
**CAIRNGORMS NATIONAL PARK
LOCAL PLAN INQUIRY**

**WRITTEN SUBMISSIONS
STATEMENT
BOAT OF GARTEN**

APRIL 2009

On behalf of Seafield Estate



HALLIDAY | FRASER | MUNRO
PLANNING

CONTENTS

1	INTRODUCTION	2
2	OBJECTION SUMMARY	2
3	THE CAIRNGORMS NATIONAL PARK AUTHORITY'S POSITION	3
3.1	DEPOSIT LOCAL PLAN (CORE DOCUMENT CD6.11)	3
4	ASSESSMENT	4
5	CONCLUSION	6

1 INTRODUCTION

This Written Submissions Statement has been prepared by Halliday Fraser Munro Planning on behalf of our Client – Seafield Estate. It sets out our expanded written submissions representation in respect of Boat of Garten.

2 OBJECTION SUMMARY

Settlement Title: Boat of Garten

Objection Reference: 455a/b

Summary Objection:

Our representation concerns the non-allocation of land to the south of Deishar Road for residential use.

3 THE CAIRNGORMS NATIONAL PARK AUTHORITY'S POSITION

3.1 DEPOSIT LOCAL PLAN (CORE DOCUMENT CD6.11)

In July 2007, the Cairngorms National Park Authority published its Deposit Local Plan (**Core Document CD6.11**). The settlement proposal for Boat of Garten within the plan provides proposed residential land uses, H1 and land to be retained for use by the community, C1.

Seafield Estate made representation to the Deposit Local Plan in respect of Boat of Garten, seeking the allocation of additional land to the south of the settlement for residential.

The CNPA's response to our representations to the Deposit Local Plan (**Core Document CD6.11**) states that:

"The allocated sites within Boat of Garten will be analysed in light of the comments received. This analysis will be linked to the need for housing land within the area, and the effectiveness of the sites included in the deposit plan. The sites will also be judged against the SEA findings, the physical constraints of these sites and the requirements for effectiveness as set out in national guidance. Having assessed these sites, a review will be undertaken of the alternative land suggested to ascertain its qualities in meeting the local housing need, and the impact it would have when assessed through the SEA."

This statement suggests that a review would be undertaken of alternative sites put forward. We have found no documentation or evidence to outline that this review has been carried out.

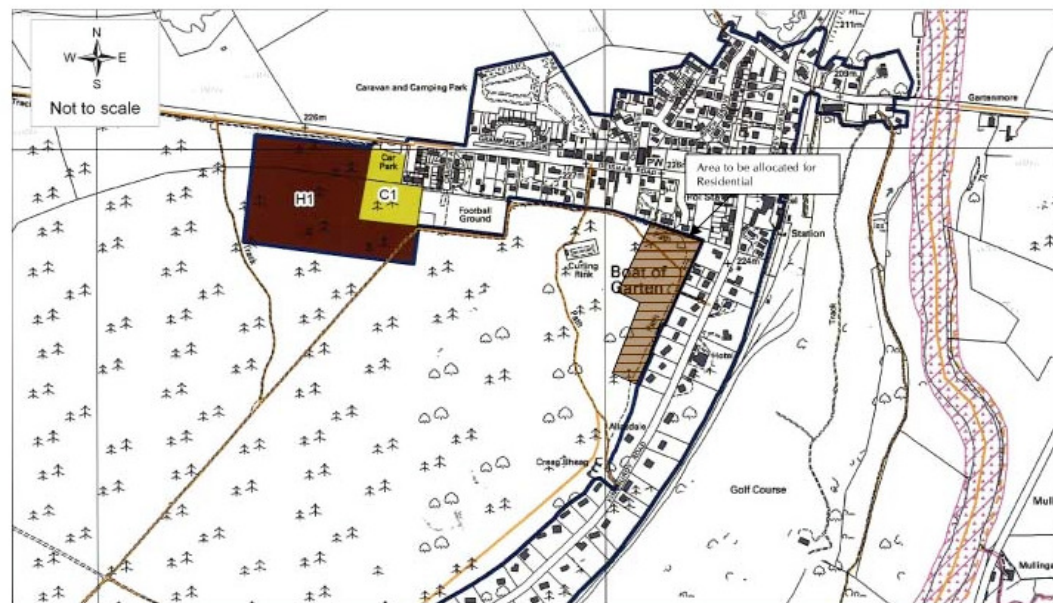
The response also suggests that alternative sites would only be considered in a future review of the plan. However, we feel that the evaluation of sites proposed in response to the Plan should be undertaken now to ensure that the most appropriate sites, in planning terms, are allocated and delivered throughout the period of the Plan.

The site selection process is explained in slightly more detail in Topic Papers recently published. Topic Paper 4 (**Core Document CD7.24**) provides information on site allocation and states: *“The adoption of a site within an existing Local Plan was considered to give certain weight to that designation”*. Despite stating that these sites would be subject to assessment to consider how they *“fitted in with the policies of the Deposit Local Plan”*, there is no evidence available of this review.

4 ASSESSMENT

HOUSING ALLOCATION

We objected due to the non-allocation of land to the south of Deisher Road as seen on the map below:



A number of residential sites, including the one we propose, have been allocated for housing in the Badenoch and Strathspey Local Plan 1997. The adopted Plan identifies the area as 5.6.1 (b) south of Deishar Road; 1.3 ha site for 15 houses and is suitable for development.

The CNPA have offered no reasoned justification for not including these sites in the Deposit Local Plan (**Core Document CD6.11**) and we suggest that our proposed residential site remains included in the settlement boundary.

The CNPA Statement of Case states that *“given the variety of opportunities which exist for the provision of housing within the proposed settlement boundary”*, our residential site should not be allocated. However, the CNPA's proposed boundary is set around existing developments and existing commitments, offering very little opportunities for housing development.

Nothing has altered in terms of these allocations as the various rounds of Modifications have progressed. Additionally, the CNPA have excluded a number of sites allocated in the Adopted Badenoch and Strathspey Local Plan leading to a status quo boundary rather than a forward looking one.

SITE LOCATION

The proposed site is bounded to the north by residential units on Deishar Road and to the east by properties on Kinchurdy Road. This proposal is an extension to an existing settlement already included in Boat of Garten. The site has good access from main roads; Deishar Road and Kinchurdy Road, meaning good connections to the village centre, local amenities and wider surrounding area. This allocation will allow for future development in Boat of Garten and will act as a logical extension to the settlement.

The CNPA's Statement of Case raises concerns over the development on an area of woodland used for recreational purposes. However, the trees on site have not been given any ecological designation. Furthermore, the core path network can be maintained despite development. This proposal could accommodate housing development set against a woodland backdrop and reflect the general character of Boat of Garten.

Rural villages offer a high quality of life and should not be unduly restricted by inflexible planning policies or allocations. It makes sense to plan for realistic

growth and suggest that larger areas of land should be released for housing in order to ensure the most appropriate locations are designated. Locating increased resident population around existing settlements is sustainable in its potential to reduce the need to travel, the support of existing and new facilities and the financial benefit for the local economy.

5 CONCLUSION

In summary, therefore, we believe that the proposals map should be amended (as included in this Statement) to identify the site to the south of Deishar Road for residential use, for the capacity of 15-20 dwellings.