



Cairngorms National Park Local Development Plan 2020 Main Issues Report

Comments Form

Introduction

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Do you agree with this approach? **Y/N**

Please explain your answer

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

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

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Main Issue 10 Land management in upland areas

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

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Please tick which settlement you are commenting on.
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Main Issues 4 and 5 – Housing and Affordability of Housing

1.0 This response has been prepared by Halliday Fraser Munro on behalf of Reidhaven Estate. This response relates to Main Issue 4 – Housing, and Main Issue 5 - Affordable Housing.

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

1.1 Housing Land requirements have reduced from the 2015 Local Development Plan (LDP). The strategy is to retain larger allocations, but recognising these take time to get infrastructure in order, also allocate a limited number of smaller sites in some locations. We would suggest that the housing land requirements are not sufficiently generous.

1.2 CNPA in their calculation of housing land requirements also rely on a low growth/low generosity above housing supply targets of 10% (the minimum the government allow them to apply) to reach their Housing Land Requirement. Given the uncertainty and time delay (and resulting under-delivery of housing over the past 5 years) in respect of An Camas Mor we would suggest that the generosity allowance should be greater, up 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.

	2020-2024	2025-2029	2030-2039 (indicative)
CNPA Total	451	360	720

Table of housing land requirements

1.3 The approach adopted by the CNPA relies significantly on the delivery of An Camas Mor as a major provider of housing in the Highland Council area. Evidence from elsewhere (Aberdeen / Aberdeenshire / Stirling / Tornagrain) indicates that this is a dangerous strategy and will not deliver the required housing. Those Local Authorities are now looking to enhance their housing land supply with small/medium sites to fill the gaps. CNPA is in danger of stifling the housing market by over-relying on An Camas Mor. A greater release of new housing land to supplement longer term allocations is required.

1.4 We would suggest that a strategy to attract younger families to the National Park is needed, and reliance shouldn't be placed on past trends of an ageing and reducing population.

B) Housing growth around Aviemore

1.5 In principle, we agree that long term development land that can be release if land supply is not met is a good idea. However, there should be additional housing sites allocated in Aviemore for immediate delivery to supplement the allocation of An Camas Mor.

- 1.6 An Camas Mor is not delivering at the rate intended. The site has already had a 3 year extension to the Planning Permission in Principle (PPP) Application. There are a number of Matters Specified in Conditions to discharge, and substantial infrastructure requirements before development can even commence on the site. We also note that there are infrastructure constraints as we understand that third party land is required to facilitate the infrastructure required to serve the site, for which no agreement is yet in place.
- 1.7 We would disagree that the site will deliver 50 units by 2012, as outlined in the 2017 Housing land Audit. Instead of waiting for An Camas Mor not to deliver, surely the pragmatic approach is to allow smaller scale sites to deliver housing immediately, allowing An Camas Mor to come on stream.

The Affordability of Housing

- 2.0 We do **not** agree that the affordable housing requirement should be increased to 35% in Aviemore. This could render developments unviable, and is contrary to Scottish Planning Policy. We would note that Aberdeenshire Council had a similar policy in their 2012 Local Development Plan, which was not carried forward to the 2017 LDP due to non-conformity with SPP.
- 2.1 We would also note that the policy on Planning Obligations is to be reviewed, and “planning obligations towards the provision of additional school capacity” will be necessary where required. Aviemore has school capacity issues, and increasing affordable housing requirements on top of other obligations is likely to make development unviable.



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Main Issue 7 - Impacts on Natura designations

- 1.0 This response has been prepared by Halliday Fraser Munro on behalf of Reidhaven Estate. This response relates to Main Issue 7 – Natura Designations.
- 1.1 We agree that the approach to conserving Capercaillie should focus on a more coordinated approach to conservation management, and focus on remote sites away from settlements. The existing requirement in the LDP requiring developers to demonstrate that they will not have an adverse impact on Capercaillie populations is not reasonable. We believe that a more broad brush approach that functions at a higher level has the potential to have a greater impact on Capercaillie populations than the current approach. As outlined in the MIR, Capercaillie are affected by people, and promoting mitigation measures adjacent to existing settlements and development sites is unlikely to have the desired effect.
- 1.2 We would suggest that the overall recreational impact on Capercaillie needs to be addressed at a higher level than individual sites. It is difficult to assess where the recreational impact will be from an individual site, as residents can travel to access the countryside, and hence the impact may be remote from the site.



