#12

COMPLETE

Collector: Web Link 1 (Web Link)

 Started:
 Friday, March 02, 2018 11:24:53 AM

 Last Modified:
 Friday, March 02, 2018 11:48:24 AM

 Time Spent:
 00:23:31

 IP Address:
 92.238.115.200

Page 2: Local Development in the Cairngorms National Park

Q1 We propose to use the vision and long term outcomes set out in the Cairngorms National Park Partnership Plan as the 'vision statement' for the Local Development Plan. Do you agree with this approach?

No

Q2 Please explain your answer

This approach should be appropriate, as the Partnership Plan sets the context for the LDP. However, the vision in the Partnership Plan is very elemental and generic and its outcomes in terms of changes 'on the ground' are not clear. We would prefer to see the vision refer to thriving communities and businesses that are able to meet their ambitions in delivering the four aims of the National Park under statute.

Q3 Do you agree with our conclusions about the changes that need to be made to policies in the existing Local Development Plan?

Respondent skipped this question

Q4 Do you think any other changes are needed?

Respondent skipped this question

Q5 Please explain your answer

Views on matters including housing land supply, economic development sites, natural flood management and developer contributions policies are set out elsewhere in our comments.

The LDP needs to make flexible provision for new hutting developments in accordance with the Scottish Government's Scottish Planning Policy document. Aberdeenshire in particular has a tradition of huts and bothies. The current LDP notes Braemar's tradition of timber back houses and there are numerous older rural hut sites between Braemar and Ballater. There is potential to accommodate a significant number of new huts in the Park without negative impacts on the landscape.

With respect to Policy 8 (1) and Policy 2(2) of the current LDP, we strongly believe that support for new sport, recreational and tourism facilities should not be restricted to where there are 'no adverse environmental impacts' but rather to where 'any environmental impacts are outweighed by the benefits following an appropriate cost-benefit analysis'. We would also suggest greater weight is put on cost-benefit analyses more generally when developments is being considered to ensure that the four aims of the Park are considered collectively in an objective manner.

Page 3: Main Policy Issues and Settlements

Q6 Which section would you like to give your views on **Main Policy** first? Issues Page 4: Main policy issues for the new Local Development Plan Q7 Please select a main policy issue: Land management in upland areas Q8 Or, Respondent skipped this question Page 5: Settlement-based Issues Q9 Please choose a settlement **Braemar** Q10 Or. Respondent skipped this question Page 6: Main Policy Issue 1: Over-arching development strategy **Q11** Do you agree that the overall development strategy No of the current Local Development Plan remains appropriate, and that we should use this as the basis for

Q12 Please explain your answer here:

the next Local Development Plan?

Braemar should be added to the list of main settlements, reflecting the ambitions of this community to accommodate village stability and growth, and to fulfil its potential as a visitor destination. Although smaller in population and size than the other main settlements identified in the MIR, Braemar is located at a geographically important point in the middle of the park and has a large hinterland making it strategically important for a large area of the National Park. In terms of its visitor function, it performs an important role for the Park and ongoing investments and projects will only enhance that role.

There is a need for flexibility in assessing the merits of appropriate small scale developments outside recognised settlements, where there will not be significant impacts on the quality of the landscape. Housing in 'countryside' areas can have a role to play in helping to meet housing delivery targets, providing affordable homes for local people and supporting local services. Buildings in the countryside have historically been a feature of the landscape in parts of the Park, in particular Aberdeenshire, which has a long tradition of bothies and, in the historic context, ferm touns.

Q13 What would you like to do next?

Answer questions on another main policy issue

Page 7: Main Policy Issue 2: Designing great places

Q14 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?

Respondent skipped this question

Q15 Do you agree that we should include a clearer policy in the new Local Development Plan to set out when tools such as master plans and development briefs will be used?

Respondent skipped this question

Q16 Please explain your answers here:

In some cases, Design Statements will be required to support development proposals. These will illustrate how developments respond to good place-making principles, either through direct or indirect reference to the six qualities set out in SPP. Invercauld Estate is committed to good quality design, layout and place-making and agrees that clarity of design intention is helpful. We also agree that a balance needs to be struck to ensure that the extent of supporting material is commensurate with the scale of the development proposal. The quality of supporting information will be more important than the quantity.

Providing greater clarity on master plan and design brief requirements will be helpful for communities, landowners and developers.

Q17 What would you like to do next?

