



Cairngorms National Park Local Development Plan 2020 Main Issues Report

Comments Form

Introduction

We are asking for your views on the big issues that the Cairngorms National Park Local Development Plan 2020 will need to address and the options for tackling them. The Main Issues Report sets out choices for the land allocations that could be made for development, and for policies that will be used to make decisions on applications for planning permission. This consultation is your chance to influence the new Local Development Plan to help make sure it:

- provides the homes, jobs and services that our communities need
- protects and enhances the Park's unique environment and cultural heritage for future generations

The consultation runs from **17 November 2017 to 2 March 2018**.

- All documents are available to view at **www.cairngorms.co.uk**
- Comments can be emailed to **planning@cairngorms.co.uk**
- Or posted to:
Cairngorms National Park Authority
FREEPOST NAT 21454
Grantown-on-Spey PH26 3BR

Please use extra sheets if required.

Alternatively, an online version is available to complete at **www.cairngorms.co.uk**

All comments must be received by 5pm on Friday 2 March 2018.

Your details

Organisation (if applicable)

Address

Please tick if you are happy to receive correspondence via email ☐

Please tick to confirm you are happy for us to hold and use your personal data according to fair collection purposes ☐

Please note we will not store personal data for anyone aged 16 or under – please tick if you are aged 16 or under ☐

Data protection

Your details will only be used for purposes associated with the Main Issues Report consultation and Cairngorms National Park Local Development Plan 2020. You may request to see personal information held by the CNPA at any time.

Fair collection statement

As a registered Data Controller, the Cairngorms National Park Authority will collect, store and use your personal data for the purpose of informing the content of the Cairngorms National Park Local Development Plan 2020. We will not publish any address information, but may include your name against any comments, if you have confirmed that you are happy for us to do so in the 'Your Details' section.

Key Questions (Y/N – delete as appropriate)

Planning in the Cairngorms National Park

Q: We propose to use the vision and long-term outcomes set out in the National Park Partnership Plan as the 'vision statement' for the Local Development Plan.

Do you agree with this approach?

Y/N

Please explain your answer

Please explain your answers

Progress in delivering the current Local Development Plan

Q: Do you agree with our conclusions about the changes that need to be made to policies in the existing Local Development Plan?

Y/N

Q: Do you think any other changes are needed?

Y/N

Please explain your answers

Main Issue 3 Impacts and opportunities from the A9 and Highland Main Line upgrades

Q: Do you agree with our proposals to allocate new employment land to take advantage of the opportunities for inward investment associated with the A9 and rail upgrades?

Y/N

Q: Do you agree that we should seek to support those communities that are at risk of being by-passed by the A9 dualling project?

Y/N

Please explain your answers

Main Issue 1 Over-arching development strategy

Q: Do you agree that the overall development strategy of the current Local Development Plan remains appropriate, and that we should use this as the basis for the next Local Development Plan?

Y/N

Please explain your answer

Main Issue 4 Housing

A) How much new housing do we need and where should it be built?

Q: Do you agree with our proposed Housing Supply Targets for the next Local Development Plan?

Y/N

Q: Do you agree that the proposed Housing Land Requirements are sufficiently generous?

Y/N

Q: Do you agree with our overall conclusions about the need for additional new housing sites in the new Local Development Plan?

Y/N

Please explain your answers

Main Issue 2 Designing great places

Q: Do you agree that the new Local Development Plan should include a new policy requiring development proposals to show how they meet the six qualities of successful places?

Y/N

Q: Do you agree that we should include a clearer policy in the new Local Development Plan to set out when tools such as masterplans and development briefs will be used?

B) Housing growth around Aviemore

Q: Do you agree that we should include long-term development land in the Local Development Plan which could be released for development in the event that An Camas Mòr does not progress as envisaged? **Y/N**

Please explain your answer

Main Issue 5 The affordability of housing

Q: Do you agree that we should increase the affordable housing requirement to 35% in Ballater and Braemar, and to 45% in Aviemore and Blair Atholl? **Y/N**

Q: Do you agree that we should include policies to require a greater mix of house types and sizes, including more smaller homes? **Y/N**

Please explain your answers

Main Issue 6 Economic development

Q: Do you agree that the new Local Development Plan should identify a limited number of new economic development sites? **Y/N**

