

Cairngorm National Park Local Plan

Statement of Case Objection 387

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1 Objection

- 1.1 The original objection was lodged via the on-line Form for Objections on the 28th September 2007.
- 1.2 An acknowledgement and details of the objection are attached as Appendix 1.
- 1.3 The essence of this objection is that
 - the Local Plan has not fully appraised all opportunities for sustainable housing developments in all potentially appropriate locations.
 - the Local Plan has not positively responded to Paragraph 3 of SPP7 which states that “*communities should be free from the threat of flooding*” by appraising such areas within the Local Plan area and identifying appropriate measures and policies to resolve such matters.
 - Whilst not objecting to the principle of development at An Camus Mor it is considered that these objection sites at Dalfaber Road are immediately available and more appropriately located (adjacent to the town centre), are already provided with all necessary infrastructure, and should be accepted as a contribution to the Local Plan housing requirement to 2012. In addition the Local Plan has not identified appropriate pedestrian and cyclist linkages from An Camus Mor to Aviemore town centre and the northern end of the objection sites or the land further north should be identified as a potential direct route for this purpose. As it involves a River Spey crossing and is critical to the integration of An Camus Mor with the facilities that are provided in the town centre, it is important that this issue is addressed now rather than at a later stage, and the Local Plan identify the optimum river crossing point for such integration.

2 Objection Site Description

- 2.1 The sites covered by this objection are as shown on the attached plan and represent two separate areas of ground to the northern and southern end of Dalfaber Road.
- 2.2 The reasoning behind these two sites being treated as 1 objection is that these sites accommodate that portion of land that is lower lying and susceptible to flooding which has historically impacted on properties at both ends of Dalfaber Road, whilst the intervening section with the majority of housing in Dalfaber Road has not been affected as it is accommodated on a raised higher ridge of land above the historical flood plain levels.
- 2.3 This in turn means that whilst the central properties are perceived by the residents as not being at risk of flooding, and have no history of such impacts, Dalfaber Road itself has been flooded at both ends of Dalfaber Road, prohibiting access to all these properties, as well as there being a number of houses and commercial properties that have been physically affected by flooding. (See attached plan showing flood limits).
- 2.4 The northern Objection site also contains the former Aviemore sewage treatment works which has been vacant and semi derelict for a number of years. This is clearly a brownfield site in need of regeneration.
- 2.5 The northern site also has the benefit of an existing electrical substation in the north western corner of the site giving cost effective provision of power infrastructure in this location. There is an existing overhead powerline that traverses the site from the substation but development in this location would bring the benefit of undergrounding this service in this location. .
- 2.6 This northern portion of land also accommodates the existing and operational Scottish Water sewage pumping station which serves this area of Aviemore, adjacent to the existing housing in Dalfaber road, again indicating the availability of infrastructure.
- 2.7 The northern site has direct access to Aviemore Town Centre via a wide underpass (under the main rail line) which accommodates the Milton Burn, whilst the southern site has direct bollarded roadway access via a pedestrian overbridge, to the southern end of the town centre.
- 2.8 Both sites benefit from good road access via Dalfaber Road and both are on the recognised National Cycle Network Route 7 which adjoins to many additional routes serving the Aviemore area, and core footpath

networks(LBS1-The River Spey,LBS30-Aviemore Orbital,LBS 35-Aviemore Burn,and LBS36- Myrtelfield Path).

- 2.9 The ground cover is mixed with raised beech and woodland covering the southern site, a portion of which is used as an unofficial car park and outdoor seating area for the Old Brig Inn. This area is also used as an access point to the Spey for kayaks and canoes.
- 2.10 The northern section is rough grazing land, used for two / three horses occasionally, but the portion between the disused sewage works and the existing housing in Dalfaber Road is poorly drained and unused. In general terms this northern section of land could be described as a gap site on Dalfaber road, with the disused sewage works as a brownfield site within this gap site and within the settlement boundary.