Answer questions on another main policy issue

Page 8: Main Policy Issue 3: Impacts and opportunities from the A9 and Highland Main Line upgrades

Q18 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

Q19 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

Q20 Please explain your answers here:

There will be opportunities to maximise benefits arising from new and improved infrastructure but some of the potential risks are highlighted in the MIR. Alongside the obvious focus on the A9 and Highland Main Line to the west of the park, the importance of the eastern road corridor at the A93 should not be forgotten. Intensifying development and population along the western corridor has implications for the eastern corridor. The two should be considered jointly in the context of the Park as a whole and potential impacts on the eastern corridor addressed in full. The character, accessibility and spread of development along these two corridors will continue to diverge, with the A93 corridor offering less convenient access to less populated and developed parts of the Park. Opportunities will also derive within the A93 corridor as a result of promotion of the 'Snow Roads'.

Q21 What would you like to do next?

Answer questions on another main policy issue

Q22 A) How much new housing do we need and where should it be built?Do you agree with our proposed Housing Supply Targets for the next Local Development Plan?

No

Q23 Do you agree that the proposed Housing Land Requirements are sufficiently generous?

No

Q24 Do you agree with our overall conclusions about the need for additional new housing sites in the new Local Development Plan?

No

Q25 Please explain your answers here:

The HNDA process applied across the plan is a relatively blunt instrument. There are wide concerns amongst rural housing practitioners and researchers relating to the quality of data emerging from broad market area reports. Often these fail to reflect particular local circumstances.

At Braemar, a local HNDA study was published by the Highlands Small Communities Housing Trust in 2015. This study provides a more reliable estimate of local demand and need at the village. It identified a significant extant demand of 59 homes, rising to 102 homes by 2020. A specific requirement of 36 affordable homes was identified over this period. Since then, housing pressure appears to have increased and active projects in the village, such as the refurbishment of the Fife Arms Hotel and erection of a visitor centre at the Duke of Fife and Princess Royal Memorial Park, are expected to add to need and demand.

Anecdotal evidence form local business owners highlights significant issues in retaining and recruiting staff due to lack of housing opportunities and unaffordable housing cost. This issue affects key workers in local services such as the primary school, as well as in tourism related businesses.

The housing allocations set out in the MIR do not reflect the recognised need and demand in Braemar and do not provide an adequate supply of new opportunities for housing or other facilities.

In addition, the Braemar community has expressed a strong desire to see housing availability and affordability greatly improved, in support of a sustainable future for the village as a place to live, work and visit. The LDP should reflect the ambitions of the residents of the village and make greater provision for housing opportunities of all types.

Suggestions for land allocations to meet this unsatisfied need and demand are made later in these representations.

Q26 B) Housing growth in AviemoreDo 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?

Respondent skipped this question

Q27 Please explain your answer here:

Respondent skipped this question

Q28 What would you like to do next?

Answer questions on another main policy issue

Page 10: Main Policy Issue 5: The affordability of housing

Q29 Do you agree that we should increase the affordable **Yes** housing requirement to 35% in Ballater and Braemar, and to 45% in Aviemore and Blair Atholl?

Q30 Do you agree that we should include policies to require a greater mix of house types and sizes, including more smaller homes?

Respondent skipped this question

Q31 Please explain your answers here:

These targets are assumed to be minimum, although it may be difficult to achieve a higher percentage of delivery for various reasons. They will help to address existing and emerging need and demand. Invercauld Estate is happy to adopt these targets in its proposals for housing sites but notes that delivery will depend to a large extent on the availability of funding via the Rural Housing Fund, Aberdeenshire Council, RSL and Scottish Government resources. The policy should build in an allowance for flexibility on the above rates for this reason and also that if a particular development site proves unviable at these affordable housing rates, the potential for the site to deliver housing stock is not lost.

At Braemar, as noted above, it will be important to provide sufficient opportunities for new housing to meet expected need.

A blanket housing mix policy may be inappropriate. At Braemar, there is an ambition in the community to provide housing primarily for local needs. Affordable provision is expected to closely reflect such local need. There may be scope to encourage market housing providers to illustrate how their housing mix responds to local needs, rather than primarily to the second homes market. The use of collaborative community engagement exercises through master planning, community action plans and charrettes (or Local Place Plans emerging via the Planning review), might encourage a collaborative approach.

Q32 What would you like to do next?

Answer questions on another main policy issue

Page 11: Main Policy Issue 6: Economic Development

Q33 Do you agree that the new Local Development Plan should identify a limited number of new economic development sites?

Respondent skipped this question

Q34 Please explain your answer here:

Appropriate economic development sites should be allocated in the LDFP to provide clarity for developers and communities. However, there is also a need to provide flexible policy which can accommodate other appropriate sites out with settlement boundaries. Settlements in the park require readily available options for expansion of existing business and new start ups. This need is evident at Braemar, where there are limited opportunities within the body of the village to accommodate business or industrial uses.

In some cases, it will be necessary to permit non-agricultural or forestry related employment uses within the rural area, due to a lack of other opportunity sites.

Q35 What would you like to do next?

Answer questions on another main policy issue

Page 12: Main Policy Issue 7: Impacts on Natura designations

Q36 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?

