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23 April 2009

Our Ref: JF/CS  
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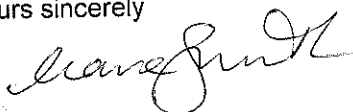
Dear Ms Krawczynska

**CAIRNGORMS NATIONAL PARK LOCAL PLAN INQUIRY  
WRITTEN SUBMISSION ON BEHALF OF GOLDCREST (HIGHLAND) LTD  
OBJECTION REFERENCE: 445**

Please find enclosed 2 no. copies of our expanded written submission in respect of the above.

I trust that this is appropriate, however, should you have any queries, please do not hesitate to contact me.

Yours sincerely



Claire Smith  
Planning Consultant

Enc.

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# Ryden

Cairngorms National Park Local  
Plan Inquiry

Written Submission

on behalf of Goldcrest (Highland)  
Ltd in relation to land at Nethy  
Bridge (Objection Ref 445)

23 April 2009

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## 1.0 INTRODUCTION

- 1.1 On behalf of Goldcrest (Highland) Ltd, objections were lodged to the Cairngorms National Park Deposit Local Plan on 25 September 2007. A total of three objections were submitted which related to the housing land requirement and phased land supply; the failure of the plan to identify land to the east of the settlement within the boundary of Nethy Bridge for residential development, as shown on the attached plan; and, that the capacity of Grantown on Spey proposal H1, should be reduced and an additional site identified in Nethy Bridge for residential development.
- 1.2 These objections were acknowledged by the Authority by letter on 17 December 2007 which also enclosed the Authority's analysis of each objection. The objections were given the reference 445a (Housing Land Requirement and Supply); 445b (Nethy Bridge); and, 445c (Grantown on Spey). Further correspondence was received on 22 May 2008 and 13 June 2008 enclosing the Authority's modifications in relation to each objection. In relation to objection 445a and 445b, no changes were proposed. With regard to the Grantown on Spey objection, the Authority advised that there is an outstanding detailed planning application for the site at Grantown on Spey, which has been allocated for some time and would be determined under the current Badenoch and Strathspey Plan produced by the Highland Council.
- 1.3 These modifications were considered by the Park Board on 28 May 2008 and the Local Plan First Modifications (**Core Document 6.12**) were issued for consultation between 16 June and 25 July 2008. Representations on these modifications were submitted on 15 July 2008 maintaining the original objections.
- 1.4 Outstanding objections were considered and Second Modifications (**Core Document 6.13**) were subsequently agreed by the Board in November 2008. These changes only related to points of clarification and correction of errors rather

than any major changes. Therefore, the objections were maintained and this was acknowledged on 9 January 2009.

## 2.0 OBJECTIONS

### 2.1 Objection 445a: Housing Land Requirement and Supply

2.1.1 Goldcrest (Highland) Ltd objected to the housing land requirement and supply as contained in Section 5 of the Cairngorms National Park Deposit Local Plan (**Core Document 6.11**). In particular, it was argued that Table 2: Housing Land Requirement Calculation on page 43 of the Deposit Local Plan should be increased. Similarly, Table 4: Phased Land Supply by Local Authority Area should be amended to make provision for additional units in Nethy Bridge. Currently in this settlement, there are no additional sites identified for residential development.

2.1.2 Paragraph 5.37 of the Deposit Local Plan highlighted that there is no exact measure of how many houses will be required in the future, nor any accurate method of predicting how many houses will be built during the lifetime of the Local Plan. The Planning Authority were therefore simply estimating the likely need and demand for additional houses. The Cairngorms National Park Plan 2007 (**Core Document 7.1**) highlights that the lack of access and good quality housing has been identified by many communities as a key issue facing the National Park. The lack of access to good quality affordable housing is one of the key challenges to creating and maintaining sustainable communities in the long term, so it is a priority to address now.

2.1.3 An analysis of the Cairngorms Housing System prepared in February 2006 (**Core Document 7.8**) also indicated that significant population and household growth is anticipated in the Local Plan area over the next few years. Affordable housing is also an issue in the area due to the high proportion of second and holiday home owners which both pushes up house prices in the area and reduces the supply

available to meet permanent housing need. It advises that the projected level of new supply as a whole would have to be fully devoted to Low Cost Home Ownership (LCHO) or affordable rent in order to meet the backlog of need and newly arising need. This is unrealistic and therefore the most pressing policy consideration is to bolster the supply of new housing in the Park area.

