

REPRESENTATION FORM

Introduction

The Proposed Local Development Plan (the Plan) sets out a strategy for future development in the Cairngorms National Park. It includes sites and proposals for development as well as the policies that will be used to make decisions on applications for planning permission. We aim to formally adopt the Plan in 2020 when the Local Development Plan 2015 comes to an end. The Plan focuses on the five year period until 2025. It also includes development proposals for the 10 year period until 2030, as well as providing a general indication of the likely scale and location of development as far as 20 years into the future.

How to comment

You can use this form to submit your comments on the Plan. Please complete a separate form for each part of the Plan you want to comment on.

All comments should be submitted no later than 5pm, Friday 5 April 2019.

Email: planning@cairngorms.co.uk

Post:

Cairngorms National Park Authority
FREEPOST NAT21454
Grantown-on-Spey PH26 3BR

You must submit your name and address to ensure your comments can be considered valid. This is because the Cairngorms National Park Authority (CNPA) is required by legislation to contact you in relation to your response.

Fair Collection Statement

As a registered Data Controller, the CNPA will collect, store and use your personal data for the purpose of informing the content of the Cairngorms National Park Local Development Plan 2020. You may request to see personal information held by the CNPA at any time. Information will be shared with the Scottish Government Department of Planning and Environment Appeals and may be published on our website. We will not publish address details but may publish the name of the person who has completed the form. By completing and submitting the form, you are consenting to the above.

Your details

Name **STEVE CRAWFORD**

Organisation **HALLIDAY FRASER MUNRO**

Address [REDACTED]

..... [REDACTED]

..... Postcode [REDACTED]

Email [REDACTED]

If you are representing a third party, please give their details below.

Name

Organisation **Mar Estate**

Address **c/o Agent**

.....

..... Postcode

Email **c/ Agent**

REPRESENTATION FORM

1. Which section of the Plan would you like to comment on? (Please state clearly which policy, settlement, site reference number, paragraph number etc, your comment relates to)

Settlement - Braemar

2. What is your comment on this section of the Plan?

Please see attached statement.

3. Please state clearly what change/s you wish to see made to the Plan to address your comment

Please see attached statement.

What happens next?

Following the consultation period, all responses will be collated and assessed. The Proposed Local Development Plan and all consultation responses will then be submitted to Scottish Ministers and subject to an Examination by an independent Planning Reporter. You can keep up to date with progress on www.cairngorms.co.uk and Facebook and Twitter via [@cairngormsnews](https://twitter.com/cairngormsnews)

Queries

If you have any queries about the consultation process, please contact a member of the Planning Policy team.

Email: planning@cairngorms.co.uk

Telephone: **01479 873535**

Cairngorms National Park Authority
14 The Square, Grantown-on-Spey, PH26 3HG
www.cairngorms.co.uk

Clear

Submit



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**CAIRNGORMS NATIONAL PARK
RESPONSE TO PROPOSED LOCAL DEVELOPMENT PLAN CONSULTATION**

APRIL 2019

**On behalf of
Mar Estate**



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS



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1.0 Introduction

- 1.1 This representation has been prepared by Halliday Fraser Munro on behalf of Mar Estate in response to the consultation on the Proposed Local Development 2020, more specifically in relation to the settlement of Braemar.
- 1.2 At the Call for Sites stage and Main Issues Reports Stage a number of representations have been made in relation to the Mar Estates interests. This representation seeks to supplement the views already made in these submissions without unnecessarily duplicating them.
- 1.3 Mar Estate have consistently maintained that Braemar needs to be recognised for its strategic importance, and its significant housing requirements need to be addressed. Previous plans have not gone far enough in securing future growth of Braemar and supporting Braemar as a place to live and work. It is recognised that there is a balance to be had, and finding the balance between community, social and economic needs can be a challenge. However, the Estate believe that additional housing is essential for the village to grow and ensure housing is available for local people. Braemar is an extremely popular tourism destination and has global recognition in this regard.