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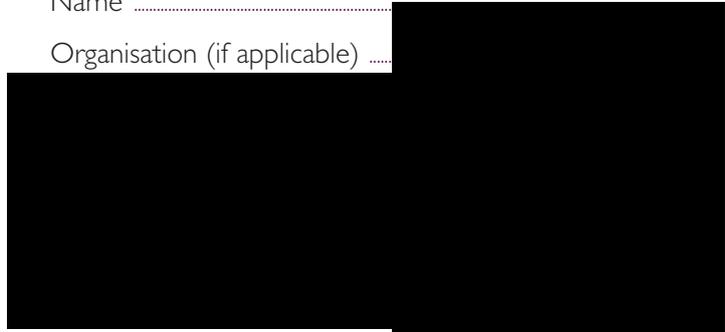
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Settlement Based Issues - Aviemore

- 1.0 This response has been prepared by Halliday Fraser Munro on behalf of Reidhaven Estate. This response relates to the settlement of Aviemore.
- 1.1 We support the allocation of site THC045 / THC059 to the north of Aviemore, however we would suggest that the southern part of the site is made available for immediate delivery. We also support the identification of land at 'North Aviemore' for mixed uses, however, again we suggest that parts of the site should be made available for immediate release.
- 1.2 We have provided a response on the delivery of An Camas Mor under Issue 7, please refer to this in relation to non-delivery of that site. In summary, we do not think that reliance should be placed on An Camas Mor to meet the housing needs of Aviemore. This site is unlikely to deliver the housing requirements, and would certainly seem to be subject to delay. Both these sites to the north of the town could deliver housing immediately, although it would be proposed to phase the delivery of the sites, see indicative phasing diagram below.
- 1.3 There are 93 units allocated in Aviemore for immediate release, which are already part of the effective housing land supply and are existing allocations carried forward from the current Local Development Plan. This means that there are no new allocations proposed. We do not believe this level of development is sufficient to sustain the settlement. Scottish Planning Policy requires LDP's to "allocate a range of sites which are effective or expected to become effective in the plan period", and so allocation of this site for immediate delivery would ensure a choice of site are available. Additional housing will ensure that there is affordable housing available for local people.
- 1.4 We would suggest that North Aviemore should be allocated for a mixed use development, with employment uses to the north of the site, adjacent to existing industrial uses. The southern part of this site is adjacent to an existing residential development and so residential uses would seem logical to the south of the site. Other uses such as community uses could also be considered on the site. Access would be taken directly from the B9152.
- 1.5 Site THC045 / THC059 is a logical extension to the settlement, and is available for immediate delivery. The site can be phased, with land to the south of the site developed initially. This is as shown by the indicative phasing diagram below. A new access would be taken from the B9152.
- 1.6 None of these sites have nature conservation designations, and in landscape terms can accommodate development. It is logical to extend the settlement north, the sites represent a sustainable extension to Aviemore, with good connectivity to the existing settlement. There are existing bus links passing the site on the B9125, and the sites are within 1mile of the train station.



Indicative Phasing Diagram, map © Googlemaps



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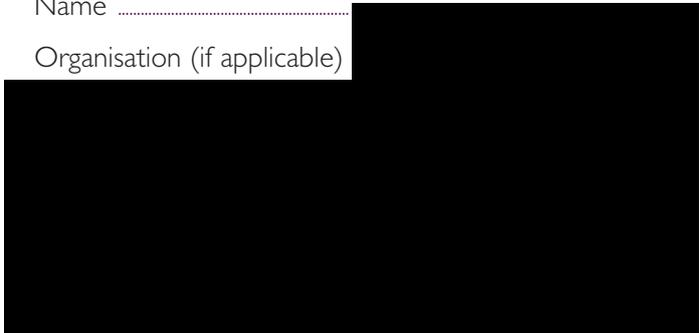
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Settlement Based Issues: Dulnain Bridge