Please explain your answer

Main Issue 7 Impacts on Natura designations

Q: Do you agree that the new Local Development Plan should include a more co-ordinated approach towards delivering wider packages of capercaillie mitigation and conservation measures? **Y/N**

Please explain your answer

Main Issue 8 Planning obligations

Q: Do you agree that the new Local Development Plan should include a revised and more rigorously justified policy on planning obligations? **Y/N**

Q: Do you agree that this should be supported by more specific guidance in the plan about what planning obligations will be required in different settlements/locations? **Y/N**

Please explain your answers

Main Issue 9 Flood risk and climate change resilience

Q: Do you agree that the new Local Development Plan should include a stronger policy requirement for SUDS to be considered in all new development proposals? **Y/N**

Please explain your answer

Main Issue 10 Land management in upland areas

Q: Do you agree that the new Local Development Plan should include an amended policy to reflect the National Park Partnership Plan's presumption against new hill tracks in open moorland areas? **Y/N**

Please explain your answer

Settlements

Please tick which settlement you are commenting on.
Comments for different settlements should be provided on separate sheets.

| | | | | | |
|-------------------------|--------------------------|--------------------------------|--------------------------|---------------------|--------------------------|
| An Camas Mòr | <input type="checkbox"/> | Cromdale | <input type="checkbox"/> | Killiecrankie | <input type="checkbox"/> |
| Angus Glens | <input type="checkbox"/> | Dalwhinnie | <input type="checkbox"/> | Kincraig | <input type="checkbox"/> |
| Aviemore | <input type="checkbox"/> | Dinnet | <input type="checkbox"/> | Kingussie | <input type="checkbox"/> |
| Ballater | <input type="checkbox"/> | Dalnain Bridge | <input type="checkbox"/> | Laggan | <input type="checkbox"/> |
| Blair Atholl | <input type="checkbox"/> | Glenlivet | <input type="checkbox"/> | Nethy Bridge | <input type="checkbox"/> |
| Boat of Garten | <input type="checkbox"/> | Glenmore | <input type="checkbox"/> | Newtonmore | <input type="checkbox"/> |
| Braemar | <input type="checkbox"/> | Glenshee | <input type="checkbox"/> | Strathdon | <input type="checkbox"/> |
| Bruar & Pitagowan | <input type="checkbox"/> | Grantown-on-Spey | <input type="checkbox"/> | Tomintoul | <input type="checkbox"/> |
| Calvine | <input type="checkbox"/> | Insh | <input type="checkbox"/> | | |
| Carr-Bridge | <input type="checkbox"/> | Inverdrue & Coylumbridge | <input type="checkbox"/> | | |

(Y/N – delete as appropriate)

| | |
|--|------------|
| Q: Have we identified the right issues for this settlement (where relevant)? | Y/N |
| Q: Do you agree with the proposed settlement objectives? | Y/N |
| Q: Do you agree with the preferred site options (where relevant)? | Y/N |
| Q: Do you agree with the protected open spaces (where relevant)? | Y/N |
| Q: Do you agree with the proposed settlement boundary (where relevant)? | Y/N |

Please explain your answers

If you have any other general comments on the topics you think the Local Development Plan 2020 should address, please let us know.

What happens next?

Consultation responses will be collated and a report of the consultation published. We will use this to inform the preparation of the Proposed Cairngorms National Park Local Development Plan 2020. We expect to publish this for a further period of public comment in late 2018.

We will regularly update on progress via **www.cairngorms.co.uk** and on Facebook and Twitter via **@cairngormsnews** and **#BigParkBigQuestions**.

Queries

Cairngorms National Park Authority,
14 The Square, Grantown-on-Spey, PH26 3HG
Tel: 01479 873535 Email: planning@cairngorms.co.uk

Monaltrie Park, Ballater

Response to Cairngorms National Park Main Issues Report

Invercauld Estate



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Appendices

Appendix 1 – Preliminary Concept Masterplan

1. Executive Summary

Invercauld Estate is responding to the Cairngorms National Park Authority (CNPA) Main Issues Report (MIR) to support the continued allocation of the site at Monaltrie Park (H1) Ballater, for inclusion in the Proposed Local Development Plan as a future housing site. This submission also seeks the inclusion of the alternative site AB017 as part of the wider site with a designation for residential development.