- 2.1.4 This was supported by consultations carried out which highlighted that a satisfactory amount of land must be allocated for residential development in the Local Plan. Without sufficient zoning of land for housing, supply would be further stifled, driving up demand further. Land availability was viewed as a particular constraint and some settlements had very little land for future housing. It is considered by Goldcrest (Highland) Ltd that Nethy Bridge is such a settlement with very little land for future housing, in fact, no sites are identified for future housing.
- 2.1.5 It is therefore essential to increase the supply of new housing in the Park area and ensure that sufficient flexibility is built in to allow for uncertainty and to accommodate the highest growth scenario. Accordingly, the figures in Table 2 should be increased substantially and additional sites should be identified for residential development in Nethy Bridge. This would help meet demand for housing in the area and help address the affordable housing problem.
- 2.1.6 On 17 December 2007, the Cairngorms National Park Authority provided an initial analysis of the objection. It was stated that a detailed paper outlining the background to the housing land requirement calculations and land supply requirements would be prepared to clarify the rationale behind the housing policies. Within this, reference was to have been made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation was also required to justify the allowance made in Table 2 for second homes and vacant properties, and detail how the approach taken would benefit local people. On completion of this paper, it was highlighted that information would be circulated to all those who made representation on this issue,

and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations and allocations made.

2.1.7 By letter, dated 22 May 2008, the Cairngorms National Park Authority further highlighted that the housing needs figures were calculated using information from various sources, including the local authority, the census and the Cairngorms National Park commissioned a study, undertaken by the University of Manchester (**Core Document 7.10**) to provide a Park wide assessment. The housing needs established in the Local Plan are based on this work. The land allocated in the plan must, in line with national guidance be effective within the plan period to meet the need and they feel that this is addressed through the current allocations. Further to this, they are of the view that the Local Plan as modified does meet the requirement and do not agree that there is a need to allocate additional land for housing. Therefore, no significant changes were proposed.

2.1.8 No detailed consultation was undertaken to assess the level of continued objection to the allocations made. The University of Manchester Report states that the population of the Park is predicted to increase by 9% between 2001 and 2025. It is not accepted that the Local Plan as modified meets the housing land requirements. There are no new housing allocations made to Nethy Bridge for the period of the Local Plan. All of the allocations are existing sites from previous Local Plans which now have planning consent. PAN 38: Housing Land (**Core Document 4.2**) states that to comply with national planning policy, authorities will require to demonstrate that the local plan provides at least a five year supply of effective housing land, plus additional land so that through the housing land audit at least a five year supply can be maintained at all times.

2.1.9 It is argued that as the housing sites in Nethy Bridge were included in previous plans, there is some constraint on the site which does not make them effective in the plan periods for which they were previously identified. In fact, the University of Manchester's 2005 Report states that "...a number of planning permissions for

housing have raised subsequent issues and constraints that mean that there is significant doubt over whether they will provide effective in the short term...". New allocations should therefore come forward to compensate for these sites which are not effective and meet the expected rise in population predicted in the Plan. The site at Nethy Bridge is appropriate to do this.

## 2.2 Objection 445b: Nethy Bridge Boundary

- 2.2.1 Objection was taken to the failure of the Plan to identify land owned by Goldcrest (Highland) Ltd within the settlement boundary of Nethy Bridge. It was considered that this land should have been included within the settlement boundary and subsequently identified for residential development in order to meet the high demand for housing, including affordable housing in the area.
- 2.2.2 Positive dialogue took place in May 2003 between Goldcrest (Highland) Ltd and Highland Council, who were the Local Authority at that time, in relation to the development potential of the site. At that time it was anticipated that the site would be identified for future housing. However, the change in responsibility for this area and the creation of the Cairngorms National Park Authority in September 2003, and therefore, the change in personnel has resulted in this site being excluded from the Deposit Local Plan (**Core Document 6.11**). This does not promote confidence in the planning system as highlighted in Scottish Planning Policy (**Core Document 2.1**).
- 2.2.3 The Cairngorms National Park's analysis of this state that the allocated sites within Nethy Bridge 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.

2.2.4 By letter dated 22 May 2008, the Authority stated that they do not consider that there is insufficient land allocated at present, therefore, it was not agreed that the any additional land required to be identified in Nethy Bridge. As a result, no modifications were made to meet the concerns of the objector.

2.2.5 The role of the National Park Plan in housing provision is to ensure thriving and sustainable communities throughout the Park. This includes focusing settlement growth in the main settlements and planning for growth to meet community needs in other settlements. Nethy Bridge is an intermediate settlement and as such is considered capable of accommodating further residential development to provide for a thriving and sustainable community as required by the National Park Plan. The failure to identify any new housing allocations could seriously affect the ability of Nethy Bridge to provide for the housing numbers to meet the needs of this popular community.

