

Issue 3	Housing Land Supply/Spatial Strategy	
Development plan reference:	Housing Land Supply Spatial Strategy	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>080 Badenoch and Strathspey Conservation Group 186 Elisabeth and Keith Urquhart 182 John Lovie 079 Mar Estate 044 North East Mountain Trust 110 Perth and Kinross Council 104 Phil Swan 195 Ramblers Scotland 226 Rothiemurchus Estate 087 Scottish Campaign for National Parks 051 Scottish Government 061 The Cairngorms Campaign 070 The Crown Estate 043 The Highland Council 196 Woodland Trust Scotland 090 Victor Jordan</p>		
Provision of the development plan to which the issue relates:	Housing land supply Settlement strategy	
Planning authority's summary of the representation(s):		
<p>HOUSING LAND SUPPLY <u>Overall supply</u> Badenoch and Strathspey Conservation Group (080) - Object to a plan which makes provision for housing land to meet need and demand – demand is substantial because of the nature of the area.</p> <p>There is no clarity on what the CNPA has achieved to date and what it might achieve in the next 5 years. The statement is idealized and not based on the CNPA track record.</p> <p>Residency Criteria - object to the scale and pace of housing proposed which is self-evidently unsustainable. We recommend the use of residency criteria to provide a small amount of development for the needs of people who cannot afford open market housing yet who have a reason for living in the CNP e.g. Work or family connections. This echoes previously discussed options proposed by CNPA.</p> <p>John Lovie (182) - The majority of respondents to the MIR preferred land allocated for affordable housing only. CNPA should provide such land rather than large allocations for open market housing.</p>		

Mar Estate (079) - Support vision and spatial strategy and the way the aims of the Park are to be delivered. Support the spatial strategy. However consider that the allocations included for Braemar do not reflect this strategy. Land allocations should be more forward looking and proactive.

North East Mountain Trust (044) - The requirement to supply sufficient land for housing should be removed from the requirements on the National Park Authority and the text should clarify this as a stated aim of the Authority. Policies should then be devised to cater specifically for the housing needs of residents, and not for unrestricted housing demand.

Phil Swan (104) - The information presented has misled the public particularly in regard to the allocation of land for housing, and the approach to affordable housing. As a result the consultation should be relaunched.

Scottish Government (051) - Concerned the requirements for housing land over next 20 years is unclear, so it is difficult to ascertain if a sufficiently generous supply of housing land is being provided. Questions the accuracy and clarity of the tables in the evidence report and the assumption that all the land with consent will be delivered. This reduces flexibility.

The Cairngorms Campaign (061) - Objects to the scale of development proposed in the Plan (as outlined in the allocations from page 50 onwards).

Request a fundamental rethink of the housing approach in the National Park, suggesting it should emulate the Peak District in England (various documentation about this approach is provided) which restricts housing to local occupancy only. Suggest National Parks should not be required to meet housing need, but acknowledges Scottish Government requirements to the contrary. Request the inclusion of an occupancy policy (suggested wording provided) within the Plan. Concerned about amount of development in Badenoch and Strathspey especially since 1991 and the detrimental impact this has had on wildlife. The continuation of this approach results in excessive housing building which damages natural and cultural heritage and is not reducing housing costs as demand will still outstrip supply, results in unlimited growth and is not reducing the overwhelming need for housing for local people.

Victor Jordan (090) - The information provided in the evidence tables regarding Aberdeenshire are confusing. It appears for this area, and Perth and Kinross there is no housing requirement for market housing, just a requirement for affordable dwellings. There is no explanation why some open market houses between 2010 to 2029 have been omitted. This is further complicated when comparing the original evidence report.

For both Aberdeenshire and Perth and Kinross no requirement is given in Table 12 on page 27 of the Evidence Report for 2015 to 2019. Instead the words "Based on established Housing Land Supply" are inserted which seem like nonsense.

Presentation of information

Scottish Government (051) - Concerned the requirements for housing land over next 20 years is unclear, so it is difficult to ascertain if a sufficiently generous supply of housing land is being provided. Questions the accuracy and clarity of

the tables in the evidence report and the assumption that all the land with consent will be delivered. This reduces flexibility.

Need for a generous supply

Scottish Government (051) - Question whether the Plan identifies a generous supply of housing land sufficient to meet all housing need and demand for at least ten years beyond the adoption of the Plan. Suggest that if the housing allocation is being restricted to protect the integrity of the Park this will need to be properly justified in the LDP

Need to protect the special qualities

Badenoch and Strathspey Conservation Group (080) - To meet this demand is incompatible with achieving sustainable development and occurs at the expense of the natural environment and would significantly harm the CNP's special qualities. Object to no justification why demand should be met in a National Park. The only reference to natural environment states that the "special qualities of the Park are enhanced by new development where possible and protected from new development that would significantly erode or harm them". This statement fails to provide a vision that gives clarity on how planning decisions are actually made.