The site has previously been promoted to the Council as a suitable location for future housing and the Council's assessment of the site as part of the MIR considers that the site is deliverable, effective and well contained. In recognition of its development potential, the Council has identified the site as a 'Preferred Site' to be brought forward to deliver 250 homes. While welcoming the Council's acknowledgement of the preferred status of Site H1, Invercauld Estate considers that alternative site AB017 should be included in the allocation to enable flexibility in the layout of the development to take account of potential flood risk issues and to allow for more cohesive and masterplanning of the area. The concept masterplan takes full account of these, however further assessment would be undertaken as part of any future planning application.

Site AB017 could replace the north east corner of the site H1, to allow further investigation in any perceived flood risk, and the latter is now shown as an area of high quality open space. With the loss of this developable area, it has been illustrated how the north west corner of the site (Site AB017) and an extension to the southern portion of the site can be sensitively accommodated as part of the overall residential proposals. The proposed settlement boundary should not to be reduced, in order to allow the masterplanning process to take into account the green infrastructure proposed in the north east corner of the site.

The site is expected to have an indicative capacity of approximately 250 units. The preliminary concept masterplan at Appendix 1, illustrates how a residential proposal can be accommodated on the site.

This response to the MIR provides a detailed site description, an initial analysis of environmental and technical matters as well as a response to relevant questions raised within the MIR document.

The report clearly demonstrates the effectiveness and deliverability of the site and concludes that the site is suitable for inclusion within the new Local Development Plan for residential use.

2. Introduction

Savills Planning is pleased to submit this representation on behalf of Invercauld Estate to the CNPA MIR 2017. This report promotes a proposed housing site at Monaltrie Park in Ballater for inclusion in the Proposed Local Development Plan.

In support of the proposed site allocation, a flooding study has been carried out to consider the development potential at the site, to identify potential constraints and to consider potential mitigation measures that may be required to enable development to proceed. In order to illustrate how this site can be successfully developed, we have prepared a preliminary concept masterplan (Appendix 1) with these representations.

Summaries of the key design considerations are contained within this report, which concludes with commentary about the overall acceptability of the site in land use terms for housing as well as commentary about the site effectiveness, with reference to Planning Advice Note (PAN) 2/2010.

Savills has been supported in preparing this submission by McCreadie Design, who have prepared the proposed concept plan. This report also sets out responses to the key related questions contained in the MIR.

Within the Cairngorms National Park LDP (adopted March 2015) the site at Monaltrie Park is allocated as site H1, with a capacity of 50 units; plus an identified future phase for 200 homes *'should future needs require, land adjacent to the site will be released to consolidate the development with the village'*. As such, the CNPA accepted the potential for a total of 250 homes in this location.

The adopted LDP lists the objectives a Masterplan is required to address, including flooding, zoning, land uses, connectivity and movement – including access and connectivity with the Deeside Way, identification of Ballater's distinctive design characteristics, conservation proposals, habitat and landscape issues, integration alongside the Highland Games site and other community facilities, etc.

The CNPA LDP (2017) continues to recognise the development potential of the site. The CNPA has identified the site as a 'Preferred Site' to be brought forward to deliver 250 homes, with the potential addition of the adjacent alternative site AB017 providing a total allocation of 250 homes on the site.

Elsewhere within CNPA, Urban Animation are preparing representations on behalf of Invercauld Estate for sites at Braemar and Bridge of Gairn.

3. Site Context

Site Description

The site relates well to Ballater and is contained within the settlement boundary. It is located at the northern edge of Ballater and is bounded to the immediate north west and south east by existing residential development, to the south by an area of open space and to the north east by agricultural land and the settlement boundary.

The site has good levels of connectivity and is approximately 500 metres from the primary school and 1km from the town centre. A bus stop is located 500m away on Tulloch Road, with the nearest major road (A93) located 2.5km from the site. A core path runs along the west and east of the site offering strong pedestrian links to the centre of Ballater. The site is vegetated by grass and shrubs and has not been subject to any previous development. The topography of the site varies between 193.5m and 198.5m above Ordnance Datum (AOD).