2.0 Bid and MIR Summary

Call for Sites 2017

- 2.1 The Mar Estate representation highlighted that during 2011 the Braemar Strategic Option Study (BSOS) was prepared to help stimulate debate on how Braemar should sit within the settlement hierarchy in the Park. It also suggested potential opportunities for new economic and housing development to meet the needs of the settlement. The preparation of the BSOS involved the CNPA, community representatives, local estates and other stakeholders. It used the community's "Vision for Braemar" as its starting point and identified a number of key areas where planning and land allocations could play their part in promoting a sustainable economic future for the settlement. Although that options study was prepared a few years ago, the basis for its findings and the contribution that additional land allocations, and appropriate planning policies, can make to Braemar's future success remain relevant now.
- 2.2 The Mar Estate believe that previous plans haven't gone far enough in supporting the future of Braemar as a place to live and work and that relying on existing planning permissions to overcome housing issues doesn't provide the answers. Only additional future allocations and their respective planning applications can go some way to providing the right housing to meet local housing need based on current information and analysis.
- 2.3 If the next Local Development Plan is to take the issues of supporting community, social and economic services and the right housing in the right place seriously then it has to respond to these in its land use policies and allocations. The balance is a challenge to achieve, but the



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basis must be the allocation of more land to open up opportunities whilst still respecting the place and its environment.

- 2.4 A series of sites for a range of development opportunities were submitted by the Mar Estate for inclusion in the future plan as they are of the view that for Braemar to tackle the issues of housing and economic development head-on, then more land has to be allocated in a coordinated and planned fashion. Mar Estate proposed sustainable growth for Braemar in settlement and edge-of-settlement sites with limited constraints. This is not a wholesale increase in the housing land available in Braemar, rather its incremental, organic growth in line with historical growth patterns. The sites being proposed included:

- (CFS1) Chapel Brae
- (CFS2) Chapel Brae West
- (CFS3) Auchendryne West
- (CFS4) Broombank terrace
- (CFS5) Cluniebank
- (CFS6) Cairnadrochit/St Andrews Terrace
- (CFS7) Braemar West
- (CFS8) Derrywood/Tomintoul

Detailed Bids were submitted for each site identifying the merits of each proposed allocation.

Main Issues Report 2017

- 2.5 Building on the previous Bid submissions, the Mar Estate's representations identified that the Housing Land Requirements are not considered to be sufficiently generous. Given the uncertainty and time delay (and resulting under-delivery of housing over the past 5 years) in respect of An Camas Mor, it was suggested that the generosity allowance should be greater, up to the maximum of 20% generosity allowance. This would allow for more housing sites to be allocated in the first plan period and as future sites. Effectively the representations outlined concerns that the plan was over reliant on large/strategic and older site allocations being carried over and that a broader range of small to medium sized sites needed to be introduced to support the delivery of housing.
- 2.6 Concerns were raised regarding the proposed levels of affordable housing set out in the preferred approach within the MIR and the impact this could have on development viability. This includes for up to 45% in some settlements and housing market areas, the highest being proposed in Aviemore. It is now proposed to increase the provisions for affordable housing in Ballater and Braemar to 45%, an increase from the 35% originally proposed in the plan.
- 2.7 Similarly Mar Estate Representations highlighted concerns that developer obligations increase the cost of development which has the potential to impact on viability and delivery rates. It was felt that this would not be desirable and may discourage development and that



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planning obligations need to be sensible, proportionate (with scope to negotiate on the basis of viability), legally required and enforced. Furthermore it was highlighted that there is no recognition of the increased costs of developing sites in remote settlements.

- 2.8 Mar Estate site submissions also promoted a range of sites for allocation and delivery in the plan, building upon the bid submissions. Sites, AB002, AB003, AB004, AB005, AB006, AB007, AB008, AB009 were identified as Reasonable Alternative Site Options in the MIR. We discuss these sites in more detail in section 3 of this report.

3.0 Proposed Plan – Braemar Site Allocations

Proposed Allocations

- 3.1 Mar Estate support the identification of site H4 for 6 dwellings. The site is an infill site on Chapel Brae that would accommodate 6 houses in a form similar to those surrounding the site. The site could be extended in line with bid AB009 to allow for the layout of the site to include additional land to the rear which could be used for landscaping.

Additional Sites for Development

- 3.2 Mar Estate put forward the following sites for development in the Main Issues Report. The Estate suggest that these small-scale sites can make a positive contribution towards housing in Braemar and suggest that they should be identified as additional housing allocations. We therefore maintain that these should be considered as viable and deliverable sites for new development to support the growth of the settlement and should be allocated within the plan.



