#BIG PARK #BIG QUESTIONS

Cairngorms NATIONAL PARK
Pàirc Nàiseanta a' Mhonaidh Ruaidh

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

Title Mrs

Name Debbie Mackay

Organisation (if applicable) Savills (UK) Ltd on behalf of Crown Estate Scotland (Interim Ma

Address [redacted]

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? Yes

Please explain your answer

The Vision and Outcomes are well established and agreed and give consistency to the various National Park plans.

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? Yes

Q: Do you think any other changes are needed? Yes

Please explain your answers

Agree with conclusion except for some new issues which are missing. See below;

Scottish Planning Policy states in paragraph 79 relating to Rural Development, that Plans should set out a spatial strategy which:
"• reflects the development pressures, environmental assets, and economic needs of the area, reflecting the overarching aim of supporting diversification and growth of the rural economy;
• promotes economic activity and diversification, including, where appropriate, sustainable development linked to tourism and leisure, forestry, farm and croft diversification and aquaculture, nature conservation, and renewable energy developments, while ensuring that the distinctive character of the area, the service function of small towns and natural and cultural heritage are protected and enhanced;
• makes provision for housing in rural areas in accordance with the spatial strategy, taking account of the different development needs of local communities;
• where appropriate, sets out policies and proposals for leisure accommodation, such as holiday units, caravans, and huts;
• addresses the resource implications of the proposed pattern of development, including facilitating access to local community services and support for public transport; and
• considers the services provided by the natural environment, safeguarding land which is highly suitable for particular uses such as food production or flood management."

There are a number of missing issues in relation to this SPP policy which should be included:

1) There is minimal/no reference to renewable energy within the MIR. Since the adoption of the last LDP, ground mounted solar meadows are becoming more popular and as a form of renewable energy which will soon achieve "grid parity" (when an alternative energy source can generate power at a levelised cost of electricity (LCOE) that is less than or equal to the price of purchasing power

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? ✔

Please explain your answer

In broad terms the Strategy of Strategic Settlements, Intermediate settlements and Rural Settlements is understood and the Park's policies which support proportionate development in each type of settlement is largely supported. However, there is a danger of repeating past patterns of by reinforcing growth where there is already growth, to the detriment of areas where new patterns of growth should be encouraged. The Park population projections are concerning both in overall growth and in the high rate of older people. Economic activity that attracts and retains younger, economically active people will be imperative to keeping a demographically balanced area.
The LDP should perhaps be more visionary in its planning for the future of the Population and explore ways to get less centralised growth.
SPP paragraph 79 states that Development Plans should reflect

"the development pressures, environmental assets, and economic needs of the area, reflecting the overarching aim of supporting diversification and growth of the rural economy";

Therefore the Park LDP should be focusing on ways to make the CNP support diversification and growth of the rural economy. The succession housing concept mentioned above is one example of an innovative a policy which could respond to the particular pressures of the rural economy.

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? ✔

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?

Please explain your answers

The six qualities are nationally accepted principles and should be part of the Park LDP. However, it may be unduly onerous to expect small scale applications, especially householder applications to respond to these criteria. Therefore it may be wise to specify sizes and types of development that do not require to demonstrate that they meet these criteria. Perhaps "Local" and Householder applications should be excluded.

Clarity on this point is welcomed.

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? Yes

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? Yes

Please explain your answers

While this is a sensible approach, there must also be scope for policies to be flexible to new economic development opportunities as they arise elsewhere in the Park in order to meet the economic and social aims of the Park.

It is also important to realise that other communities on the peripheries of the Park and not directly impacted by the A9 dualling, still require proactive planning and regeneration if they are to contribute to the overall wellbeing of the area,

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? ✔

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

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

Please explain your answers

While the figures the Park has arrived at are substantiated in the MIR they are based on a "low growth" scenario and could therefore be considered a "self-fulfilling prophecy". We consider that a more flexible and ambitious approach to housing provision in the Park could assist in meeting housing need and demand more effectively. In particular, we consider that the Park should consider the use of a policy similar to Moray Council's "Long" housing policy which involves allocating land for long term or alternative growth should the Housing Land Supply fall behind 5 year requirements. This award winning policy is a recognised good practice approach to managing the release of land in the longer term in a managed way that provides certainty for communities and developers alike.

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? ☐

Please explain your answer

N/A

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? ☐

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

Please explain your answers

N/A

Regarding policies setting out a required mix of house types and sizes, while the reasons for undertaking this policy are recognised and substantiated in the MIR, they still carry the risk of deterring the private housebuilder in marginal market areas in the Park (which describes much of the Park) by requiring them to adapt their market tested products.

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? ☑

Please explain your answer

It is more important to maintain a flexible approach to providing economic development sites across the Park in response to opportunity. Given the economic challenges of such a rural area with a low density of population, economic opportunities should be supported where they arise.

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? ☐

Please explain your answer

Measures to protect and enhance the habitat of protected species such as Capercaillie are welcomed.

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? ☑

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? ☑

Please explain your answers

Clarity on Developer Obligations is valued as it provides greater certainty to the development process. However, care should be taken not to raise expectations of the amounts that can be achieved from development in the marginal markets of the Park. Achieving any level of development which supports economic and social activity is to be valued and supported, not crippled with overly aspirational developer obligations.

It is agreed that this should be supported by more specific guidance in the plan about what planning obligations will be required in different settlements/locations.