Respondent skipped this question

Q37 Please explain your answer here:

Invercauld Estate does not believe that strategic development planning in the Park should be driven by one species, particularly where that species is not found in development sites.

Q38 What would you like to do next?

Answer questions on another main policy issue

Page 13: Main Policy Issue 8: Planning obligations

Q39 Do you agree that the new Local Development Plan should include a revised and more rigorously justified policy on planning obligations?

Yes

Q40 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?

Yes

Q41 Please explain your answers here:

Yes, this would be helpful for prospective developers and communities. Clarity is helpful at an early point, enabling prospective developers to understand requirements and devise funding packages for investments. However, this will need to be balanced with flexibility for individual site circumstances.

Q42 What would	vou like	to do	next?
----------------	----------	-------	-------

Answer questions on another main policy issue

Page 14: Main Policy Issue 9: Flood risk and climate change resilience

Q43 Do you agree that the new Local Development Plan should include a stronger policy requirement for Sustainable Drainage Schemes (SUDS) to be considered in all new development proposals?

Yes

Q44 Please explain your answer here:

We would expect new development proposals to include SUDS in any case. However, detailed SUDS proposals should be provided at an appropriate ate point in the design process, ensuring that the cost of preliminary proposals or Planning in Principle applications are not over-burdened by up front costs.

Q45 What would you like to do next?

Answer questions on another main policy issue

Page 15: Main Policy Issue 10: Land management in upland areas

Q46 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?

No

Q47 Please explain your answer here:

Invercauld Estate does not agree with this proposal. Any proposal for a new track should be considered on its merits through a cost-benefit analysis. Otherwise, a relative minor landscape impact, for example, could be deemed to outweigh a sound reason for construction of a new track that is entirely consistent with delivery of the four aims under the National Park (Scotland) Act 2000. Also, the existing LDP identifies that the existing policy is working.

Q48 What would you like to do next?	Answer questions on settlement-based issues
Page 16: An Camas Mòr	
Q49 Do you agree with the proposed objectives?	Respondent skipped this question
Q50 Do you agree with the preferred site options?	Respondent skipped this question
Q51 Explain your answers here:	Respondent skipped this question

