

**RESPONSE TO CAIRNGORM NATIONAL PARK AUTHORITY  
TO  
CAIRNGORM NATIONAL PARK AUTHORITY LOCAL DEVELOPMENT PLAN  
PLAN OUTCOMES CONSULTATION  
ON BEHALF OF MAR ESTATE**

July 2024

## 1. INTRODUCTION

The purpose of this paper is to respond to the Cairngorm National Park Authority's (CNPA) current consultation on the Outcomes of their next Local Development Plan (LDP). This response is submitted on behalf of Mar Estate. Mar Estate is a major landowner within the National Park owning some 16,000 acres in and around the village of Braemar. The Estate is committed to delivering homes including homes to meet the needs of the community of Braemar in support of sustainable economic development.

Mar Estate have supported the community of Braemar in many ways, including doubling the size of the village shop, selling a site to the local community for £1 for the development of 15 affordable homes and supporting young people with farming careers. In addition, the Estate has worked with the community to create the Corriemulzie Hydro Scheme which helps fund community benefits. The Estate wishes to build upon this collaborative working to ensure the delivery of homes within Braemar to meet the needs of the community whilst retaining the village's character.

Mar Estate believes that Braemar needs a deliverable supply of land for affordable and mainstream housing as well as business/workspace. Braemar has seen significant changes over the last decade, and it is essential the future of the village is well planned with a growth plan put in place. The Plan must be ambitious and flexible and not be a barrier to sustainable economic growth and housing delivery. The Local Development Plan outcomes must focus on these priorities.

## 2. RESPONSE TO QUESTIONS

### **Do you think that the report identifies the correct legislation, plans, policies and guidance that direct the outcomes for the next Local Development Plan?**

We, for most part, agree that the legislation, plans, policies and guidance are the correct documents for the preparation of the next Local Development Plan. There are, however, some omissions. For example, there is no reference to the Housing Needs and Demand Assessments (HNDA) for the constituent authority areas which will be material in considering the need for homes in the area. Whilst these HNDAs provide an indication of need, they do not provide the full picture. Homes for Scotland have recently carried out research to demonstrate that over 28% of households in Scotland have some form of housing need (<https://homesforscotland.com/our-work/existinghousingneedinscotland/>). In Aberdeenshire (where Braemar is located) that figure is 22%. These figures are

figures of *existing* need and do not take account of requirements to sustain tourism, local businesses and future growth.

A letter from the Chief Planner (<https://www.gov.scot/publications/planning-for-housing-chief-planner-letter-june-2024>) recognises the need for further engagement on the matter of housing need following the declaration of a “Housing Emergency” in Scotland. We therefore recommend that the CNPA carry out their own robust assessment of housing need and provide a generous amount of deliverable housing land in their next Local Development Plan to meet local housing need.

When considering affordable housing, the next LDP must recognise that “housing need” exists beyond the people on Council/RSL waiting lists. For example, Mar Estate is frequently approached by parties seeking a house or flat to rent or a plot in order to build a home. Meeting these needs is a form of providing homes that are affordable to the community and needs to be recognised as such in the next Local Development Plan. All too often the reliance on waiting lists does not benefit people local to the area resulting in them having to move away.

Mar Estate believe that alternative mechanisms for affordable housing delivery need to be brought forward prior to the next Local Development Plan. Existing models for affordable housing have failed to deliver to meet demand. Indeed, a blog by the CNPA’s Convenor, Sandy Bremner, on 14 March 24 (<https://cairngorms.co.uk/park-talk-affordable-housing-delivery/>) recognises this and calls for a re-set of the economic model for the delivery of affordable housing. It is imperative that the CNPA addresses this as part of the evidence gathering stage of the Plan so that the models can be agreed and be ready to be implemented prior to the Plan’s adoption. This will require collaboration between a number of stakeholders including landowners. The detailed work on this needs to start immediately in order to deliver economic and practical solutions.

The delivery of more affordable housing aligns with Priority 7: Housing of the CNPA (<https://cairngorms.co.uk/working-together/national-park-partnership-plan/visitor-experience/priority-7-housing/>). We wholeheartedly support the second part of the Agenda for Action item (e) encouraging the use of innovative delivery models to maximise the number of affordable homes that are built. This will be fundamental to delivering outcomes associated with providing homes to meet the needs of the community and to help sustain local businesses. To this end, we recommend that the CNPA employ an Affordable Housing Delivery Manager. This would be a person skilled in the understanding of housing economics and who has a proven track record delivering housing and associated infrastructure. This person will work with stakeholders to agree the alternative mechanisms for housing delivery.