The River Dee flows in a north easterly direction past Ballater and is located some 240m to the south east of the site at its closest point. The Ballater Burn originates on the hillslope immediately to the north of Ballater and flows eastwards approximately 400m to the north of the site before joining the Tullich Burn approximately 1.5km to the north east of the site.

An old railway embankment (now a footpath) extends along the south eastern boundary of the site, separating it from the housing development and River Dee beyond. Immediately adjacent to the development site, the footpath embankment ranges in height from 0.9m to 1.1m.

It is considered that residential development of the site would provide an opportunity to create a new, long term residential development. Inclusion of the site as a residential development location within the wider urban area would identify Monaltrie Park (the proposed development site) as a positive addition to the town, with residential development on the site being self contained. The proposed preliminary concept masterplan at Appendix 1 clearly shows the potential for the site to be a sensitive and sustainable addition to Ballater.

Design Considerations

The concept masterplan prepared in support of the representation has been designed around the known site constraints and opportunities. Reference should be made to this plan to assist in understanding the approach taken in illustrating how a new form of development could be seen to fit into this setting.

The proposed layout of the site has been amended in line with recent discussions held in February 2018 with both CNPA and SEPA, taking account of potential flood constraints. Given the potential flood risk, the north east corner of the site has now been designed for an area of high quality open space. Given this change to the design, we have shown how the north west corner of the allocation (Site AB017) and an extension to the southern portion of the site can be sensitively accommodated as part of the overall residential proposals. In addition to this, the concept masterplan shows how additional adjacent land to the north east can become an annual car park for the Ballater Games event, allowing easy access to Monaltrie Park along the old railway line. Invercauld Estate is keen to ensure the long term continuity of the Ballater Games given its long association with this community event.

In taking forward the design concept, consideration has been given to adjacent land uses and importantly, how the land holding relates to the existing settlement of Ballater. A Conservation Area is located to the south of the site and in presenting a design solution across the site reference has been taken from this surrounding area. The site is located to the north east of Ballater with the Category B Listed Monaltrie House located further to the north of the site. The proposed residential development has been planned to draw upon the advice given in best practice guidance and planning policy. The concept masterplan has been tailored to address site specific issues, including minimising the need for significant ground modelling by working with the existing land form to help mould in the new infrastructure/roads and in turn, the dwellings, into the landscape. The proposals are set back off Monaltrie Avenue along the access road to Monaltrie House, creating a buffer between the Category B listed building.

The concept plan illustrates a development that visually connects with the existing housing areas to the north and south but with a strong linear park focus to the development form visually and physically linking the existing Monaltrie Park with a potential new area of open space 'The Meadows'. There is also scope for a new sports pitch to be created which could then be seen to complement the existing facilities at Monaltrie Park. The concept plan incorporates the idea of live work units with small craft or office spaces accessible to the rear of plots either individually or within groups. A new community 'Hub' could also provide facilities for use during the Highland Games and indeed, other community events.

The preferred and most likely primary access to the new development form will be from Provost Craig Road. There is an existing track in this location used for the Ballater Game and would this would be significantly upgraded to accommodate the development proposals. This upgrade would improve accessibility to the Games Park during the Ballater Games. Potential secondary accesses would link to the site from Monaltrie Avenue. The provision of new footpaths as part of the development proposals will ensure the site will integrate with existing walking and cycling infrastructure in the area, enabling future residents to access local amenities, including schools and public transport facilities on foot or by cycle, encouraging travel by sustainable modes of transport.

Consideration has also been given to the potential impact on the Core Path Network with the proposals, as presented, illustrating scope for an extended network of paths to be introduced around the development linking the new housing area with not only the Core Paths but also, the established community. It is also acknowledged that the existing tree belts edging the site, particularly the north west corner, are in need of pro-active management and therefore, as part of the development strategy, the tree resource will be included in a site wide Management Plan designed to secure the long term value of these features.

The Core Path to the northern edge of the site could include new tree planting designed to enhance the setting to this with the route broadening out as it passes by the site. Connections to/and from the site have also been highlighted for pedestrians/cyclists and three access options have been shown.

Overall the site is not considered to be ecologically sensitive, a number of surveys will be undertaken to identify any natural heritage assets and to build appropriate mitigation into future design. While it is acknowledged that the north west portion of the site has some limited ecological habitats, mitigation measures can be satisfactorily accommodated.