Page 17: Aviemore Q53 Have we identified the right issues for Aviemore? Respondent skipped this question Q54 Do you agree with the proposed settlement objectives? Respondent skipped this question Q55 Do you agree with the preferred site options? Respondent skipped this question Q56 Do you agree with the protected open spaces? Respondent skipped this question Q57 Do you agree with the proposed settlement boundary? Respondent skipped this question Q58 Explain your answers here: Respondent skipped this question Q59 What would you like to do next? Respondent skipped this question Q59 What would you like to do next? Respondent skipped this question Q60 Have we identified the right issues for Ballater? Respondent skipped this question Q61 Do you agree with the proposed settlement objectives? Q62 Do you agree with the preferred site options? Respondent skipped this question Q63 Do you agree with the protected open spaces? Respondent skipped this question Q64 Do you agree with the proposed settlement Respondent skipped this question Q65 Do you agree with the proposed settlement Respondent skipped this question Q65 Do you agree with the proposed settlement Respondent skipped this question Q65 Explain your enswers here: Respondent skipped this question	Q52 What would you like to do next?	Respondent skipped this question
Q55 Do you agree with the proposed settlement objectives? Q55 Do you agree with the preferred site options? Respondent skipped this question Q56 Do you agree with the protected open spaces? Respondent skipped this question Q57 Do you agree with the proposed settlement boundary? Respondent skipped this question Q58 Explain your answers here: Respondent skipped this question Q59 What would you like to do next? Respondent skipped this question Page 18: Ballater Q60 Have we identified the right issues for Ballater? Respondent skipped this question Q61 Do you agree with the proposed settlement objectives? Q62 Do you agree with the preferred site options? Respondent skipped this question Q63 Do you agree with the protected open spaces? Respondent skipped this question Q64 Do you agree with the proposed settlement boundary? Respondent skipped this question Q65 Explain your answers here: Respondent skipped this question	Page 17: Aviemore	
Operatives? Q55 Do you agree with the preferred site options? Respondent skipped this question Q56 Do you agree with the protected open spaces? Respondent skipped this question Q57 Do you agree with the proposed settlement boundary? Q58 Explain your answers here: Respondent skipped this question Q59 What would you like to do next? Respondent skipped this question Q60 Have we identified the right issues for Ballater? Respondent skipped this question Q61 Do you agree with the proposed settlement objectives? Q62 Do you agree with the preferred site options? Respondent skipped this question Q63 Do you agree with the protected open spaces? Respondent skipped this question Q64 Do you agree with the proposed settlement Respondent skipped this question Q65 Do you agree with the proposed settlement Respondent skipped this question Q64 Do you agree with the proposed settlement Respondent skipped this question Q65 Explain your answers here: Respondent skipped this question	Q53 Have we identified the right issues for Aviemore?	Respondent skipped this question
Q56 Do you agree with the protected open spaces? Respondent skipped this question Q57 Do you agree with the proposed settlement boundary? Respondent skipped this question Respondent skipped this question Q58 Explain your answers here: Respondent skipped this question		Respondent skipped this question
Q57 Do you agree with the proposed settlement boundary? Q58 Explain your answers here: Respondent skipped this question Q59 What would you like to do next? Respondent skipped this question Page 18: Ballater Q60 Have we identified the right issues for Ballater? Respondent skipped this question Q61 Do you agree with the proposed settlement objectives? Q62 Do you agree with the preferred site options? Respondent skipped this question Q63 Do you agree with the protected open spaces? Respondent skipped this question Q64 Do you agree with the proposed settlement boundary? Q65 Explain your answers here: Respondent skipped this question	Q55 Do you agree with the preferred site options?	Respondent skipped this question
Doundary? Q58 Explain your answers here: Respondent skipped this question Respondent skipped this question Page 18: Ballater Q60 Have we identified the right issues for Ballater? Respondent skipped this question Q61 Do you agree with the proposed settlement objectives? Respondent skipped this question Respondent skipped this question Q62 Do you agree with the preferred site options? Respondent skipped this question Respondent skipped this question Q63 Do you agree with the protected open spaces? Respondent skipped this question Respondent skipped this question Q64 Do you agree with the proposed settlement boundary? Respondent skipped this question	Q56 Do you agree with the protected open spaces?	Respondent skipped this question
Q59 What would you like to do next? Respondent skipped this question Q60 Have we identified the right issues for Ballater? Respondent skipped this question Q61 Do you agree with the proposed settlement objectives? Respondent skipped this question Respondent skipped this question Respondent skipped this question Q62 Do you agree with the preferred site options? Respondent skipped this question Q63 Do you agree with the protected open spaces? Respondent skipped this question Q64 Do you agree with the proposed settlement boundary? Respondent skipped this question	· · ·	Respondent skipped this question
Page 18: Ballater Q60 Have we identified the right issues for Ballater? Respondent skipped this question Q61 Do you agree with the proposed settlement objectives? Q62 Do you agree with the preferred site options? Respondent skipped this question Q63 Do you agree with the protected open spaces? Respondent skipped this question Q64 Do you agree with the proposed settlement boundary? Q65 Explain your answers here: Respondent skipped this question	Q58 Explain your answers here:	Respondent skipped this question
Q60 Have we identified the right issues for Ballater? Respondent skipped this question	Q59 What would you like to do next?	Respondent skipped this question
Q61 Do you agree with the proposed settlement objectives? Respondent skipped this question	Page 18: Ballater	
Q62 Do you agree with the preferred site options? Respondent skipped this question Q63 Do you agree with the protected open spaces? Respondent skipped this question Q64 Do you agree with the proposed settlement boundary? Respondent skipped this question Respondent skipped this question Respondent skipped this question	Q60 Have we identified the right issues for Ballater?	Respondent skipped this question
Q63 Do you agree with the protected open spaces? Respondent skipped this question		Respondent skipped this question
Q64 Do you agree with the proposed settlement boundary? Respondent skipped this question Respondent skipped this question Respondent skipped this question	Q62 Do you agree with the preferred site options?	Respondent skipped this question
Q65 Explain your answers here: Respondent skipped this question	Q63 Do you agree with the protected open spaces?	Respondent skipped this question
		Respondent skipped this question
Q66 What would you like to do next? Respondent skipped this question	Q65 Explain your answers here:	Respondent skipped this question
	Q66 What would you like to do next?	Respondent skipped this question