Need to match supply with employment

Elisabeth and Keith Urquhart (186) - Housing proposals are more than necessary, are unsustainable, are not matched with employment provision and promotes long distance travel to work.

Nature of allocations

Elisabeth and Keith Urquhart (186) - Housing proposals are more than necessary, are unsustainable, are not matched with employment provision and promotes long distance travel to work.

Ramblers Scotland (195) - Support new housing being focused within settlement boundaries. However too concentrated development would lead to loss of green space and opportunities for public enjoyment of the outdoors

Scottish Campaign for National Parks (087) - Large allocations will not enhance the national park and promote developers securing as many houses as possible to meet an unrequited demand to live in the Park, which cannot be absorbed into the character of existing settlements.

The policies should encourage a return to attractive stone built properties which fit into existing townscapes through small scale additions to the built environment

Woodland Trust Scotland (196) - Object to the approach taken to allocate land for housing which is in or adjacent to ancient woodland, ancient replanted woodland, or ancient semi-natural woodland.

SPATIAL STRATEGY

Conflict with the aims of the Park

Badenoch and Strathspey Conservation Group (080) -

The LDP cannot simplistically state that the development will be the 'right' amount and in the 'right' place and it will 'best' use existing resources. These are judgements that need to be made based on information. The LDP should not

include subjective opinion. It should provide logically argued justification.

Timescales of the Plan

Badenoch and Strathspey Conservation Group (080) -

Para 1.23 - Object to the timescale of 'in the next 5 - 20 years' in the context of 'everyone should be able to see what those opportunities [for new housing] are in the next 5-20 years' and to the inclusion of allocations for the next 20 years. This is double the length of time stated in 1.1, is undemocratic, creates planning blight, and providing too little opportunities for reappraisal of the allocated sites. There is no indication of how much land is considered to apply to which 5 year period which should be clearly stated under each settlement.

Amount and nature of development

Badenoch and Strathspey Conservation Group (080) -

Object to the statement "We want to enable new housing which is affordable and meets community needs". CNPA is not in a position to achieve this. The CNPA's model of housing provision provides a small proportion of affordable housing and a large proportion of open market housing. In addition, the definition of 'affordable' can include open market housing that is smaller and therefore at the less-expensive end of the market.

Strategy focused on infrastructure

Badenoch and Strathspey Conservation Group (080) -

Para 1.22 – Object. The first sentence which suggests opportunities for economic growth and diversification is not justified. There is a conflict between economic growth and diversification particularly on some land allocated for economic development. There is no proper justification for the route taken in allocations or approach which includes consideration of the natural environment and commitments to sustainability. The 2nd sentence creates conflict as the land allocations are all on land mentioned in this sentence except for mountain (for obvious reasons). It is therefore unclear what this paragraph is meaning.

Scottish Campaign for National Parks (087) - The use of infrastructure and communications corridors to focus development is flawed as these are also corridors critical to natural heritage assets. Thus, the reasons for and means of development must serve the higher purpose of maintaining these assets.

Consequentially housing need should not be met by simply applying a 25% contribution from open market development which will result in an oversupply of open market, expensive houses for retirees or second homes or commuters. This over supply de-stabilises community cohesion and negates the aspiration of the NPA to have 'thriving communities'.

Examples elsewhere, eg the Peak District National Park have been released from the need to respond to government targets for housing supply, thus allowing a focus on supplying housing to meet the needs of the Park's communities

Phil Swan (104) - Concerned para 1.21 and 1.22 do not present an accurate picture of the transport connectivity of the north-east of the Park. Question the blue corridor shown on the strategy diagram between Ballater and Braemar and what is intended but opportunities for growth and diversification in this area. Suggests this is an area of over development and impacted by bad weather. Suggests plan is not doing enough to reduce car dependency. Agree that Ballater

does not affect the strategic transport network.

Spatial strategy diagram

Badenoch and Strathspey Conservation Group (080) - Object as Figure 3 fails to provide any useful or useable information. It seems to serve no practical purpose. It is unclear if it is a material consideration. It is impossible to define the division between the areas for growth and the areas for land management and nature conservation. It is also incorrect because there are land uses in the blue area that follow the description of the green land and vice versa. The blue area cannot reasonably be described as a 'Focus'.

An Camas Mòr appears to be presented as both a settlement and a key employment site when in reality it does not exist.

The 'Key employment sites' are nothing more sophisticated than the larger settlements.

Some of the most important land for agriculture, forestry, conservation and recreation is in the straths and appears to be within the blue area.