3 Local Plan Policy

- 3.1 The Cairngorm National Park Deposit Local Plan Modification 1 (Ref.) allocates the objection sites as being within the National Scenic Area and apart from the small portion of the northern site which is the former sewage treatment works the sites lie outwith the settlement boundary. [Approximately 1.3 acres at the former sewage treatment works lies within the settlement boundary].
- 3.2 Interestingly enough there are no other Local Plan designations that apply to these sites and in this respect, it should be noted that these sites are therefore covered by the same base allocations as housing site H2, H3 and the whole of An Camus Mor.
- 3.3 It is acknowledged that these sites do adjoin the River Spey SSSI and the River Spey SAC but it is considered that there is adequate space to buffer any potential development of these site from these additional designations and enhance the quality of the environment of these existing sites by accommodating development and requiring enhanced landscaped treatment of the respective buffer areas between the development and the areas covered by these designations.
- 3.4 The Local Plan has allocated 3 sites for housing development in Aviemore H1, H2, and H3 but has promoted the substantial growth required for Aviemore courtesy of the Structure Plan requirements by identifying An Camus Mor as a new sustainable community.
- 3.5 This objection does not object to the development of An Camus Mor in principle but stresses that there is a need for consistency and justification for all the Aviemore Housing sites and An Camus Mor, and that alternative sites require to be fairly appraised in relation to their potential contribution to sustainable development.
- 3.6 This objection will specifically raise concerns about the delivery of the required housing for the Local Plan area and will suggest that the objection sites are well located to meet national and local sustainability criteria, have current infrastructure in place to confirm delivery of development, and with the correct design input will protect the existing community in this section of Aviemore from flooding and provide a positive contribution and environmental enhancement to this section of Aviemore, adjacent to the Town Centre.

4 Local Plan Omissions

- 4.1 The Cairngorm National Park Authority have a responsibility to ensure that the emerging Local Plan addresses all necessary matters to deliver a robust planning statement to guide the future development of the Local Plan Area.
- 4.2 In this regard there are 2 matters where it is believed that the authority have not provided such guidance.
- 4.3 The modification to the Local Plan on Page 29 para 4.74 states *The Act also designated the National Park Authority as a “responsible authority”, introducing legal duties to ensure compliance with the Water Framework Directive aims and objectives, as well as a requirement to promote sustainable use of water resources and sustainable flood management.*
- 4.4 In addition current planning advice re flooding in Planning and Flooding SPP7 in Para 3 states *In achieving social, economic and environmental goals in support of sustainable development, and delivering environmental justice, a long-term view of flood risk has to be taken. **Communities should be free from the threat of flooding.** Those who are already socially and economically disadvantaged may be particularly vulnerable to the hardship caused by flood damage to their homes and possessions. The identification of land and property for development and redevelopment, including economic development, should therefore have regard to the potential harmful effects of flooding. New development should aim to be in harmony with the water environment and not attempt to work against it.*
- 4.5 Para 19 of SPP7 re. Landraising, states that *Landraising which permanently elevates a site above the functional flood plain of a watercourse, or elsewhere if flooding is an issue, may have a role. Proposals for landraising should:*
- *be linked to the provision and maintenance of compensatory flood water storage to replace the lost capacity of the functional flood plain;*
 - *have a neutral or better effect on the probability of flooding elsewhere, including existing properties;*
 - *not create a need for flood prevention measures elsewhere;*
 - *not create ‘islands’ of new development but should adjoin developed areas outwith the functional flood plain; and*
 - *be set back from the bank of the watercourse.*
- 4.6 The fact that this objection has offered an opportunity to the Authority to address their legal responsibilities in relation to sustainable flood management and to promote development that could offer a solution to removing a risk of flooding from part of their existing community is

unacceptable and not in compliance with sustainable flood management principles nor in line with Para 3 of SPP7, particularly so when para 19 of SPP7 supports the principle of landraising which is the fundamental premise of this objection.

- 4.7 The details of these matters will be discussed in more detail later but it is considered that in not taking advantage of this proposed development to provide much needed housing in a sustainable location adjacent to Aviemore Town Centre and at the same time provide a potential solution to the risk of flooding affecting the properties and access to Dalfaber Road means that the Local Plan has an omission in not having addressed this matter.

