

## **BOAT OF GARTEN AND VICINITY COMMUNITY COUNCIL**

### **RESPONSE TO CAIRNGORM NATIONAL PARK LDP 2020 –MAIN ISSUES REPORT**

#### **GENERAL COMMENT**

- 1) Future planning for this should be on a 10 year cycle, not 5 years.
- 2) The draft plan reads as a continuation of the previous plan, but lacking in specific detail about economic opportunities, housing stock, population data etc.
- 3) There is tension between different competing aims, some of which are at odds with each other e.g. *conserve and enhance the natural and cultural heritage as against promoting sustainable economic and social development of communities.*
- 4) It is only one part of the CNP Partnership Plan and should have included more about the other strategies, Active Cairngorms, Cairngorms Nature and Economic Strategy./Leader.
- 5) To use the Vision Statement from the Partnership Plan makes sense.
- 6) Looking more locally, it is not felt that the Draft Plan meets the objectives of Boat of Garten as a small community within the Park.

#### **OVERALL DEVELOPMENT STRATEGY (1)**

- 1) In the main, the CNPA's preferred strategy is acceptable on the basis of 'small scale development that adds to existing buildings in rural areas would continue to be permitted'.
- 2) In designing great places there is concern that it could reduce the amount of house building if there are over restrictive requirements on building development, yet a balance is needed on ensuring that communities can continue to grow in a manner appropriate to local need. Housing should blend in with other housing in the area. It is important to maintain diversity of settlement size within the Park.
- 3) It is important to conserve land for nature, woodland and sensitive farm and forestry management.
- 4) The six qualities of successful places are supported in general but a clearer policy needs to be detailed.

#### **DESIGNING GREAT PLACES (2)**

- 1) Q2 and Q2 – We agree with these proposals and consider them to be worthwhile aims.
- 2) Any new building should meet the highest standards of insulation and clean energy use.

#### **A9 IMPACTS (3)**

- 1) Question 1 – YES agreed.
- 2) Question 2 – There is a need for more impact assessment of the viability of potentially negative impact on smaller communities. Some will gain and some will lose. Potential investment/development sites suggested make sense but there is a need for much more focus and detail here.

#### **HOUSING (4)**

- 1) It is not clear how the Housing Supply Targets were arrived at. Therefore it is almost impossible to judge whether these are right or wrong.
- 2) Housing land requirements seem acceptable but these need to be flexible within the LDP.
- 3) Q 2 and Q3 are agreed.

- 4) Population projections are notoriously difficult to quantify. Over the last few years it is apparent that inward migration has increased and if more affordable housing is built then it is likely that this trend would continue. The current difficulty is that there are a significant number of low paid workers within the park geography who live outside the park because of lack of affordability of housing within. Percentages of older age group, younger families and children may actually be at odds with other trends in the Highlands. Flexibility is required to be incorporated within the plan. Information is also needed on the type of householders in properties especially the properties which are used for rentals and holiday lets. This is not clear from the report.

#### **AFFORDABILITY OF HOUSING (5)**

- 1) Mechanisms for restricting the sale of holiday homes should be found. e.g. Cornwall has passed a by-law. This could, in time, impact positively on the affordability of homes for local people.
- 2) We agree with question 1 about increasing the requirement of affordable housing on sites as listed. However it is thought that this should be extended to other communities too. Greater proportion increases should also be considered. Test the market at 50%.
- 3) A definition of 'affordable' is needed which takes into account the lower than average wages and salaries available in the Park area.
- 4) We agree with Question 2. There is definitely a need for a greater mix of housing types and sizes and for smaller homes. This should to be matched to local identified need.
- 5) BOGVCC welcomes the inclusion of flexible planning policies to promote affordable housing in the current LDP and is firmly of the view that also these should be included in the 2020 LDP. This is particularly relevant to Boat of Garten as the site assessment report recommends that it would be more appropriate for the two Boat of Garten sites identified for an individual planning application to be brought forward without the sites being included in the LDP itself. However it would be useful to include some clarity about such mechanisms. Not every community is aware of the range of options from housing trusts to community ownership.
- 6) 'Affordable' must not equate to cheaper standard of build. The highest standards of design, insulation etc. must be maintained.
- 7) All new affordable housing **must** be retained in perpetuity for the affordable sector.