What is 'diversification' intended to refer to?

North East Mountain Trust (044) - Figure 3 - revise to show areas where natural heritage is key and conservation should have priority, to assert that development should be restricted.

Perth and Kinross Council (110) - Diagram: there is a discrepancy between the key and the colours used on the diagram. The key and diagram should match.

Rothiemurchus Estate (226) - Seeks clarification of status of strategy map, as explained at Aviemore CC public meeting- that this is attempting to show where development is likely rather than being an attempt at zoning. Concerned the wording of the last two sentences or para 1.23 suggest the two approaches growth to protection are polar opposites, which is not correct. Current wording and placing within the plan may cause confusion and discourage investment in areas not identified as the focus for growth.

Scottish Government (051) - INFORMAL COMMENT - HS advice provided at MIR stage and settlement maps still stands and could be included in the Action Programme. The maps included in the Proposed Plan were not very clearly presented. HS notes that area based heritage designations have been included except for battlefields.

The Crown Estate (070) - Diagram shows the majority of the Park covered in green designations managed for sporting, agriculture, recreation and nature conservation benefits. Suggests this will stifle other forms of development.

The Highland Council (043) - Spatial Strategy and Vision - support. However the Strategy Map could be improved to reflect connections beyond the CNPA and pick up more elements of the Spatial Strategy text

Victor Jordan (090) - The spatial strategy should focus on the identification of

affordable housing options in settlements which is realistic in light of the capacity of that settlement and its landscape setting. This would move away for a reliance on open market housing, and better meet the needs of sustainable communities. The diagram is flawed because it is not appropriate to have the focus for growth shown by a very wide blue stripe which impinges, especially in Aberdeenshire, on to the wild areas. Secondly it is correct to make certain important roads the focus for growth in a way distinct from the wild areas. Eg A93 between Ballater and Braemar which forms part of the NSA.

Modifications sought by those submitting representations:

HOUSING LAND SUPPLY

Overall supply

Badenoch and Strathspey Conservation Group (080) – remove the provision of land for housing to meet demand. The use of residency criteria should be included.

John Lovie (182) - Allocate land for affordable housing only rather than large allocations for open market housing.

Mar Estate (079) - Land allocations should be more forward looking and proactive, particularly in Braemar.

North East Mountain Trust (044) - Clarify in the text that the Authority will seek to be released from its requirements to supply sufficient land to meet the need and demand for housing land in its areas.

Phil Swan (104) – relaunch the consultation process.

Scottish Government (051) - Suggests producing a single easily understandable table which sets out the total housing land requirement and subtracts total land supply from this requirement, which could then be split into affordable.

The Cairngorms Campaign (061) - Reconsider whole approach to housing policy and do not allocate large housing sites within the Park. Include an occupancy policy (suggested wording provided) within the Plan.

Victor Jordan (090) - the proposed plan be reissued for consultation in a form which sets out the housing requirement(s)

Presentation of information

Scottish Government (051) - The Plan should clearly show the contribution to meeting all housing need and demand expected from allocated and windfall sites up to year 10.

Need for a generous supply

Scottish Government (051) - Sufficient justification for the approach adopted must be provided within the Plan.

Need to protect the special qualities

Badenoch and Strathspey Conservation Group (080) – The approach should also

include more clarity for planning decisions matched against the obligations to conserve and enhance natural heritage.

Need to match supply with employment

Elisabeth and Keith Urquhart (186) - Delete large housing allocations from the Plan.

Ramblers Scotland (195) - Clarify that development within settlements would not erode or result in loss of green space and opportunities for public enjoyment of the outdoors.

Scottish Campaign for National Parks (087) - Remove large allocations and focus on small scale high quality developments which respect the character of existing settlements

Woodland Trust Scotland (196) – remove allocations which are in or adjacent to ancient woodland, ancient replanted woodland or ancient semi-natural woodland.

SPATIAL STRATEGY

Conflict with the aims of the Park

Badenoch and Strathspey Conservation Group (080) – Remove the conflicts between allocations and the commitments to natural heritage and sustainability.

Timescales of the Plan

Badenoch and Strathspey Conservation Group (080) – Amend the timescale for housing allocations to 5 years.

Amount and nature of development

Badenoch and Strathspey Conservation Group (080) – provide a justification for the strategy for growth and the allocations included in the plan. Provide more detailed information on the spatial strategy to clearly indicate where areas for growth begin and end.

Strategy focused on infrastructure

Badenoch and Strathspey Conservation Group (080) – Provide more sophisticated approach to the selection of key employment sites.