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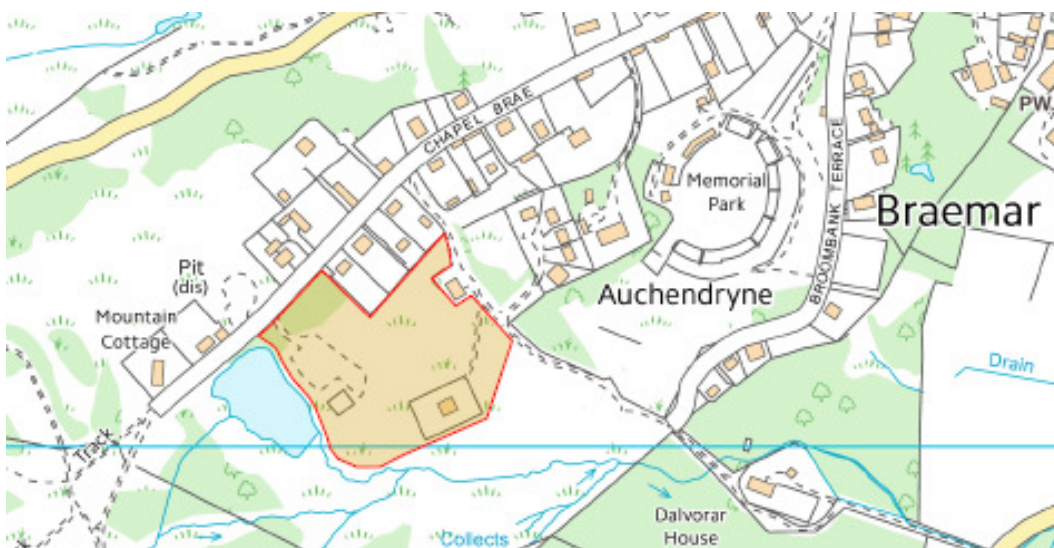
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Chapel Brae West (MIR Reference AB008)



- 3.3 The site assessment undertaken by the Park Authority found that the site would have an adverse impact on the setting of Braemar. We do not agree with this given the site sits immediately adjacent to existing development. The surrounding housing at this part of Chapel Brae comprises 2 rows of housing – one on Chapel Brae and one immediately behind accessed by small lanes/tracks. Development on this site would replicate that pattern and is suitable for up to 2 or 3 houses. Once built it would appear as the settlement edge in a similar fashion to the existing settlement edge.

Auchendryne West (MIR Reference AB007)



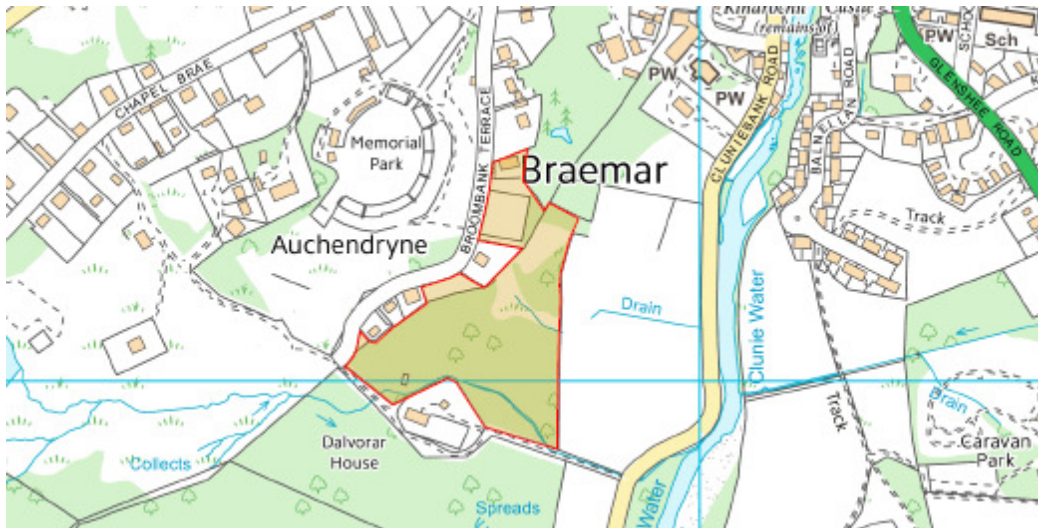


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- 3.4 The site assessment undertaken by the Park Authority found that the site would have an unacceptable landscape impact and that high-density development would not be suitable. The site is adjacent to the existing settlement and is partially brownfield. A small-scale development as proposed would fit with this part of the settlement. The detailed layout would take account of the surrounding character and ensure a green space link / visual corridor is provided between the Memorial Park and the nature reserve to the west.