- 1.0 This response has been prepared by Halliday Fraser Munro on behalf of Reidhaven Estate. This response relates to the settlement of Dulnain Bridge.
- 1.1 We object to the failure to include site THC041 and THC042 as allocations for housing in Dulnain Bridge. Site EP1 is in the effective land supply to 2021, so should not contribute towards meeting new housing requirements. Site H1 is anticipated to come forward in the near future, but additional allocations are required to sustain the village.
- 1.2 Sites THC041 and THC042 relate well to the village, and offer an alternative form of housing delivery. Low density housing in the form of self-build plots could be accommodated within the existing woodland. Whilst it is acknowledged that there is a presumption in favour of retaining woodland, the needs of the settlement of Dulnain Bridge in terms of sustaining local services and delivering local housing need to be considered.



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

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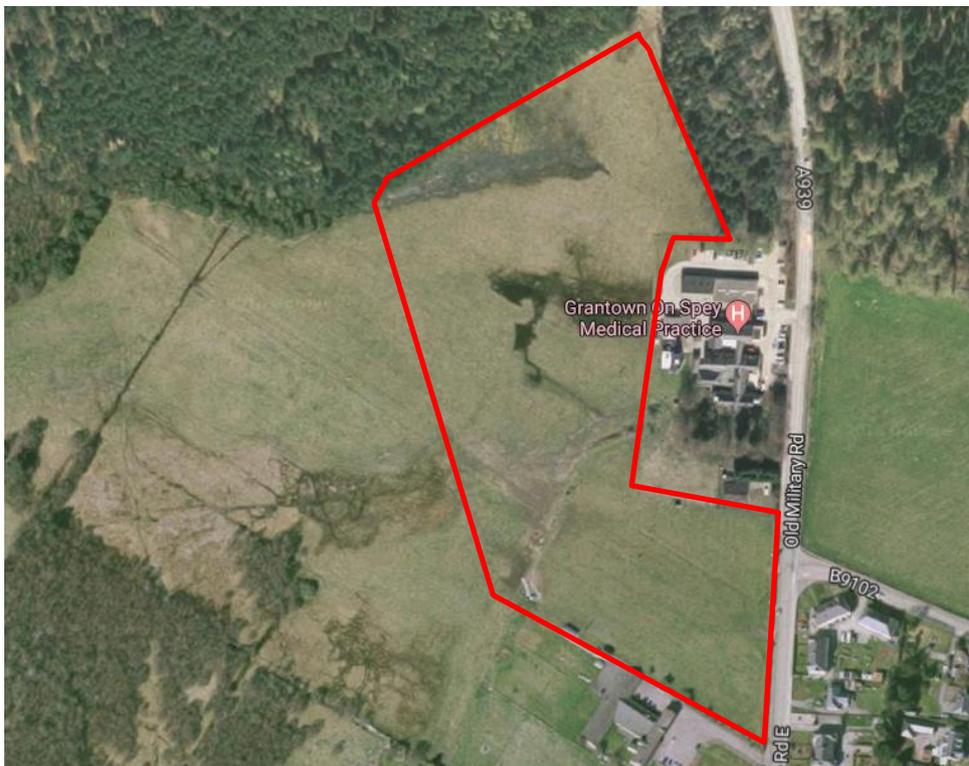
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Settlement Based Issues – Granttown-on-Spey

1.0 This response has been prepared by Halliday Fraser Munro on behalf of Reidhaven Estate. This response relates to the settlement of Granttown-on-Spey.

Site THC039

1.1 We support the allocation of THC039 as an extension to site H2 for a total of 50 houses. This is a logical extension to the town, and is well located for access to existing services. The site is flat, with woodland to the north and south meaning development on the site can be accommodated within the existing landscape. The site would deliver housing to meet local needs, including 25% affordable housing.



Aerial view of site © Google Maps

Site THC040

1.2 We would also suggest that in order to sustain services in Granttown-on-Spey, site THC040 should be identified as potential future housing / long term housing site. This site has no constraints, and is currently in use as agricultural land. Water management issues could be overcome, and would be fully considered as part of a landscape strategy which could consider parts of the site for open space or woodland planting.