Scottish Campaign for National Parks (087) - Delete the current spatial strategy and focus on one which provides for local housing need and protects corridors critical to natural heritage assets

Phil Swan (104) - Remove blue corridor between Ballater and Braemar from the strategy diagram.

Spatial strategy diagram

Badenoch and Strathspey Conservation Group (080) – Remove An Camas Mor as it does not exist. Provide a definition of diversification as mentioned on the diagram.

North East Mountain Trust (044) - Revise figure 3 to include land where natural heritage and conservation objectives will take priority and where development will

be restricted.

Perth and Kinross Council (110) - Amend the key and map to ensure consistency.

Rothiemurchus Estate (226) - Requests deletion of word want for from first sentence, and deletion of last two sentence of para 1.23 (pg 11)

Scottish Government (051) – include improved spatial information which properly reflects heritage designations.

The Crown Estate (070) - Request strategy diagram and state that the green areas could also be managed for renewable resources, employment and housing as appropriate to scale and setting.

The Highland Council (043) – indicate on the diagram key links outside the Park, including Inverness.

Victor Jordan (090) - Revise the spatial strategy to focus development in a way which recognises the need for affordable development to meet the needs of sustainable communities, and respects the capacity of individual settlements.

Summary of responses (including reasons) by planning authority:

HOUSING LAND SUPPLY

Overall supply

Badenoch and Strathspey Conservation Group (080); John Lovie (182); Mar Estate (079); North East Mountain Trust (044); Phil Swan (104); Scottish Government (051); The Cairngorms Campaign (061); Victor Jordan (090) - Regarding the overall supply of land for housing, the CNPA is no different to any other planning authority, and must therefore devise a Local Development Plan which complies with Scottish Planning Policy (SDXxx para 70 onwards), providing a generous supply of land for housing which is based on the outcome of the housing need and demand assessment. This looks to the future in a way which allows land allocations to match need and demand for up to 20 years. The CNPA have not deviated away from the information provided in the HNDAs and will continue to use this base information as instructed by Government unless and until there is a change in Government position on this matter.

The CNPA accept and understand the confusion of some regarding the level of information provided in each HNDAs and it is accepted within the evidence paper (SDXxx page xxx) that not all HNDAs provide precise information on the part of the Park within their area. This is explained within the evidence paper (SDXxx para xxx).

The CNPA remain committed to working with government and other public sector partners to seek a review of the obligations placed on National Parks in Scotland to provide land in the same way as every other planning authority. Whilst this may or may not take the form of restricted occupancy, solely affordable provision, or provision to meet only local demand this remains outwith the remit of the CNPA at present and whilst CNPA can empathise with the frustrations and confusion on the part of some respondents to the different position in English National Parks, CNPA does continue to follow government direction set out in SPP.

Presentation of information

Scottish Government (051) – CNPA must set out its calculations for housing land supply for years 0-20 based on housing authority HNDAs, in accordance with SPP para 70 onwards (SDxx). CNPA is not the housing authority for its area, and so must rely on information produced by the 5 housing authorities covering its area. Perhaps inevitably, each housing authority produces its own HNDA to a timescale to inform its own LDP. Whilst CNPA endeavours to link these 5 differing HNDAs, it is undoubtedly a complex process which does not fit as neatly as one would expect to find in a local authority. In addition, each HNDA is based on functional housing market areas. Within the CNPA only one part of the area forms such a housing market area, that part of The Highland Council within the Park. For all other parts of the Park, the information provided by the housing authority is limited. Moray Council provide information for that part of the Park within their council area, and this has been included in the combined calculations. Perth and Kinross, Angus and Aberdeenshire however do not. The evidence paper (SDxx) has tried to set a calculation for these areas based on the best information available, and to accord with CNPA commitment to support sustainable communities by providing options for growth.

In presentational terms, the CNPA accept that the assessment of this information is complex and has set the combined information from the 5 housing authorities and their associated HNDAs out in supporting evidence to the Plan (SDXxxx). The joining together of this information is not a simple one and the CNPA accept that provision of more simplistic information would be simpler to follow. However, the CNPA has struggled to combine all the necessary information into one table as suggested (051). CNPA considers the tables show the complex information associated with this in a lateral way:

- the need and demand identified by each local authority
- the position with current allocations and permissions
- the combined projected requirement to 2029
- the affordable requirement
- the contribution made from consented and windfall supply
- the contribution made from the effective supply
- and finally, the contribution made from the allocations in the LDP.

CNPA accepts that the tables are not as simple to follow as one might expect in a local authority. With this in mind, CNPA does not accept that there is a simple means to present the information, and does not see how combining the information into one table would clarify the position.