Q68 Do you agree with the proposed settlement objectives? Respondent skipped this question Q69 Do you agree with the preferred site options? Respondent skipped this question Q70 Do you agree with the protected open spaces? Respondent skipped this question Q71 Do you agree with the proposed settlement boundary? Respondent skipped this question Q72 Explain your answers here: Respondent skipped this question Q73 What would you like to do next? Respondent skipped this question Page 20: Kingussie Q74 Have we identified the right issues for Kingussie? Respondent skipped this question Q75 Do you agree with the proposed settlement objectives? Respondent skipped this question
Q70 Do you agree with the protected open spaces? Respondent skipped this question Respondent skipped this question Q72 Explain your answers here: Respondent skipped this question Q73 What would you like to do next? Respondent skipped this question Page 20: Kingussie Q74 Have we identified the right issues for Kingussie? Respondent skipped this question Respondent skipped this question
Q71 Do you agree with the proposed settlement boundary? Q72 Explain your answers here: Respondent skipped this question Q73 What would you like to do next? Respondent skipped this question Page 20: Kingussie Q74 Have we identified the right issues for Kingussie? Respondent skipped this question Respondent skipped this question
Q72 Explain your answers here: Respondent skipped this question Q73 What would you like to do next? Respondent skipped this question Page 20: Kingussie Q74 Have we identified the right issues for Kingussie? Respondent skipped this question Q75 Do you agree with the proposed settlement Respondent skipped this question
Q73 What would you like to do next? Respondent skipped this question Page 20: Kingussie Q74 Have we identified the right issues for Kingussie? Respondent skipped this question Q75 Do you agree with the proposed settlement Respondent skipped this question
Page 20: Kingussie Q74 Have we identified the right issues for Kingussie? Respondent skipped this question Q75 Do you agree with the proposed settlement Respondent skipped this question
Q74 Have we identified the right issues for Kingussie? Respondent skipped this question Q75 Do you agree with the proposed settlement Respondent skipped this question
Q75 Do you agree with the proposed settlement Respondent skipped this question
Q76 Do you agree with the preferred site options? Respondent skipped this question
Q77 Do you agree with the protected open spaces? Respondent skipped this question
Q78 Do you agree with the proposed settlement boundary? Respondent skipped this question
Q79 Explain your answers here: Respondent skipped this question
Q80 What would you like to do next? Respondent skipped this question

Page 21: Newtonmore

Q81 Have we identified the right issues for Newtonmore?	Respondent skipped this question
Q82 Do you agree with the preferred site options?	Respondent skipped this question
Q83 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q84 Do you agree with the protected open spaces?	Respondent skipped this question
Q85 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q86 Explain your answers here:	Respondent skipped this question
Q87 What would you like to do next?	Respondent skipped this question
Page 22: Blair Atholl	
Q88 Have we identified the right issues for Blair Atholl?	Respondent skipped this question
Q89 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q90 Do you agree with the preferred site options?	Respondent skipped this question
Q91 Do you agree with the protected open spaces?	Respondent skipped this question
Q92 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q93 Explain your answers here:	Respondent skipped this question
Q94 What would you like to do next?	Respondent skipped this question
Page 23: Boat of Garten	
Q95 Have we identified the right issues for Boat of Garten?	Respondent skipped this question

Q96 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q97 Do you agree with the preferred site options?	Respondent skipped this question
Q98 Do you agree with the protected open spaces?	Respondent skipped this question
Q99 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q100 Explain your answers here:	Respondent skipped this question
Q101 What would you like to do next?	Respondent skipped this question
Page 24: Braemar	
Q102 Have we identified the right issues for Braemar?	No
Q103 Do you agree with the proposed settlement objectives?	No
Q104 Do you agree with the preferred site options?	No
Q105 Do you agree with the protected open spaces?	Respondent skipped this question
Q106 Do you agree with the proposed settlement boundaries?	No

Q107 Explain your answers here:

Issues/Objectives:

Broadly speaking, the issues noted are consistent with the recently reviewed Community Action Plan. However, the low-key approach set out in the MIR is disappointing and does not reflect the aspirations of the community to re-establish Braemar as both a vibrant village community for its residents and a world-class visitor destination.

The LDP needs to be more ambitious in its approach to match the vision embraced by the community and deliver a sustainable future for the village.

As well as affordable housing provision, stabilising and growing the population is seen locally as a key issue. Provision of services and opportunities for young people is also a key issue for local people. Finally, improved public transport is of great concern to the community.

In response to the MIR the Braemar Community and the two main local landowners at Braemar, Invercauld Estate and Mar Estate, have agreed a joint statement:

"In recent years, a number of Braemar's community groups and landowners have participated in a collaborative programme of discussions. The aim has been to arrive at agreement on a long term sustainable vision for the village.

The Braemar Community Action Plan 2017 sets out this vision. It brings together a wide range of actions and projects which the Braemar community thinks are achievable and would deliver benefits for the village. Five themes are identified:

Visitor experience
Active Braemar
Youth and Learning
Community Capability
Housing and Economic Development

Delivering some aspects of the Community Action Plan vision will require land or buildings for new developments. The village can already provide for some of these requirements. However, there is a significant need for new housing and business space to meet local needs. This must be delivered at a rate which allows the village to grow organically and enhances the character of Braemar as a place to live and work, not just a tourist destination.

The CNPA has published its Main Issues Report for consultation. We do not believe the report goes far enough to meet the aspirations of the village or to embrace the community's desire to have a planned long term solution to Braemar's development needs.

