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# CAIRNGORMS NATIONAL PARK AUTHORITY

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## FOR DECISION

**Title: CAIRNGORMS NATIONAL PARK  
LOCAL PLAN - CONSULTATION DRAFT**

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### **Purpose**

The purpose of this paper is to:

- brief Members on the Local Plan preparation process so far and the measures required to keep it moving forward;
- obtain agreement for the publication of a Consultation Draft Local Plan;
- obtain agreement for a series of Local Plan workshop sessions for Members.

### **Recommendations**

1. That the Planning Committee agrees to publish a Cairngorms National Park Local Plan – Consultation Draft for formal consultation in order to obtain views and comments from local communities and a wide range of other interested parties all of which will inform the eventual position that Members take on policies and proposals for the Finalised Deposit Version.
2. That the Planning Committee agrees to a series of workshop sessions to allow Members to consider and discuss policy options and related issues with regard to the emerging Cairngorms National Park Local Plan in tandem with the wider consultation process.

### **Executive Summary**

3. Following the extensive initial consultation with local communities and others in 2004, work has been proceeding with analysing the results of the consultation and drafting the Local Plan. We are now at a stage where it is considered appropriate to publish the embryonic draft of the Local Plan and hold a further round of consultation to gauge whether the contents reflect the views expressed in the initial consultation. *It is not necessary or desirable for Members to endorse the content at this*

*stage, only the publication for consultation purposes.* In tandem with this wide consultation, it is also proposed to hold a consultation for Members taking the form of a series of workshops that will allow Members to explore and discuss the issues in greater depth. All of this consultation will in turn inform the drafting of the Finalised Deposit Version of the Local Plan that will eventually come before the Planning Committee for formal endorsement. It is considered that the recommendations in this report allow the Local Plan process to move forward whilst ensuring that there is opportunity for full and considered dialogue before any decisions are taken on the content of the final document.

## **Information & Context**

4. From the outset the Cairngorms National Park Local Plan has been a priority. With 4 existing Local Plans of varying age and content, it was considered imperative to secure a policy framework that would give consistency and direction for planning in the Park in accordance with the 4 aims. It was agreed at the outset that consultation and community involvement would be at the heart of the Local Plan.
5. The Local Plan project has been moving forward apace overseen by the Local Plan Working Group that has a wide membership including CNPA staff and Board Members, the 4 local authorities, statutory agencies, representative of land owners, Association of Cairngorms Community Councils and the Chamber of Commerce.
6. The consultation carried out in the latter part of 2004, prior to work starting on the drafting of the Local Plan, involved a postal questionnaire with >14% response rate and 44 community meetings attended by some 10% of the Park's population. The report on this consultation was accepted by the Planning Committee in April 2005.
7. The results of the consultation have informed the work on the draft Local Plan over the last few months, as have ongoing consultations with statutory agencies etc. and the results of the Heriot-Watt University Cairngorms Housing System Analysis. Work in progress has been circulated round the Local Plan Working Group and comments taken on board. Draft community statements and settlement maps have been made available to communities for comment, to check on accuracy and to ascertain that they reflect the views expressed in the initial consultation.
8. The Local Plan will have to be subject to Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) as previously agreed by Members. This process has already commenced and meetings have taken place with various statutory agencies to agree the scope of the SEA. As well as consulting on the Local Plan it is also necessary to consult on the SEA/SA. IN addition, the SEA/SA has to be carried out at each stage of the Local Plan's evolution.

9. The Local Plan is still work in progress and there are areas where some information is awaited e.g. more detailed population/household projections, precise infrastructure capacity, results of landscape capacity work currently being carried out by consultants. It is considered, however, that it is vital to keep the process moving forward. Sufficient work has been done to justify the publication of a consultation draft at this stage to ascertain if the work so far reflects previously expressed views, and to obtain additional comment and information that will enable critical areas of policy to be further refined to enable Members to take a view on the content of the Finalised Version.
10. Given that the document is still evolving, and Members have not yet had the opportunity for the necessary in-depth discussion and analysis of all of the issues and consultation responses, it is not felt appropriate at this stage to ask the Planning Committee to endorse the contents. It is considered sufficient at this stage for Members to accept the Consultation Draft of the Local Plan simply for publication to promote further consideration and comment by local communities and others with a stake in the Park.