1.3 There is a care home currently under construction to the south west part of the site, so development in this area between the existing housing and the caravan park has been established.



Aerial view of site THC040 © Google maps

Housing Land Supply

- 1.4 We note that the MIR is slightly misleading in that it appears there are two allocations of 50 houses, when in fact site H2 is a 50 unit allocation along with THC039. Therefore, the actual increase in housing within the settlement equates to only 30 units. Site H1 has detailed planning permission and 43 units are expected to come forward by 2021, and so shouldn't be counted towards meeting new housing land requirements



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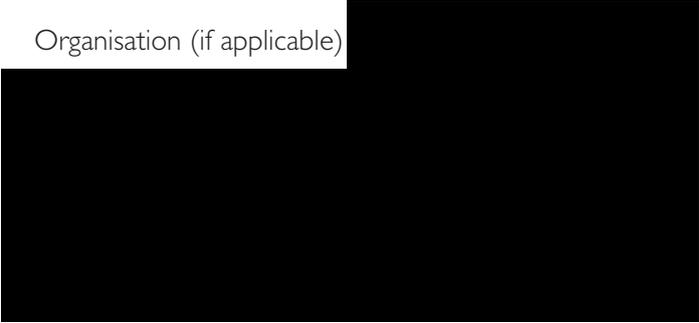
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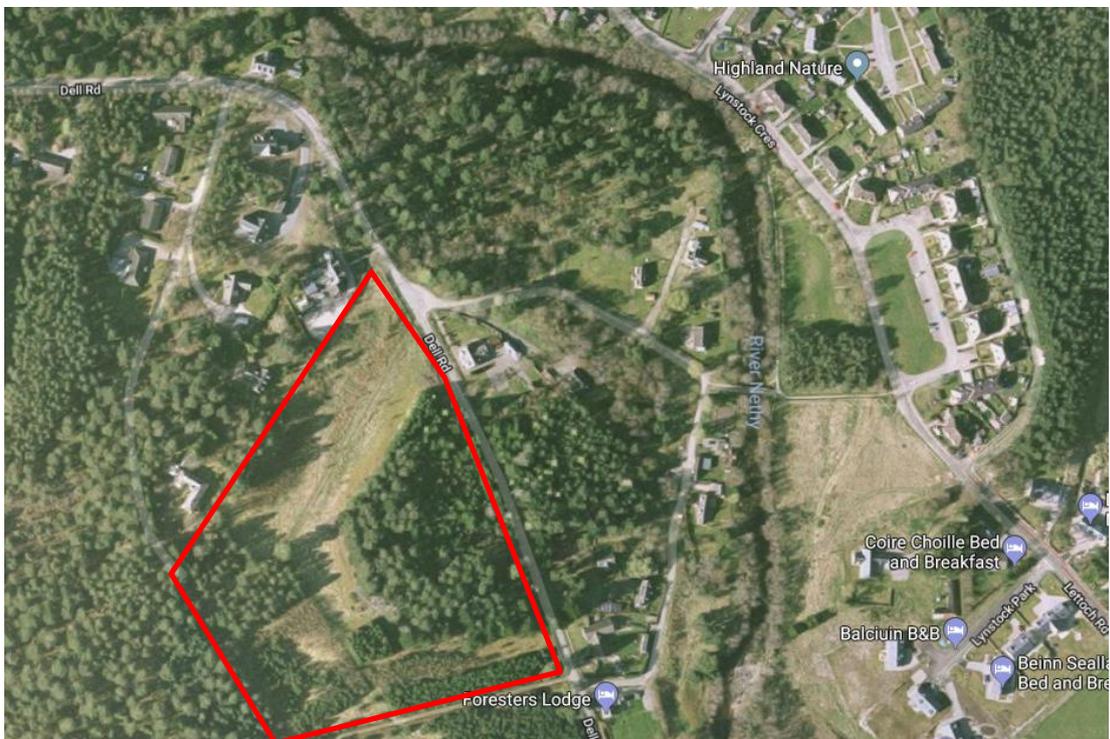
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Settlement Based Issues: Nethy Bridge