Braemar needs a good supply of opportunities for much needed affordable and market housing and also business and office space. This needs to be planned for in a long term, as opposed to a piecemeal, fashion. To enable people to live and work in the village year-round, we need to be more ambitious in looking at the sites available. It is important that sufficient options are available given that some sites may not be developed for currently unforeseeable reasons. This is evidenced by the low delivery rate of existing Local Development Plan allocations.

The CNPA should reflect the ambitions of the Braemar community in its emerging Local Development Plan. It should enable the delivery of the Braemar Community Action Plan vision by making adequate land available for the kind of developments the village needs. The plan must not constrict the aspirations of this active and dynamic village community.

Open Space:

There should be provision to review open space, public realm and play provision as part of the planned collaborative master planning exercise for land at the north east of Braemar (site AB022 in the MIR).

Settlement Boundary:

the Braemar community has expressed an ambitious desire to re-establish the village as a vibrant community with adequate housing and employment opportunities for local people and a world-class visitor destination for tourists. The settlement boundary shown will not facilitate delivery of this ambition.

Site Options:

the Braemar community has a much bolder, long term vision for the village and the MIR does not provide the sites and land allocations to deliver this.

We have set out comments on the Preferred and Non-preferred sites below. However, it is important that ongoing community

engagement and master planning work is allowed to run its full course before firm proposals are identified. Invercauld Estate is cooperating with Braemar Community Council, local groups and other landowners in bringing forward a community engagement-led master planning process for the two main areas of potential long-term village growth at Braemar. These areas are to the south east and north east of the village.

The Community Council has led a review of the Braemar Community Action Plan (CAP), publishing an updated document in 2017. The CAP process was collaborative and Invercauld Estate participated fully. Both the Estate and the Community Council recognise that local landowners have a key role in facilitating delivery of the CAP action programme.

The CAP vision can only be delivered if sufficient land is available for appropriate housing, employment, local services and tourism-related developments. Invercauld Estate has committed to a community engagement-led master planning process for Braemar's potential growth areas and is actively taking forward this process.

The master planning exercise will consider more fully the rate of development required to deliver the CAP vision, whilst protecting the character and amenity of the village for its residents and visitors. It will consider the distribution of land uses and how new developments can fit together to form cohesive, organic growth for the village. It will consider building design, connectivity, open space and landscape setting, gateways and arrival at the village. It will set out a long term framework for delivering affordable housing, employment and services to meet the needs of residents and visitors, showing how landowners, agents, community groups and businesses can work together to deliver a sustainable future for Braemar.

At the south east of the village, a wide ranging flood risk and alleviation study is at an advanced stage. It is due to report in late Spring 2018. This study will clarify how Natural Flood Management in the catchment of the River Clunie, which flows through Braemar and into the River Dee, can be used to ensure existing homes and businesses can be most effectively protected and how new development can be accommodated safely. This study will enable the master planning study to fully address options for land at the south east of the village. These options include expansion of the caravan park, other tourism-related developments, new housing and enhancement of the arrival experience at the southern gateway to the village. The land area includes preferred and non-preferred MIR sites T1, AB019, AB023, AB019 and AB024, as well as surrounding land and woodland. For a Natural Flood Management scheme in the catchment of the River Clunie to be commercially viable, Invercauld Estate would need to be confident that the works involved would enable development at the south of the Braemar.

At the north east of Braemar, the master planning study will address options for a mixed use development providing housing, employment, community, tourism, open space and car parking uses. There is also scope to enhance the arrival experience at the north eastern gateway to the village. The land area includes the non-preferred MIR sites AB021 and AB022.

CNPA will be invited to participate in the collaborative master planning exercise at Braemar. This will ensure that key requirements and ambitions for the Park are fully embedded in the process. It will enable CNPA to understand the master plan proposals as they evolve and to shape the Proposed LDP document to more directly reflect the views of the community. This process can act as an example of best practice, setting out a template for a Local Place Plan approach, as proposed in the Scottish Government's Planning Bill.

The master planning exercise will be completed in advance of CNPA's production of the Proposed LDP, which is understood to be scheduled for the end of 2018 and therefore affords an opportunity for an exemplar master planning process to be carried out within the Cairngorms National Park as part of the emerging LDP process.

Comments On Preferred Sites:

ED1 - Ambulance Station: As well as economic development uses, this site may be suitable for affordable housing.

ED2, The Mews - Support for this allocation.

T1, Caravan Park and part of AB019 Caravan Park Extension: Support in principle but detailed proposals will emerge from the master planning study and flexibility should be provided for this.

AB023: Support in principle but detailed proposals will emerge from the master planning study.

Comments On Non-preferred Sites:

Remainder of AB019: There may be further scope for development here. This will be clarified through the flood risk study and the master planning exercise.

AB021: The potential for development of car parking and arrival facilities will be addressed in detail through the master planning process.

AB022: This site offer significant potential for long term, master planned growth of Braemar. There are no other viable alternatives. It will be the main focus for the master planning study at the north east of Braemar.