#### Presentation & Format

11. The working version of the Local Plan still has the format and appearance of a traditional local plan. This is simply for ease of drafting to ensure that all issues are fully covered and to allow for a proper comparison with existing local plans and Scottish Executive planning policy and guidance. It is intended that the Finalised Deposit Version will have a more exciting, simpler and shorter format with fewer policies encapsulating the range that is currently covered by a larger number of more comprehensive policies. It is important at this stage to present the work in this form so it can be demonstrated that it has a sound basis. We will end up with a distinctive Cairngorms National Park Local Plan.

#### Housing Policy

12. All of the policies in the Local Plan are important, but housing policy is likely to be the most difficult and contentious area. During the previous consultation the lack of affordable housing was the main concern in every community in the Park, along with concern at the impact of second homes and the view that the scale of development in recent years was disproportionate to the size of settlements. The lack of capacity in sewerage and water infrastructure is also a constraint for future development. The Park was not in existence when the existing local plans were prepared and there is now a need to produce a Local Plan that achieves the 4 aims in a collective and co-ordinated way. In essence the needs of communities have to be met whilst safeguarding the natural and cultural heritage of the Park. This points to a Local

Plan with a focus on providing the level of housing necessary to maintain viable and thriving communities.

13. The Heriot-Watt work has made progress in quantifying the numbers of affordable houses needed in various areas throughout the Park. We are able to match that with projects in the pipeline and identify further provision required for the 5 year period covered by the Local Plan. Affordable housing in the narrow definition used by Communities Scotland, housing associations and local housing authorities effectively means social rented or low cost home ownership housing. It is clear from the Heriot-Watt work and the community consultation to date that there is a large section of the population who do not qualify for “affordable housing”, but cannot afford to access housing on the open market. To meet the existing and future needs of communities in this respect there will need to be some provision for what can be termed “local need” housing.
14. The existing local plans have not met affordable or local housing needs yet a substantial level of housing development has taken place that has had a pronounced environmental impact. Perpetuation of this trend will not meet the Park’s housing needs or safeguard the natural and cultural heritage. It is unsustainable. With a clear requirement for both affordable and local need housing in the Park, a lack of infrastructure capacity, and a statutory duty to safeguard the natural and cultural heritage, it is clear that Local Plan policies will have to be more restrictive than in the past.
15. The housing paper previously considered by the Board highlighted the need to look at various options to address housing problems in the Park including a percentage of development set aside for affordable housing, new development tied to meeting the needs of people resident in or moving to the Park to work, changes to planning legislation regarding second homes, and restricting occupation of houses to principal residences.
16. The Heriot-Watt study has commented on these options and highlighted that circumstances in the Park require some targeted measures. Further work does need to be done on the precise nature of restrictions on new housing, in terms of practicality, availability in perpetuity, financial viability, availability of funding mechanisms, deliverability and enforceability. Whilst there is much in National Planning Policy that would appear to support some of the measures we might want to explore, the Scottish Executive has stressed that policies have to be evidence based. The Consultation Draft of the Local Plan will provide an opportunity to explore these issues and gauge a wide range of opinion.

17. With this in mind it is intended that the Consultation Draft of the Local Plan contains some options for housing policies ranging from some similar to existing local plans where a proportion of each site has to be affordable, to more radical policies where the vast majority of housing has to meet affordable and local needs in the Park. Everything in the document will be without prejudice to the eventual decision of Members on the Finalised Deposit Version of the Local Plan.

### Members Role in the Consultation Process

18. Whilst Members must take account of the results of the wider consultation process, it is also important that they have an opportunity to consider the issues and content of the Local Plan in depth and not only in the context of relatively short debates during formal Planning Committee meetings.
19. It is therefore proposed that we arrange a series of workshops where Members can explore and debate the issues and draft policies etc. at length. This will be a parallel consultation to that with communities and others, and can take any form that Members feel to be appropriate. It is considered that at least 2 or 3 sessions will be necessary, probably topic based, and involving staff from various groups in the authority depending on the subject matter. A workshop on housing, for example, would require input of staff from both the planning and economic/social development groups to ensure that both planning policy and delivery mechanisms were covered.

### **Conclusion**

20. There is a lot of work to be done in a relatively short period of time, particularly as we wish to have a joint consultation for the National Park Plan and Deposit Version of the Local Plan in Spring 2006. There is considerable expectation amongst communities for a Local Plan that reflects the results of consultation to date. As a Planning Committee you urgently need an up to date Local Plan for the entire Park to give consistency for all involved in the planning process. For these reasons, it is imperative that the process keeps moving forward and it is considered that the measures proposed in this report and the recommendations on the first page are the appropriate way of doing this.

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