The CNPA do accept however that the position for years 0-10 is not clear. The tables included in the evidence paper set out clearly years 0-5 and years 0-20. The CNPA therefore suggests the inclusion of a revised Table 27 of the evidence report (SDxx) to set out the years 5-10 position. This is taken from published information produced by the constituent local authorities in their housing land audits and appended to Background Evidence Report (SDxx) as updated through Evidence Report (SDxx) and taking account of the latest information from the relevant local authority.

(revised table appended)

In addition CNPA has reconsidered how this information is presented within the Plan. CNPA would suggest that to provide absolute clarity to the reader, and in light of information which is presented in evidence reports rather than within the LDP itself, it would be useful to incorporate wording into the Plan to set out the position. CNPA would therefore like to suggest the addition of Table 27 of SDxx as an appendix to the LDP. In addition CNPA would support the addition of wording to the text associated with each allocation to set out what is expected to come forward during the Plan period. Suggested wording along the lines set out below is provided as a possible way to clarify.

Settlement	Text position	Additional text added to end of para
An Camas Mor	Page 58 para 14.27	It is expected that 315 units will be supplied within the next 5 years to contribute to the overall supply of housing land within the National Park.
Ballater	Page 74 H1	It is expected that 39 units will be supplied within the next 5 years to contribute to the overall supply of housing land within the National Park
Ballater	Page 74 H2	It is expected that 8 units will be supplied within the next 5 years to contribute to the overall supply of housing land within the National Park
Boat of Garten	Page 87 H1	It is expected that 30 units will be supplied within the next 5 years to contribute to the overall supply of housing land within the National Park
Braemar	Page 93 H1	It is however not expected that this development will be supplied within the next 5 years
Carr-bridge	Page 105 after H2	It is expected that 50 units will be supplied across both H1 and H2 within the next 5 years to contribute to the overall supply of housing land within the National Park
Cromdale	Page 111 H1	It is expected that 20 units will be supplied within the next 5 years to contribute to the overall supply of housing land within the National Park
Dalwhinnie	Page 116 H1	It is however not expected that this development will be supplied within the next 5 years.
Dalwhinnie	Page 116 H2	It is however not expected that this development will be supplied within the next 5 years.
Dinnet	Page 122 H1	It is however not expected that this development will be supplied within the next 5 years
Dinnet	Page 122 H2	It is however not expected that this development will be supplied within the next

		5 years.
Dalnain Bridge	Page 126 H1	It is however not expected that this development will be supplied within the next 5 years
Grantown-on-Spey	Page 142 H1	It is expected that 10 units will be supplied within the next 5 years to contribute to the overall supply of housing land within the National Park
Grantown-on-Spey	Page 142 H2	It is expected that 20 units will be supplied within the next 5 years to contribute to the overall supply of housing land within the National Park
Kincraig	Page 160 H1	It is expected that 10 units will be supplied within the next 5 years to contribute to the overall supply of housing land within the National Park
Nethy Bridge	Page 175 after H1 and H2	It is expected that 10 units will be supplied across H1 and H2 within the next 5 years to contribute to the overall supply of housing land within the National Park
Newtonmore	Page 181 H1	It is expected that 40 units will be supplied within the next 5 years to contribute to the overall supply of housing land within the National Park
Tomintoul	Page 190 H1	It is expected that 4 units will be supplied within the next 5 years to contribute to the overall supply of housing land within the National Park
Tomintoul	Page 190 H2	It is expected that 6 units will be supplied within the next 5 years to contribute to the overall supply of housing land within the National Park

Need for a generous supply

Scottish Government (051) – Evidence to support the CNPA approach is set out in evidence reports published to support the Main Issues Report (SDxx) and updated to support the proposed LDP (SDxx). Reference should therefore be made to both. Regarding the generous nature of the supply the HNDAs build a degree of flexibility into their calculations. The CNPA have taken this flexibility into account in working out the requirements from the HNDAs. SDxx Evidence Paper page 15 para 5.11 clarifies The Highland Council included flexibility into their calculations. Table 6 (page 16) goes on to add further flexibility in regards to migration. Page 18 para 5.28 clarifies the flexibility built into the Moray Council calculation. Page 20 para 7.9 goes on to summarise the level of flexibility which has been included.

CNPA does not therefore consider that the supply is restricted, but is in fact in accordance with SPP and its requirements to build in sufficient flexibility. In calculating the total requirement for land supply CNPA has set out the projected

requirement in Tables 11-14 (SDxx page 25). The figure calculated of 2,860 included 551 which should be affordable. This figure has been assessed through the Strategic Environmental Assessment and Habitats Regulations Appraisal. In considering how much flexibility to include CNPA has built in those sites which have permission. Para 8.3 (SDxx page 24) clarifies this to be the case. CNPA has based its calculations on the information gathered by the 5 local authorities in their housing land audits, within which the effectiveness of those sites with permission is set out. It is these figures which have been incorporated into table 10 (SDxx page 23) which sets out the current position regarding effectiveness, and table 27 (SDxx page 35). CNPA has no reason to assume the information presented in the housing land audits is flawed, nor that the effectiveness of sites with permission will not prove accurate.

