
**CAIRNGORMS NATIONAL PARK
LOCAL PLAN INQUIRY**

**WRITTEN SUBMISSIONS
STATEMENT
GRANTOWN ON SPEY: H2**

APRIL 2009

On behalf of Reidhaven Estate



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1 INTRODUCTION

This Written Submissions Statement has been prepared by Halliday Fraser Munro Planning on behalf of our Client – Reidhaven Estate. It sets out our expanded written submissions representation in respect of Grantown on Spey H2. It follows from discussions with CNPA officers in January 2009.

2 OBJECTION SUMMARY

Settlement Title: Grantown on Spey: H2

Objection Reference: 456p

Summary Objection:

Our representation supported the allocation for H2, however proposed an extension of the allocation to the north. We also sought clarification in relation to the proposed access arrangements.

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 Grantown on Spey within the plan provides proposed residential land uses, H2. It states:

"A 3.25Ha site to the north of Beachen Court with capacity for around 50 dwellings. The site is known to be used for wading birds and would require more detailed survey to establish the ecological importance of the site and the impact of any development."

Our representation to the Deposit Local Plan supported the designation of H2, however sought the extension of the site to the west and north.

There were no amendments made to the policy as part of the First Modification. A further representation was, however, made in order to maintain our original objection and seek clarification to ensure reference is made to access within the settlement statement.

In response to representations made, the CNPA stated that: *"Having assessed the site, a review will be undertaken of the additional land suggested to ascertain its qualities in meeting the local housing need, and the impact it would have when assessed through the SEA"*.

Despite suggesting new sites, we are not aware of these being assessed in relation to the above issues. We have not received any response relating to why such suggested sites have been ruled out, aside from references to Housing Allocations and the fact that the Park are not proposing to change these in order to allocate further housing in Grantown on Spey.

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.

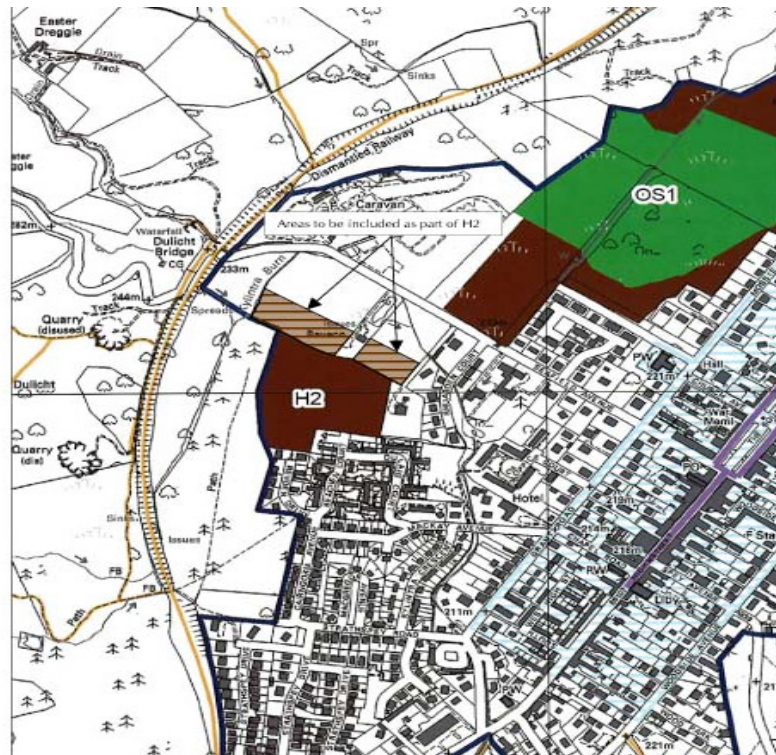
The site selection process is explained in slightly more detail in recently published Topic Papers. However, these have only been available for a short period of time and do not include information on the evaluation of proposed sites by objectors. It is therefore difficult to make comment on whether the most appropriate sites have been chosen or not.

Despite expressing support for the H2 allocation, we feel that the site can be extended to the north and the capacity increased accordingly.

4 ASSESSMENT

SITE EXTENSION

Although we support the designation of the residential site H2, we believe there is an opportunity to extend the site to the north as outlined below:



It is our view that this extended site is suitable for development. This wider area is also allocated for residential purposes within the adopted Badenoch and Strathspey Local Plan (**Core Document CD6.6**) since 1997. The existing Plan identifies the area as 3.1.1 (a) Seafild Avenue - Beachen Court; 6.0 ha site with capacity for 30 houses. It also states the site requires access for Seafild Ave and low-density infill above north escarpment. The whole of this area is therefore considered within the adopted plan as suitable for development.

It is unclear why the area to the north of the H2 zoning within the Deposit Local Plan has been excluded from the Deposit Local Plan and not carried

through from the current adopted plan. We can find no clear justification for the exclusion of this area to the north.

The CNPA in recently published, Topic Paper 4 (**Core Document CD7.24**) provides background information regarding allocated sites. As an initial starting point, paragraph 2.2 of the this document outlines that:

“The adoption of a site within an existing Local Plan was considered to give certain weight to that designation. Sites were then reassessed to consider how they fitted with the policies of the Deposit Local Plan and the strategic guidance provided within the National Park Plan. Where, however, the allocations contained within current plans was considered to conflict to conflict with the policy approach proposed in the Deposit Local Plan, or strategic guidance for the Park Plan, sites not included”.

On the basis of the criteria outlined in the Topic Paper, it is unclear why this extension was not brought forward into the Deposit Local Plan and how it was assessed. There is no justification as to why this area was excluded.

The CNPA within Topic Paper 4 further outline that *“sites from current plans have also been excluded where the amount of land being proposed for any particular use was considered to be in excess of the requirement identified within the Plan”*. If this is the reason as to why this area was excluded, there should be background justification available.

Additionally, the CNPA outline that sites were also assessed in relation to the SEA. From reviewing the SEA report, it appears that assessment has only been undertaken in relation to allocated sites. There is no evaluation of the additional sites.

Furthermore, in their Statement of Case, the CNPA outline that this extension to the H2 site could be considered under Policy 22 as it is within the settlement boundary. Therefore, this provides an opportunity for housing development subject to it being compatible with existing and adjacent land uses. Given that

this response suggests that the site may be suitable for development it should be included within the zoning.

The plan makes reference to the use of the area by wading birds; however, the Strategic Environmental Assessment (SEA) outlined that existing disturbance from surrounding properties and predation means loss of area would have a minor significance.

Furthermore, the aspen trees that currently lie on the site can be protected from development in the future. These issues would be addressed as part of a planning application.

ACCESS

There should be reference within the settlement statement for H2 in relation to access. Access from Seafield Ave was previously considered suitable in the Badenoch and Strathspey Local Plan. In addition, there is a potential ransom strip in relation to access elsewhere which could impact on deliverability.

5 CONCLUSION

In summary, therefore, we believe that the proposal map should be amended to extend the H2 site to the north and increase the capacity accordingly. The text should be adjusted to reflect this.

Furthermore, amend the settlement statement to ensure there is a provision for access from Seafield Avenue.