Effectiveness

PAN 2/2010 Planning Advice Note: Affordable Housing and Housing Land Audits (August 2010) identifies a criteria based approach for the release of further housing land through the consideration of planning applications. The effectiveness criteria are also useful to consider in the release of further sites for housing through the local development plan review.

The effectiveness criteria set out in paragraph 55 of the PAN are discussed in the Table below.

| PAN 2/2010 Effectiveness Criteria | |
|-----------------------------------|---|
| Ownership | The site is within the control of Invercauld Estate who are willing to release it for residential development. |
| Physical | There are no known insurmountable physical constraints relating to slope, access, flooding or ground conditions affecting the site that would make it unsuitable for residential development. |
| Contamination | Work undertaken to date on ground conditions does not identify any contamination issues. There is a history of coal mining in the wider area that will require further assessment but this is not expected to be a barrier to development. |
| Deficit Funding | No public funding is required to make residential development on the site economically viable. |
| Marketability | Savills is currently in discussions with a number of housebuilders and considers that the first phase site can be substantially, if not wholly, developed by 2022. |
| Infrastructure | There are no known abnormal infrastructure issues that require to be addressed to allow development of the site. |
| Land Use | The site is located immediately adjacent to an established residential area, on the edge of the existing settlement, residential use of the site is therefore consistent with the wider pattern of land use in the area. The site is also within easy reach of other ancillary land uses such as schools, public transport etc. |

4. Response to Main Issues Report

The MIR contains a number of questions upon which Invercauld Estate wish to make comment. This section of the report outlines Invercauld's response on these matters. The Monaltrie Park site is a prime example of a site that Invercauld Estate believes merits formal allocation as a residential development site in the forthcoming Cairngorm National Park LDP.

MIR Question Responses

Main Issue 1

Do you agree that the overall development strategy of the current Local Development Plan remains appropriate, and that we should use this as the basis for the next Local Development Plan?

Invercauld Estate believes that the overall development strategy of the current Local Development Plan in respect of Ballater is consistent with Scottish Planning Policy guidance which requires spatial strategies in development plans to promote a sustainable pattern of development. Most new development would continue to be focused on the main 'strategic' settlements in the National Park. As such, the Monaltrie Park site located within the 'strategic' settlement of Ballater should be identified as a residential allocation for up to 250 homes.

Main Issue 2

Do you agree that the new Local Development Plan should include a new policy requiring development proposals to show how they meet the six qualities of successful places?
Do you agree that we should include a clearer policy in the new Local Development Plan to set out when tools such as masterplans and development briefs will be used?

There are various aspects of this section of the MIR upon which Invercauld Estate agree with the Council's objectives. In particular the aspiration to that new development aspires to the highest standards of design by meeting the six qualities of successful places. Any forthcoming proposal at Monaltrie Park would incorporate all six qualities.

Notwithstanding Invercauld Estate's broad agreement with these objectives, Invercauld Estate advocates that the policy could be written so that it only applies to larger developments. This will mean that small-scale developments would not be required to show how they meet the six qualities, saving both the applicant and planning authority time and resources.

Main Issue 4

Do you agree with our conclusions about the need for additional new housing sites in the new LDP?

Invercauld Estate agrees that there is a need for additional new housing sites within the LDP. In order to achieve delivery of these new sites, it would be prudent for the CNPA to identify readily developable sites, effective within the plan period, to ensure the housing land supply targets are met. Such an approach would seek to encourage the development of sites that can be substantially built out by 2022, are not reliant on the prior provision of infrastructure, that can coexist with surrounding land uses and can create or be contained within robust defensible boundaries and do not set a precedent for subsequent future expansion.

Monaltrie Park, Ballater

Response to Cairngorms National Park Main Issues Report



The site at Monaltrie Park can satisfy these criteria, as demonstrated by this report. On this basis, it is considered that the site merits a residential allocation for 250 homes.

Main Issue 5 The affordability of housing

Q: Do you agree that we should increase the affordable housing requirement to 35% in Ballater and Braemar, and to 45% in Aviemore and Blair Atholl?

While SPP sets an affordable housing level of 25%, any additional affordable provision must not impact the viability and delivery of wider residential developments. As such, each application should be judged on a case by case basis.

