

CAIRNGORMS NATIONAL PARK AUTHORITY

FOR DECISION

**Title: GRANTOWN-ON-SPEY CONSERVATION AREA
MANAGEMENT PLAN CONSULTATION**

**Prepared by: Dan Harris, Planning Manager (Forward Planning and
Service Improvement)**

Purpose

1. To inform the Planning Committee of Highland Council's consultation on a Draft Grantown-on-Spey Conservation Area Management Plan and to agree the Cairngorm National Park Authority's response to the consultation.

Recommendation

2. That the Planning Committee agree to officers submitting the response to the consultation outlined in this report.

Background

3. Conservation areas were first introduced by the Civic Amenities Act 1967 with the current legislative framework provided by the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. The Act places a statutory duty on Local Authorities to identify and designate parts of their area which merit conservation area status by virtue of their "special architectural or historic interest".
4. Conservation areas therefore exist to manage and protect the special architectural and historic interest of a place - in other words, the features that make it unique. Conservation area status brings the following works under planning control:
 - a. Demolition of unlisted buildings or structures.
 - b. Removal of, or work to trees.
 - c. Development involving house extensions, roof alterations, windows, stone cleaning or painting of the exterior, satellite dishes, provision of hard surfaces, the erection or alteration of gates, fences and walls.
 - d. Erection of ancillary buildings (such as sheds/garages) and raised decking/platforms.
5. Grantown-on-Spey Conservation Area was originally designated on March 4th 1975 by Moray and Nairn Joint County Council. In 2018-19 a Conservation Area Appraisal carried out, undertaken on behalf of The Highland Council, as a Grantown 250 legacy project led by The Grantown Society. The Appraisal identified issues and recommended to enlarging boundary. The purpose of the Conservation Area

Management Plan is to address the findings of the Appraisal and further consider the Conservation Area's challenges, threats and opportunities.

6. The consultation on the Management Plan is being run by The Highland Council, between 6th of February to 19th March 2023. A consultation event was also held in Grantown's Community Centre Café on February 15th.

Proposed CNPA Consultation Response

7. The National Park Authority thank The Highland Council for the opportunity to comment on the draft Grantown-on-Spey Conservation Area Management Plan which overall is very welcome. The Management Plan will support the use of Policy 9: Cultural Heritage in the Cairngorms National Park Local Development Plan (LDP) 2021, which states that "Developments affecting a conservation area should be consistent with any relevant conservation area appraisal or management plan." The Park Authority is pleased that the Management Plan specifically references Policy 9 and the LDP in its introduction, highlighting the relation between the documents. The Management Plan also supports the National Park Partnership Plan's (NPPP) 2022 Priority C10. Cultural heritage, which aims to "Safeguard and promote the Park's cultural heritage and provide opportunities for everyone to experience and learn about the National Park's outstanding historic environment, history and culture." The NPPP is not referenced in the Management Plan and so it is recommended that a reference be added in Section 1.
8. The Park Authority agrees with the summary of significance and identification of the character areas within the town. Further context may be gained from the Park Authority's own work on landscape character and including a reference to this in Section 2.0 of the Management Plan may be beneficial:
<https://cairngorms.co.uk/caring-future/cairngorms-landscapes/landscape-areas/?grantown-on-spey>
9. The Park Authority agrees that lack of repair, loss of original architectural detail, the use of inappropriate materials, inappropriate and unsympathetic alterations and extensions are a challenge within the conservation area. It notes that many of the measures to address these fall outside the planning system and would welcome further practical guidance or examples of best practice on how to encourage or implement them.
10. The Park Authority welcomes the prominence given to the public realm and its management within the Management Plan. This supports a number of priorities of the NPPP's, including B9. Mental and physical health, C4. Village and town centres, C6. A sustainable destination, C7. Transport to and around the Park, C8. Accessible path and cycle network, C9. High-quality visitor experience and C10. Cultural heritage.
11. The Park Authority support the identification of different management approaches to different areas of the Conservation area. In particular, the more permissive approach to the alteration and adaptation of buildings within the more modern parts of the Conservation Areas is welcomed.

12. While the Park Authority agree that the adaptation of buildings and installation of micro renewables represents a particular challenge in the Conservation Area, it finds the suggested means of management, as outlined in paragraphs 5.6 to 5.7, either lacking in detail or too restrictive. The paragraphs and the guidance they direct the reader to could be in conflict with National Planning Framework 4 (NPF4), in particular Policy 1 which states that “When considering all development proposals significant weight will be given to the global climate and nature crises”.
13. Further areas of conflict arise from:
 - a. Policy 2, which states that “Development proposals to retrofit measures to existing developments that reduce emissions or support adaptation to climate change will be supported”.
 - b. Policy 11, which states that “Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported”.
 - c. Policy 19, which aims “to encourage, promote and facilitate development that supports decarbonised solutions to heat and cooling demand and ensure adaptation to more extreme temperatures” and states that “development proposals for buildings that will be occupied by people will be supported where they are designed to promote sustainable temperature management, for example by prioritising natural or passive solutions such as siting, orientation, and materials.”
14. It is acknowledged that NPF4’s Policy 7 states that “development proposals in or affecting conservation areas will only be supported where the character and appearance of the conservation area and its setting is preserved or enhanced”. However, as stated in the letter, dated February 8th 2023, from the Chief Planner and Minister for Public Finance, Planning and Community Wealth on the transitional arrangements for National Planning Framework 4, Policy 1, “prioritises the climate and nature crises in all decisions”.
15. The Park Authority is of the view that the adaptation of buildings, to both reduce their carbon footprint and address the effects of the changing climate is of great importance and especially so in Conservation Areas, where many buildings are of an age and construction that means they are challenging in terms of constraints and cost to adapt. There is a risk that a restrictive approach to the adaptation of historic buildings within the Conservation Area will lead to them becoming unaffordable to run and unusable for a range of purposes, including domestic, commercial and community uses, thus leading to further issues of maintenance and neglect. We would prefer that the management plan identified how changes can be made at the same time as preserving the overall character of the Conservation Area and recommend that paragraphs 5.6 to 5.7 are re-drafted to be more supportive of the adaptation of buildings for climate resilience, energy efficiency and the installation of micro renewables.
16. Paragraphs 5.6 to 5.7 contain a number of links to Historic Environment Scotland (HES) documents, all of which pre-date the publication of NPF. The Park Authority therefore recommends that the compliance of these documents with NPF4 be checked before publishing a final draft.
17. The Park Authority note the inclusion of potential development sites within the Management Plan. It should be noted that the identification of a site within the

Management Plan does not bestow any weight upon any development proposals on these sites and that proposals will be determined in accordance with the policies of NPF4 and the Cairngorms National Park LDP.

18. The Park Authority welcomes any further consultation with the Highland Council on the Management Plan and is happy to provide further information or clarification if necessary.

Next Steps

19. To submit the consultation response to the Highland Council before March 19th.

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Draft Grantown-on-Spey Conservation Area Management Plan:

<https://consult.highland.gov.uk/resources/portal/supportingfiles/775558>

National Planning Framework 4:

<https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2023/02/national-planning-framework-4/documents/national-planning-framework-4-revised-draft/national-planning-framework-4-revised-draft/govscot%3Adocument/national-planning-framework-4-revised-draft.pdf>