Based on the information supplied by the housing authorities in their HNDAs which have all been confirmed as robust and credible by Scottish Government, detailed information from the local authorities on the effectiveness of housing land collected in their housing land audits, and additional information supplied by CNPA for those areas which are not discrete housing market areas, CNPA considers that the supply identified is both generous and compliant with SPP para 70 onwards (SDxx).

Need to protect the special qualities

Badenoch and Strathspey Conservation Group (080) – regarding the need to protect the special qualities, the CNPA remains committed to meeting its obligations to provide sufficient land for housing development in a way which ensures the collective delivery of the 4 aims of the Park and the conservation and enhancement of the natural and cultural heritage of the area (SDXxx National Parks (Scotland) Act 2000). This is demonstrated by the policies included in the Plan to ensure protection (Sustainable Design, Natural Heritage, Landscape, Cultural Heritage, Resources), by the detailed supplementary guidance provided to support the Plan (SDXxx), by the completion of phase 1 standard habitat surey works on allocated sites (SDXxx), and by the detailed design information provide in the plan for each settlement or community. The CNPA do not therefore agree that there is insufficient direction and guidance to clarify how planning decisions will be taken.

Need to match supply with employment

Elisabeth and Keith Urquhart (186) – regarding the supply matching growth aspirations in the economy, the National Park Partnership Plan (SDXxx page 41) is clear that to deliver its long term outcome 1 of creating a sustainable economy supporting thriving businesses and communities, there is a need to provide housing land that meets the identified need and demand set out in the Housing need and demand assessments prepared by the Local Authorities (CD xxxx page 41 Policy 1.1 f)). This remains the CNPA's adopted position and the Local Development Plan acts as a tool to achieve this outcome. The plan therefore provides for housing development which will support growth in the economy. The CNPA do not accept that one can happen before the other, the two must go hand in hand. To plan for growth in the economy, and the provision of more jobs must therefore be matched with the provision of sufficient housing land and the CNPA do not therefore see this approach as being unsustainable.

Nature of allocations

Elisabeth and Keith Urquhart (186); Ramblers Scotland (195); Scottish Campaign for National Parks (087); Woodland Trust Scotland (196) - Regarding large land allocations, the CNPA accept that historically there has been a greater focus on conventional land allocations for large volume developments. The proposed LDP does take forward land which is considered to be effective in meeting the requirements for housing but has removed a number of sites from the current plan which are considered excessive to meet this requirement, and has not included any large scale new additions. The CNPA considers it has therefore acted appropriately in providing a degree of continuity to developers and land owners, in taking forward allocations which are meeting the requirements in settlements across the Park, and has not included large areas of additional land. To improve the design of new developments and the fit with existing settlements, the CNPA has included a number of measures, including design supplementary guidance, and detailed development briefs for a number of sites. This work includes a focus on the provision of open space, and the protection of access to recreation space. It also includes detailed information within the settlement section of the plan to highlight requirements to ensure proper consideration of woodland. The CNPA do not consider this should preclude development, but rather that there is a need to ensure additional consideration and care in the preparation of any scheme. Further work on this will take place following adoption of the Plan. The CNPA do not therefore support any change to this general approach.

SPATIAL STRATEGY

Conflict with the aims of the Park

Badenoch and Strathspey Conservation Group (080) - Regarding a spatial strategy which is based on economic growth, the CNPA do not agree that there is a conflict between growth and conservation. The CNPA is committed to supporting the communities in the Park and encourages sustainable economic growth in line with the government's direction in a way which delivers the four aims of the Park. In devising the spatial strategy, the CNPA has recognised that the most sustainable location for growth is within existing settlements. It has then expanded this to focus the majority of growth on those settlements and the key routes between them. The text clarifies this intent. This approach is in accordance with the approved National Park Partnership Plan (CD xxx page 42 Policy 1.2) which sets out a settlement hierarchy based on main and other settlements. During the plan making process the CNPA have then identified land for development. These have been assessed (SDXXXX) and filtered. The proposed plan is the culmination of this work, and provides direction to sites which meet the objectives of the spatial strategy in a way which can deliver the four aims of the park in a collective way.