AB024: There may be scope for tourism-related developments and village gateway enhancements here. This will be clarified through the flood risk study and the master planning exercise.

Additional Comments On Site AB001 at Bridge of Gairn:

Invercauld Estate submitted representations to the Call For Sites requesting allocation of land at Bridge of Gairn for housing development. We remain convinced that the land is ideally suited to this use and request that it should be allocated in the proposed LDP Evidence in support of the site remains as previously submitted at the Call For Sites stage.

The MIR does not provide sufficient comfort that other policy in the Plan will facilitate development of the site for housing through the planning application process. Although Bridge of Gairn is a smaller settlement, delivery of rural housing opportunities is important in the Park. This site is deliverable and should be allocated in the Plan, providing clarity for prospective developers and local residents.

We strongly challenge CNPA's assessment of the site in the supporting information to the MIR, on the following grounds:

The assessment suggests the site is poorly related to the existing settlement. In fact it is clearly an infill site, surrounded by existing development on three sides.

- 2. There are indeed limited facilities at Bridge of Gairn but as the assessment notes, these are available locally at Ballater. Restricting development to expansion of the main towns in the Park will result in a loss of rural population, through household size reduction and demographic change. It will also create an increasingly urban-focused development pattern of main population centres with a diminishing role for rural living. Finally, the ongoing loss of existing homes to second home ownership will continue to erode smaller settlements such as Bridge of Gairn. A small amount of organic growth should be permitted to sustain the settlement and encourage new services and facilities to locate there.
- 3. The assessment notes the site is not adjacent to a major road but notes it lies on the A93, the main road corridor through the eastern side of the Park. In the rural heart of the Park, not all sites will be located next to major routes. This is one of the defining features of the Deeside part of the Park. Again the urban-focused assessment does not take account of the rural nature of the settlement and its location, just 1.5km from one of the Park's identified strategic settlements.
- 4. The assessment notes the site is adjacent to bus stops but raises concerns over bus frequency in this rural area. It defies logic to prevent organic growth of an existing settlement on the basis of concerns over the sustainability of bus services. The logical conclusion is a downward spiral in service provision, as the population continues to fall. Supporting organic growth here will help to increase bus patronage, enhancing sustainable transport options for residents at Bridge of Gairn.

We note that the site receives a green mark for ecology and landscape - the best rank available.

The site has been proposed for 4 or 3 houses since there is a need for septic talks. However, there would be scope to provide a communal private drainage system which could enable more houses to be built. Invercauld Estate would be willing to consider this in support of an allocation for housing development.

CNPA has a duty to provide an adequate supply and choice of housing sites. Allocating this site for housing development would be appropriate in the local and wider context.

Q108 What would you like to do next?	I have finished with the consultation
Page 25: Carr-Bridge	
Q109 Have we identified the right issues for Carr-Bridge?	Respondent skipped this question
Q110 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q111 Do you agree with the preferred site options?	Respondent skipped this question
Q112 Do you agree with the protected open spaces?	Respondent skipped this question
Q113 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q114 Explain your answers here:	Respondent skipped this question
Q115 What would you like to do next?	Respondent skipped this question
Page 26: Cromdale	
Q116 Have we identified the right issues for Cromdale?	Respondent skipped this question
Q117 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q118 Do you agree with the preferred site options?	Respondent skipped this question
Q119 Do you agree with the protected open space?	Respondent skipped this question

Q120 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q121 Explain your answers here:	Respondent skipped this question
Q122 What would you like to do next?	Respondent skipped this question
Page 27: Dulnain Bridge	
Q123 Have we identified the right issues of Dulnain Bridge?	Respondent skipped this question
Q124 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q125 Do you agree with the preferred site options?	Respondent skipped this question
Q126 Do you agree with the protected open spaces?	Respondent skipped this question
Q127 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q128 Explain your answers here:	Respondent skipped this question
Q129 What would you like to do next?	Respondent skipped this question
Page 28: Kincraig	
Q130 Have we identified the right issues for Kincraig?	Respondent skipped this question
Q131 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q132 Do you agree with the preferred site options?	Respondent skipped this question
Q133 Do you agree with the protected open spaces?	Respondent skipped this question
Q134 Do you agree with the proposed settlement boundary?	Respondent skipped this question

Q135 Explain your answers here:	Respondent skipped this question
Q136 What would you like to do next?	Respondent skipped this question
Page 29: Nethy Bridge	
Q137 Have we identified the right main issues for Nethy Bridge?	Respondent skipped this question
Q138 Do you agree with the preferred site options?	Respondent skipped this question
Q139 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q140 Do you agree with the protected open spaces?	Respondent skipped this question
Q141 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q142 Explain your answers here:	Respondent skipped this question
Q143 What would you like to do next?	Respondent skipped this question
Page 30: Tomintoul	
Q144 Have we identified the right main issue for Tomintoul?	Respondent skipped this question
Q145 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q146 Do you agree with the preferred site options?	Respondent skipped this question
Q147 Do you agree with the protected open spaces?	Respondent skipped this question
Q148 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q149 Explain your answers here:	Respondent skipped this question