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? ☑

Please explain your answer

While it is recognised that management of the water environment is essential, the requirement for SUDs should be proportionate to the size of development and should not unreasonably burden smaller scale developments.

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? ☐

Please explain your answer

The East Cairngorm Moorland Partnership provides for how the 5 involved estates will manage hill tracks and is an example of a positive approach to this issue. There is potential for environmentally sensitive positive schemes where there are real benefits to be gained either for the environment, economy and community of the Park. A more fine-grained approach involving for example, a critera-based policy could work more effectively than a "presumption against".

Settlements

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

An Camas Mòr ☐	Cromdale ☐	Killiecrankie ☐
Angus Glens ☐	Dalwhinnie ☐	Kincraig ☐
Aviemore ☐	Dinnet ☐	Kingussie ☐
Ballater ☐	Dulnain Bridge ☐	Laggan ☐
Blair Atholl ☐	Glenlivet ✔	Nethy Bridge ☐
Boat of Garten ☐	Glenmore ☐	Newtonmore ☐
Braemar ☐	Glenshee ☐	Strathdon ☐
Bruar & Pitagowan ☐	Grantown-on-Spey ☐	Tomintoul ✔
Calvine ☐	Insh ☐	
Carr-Bridge ☐	Inverdruie & Coylumbridge ☐	

*(**Y/N** – delete as appropriate)*

Q: Have we identified the right issues for this settlement (where relevant)? Yes

Q: Do you agree with the proposed settlement objectives? Yes

Q: Do you agree with the preferred site options (where relevant)? Yes

Q: Do you agree with the protected open spaces (where relevant)? Yes

Q: Do you agree with the proposed settlement boundary (where relevant)? No

Please explain your answers

Tomintoul
CES(IM) owns most of the land around Tomintoul as part of the Glenlivet Estate and is interested in supporting the sustainable development of the village. CES(IM) instigated and continues to support the Development Trust and its regeneration strategy. CES(IM) are Board members on the Trust. They also built 3 craft units which are rented to local businesses. They also support the Trust with provision of Office Space and are a major funder to the Landscape Partnership. The have developed the Glenlivet Mountain Bike hub and trails and an extensive network of paths across the estate. CES(IM) participates in the East Cairngorm Moorland Partnership and is involved in peatland restopration, the landscape partnership riparian scheme and tree planting.

CES(IM) agrees with the issues highlighted "Delivery of development to support the community and local economy".

As the market for private housing in this area has been slow due to its remote nature, the allocated sites (H1 and H2) have not yet come forward. However, we strongly support the retention of these sites as housing allocations as they provide scope for the growth of the village and the planned provision of housing in response to need and/or demand. We consider that there is scope to explore an affordable housing project for Tomintoul and working with the Development Trust, on a community basis with engagement from key stakeholders such as the Park Authority. There may be scope for some market housing to cross-subsidize the affordable housing to also be explored. CES(IM) would wish to discuss this opportunity further with the Park Authority and community in due course. In the meantime, CES(IM) would want to see flexibility built into the objectives and the plan so that there is scope for alternative sites to be accepted for development should they arise as the result of a collaborative community planning process. We consider that the list of site qualities in the Site Assessment sheets are

CES(IM) agrees with the current allocations but would also like to see flexibility built into the objectives and the plan so that there is scope for alternative sites to be accepted for development should they arise as the result of a collaborative community planning process as stated above.

We are also of the view that there are several additional sites with potential for housing development and we have attached a document with two plans showing their locations. These sites include one to the north of the playing field at the south end of the village and two infill sites off Cults Drive. They are readily accessed and are similar in nature to the other allocated sites in terms of the criteria in the Site Assessments.

The MIR proposes removing T1 (Tourism development). We assume that this is because the wigwam site has been developed to the east and T1 is no longer seen as necessary. However, we consider that there is capacity to increase the leisure offering complementary to the wigwams and therefore would want to see the retention of T1. The Park Authority should also be aware that the land to the west end of T1 forms part of a Wildlife Mitigation Area (see attached plan) for the Wigwam site and there is an Adventure Playground to the the east of the Wildlife Mitigation area. It therefore makes sense to retain the T1 allocation to allow further tourism/recreational activities to come forward here in support of the overall visitor offer and the local community.

CES(IM) agrees with the current allocations but would also like to see flexibility built into the objectives and the plan so that there is scope for alternative sites to be accepted for development should they arise as the result of a collaborative community planning process as stated above.

Glenlivet

CES(IM) owns most of the land around Glenlivet as part of the Glenlivet Estate and is interested in supporting the sustainable development of the village.

CES(IM) agrees with the issues highlighted.

We consider that there is scope to explore an affordable housing project for Glenlivet and working with the Development Trust, on a community basis with engagement from key stakeholders such as the Park Authority. There may be scope for some market housing to cross-subsidize the affordable housing to also be explored. CES(IM) would wish to discuss this opportunity further with the Park Authority and community in due course. In the meantime, CES(IM) would want to see flexibility built into the objectives and the plan so

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

Cairngorms National Park Local Development Plan 2020
Main Issues Report

Response by Savills on behalf of Crown Estate Scotland (Interim Management) in relation to Glenlivet Estate

Plans of Potential additional Development Sites in Tomintoul

1) Site to North of Playing Field Tomintoul

2) Sites off Cults Lane