Main Issue 8

Do you agree that the new Local Development Plan should include a revised and more rigorously justified policy on planning obligations?

Do you agree that this should be supported by more specific guidance in the plan about what planning obligations will be required in different settlements/locations?

Invercauld Estate supports the CNPA's alternative approach to continue applying the existing Local Development Plan's approach to planning obligations. Invercauld Estate considers this allows for the CNPA to take a proportionate response to developments on an individual basis.

The key element in ensuring that a developer contributions policy is not required is creating certainty that the response to developers from the Council is always proportionate. This will require to be carefully monitored by the Council's officers to ensure a fair approach is taken in line with Circular 3/2012 'Planning Obligations and Good Neighbour Agreements'.

Main Issue 9

Do you agree that the new Local Development Plan should include a stronger policy requirement for SUDS to be considered in all new development proposals?

Invercauld Estate agree with the reasonable alternative strategy, and seek the CNPA to continue to apply the existing Local Development Plan's approach to SUDS. Invercauld Estate advocates that the policy could be written so that it only applies to larger developments. This will mean that small-scale developments will not need to consider the inclusion of SUDS, saving both the applicant and planning authority time and resources.

Settlement comments: Ballater

Do you agree with the preferred site options?

Invercauld Estate support the preferred status of Site H1, but consider that alternative site AB017 should be included also as part of the wider site, providing a total allocation of 250 homes. The proposal would enhance the community of Ballater, by providing a high quality new development in an appropriate location.

5. Summary

The site at Monaltrie Park is readily developable for residential use. The site is shown to be effective in accordance with the criteria set out in paragraph 55 of PAN 2/2010. This report contains information pertinent to the consideration of the suitability of the site at this stage in the development process. No insurmountable barriers to the development of the site have been identified through survey work to date. As noted, given that some potential flood risk may exist in the north east corner of the site, the layout of the proposed development has been amended to include site AB017 and allow further areas of high quality open space in the north east corner of the site. Further studies required as the site progresses are not anticipated to change this view of the site as effective.

The proposed extension to Ballater can be sensitively accommodated, with the first phase able to be delivered within the lifetime of the emerging Local Development Plan. Where impacts have been identified for the development, appropriate mitigation measures and solutions have been identified and would be undertaken as part of the future masterplanning and planning of the site. Overall, the proposed residential units will help address the need for additional housing in Ballater over the coming years.

To ensure the aims of sustainable development are met, it will be prudent of the CNPA to identify readily developable sites, effective within the plan period, to ensure the housing land supply targets are met. The site at Monaltrie Park is one such site that can fulfil this criteria.

The Monaltrie Park site is well placed in terms of its scale and effectiveness to be allocated as a housing site under in the new LDP. We therefore provide support in the form of this representation seeking an allocation for Monaltrie Park for up to 250 houses with a policy to guide its future development.

RESIDENTIAL MIX COULD INCLUDE:

- DETACHED
- SEMI DETACHED
- COTTAGE APARTMENTS
- TERRACES
- APARTMENT VILLAS

- LIVE WORK
- START-UP SPACES
- RETIREMENT
- GUEST HOUSES

CRAIGENDARROCH HILL



LEGEND :

- EXISTING TREE COVER
- PROPOSED BUILDING FORMS (INDICATIVE) - RESIDENTIAL / MIXED USES
- PRIMARY INFRASTRUCTURE
- SECONDARY INFRASTRUCTURE + LANES
- EXISTING / PROPOSED PATH NETWORK
- PATH CONNECTIONS TO / FROM THE SITE
- AMENITY OPEN SPACE
- PROPOSED STRUCTURE PLANTING
- SWDS FEATURES (INTEGRATED)
- SCULPTURE / GATEWAY FEATURES
- HARD LANDSCAPE FOCUS TO SMALL SQUARES + REAR COURTS / LANES
- DIRECTIONAL SIGNS
- TOURIST / VISITOR INFORMATION POINT

'THE HUB' : POTENTIAL
COMMUNITY FOCUS + COULD

INCLUDE : CRECHE
CAFE
HEALTH CARE
MULTI-USE SPACE
INTERNET ACCESS
HIGHLAND GAMES SPACE