Q150 What would you like to do next?	Respondent skipped this question
Page 31: Angus Glens	
Q151 Do you agree with the proposed objectives?	Respondent skipped this question
Q152 Explain your answers here:	Respondent skipped this question
Q153 What would you like to do next?	Respondent skipped this question
Page 32: Bruar and Pitagowan	
Q154 Do you agree with the proposed objectives?	Respondent skipped this question
Q155 Explain your answers here:	Respondent skipped this question
Q156 What would you like to do next?	Respondent skipped this question
Page 33: Calvine	
Q157 Do you agree with the proposed objectives?	Respondent skipped this question
Q158 Explain your answers here:	Respondent skipped this question
Q159 What would you like to do next?	Respondent skipped this question
Page 34: Dalwhinnie	
Q160 Have we identified the right issues for Dalwhinnie?	Respondent skipped this question
Q161 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q162 Do you agree with the preferred site options?	Respondent skipped this question
Q163 Do you agree with the protected open spaces?	Respondent skipped this question

Q164 Explain your answers here:	Respondent skipped this question
Q165 What would you like to do next?	Respondent skipped this question
Page 35: Dinnet	
Q166 Have we identified the right issues for Dinnet?	Respondent skipped this question
Q167 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q168 Do you agree with the preferred site options?	Respondent skipped this question
Q169 Do you agree with the protected open spaces?	Respondent skipped this question
Q170 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q171 Explain your answers here:	Respondent skipped this question
Q172 What would you like to do next?	Respondent skipped this question
Page 36: Glenlivet	
Q173 Do you agree with the proposed objectives?	Respondent skipped this question
Q174 Explain your answers here:	Respondent skipped this question
Q175 What would you like to do next?	Respondent skipped this question
Page 37: Glenmore	
Q176 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q177 Do you agree with the preferred site options?	Respondent skipped this question

Q178 Do you agree with the protected open spaces?	Respondent skipped this question
Q179 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q180 Explain your answers here:	Respondent skipped this question
Q181 What would you like to do next?	Respondent skipped this question
Page 38: Glenshee	
Q182 Do you agree with the proposed objectives?	Respondent skipped this question
Q183 Explain your answers here:	Respondent skipped this question
Q184 What would you like to do next?	Respondent skipped this question
Page 39: Insh	
Q185 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q186 Do you agree with protected open spaces?	Respondent skipped this question
Q187 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q188 Explain your answers here:	Respondent skipped this question
Q189 What would you like to do next?	Respondent skipped this question
Page 40: Inverdruie and Coylumbridge	
Q190 Do you agree with the proposed objectives?	Respondent skipped this question
Q191 Do you agree with the preferred site options?	Respondent skipped this question

Q192 Do you agree with the protected open spaces?	Respondent skipped this question
Q193 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q194 Explain your answers here:	Respondent skipped this question
Q195 What would you like to do next?	Respondent skipped this question
Page 41: Killiecrankie	
Q196 Do you agree with the proposed settlement objectives?	Respondent skipped this question
Q197 Do you agree with the protected open spaces?	Respondent skipped this question
Q198 Do you agree with the proposed settlement boundary?	Respondent skipped this question
Q199 Explain your answers here:	Respondent skipped this question
Q200 What would you like to do next?	Respondent skipped this question
Page 42: Laggan	
Q201 Do you agree with the proposed objectives?	Respondent skipped this question
Q202 Do you agree with the preferred site options?	Respondent skipped this question
Q203 Explain your answers here:	Respondent skipped this question
Q204 What would you like to do next?	Respondent skipped this question
Page 43: Strathdon Q205 Do you agree with the proposed objectives?	

Q206 Explain your answers here:

Respondent skipped this question

Q207 What would you like to do next?

Respondent skipped this question

Page 44: Final Thoughts

Q208 If you have any other general comments on the topics you think the Local Development Plan 2020 should address, please let us know here:

Respondent skipped this question

Page 45: Your Details

Q209 Please fill in your details here:

Name

Name of organisation if relevant

Postal address

Email address

Telephone number

Invercauld Estate, c/o Richard Heggie

Urban Animation

Q210 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 CNPA at any time.

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 (see the Fair Collection Statement below). 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 Local Development Plan. We will hold your data securely for a period of no more than 5 years. You have the right at any time to ask that this data be removed. 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.

,

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

Page 46: Equalities Information