Some of the other Agenda for Action items of Priority 7: Housing, need to be revisited as part of the preparation of next Local Development Plan. For example,

requiring additional affordable housing above the normal national maximum of 25% (Item (c)) undermines the viability of all housing developments given the need for mainstream housing to subsidise affordable housing. Development economics cannot sustain this especially in conjunction with item (d) which seeks an emphasis on smaller homes in new developments.

**Do you think that the information presented in this report is sufficient to inform the preparation of the next Local Development Plan?**

The information presented in this report is a good starting point, however, further work is required to inform the preparation of the next Local Development Plan. Specifically, there is a need to update the Community Action Plans for the area and engage fully with landowners and communities to ensure local needs and aspirations are being met. As an example, the Braemar Community Action Plan was completed in 2017 and many of the objectives of the Plan have been fulfilled through the collaborative efforts of the community, landowners and businesses. It is currently being updated and it is essential that its new objectives are addressed through the LDP.

It is critical that the next Local Development Plan has a long-term vision especially as it is intended to cover a period of at least 10 years. That vision must be deliverable within the timeframe of the Plan with short (0-2 years), medium (3-5 years) and long term (5 year +) objectives. The Plan will need to be prepared on as robust an evidence base as possible and there needs to be a commitment from the CNPA that there will be a mid-term review of the LDP where it is shown that the Plan is not meeting its objectives. For this reason, the objectives/outcomes of the Plan must be measurable.

The Park Partnership Plan 2022 under its "Place" objective has a desire to make housing more affordable, to allow more people have access to affordable housing and the proportion of vacant homes, second homes and holiday lets decreased. We do not agree fully with this, and request amendments are made to feed into the next LDP. There needs to be a balance of housing in each area. It needs to be recognised that second homes and holiday lets are essential to the tourism economy in villages such as Braemar. It also needs to be recognised that so called second homes in Braemar are often owned by Braemar people who split their time between places of work and the village. These people are an important part of the village community and economy.

As mentioned elsewhere, there is a need to consider new mechanisms to deliver housing to meet a variety of housing needs in the CNPA area. Mar Estate is keen to promote a model for shared-equity self-build plots. The equity share would be retained by the Estate and be for the benefit of local people. This consultation response is not the place to detail the proposed model and Mar Estate believe it

should be discussed and developed in advance of the Call for Ideas stage of the new plan. Mar Estate would therefore welcome the opportunity to discuss their proposals with the relevant stakeholders in early course.

A further alternative mechanism would be to identify, in agreement with landowners and the community, specific sites for affordable housing. The sites would be of sufficient size to provide the efficiencies to allow the homes to be delivered by a Registered Social Landlord (RSL) or similar enabling body. Affordable “credits” would then be granted to the landowner and land within the same ownership, without a specific affordable housing requirement, would be zoned for housing. Again, Mar Estate would welcome the opportunity for early dialogue on this.

**Do you know of any additional legislation, plans, policies and / or guidance that would help inform the outcomes for the next Local Development Plan?**

As above, we believe there is a need to consider up to date information in relation to housing need. There is also a requirement to do additional survey work in order to fully understand the needs and aspirations of communities and therefore updates of Community Action Plans are required as well as full engagement and visioning exercises for communities.

To ensure that appropriate and deliverable sites are identified for housing and business use in the next Local Development Plan, the Call for Ideas stage, should explicitly include a Call for Sites. This would identify land that is available for development, their planning suitability and could include an assessment of the sites’ deliverability. In addition to this the CNPA should critically review settlement boundaries to ensure sustainable growth is not constrained.

**Do you think that the correct implications for the next Local Development Plan’s outcomes have been identified?**

The outcomes of the next Local Development Plan must be measurable and demonstrably deliverable with a delivery plan prepared in tandem with the LDP. There needs to be direct and meaningful engagement with landowners and communities to ensure the plans can work and objectives delivered. There also needs to be early engagement with infrastructure providers (e.g. Scottish Water and SSE) to ensure there are no technical constraints to development and ensure infrastructure upgrades are included in their relevant business plans. Indeed, the provision of an appropriate electricity supply for development has undermined the economic viability of housing sites in Braemar and must be addressed as a matter of urgency.

In some situations, where all brownfield and infill sites have been used within a community, or plans for them are progressing, such as Braemar, there will be a need

to release additional greenfield sites for development in a manner that respects the character of the communities. The boundaries of the Braemar settlement were last comprehensively reviewed in 1994 and must be revisited as part of the next LDP to ensure the growth of the village is not constrained. A generous supply of housing land will help deliver a variety of homes and meet a wide range of needs within the community.

### **3. CONCLUSIONS**

In conclusion, we reiterate that the next Local Development Plan must focus on deliverable and measurable outcomes. As a major and pro-active landowner within the CNPA, Mar Estate would welcome the opportunity to engage with the CNPA through all stages of the plan preparation process and in particular request the opportunity to explore alternative models for the delivery of housing in early course.

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