2.2.6 The University of York's 2005 Report "The Impact of Second and Holiday Homes in Rural Scotland" as referred to in the 2005 Report by the University of Manchester (**Core Document 7.10**) carried out a case study of Nethy Bridge. It was found that houses were becoming less affordable with prices higher than the Highland average, earnings were low and availability of social rented housing was low. The identification of housing in Nethy Bridge would address these issues and this site, in particular is considered appropriate for development.

2.2.7 The site is immediately adjacent to the settlement boundary of Nethy Bridge. It is bound to the north by an existing road; to the east by existing housing; to the south by the road to Lurg; and, to the west by existing woodland. The site itself is located within an area of woodland, however, a precedent for residential development in such locations has been made due to the identification of two sites (H2) to the north

within School Wood. Permission exists for these developments in this woodland and the objection site could similarly provide residential development in an attractive location.

- 2.2.8 The ancient woodland would be retained on the site and it was proposed that those areas that are developed would result in the minimum felling of trees in order to create an attractive integrated development. A proportion of the site would be developed for affordable housing, therefore meeting the strategic objectives and priorities for action identified in the Cairngorms National Park Plan (**Core Document 7.1**) to make housing more affordable.
- 2.2.9 The provision of a new footpath to link existing forest walks in the area and a riverside walk to any development on the site was proposed. This would ensure that the site was well integrated with the remainder of Nethy Bridge and provide an attractive route through the existing, remaining woodland.
- 2.2.10 The site at Nethy Bridge is capable of being developed at the earliest opportunity and has the backing of a developer who is committed to providing a high quality residential development in the framework of the woodland. It is argued that other housing developers may be more reluctant due to the uncertain economic climate, which may have an impact on the effective supply in due course. This should be taken into consideration when determining appropriate sites for inclusion in the local plan.
- 2.3 Objection 445c: Grantown on Spey**
- 2.3.1 Objection was made on behalf of Goldcrest (Highland) Ltd that the Local Plan makes an overprovision of housing in Grantown on Spey to the detriment to other settlements in the area. Whilst it is acknowledged that Grantown on Spey is capable of accommodating additional growth, the scale of development is excessive and will do nothing to sustain other, smaller settlements in the area. Site H1 should

be reduced in terms of scale and housing allocation should be made at a new site in Nethy Bridge.

2.3.2 This would help sustain the settlement of Nethy Bridge by providing future residential land in an area that has no such sites identified in the Deposit Local Plan (**Core Document 6.11**). This site is a logical area for expansion being adjacent to the boundary of Nethy Bridge.

2.3.3 The Cairngorms National Park Authority's analysis of this objection stated that the site has a current, outstanding application and due to the timescales involved this application will be determined in line with the policies of Highland Council Local Plan. The determination of the site will however be carefully monitored to ensure that the appropriate level of detailed information is included within the future plans for the Local Plan. In the event that the detailed application is refused, the situation will be revised. No modifications were subsequently proposed.

2.3.4 It is accepted that the Grantown on Spey application is to be determined against the Badenoch and Strathspey Local Plan. The CNP Authority conceded that the site has been allocated for some time and would be determined against the Badenoch and Strathspey Local Plan 1997 (**Core Document 6.6**). This raises some doubt as to whether it should be considered effective and is suitable for development. Additional land at Nethy Bridge should be identified to compensate for any constraints on this site to enable the delivery of an adequate supply of housing land in the lifetime of the Cairngorms National Park Local Plan.

### 3.0 CONCLUSIONS

3.1 It is argued that the housing land requirements in the Cairngorms National Park should be increased and provision made for residential development in Nethy Bridge. Affordable housing is an issue that affects the Cairngorms National Park and Nethy Bridge in particular due to the high proportion of second and holiday

homes in the area. The identification of housing in Nethy Bridge would help alleviate this problem.

- 3.2 Further to this, no new housing allocations have been identified in Nethy Bridge and as it is an intermediate settlement it is capable of accommodating new housing. Therefore, it is considered that a specific housing site should be allocated to the settlement. The site proposed by the objector, immediately adjacent to the settlement boundary is appropriate and would provide for a thriving and sustainable settlement as well as helping to ease the affordable housing situation.
- 3.3 All of the allocations made in Nethy Bridge are sites from previous Local Plans. These now have planning consent, but have not been built. It therefore argued that they cannot be considered effective. New allocations should therefore come forward to meet the expected rise in population and the site at Nethy Bridge is appropriate.
- 3.4 If the argument to increase the housing land requirement is not accepted, it was previously suggested that the Grantown on Spey housing allocation should be reduced and redistributed to Nethy Bridge. It was highlighted by the CNP Authority that planning permission already exists for this site. Again, this raises questions as to the effectiveness of this site. Therefore, the site in Nethy Bridge should be identified to compensate for this constraint.