5 National Planning Objectives

- 5.1 The recently published SPP 2008, identifies the underlying policy objectives of the planning system. In particular Para 5 states

The Government believes strongly in the value of forward-looking, visionary and ambitious plans that will guide development. They will provide guidance to potential investors in Scotland's future on likely paths to success; provide various interests the opportunity to participate in shaping the future of their nation and their communities; and give public authorities a structure within which decisions can be made with confidence. Plans should seek to lead and guide change. The statutory requirement to keep plans up to date should ensure that they reflect and respond to emerging pressures and issues.

- 5.2 Para 8 of the SPP establishes the Core Principles that the Government believes that the modernised planning system should adhere to . These are

- *There should be a genuinely **plan-led** system, in which succinct development plans set out ambitious, long-term visions for their area. They will be kept up to date, and provide a practical framework within which the outcome of planning applications can be decided with a degree of certainty and efficiency.*
- *The **primary responsibility** for the operation of the planning system and service **is with local and national park authorities.***
- ***Confidence in the planning system** needs to be reinforced through: the efficient and predictable preparation of plans and handling of applications;
transparency in decision-making and reliable enforcement of the law and planning decisions.*
- *The **constraints and requirements** that planning imposes **should be necessary and proportionate.***
- *The system should operate to **engage all interests as early and as fully as possible** to inform decisions and allow issues of contention and controversy to be identified and tackled quickly and smoothly.*
- *There should be a clear focus on the **quality of outcomes**, with due attention given to considerations of the sustainable use of land, good design and the protection and enhancement of the built and natural environment.*

- 5.3 The development plan therefore requires to identify sites, that can be seen to address planning issues, that can make efficient use of land and infrastructure, and at the same time be aspirational and realistic.
- 5.4 The objection sites can fulfil these requirements.
- 5.5 The objection site can make more efficient use of land, as its current use is clearly an underutilisation of part vacant brownfield land and poor quality grazing land in a well located position close to the town centre.
- 5.6 The objection site is also well served by existing infrastructure (road access, sewerage connections, power connections etc.) and is therefore a more efficient location to deliver development compared to the substantial investment required to deliver housing from An Camus Mor.
- 5.7 The development of such a location also accords with the aspiration of making communities *free from the threat of flooding*, and is realistic in that the cost of delivering housing (because of the costs of providing infrastructure) from this site is less than elsewhere in this Local Plan area.

6 Sustainable Development

- 6.1 The Scottish Government has established that all development requires to be sustainable. Current policy states

Sustainable development is integral to the Scottish Government's overall purpose - to focus government and public services on creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth.

A Greener Scotland - improving Scotland's natural and built environment and the sustainable use and enjoyment of it - is one of the five strategic objectives that form part of the Government's National Performance Framework, which sets out high level targets, outcomes and indicators applicable across the public sector in Scotland.

This requires that we

*value and enjoy our **built and natural environment** and protect it and enhance it for future generations*

*reduce the local and global environmental impact of our **consumption and production***

*live in well-designed, **sustainable places** where we are able to access the amenities and services we need*

- 6.2 It is our suggestion that development of the objection sites for housing accords with these policy objectives as the developments protect and improve the built and natural environment and create sustainable places with good access to amenities and services

- 6.3 The Highland Council has also specified how development requires to address sustainability through Structure Plan policy