- 1.0 This response has been prepared by Halliday Fraser Munro on behalf of Reidhaven Estate. This response relates to the settlement of Nethy Bridge
- 1.1 We object to the failure to include site THC036 and THC037 as allocations for housing in Nethy Bridge. Nethy Bridge is a large village which requires growth to sustain local services such as the primary school, local shop, bus services and other facilities.
- 1.2 We would suggest that the two allocations proposed amounting to 24 units are not sufficient to sustain services in Nethy Bridge. The assessment of site THC037 recognises that the site has potential. We would suggest that this site should be allocated in addition to sites THC002 and THC003 to ensure a choice of housing within the settlement to meet local housing needs. The landowner would be willing to consider a community housing initiative on this site. Alternatively site THC037 offers a better location than THC002 for the expansion of the settlement.
- 1.3 Whilst site THC036 has been dismissed on the grounds it relates poorly to the settlement and is protected as 'open space', we would suggest that the site should be allocated. The retention of the path could be accommodated within a low density development, and woodland would be retained where possible. Self-build plots within this site would help to provide opportunities for housing for local people.



Aerial view of Site TH036



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

Name

Organisation (if applicable) [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? **Y/N**

Please explain your answer

Please explain your answers

Progress in delivering the current Local Development Plan

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

Y/N

Q: Do you think any other changes are needed?

Y/N

Please explain your answers

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

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

Y/N

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

Y/N

Please explain your answers

Main Issue 1 Over-arching development strategy

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

Y/N

Please explain your answer

Main Issue 4 Housing

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

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

Y/N

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

Y/N

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

Y/N

Please explain your answers

Main Issue 2 Designing great places

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

Y/N

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

B) Housing growth around Aviemore

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

Please explain your answer

Main Issue 5 The affordability of housing

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

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

Please explain your answers

Main Issue 6 Economic development

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

Please explain your answer

Main Issue 7 Impacts on Natura designations

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

Please explain your answer

Main Issue 8 Planning obligations

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

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

Please explain your answers

Main Issue 9 Flood risk and climate change resilience

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

Please explain your answer

Main Issue 10 Land management in upland areas

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

Please explain your answer

Settlements

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

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

(Y/N – delete as appropriate)

Q: Have we identified the right issues for this settlement (where relevant)? **Y/N**

Q: Do you agree with the proposed settlement objectives? **Y/N**

Q: Do you agree with the preferred site options (where relevant)? **Y/N**

Q: Do you agree with the protected open spaces (where relevant)? **Y/N**

Q: Do you agree with the proposed settlement boundary (where relevant)? **Y/N**

Please explain your answers

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

What happens next?

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

We will regularly update on progress via www.cairngorms.co.uk and on Facebook and Twitter via [@cairngormsnews](https://twitter.com/cairngormsnews) and [#BigParkBigQuestions](https://twitter.com/BigParkBigQuestions).

Queries

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

Settlement Based Issues: Boat of Garten

- 1.0 This response has been prepared by Halliday Fraser Munro on behalf of Reidhaven Estate. This response relates to the settlement of Boat of Garten.
- 1.1 Despite the objective of the settlement to ‘support the delivery of housing to meet local needs, particularly affordable housing and opportunities for community owned housing’, no new housing allocations are proposed in Boat of Garten. We suggest that site THC044 to the south of Deshar Road should be included in the Local Development Plan to meet local housing needs. We would propose that housing can be brought forward within the woodland, either in conjunction with a Community Housing Initiative or as plots for self-build.
- 1.2 Site THC044 has been dismissed on the loss of woodland, and impact on Capercaillie. The MIR proposes a new approach to Capercaillie conservation, which takes cognisance of the fact that Capercaillie are not attracted to settlements and built up areas. Enhancements to the woodland more remote from the settlement could provide suitable mitigation.
- 1.3 We would also note that the site is designated ancient woodland. Whilst there is a presumption against the loss of ancient woodland, there are few alternative sites in Boat of Garten, and hence the socio-economic benefit of additional housing to the settlement needs to be weighed against the limited loss of woodland in this case. The site is not heavily wooded, with a track along the eastern part of the site.



Aerial view of site TCH044 © Googlemaps