Timescales of the Plan

Badenoch and Strathspey Conservation Group (080) – regarding the timescales set out in para 1.23, these are in accordance with Scottish Planning Policy (SDXXX para xxx). The CNPA do not accept that this will cause blight, and does not present options for future appraisal. This will occur on a five yearly cycle during the preparation of the next development plan. Regarding clarity on the proportion of this land which falls into each year, the CNPA have included this information within the housing tables contained within the Evidence Paper, (SDXXX Table 11). However the CNPA acknowledges that this is not as clear for

the reader as it might be. The CNPA would therefore support an amendment to the text associated with each housing allocation within the Plan to clarify what number of houses is expected to come forward in years 0-5, and include as an appendix to the Plan a table setting out the 0-5 year, 5-10 year and 0-20 year housing land supply (see below).

Amount and nature of development

Badenoch and Strathspey Conservation Group (080); Rothiemurchus Estate (226); Scottish Campaign for National Parks (087); Scottish Government (051) – regarding the amount and nature of development, the CNPA remain committed to the provision of affordable housing development to meet the need identified. This is supported by the approved National Park Partnership Plan (SDXXXX page 42 Policy 1.4) which supports innovative approaches to affordable housing to meet local needs. The CNPA has agreed with the local housing authorities who are constituent authorities of the Park to provide for the housing need and demand identified (as above). The CNPA has also accepted the Government's benchmark figure for the provision of affordable development within housing projects. The CNPA do not agree that it is acting outside its ability to required affordable development and set out a % to be provided as part of larger schemes. Whilst the CNPA accept that some English National Park Authorities have different obligations, the CNPA must work within the parameters of the legislation set down in Scotland. This includes the need to provide housing to meet the need and demand as identified and agreed by government. For clarify the CNPA has provided a definition of affordable housing within the glossary. This is in line with accepted definitions for the term.

The CNPA do not consider growth and protection to be opposing objectives which are mutually exclusive. The Plan sets out its aspirations for growth tempering this with appropriate policies to ensure adequate protection to the special qualities. The CNPA do not therefore consider there to be a need to remove the last two sentences of para 1.23

Strategy focused on infrastructure

Badenoch and Strathspey Conservation Group (080); North East Mountain Trust (044); Perth and Kinross Council (110); Rothiemurchus Estate (226); Scottish Campaign for National Parks (087); Scottish Government (051); The Crown Estate (070); The Highland Council (043) – The Spatial Strategy is to build on the strengths of the area and on its existing infrastructure, focusing growth on existing settlements and along the routes which link them. The CNPA accepts that these also provide important corridors for natural heritage. There is no implication that the strategy will undermine these and the plan includes the necessary policies to ensure their protection.

The strategy diagram is intended to show in a graphic way how this strategy will be achieved. It, in itself will not be used to zone land and is intended to clarify, at the broadest level, where key sites for growth are and where we will seek to focus economic growth and diversification, and not as suggested by objectors, preclude certain forms of development outside these focuses for growth, nor allow unacceptable development within these key routes.

The diagram does give an indication of key routes leading into, through and out of the Park. The CNPA would not, however, object to an amendment to this diagram to add text to indicate these routes lead to Perth, Inverness, Aberdeen if it is considered to improve the clarity of the diagram.

The diagram shows settlements later included in the Proposals section of the Plan. The role of An Camas Mor cannot be ignored in this regard as it will provide for housing and employment over the next 20 years and beyond. This is clarified in the text at para 1.23.

The comments regarding the key employment sites also reflect the proposals maps later in the plan, where sites are identified for growth. The diagram is intended to be diagrammatic rather than sophisticated, and detail regarding these sites is provided in the Proposals section of the Plan.

The key uses diversification to indicate these are areas where the CNPA expects to see developments which promote sustainable growth, should this be building on existing opportunities, or creating new ones through diversification of existing activities. This includes both development on the ground and other land management practices to enhance existing natural heritage.

The CNPA acknowledges the error in the key to the diagram and seeks to include the amendment as a non notifiable modification.

With reference to the inclusion of additional information into this diagram, the CNPA remain clear that this should be an indicative diagram. It is not a map to show detailed information on constraints to development. The map does show quite clearly that large areas of the Park are to remain managed for sporting, agriculture, recreation and natural conservation benefits. It is part of the CNPA's intention to provide additional information to the reader once the plan is adopted in the way of online links to data held by third parties, such as natural and cultural heritage designations. This information, which is not controlled by the CNPA will be provided for information only and can then be updated as necessary without the need for further amendment to the Plan. The CNPA do not consider it correct to embed this third party information within the Plan which cannot then be updated without consultation.