Broombank Terrace (MIR Reference AB006)

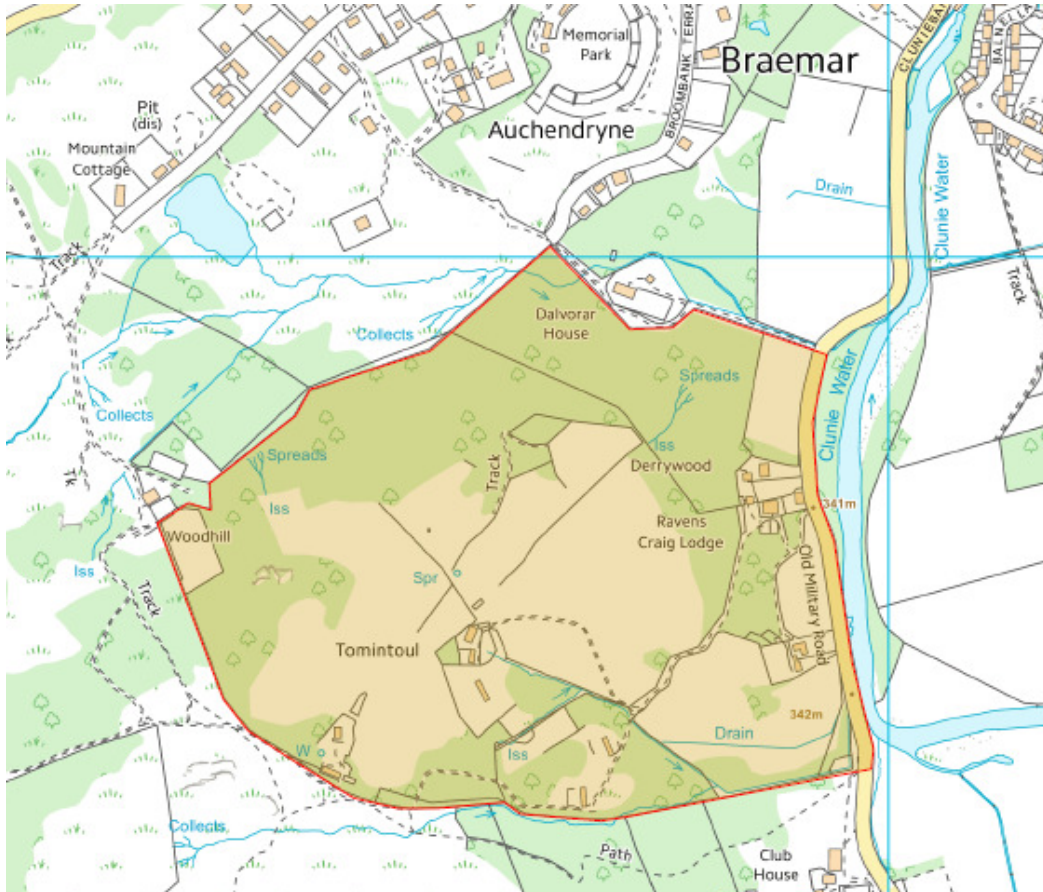


- 3.5 The site assessment undertaken by the Park Authority found that the majority of the site is semi-natural woodland which is of ecological importance and contributes to the setting of Braemar. The scale of the site was considered to exceed the housing requirement for Braemar. However, we believe that the site offers the potential for small-scale development within the confines of the trees and where setting would allow. The site is well-screened and might be suitable for small scale development. Drainage and access can be addressed through detailed design, and sensitive design and need not restrict development on the site. There are options to relocate the curling pond and guiding hut to better locations within Braemar.



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Derrywood/ Tomintoul (MIR Reference AB002)



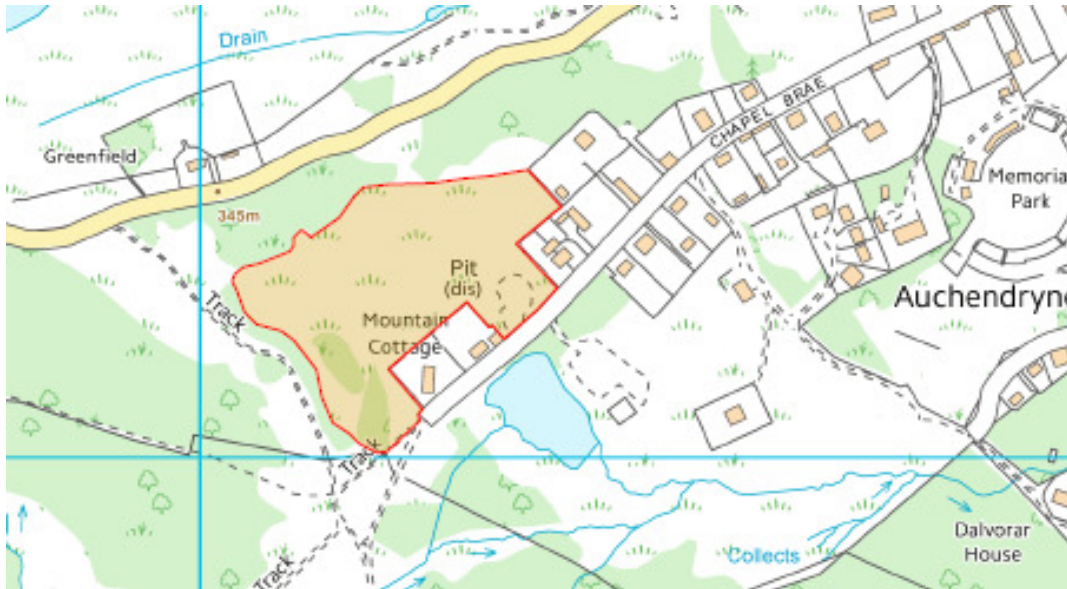
- 3.6 The site assessment undertaken by the Park Authority found that the scale of the site is significant, and a proportion of the site lies within a SSSI, with the whole site located within a National Scenic Area. The site was put forward for small scale development, which is of low density and low impact. This would offer a different type of development and could make a positive contribution to the housing mix, and the character of the area.



