.

We would be happy to meet the park authority to discuss these issues further.

Yours faithfully

Helen Todd Campaigns & policy manager

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