#### **ECONOMIC DEVELOPMENT (6)**

- 1) Question 1 – YES agreed.
- 2) However we understand that the Scottish Government Policy is to encourage development along the Inverness/ Aberdeen corridor, which could marginalise the CNPA or Highland Council being funded centrally. Reassurance should be sought from SG on this point.
- 3) There should be some idea of the type of economic development that CNPA is looking to encourage included in the final plan.
- 4) Any business development premises should be designed to fit in with the local environment.
- 5) Economic development should not take place adjacent to sensitive capercaillie areas.
- 6) There is a need for both BEAR Scotland and Highland Council to maintain a good road network if economic development is to be sustainable.

## **IMPACTS ON NATURE DESIGNATIONS (7)**

- 1) What is stated in this question is agreed.
- 2) However there should be a wider focus with the impact assessment having a more inclusive effect on other flora and fauna; e.g. red squirrels, crested tits, rare orchids etc.
- 3) This community continues to be concerned about the impact of sewage flowing into the river from our new treatment works, despite assurances from SW and SEPA that detrimental levels affecting freshwater pearl mussels have not been reached.

## **PLANNING OBLIGATIONS (8)**

- 1) Question 1 – agreed a revised and more rigorous policy is needed.
- 2) Question 2 – agree more specific guidance about planning obligations for different sites is needed.
- 3) Any planning obligations decided upon should be sensible, appropriate, legally required AND enforced.

## **FLOOD RISK AND CLIMATE CHANGE RESILIENCE (9)**

- 1) Question 1 – Agreed - sustainable drainage schemes should be required on all new developments.
- 2) Agree that natural flood management should be used where possible.

## **LAND MANAGEMENT IN UPLAND AREAS**

- 1) Question 1 – Agreed. It is important for upland areas to be protected. If new tracks are required they should be exceptional and subject to strict planning conditions.

## **THE SETTLEMENT OF BOAT OF GARTEN**

- 1) In our view the settlement boundary should include Street of Kincardine, Mains of Garten, Drumuillie, and Chapelton. The Boat of Garten Community Council area is unusual in having these outside settlements. Their absence from the settlement boundary would suggest that they are not considered within the LDP. Confusion in planning terms especially can arise when planning applications are received in these areas whether or not they are 'called in' by CNPA. There could be scope for affordable housing in some of these outlying areas which is not considered within this document.
- 2) Digital connectivity for Boat of Garten remains a high priority. It is disappointing that the mobile mast for which planning permission was granted on the railway yard, designated within this plan for economic development, has not gone ahead. A pre-application consultation has been received for a mast on the site at the end of Strathspey Park. Within the site assessment report it is also suggested that this site has potential for 2 affordable housing plots. Should such a planning application for the mast be received in the very near future, which seems likely, it should be called in by CNPA as this area is not currently designated as a site for economic development. It is part of Deshar Woods.
- 3) There is no objection to the settlement objectives as they stand. However they are incomplete. The main objective from the perspective of the village is that it should be a 'pleasant, supportive, safe, accessible place to live in a sustainable environment'.

- 4) The village has a speeding working group which, in liaison with Highland Council and the Police, is seeking to promote safe, active travel for all members of the community.
- 5) It needs to be economically sustainable and have a population size that supports the school, church, golf club, viability of the community hall, shops, restaurants, accommodation and other businesses and with good access to local services in Badenoch and Strathspey and beyond.
- 6) The number of holiday homes where houses are vacant for long periods of time is an issue which causes concern to the community.
- 7) There are new babies and toddlers in the village for which the nursery school will be short of places as they become of that age. It is essential they are accommodated within the nursery school if the main primary school is to be sustainable. It is recognised that this is a matter for Highland Council but CNPA should also be alert to this as part of village sustainability.
- 8) Enhancing affordable housing remains an issue for this village. It is known that there are local families and individuals still on the housing list needing affordable accommodation. Because of our location surrounded by woodland it is hard to identify housing sites other than THCO74 and THCO75 for 100% affordable housing.
- 9) We agree with the importance of the railway and caravan park for tourism. It is noted that CNPA have ruled out THCO58 as an economic development site.
- 10) The protected open spaces of the Milton Loch and Woodland and the Playing Field are agreed.

**DATE 26th FEBRUARY 2018**