Phil Swan (104) – The road between Ballater and Braemar, the A93 is a major link road and whilst not a formal trunk road, is the main route between these two key settlements in the north east of the Park. The CNPA remains confident that focusing the majority of growth along this route, with key developments being focused on the identified settlements is an appropriate spatial strategy. Equally, the CNPA remain confident that this route acts, and will continue to act as a major focus for tourist activity. The CNPA do not therefore consider it appropriate to amend para 1.21 and 1.22, nor to remove the part of the strategy diagram which indicates a focus for economic growth and diversification between Ballater and Braemar. The CNPA do not agree that it is an area of over development as it provides a vital link from the heart of the Park, at Braemar to the east. Nor does it agree that it is not doing enough to reduce car use. Creating a focus for growth does just that, and endeavours to restrict development elsewhere. The CNPA remains committed to encouraging economic growth in the identified settlements to support their communities, and whilst the A93 is affected by seasonally severe weather, this adds to the economic prosperity of the area, with Glenshee Ski Area at its end. The CNPA do not therefore support any change to the spatial strategy in response to this representation.

Spatial strategy diagram

Victor Jordan (090) - Regarding the spatial strategy diagram, as the text clarifies; it is a diagram and should be read as such. The route between Ballater and Braemar is not considered so remote as to be inappropriate for a focus for growth

and is an important route linking these two communities. The issues regarding the provision of open market and affordable housing are addressed above.

Reporter's conclusions:

Reporter's recommendations:

Table 27 amended: Housing land supply for LDP

Settlement	Site Name	Status	Consent	Remaining capacity	Effective 0-5 year	Land supply 0-5 year	Land supply 5-10 year	Effective 0-20 year	Land supply 0-20 year
Aberdeenshire									
Ballater	HI Monaltrie Park	Existing allocation		250	39	39	72	96	96
	Sir Patrick Geddes WWay	Proposed allocation		8		8			8
Braemar	St Andrews Terrace	Consent	30	30	30	30		30	30
	Balnellan Rd	Consent	25	25	20	20		20	25
	Kindrochit Court	Consent	11	11		11			11
	Invercauld Frm/Bus Depot	Consent	13	6	13	6		13	6
	Chapel Brae	Proposed allocation		6			6		6
Dinnet	Land to west	Proposed allocation		4			4		4
	Land to east	Proposed allocation		15			15		15
			79	355	102	114	97	159	201

Planning Paper 1 6 December 2013
Appendix 2

Settlement	Site Name	Status	Consent	Remaining capacity	Effective 0-5 year	Land supply 0-5 year	Land supply 5-10 year	Effective 0-20 year	Land supply 0-20 year
Highland									
An Camas Mor	An Camas Mor	Consent	1,500	1500	275	315	250	1025	1025 (future capacity of 475)
Aviemore	Land north of AHR	Consent	161	140	50	50	50	161	161
	Dalfaber west of golf course	Consent	85	85	49	49	31	80	80
	Dalfaber east of Aviemore								
	Highburnside	Consent	45	23		23			23
	Milton Place	Consent	25	25		25			25
	Grampian Road	Consent	20	20		20			20
Boat of Garten	Land by School	Proposed allocation		30		30			30
Carr-Bridge	H1	Consent	117	117	50	50	81	117	117
	Carr Road	Proposed allocation					See above		
	Crannick Park	Proposed allocation					See above		
Cromdale	Auchroisk Park	Consent	22	22		22			22
	West of Auchroisk Pk	Proposed allocation		20		20			20
Dalwhinnie	H1	Existing allocation		6			6	6	5
	H2	Existing allocation		5		5		5	5
	Land at former hotel	Consent	5	5			5	5	5
Dalnain Bridge	H1	Existing allocation		30			12	30	30
	Adjacent to H938	Consent	10	10	6	6	4	10	10

Planning Paper 1 6 December 2013
Appendix 2

	Church Terrace	Consent	2	2		2			2
Grantown-on-Spey	HI	Existing allocation		50	10	10	20	50	50
	Strathspey Hotel	Consent	8	8		8			8
	Land adjacent to hospital	Proposed allocation		20		20			20
Kincraig	HI	Existing allocation		40	10	10	15	40	40
	Ardgeal	Consent	10	6		6			6
Kingussie	Between Ardbroilach Rd and Craig an Darach	Consent	300	300	50	75	90	300	300
	St Vincents Terrace	Consent	4	4		4			4
Nethy Bridge	School Wood	Existing allocation		54		10	30	40	54
Newtonmore	HI	Consent	81	119	40	40	37	120	200
			2395	2641	540	800	631	1989	2262

Moray									
Tomintoul	HI	Existing allocation		6		4		4	6
	H2	Existing allocation		12	1	6	6	1	12
	57 Main Street	Consent	8	8	8	8		8	8
			8	26	9	18	6	13	26

Perth & Kinross									
Blair Atholl	Old A9	Consent		5	5	5		5	5
				5	5	5		5	5