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Braemar West (MIR Reference AB003)



- 3.7 The site assessment undertaken by the Park Authority found that the site would elongate the settlement and is of an excessive scale for Braemar. The site was also considered to have landscape impacts due to its elevated position. This site should be considered as a potential future housing area. Allocations for Long Term Housing have been made in Aviemore, and it is suggested that identifying such land in Braemar would provide greater certainty for the settlement in terms of future growth opportunities. The site is not within any environmental designations and any landscape impact could be minimised through layout and strategic landscaping.

4.0 Proposed Plan Housing Land Strategy and Braemar Settlement Strategy

- 4.1 Braemar needs to be recognised for its strategic importance, as being geographically located at the heart of the National Park along a key tourist route (the A93), but also as the second largest settlement in the Aberdeenshire area of the National Park. Its significant housing pressures and requirements therefore need to be addressed. Previous plans have not gone far enough in securing future growth of Braemar or in recognising the settlement for its role as a highly popular tourist destination and desirable place to live overall. Development needs to weigh up the varying requirements of community, social and economic and environmental. However, Mar Estate believe that additional housing is essential for the village to grow and ensure housing is available for local people.
- 4.2 Concerns remain that the proposed plan's Housing Land Requirements are not considered to be sufficiently generous. Given the uncertainty and time delay (and resulting under-delivery of housing over the past 5 years) particularly in respect of An Camas Mor, it is suggested that the generosity allowance should be greater, up the maximum of 20% generosity allowance.



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This would allow for more housing sites to be allocated in the first plan period and as future sites. The plan is over reliant on large/strategic and older site allocations being carried over and that a broader range of small to medium sized sites needed to be introduced to support the delivery of housing.

- 4.3 Table 1 below shows that over the past five years there have been an average of 9 houses built in the Aberdeenshire part of the National Park (covering Ballater, Braemar and Dinnet). This is not sufficient to meet the needs of the area and additional housing is needed in the area to sustain local services and provide housing for local people. The forecast completions are slightly higher but housing land audits are notoriously inaccurate at predicting future build rates, and it is reasonable to assume that completions will continue on a similar vein to historic rates unless there is a change to the strategy, and a good range of housing sites allocated in the area.

Actual					Anticipated								
2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2025+
13	11	12	19	4	2	19	28	38	25	20	20	20	140

Table1: Housing Completions in Aberdeenshire Part of Cairngorms National Park (source: <https://www.aberdeenshire.gov.uk/media/22980/final-housing-land-audit-2018.pdf>)

5.0 Conclusion

- 5.1 We believe that the proposed plan Housing Land Requirements are not considered to be sufficiently generous in Braemar. There remains too much emphasis on large strategic allocations to deliver housing in the National Park. We do not believe that the proposed plan recognises the strategic importance of Braemar as the second largest settlement in the Aberdeenshire area of the National Park nor that the local and significant housing pressures and requirements of the settlement are adequately addressed. We are concerned about the level of affordable housing proposed in Braemar. A requirement to make 45% of development sites affordable has the potential to render developments unviable, and this is on top developer obligations which are also affecting the feasibility of sites. We are concerned that these two issues combined discourage development in Braemar.

We believe that the sites promoted by Mar Estate for inclusion in the proposed plan would help to address these issues by supporting the Park Authority to meet its housing requirements and to support the sustainable growth of Braemar. On that basis we would request that these sites be considered for allocation in the plan.