HIGHLAND STRUCTURE PLAN (2001) Policy G2

Design for sustainability

Proposed developments will be assessed on the extent to which they:

are compatible with service provision (water and sewerage, drainage, roads, schools, electricity);

are accessible by public transport, cycling and walking as well as car; maximise energy efficiency in terms of location, layout and design, including the utilisation of renewable sources of energy;
are affected by significant risk from natural hazards, including unless adequate protective measures are incorporated, or the development is of a temporary nature;
are affected by safeguard zones where there is a significant risk of disturbance and hazard from industrial flooding, coastal erosion, land instability and radon gas, installations, including noise, dust, smells, electro-magnetism, radioactivity and subsidence;
make use of brownfield sites, existing buildings and recycled materials;
impact on individual and community residential amenity;
impact on non-renewable resources such as mineral deposits of potential commercial value, prime quality or locally important agricultural land, or approved routes for road and rail links;
impact on the following resources, including pollution and discharges, particularly within designated areas :habitats; freshwater systems; species; marine systems; landscape; cultural heritage; scenery; air quality;
demonstrate sensitive siting and high quality design in keeping with local character and historic and natural environment and in making use of appropriate materials;
promote varied, lively and well-used environments which will enhance community safety and security and reduce any fear of crime;
accommodate the needs of all sectors of the community, including people with disabilities or other special needs and disadvantaged groups; and
contribute to the economic and social development of the community.

Developments which are judged to be significantly detrimental in terms of the above criteria shall not accord with the Structure Plan.

- 6.4 It is evident that the development of this objection site accords with the Regional Council's policy for sustainable development as it:-
- Is compatible with service provision
 - Is accessible by public transport
 - Can maximise energy efficiency in terms of location
 - Can resolve community risks from flooding
 - Is not affected by risk of disturbance and hazard
 - In part makes use of a brownfield site
 - Improves existing residential amenity (flood risk resolution)
 - Does not impact on renewable resources, or prime quality land

- Can be designed to remove impacts on environmental resources
- Can accommodate requirements for siting and design
- Can enhance a well used location and improve safety (flooding) and provide for improved core footpaths
- Can provide affordable housing in an appropriate location and accommodate housing with direct disabled access to the town centre

6.5 Furthermore it is believed that this site more fully accords with this policy requirement than other sites that are currently being promoted for residential development through this Local Plan.

7 Accessibility

7.1 Scottish Planning Policy SPP 17 Planning and Transport states

The aim of planning policy is to support and accommodate new investment and development in locations accessible by a range of means of transport and which seek to minimise the impact on existing transport networks and the environment. Transport cannot be an afterthought in the development process. Accessibility issues should be factored into the preparation of development plans and appraisal of planning applications from the outset.

7.2 This SPP also defines sustainable location and states

By “sustainable location” this guidance means locations readily accessible by public transport, walking and cycling networks, where car dependency is mitigated...

7.3 It is suggested that this location, within close proximity to the town centre and all existing transport networks, as well as its immediate proximity to the recognised walking and cycle networks serving Aviemore, is perhaps the most appropriately located potential housing site for the provision of housing development in Aviemore, to fulfil this policy requirement.

8 Housing

- 8.1 Guidance to Planning Authorities re. the identification of strategy for the location of housing is given in Planning for Homes SPP 3 2008 in Para 56 which states

The following key considerations should form the basis for the strategy:

- *the efficient use of land and existing buildings, resources and infrastructure;*
- *accessibility by a range of transport options to jobs and services for all sections of the community ;including transport and educational investment, and with other major proposals such as business or other economic development; and*
- *the protection and enhancement of landscapes; natural, built and cultural heritage; biodiversity; and the wider environment, including consideration of flood risk.*

- 8.2 The principle of directing development to more accessible locations in support of sustainable communities as referred to in 7.1/7.2 above, is fully supported by Paras 73 - 75 of SPP3, which states

Accessible locations

73. To contribute to the reduction of greenhouse gas emissions, The Scottish Government is committed to the effective integration of land use and transport. Patterns of development should seek to reduce the demand for travel and reliance on the private car, and help to reduce energy consumption generally.

74. In considering the appropriate location of new residential development, preference should be given to locations which can be well-integrated with existing and proposed public transport, walking and cycling networks. Such locations should be developed at higher densities. In central locations, integrating housing with commercial, community and leisure uses in mixed developments can create improved access to jobs and a wide range of services. People living in rural areas may continue to rely heavily on private forms of transport where there are few alternatives.

75. In seeking to locate new housing where it will be accessible by a range of forms of transport, planning authorities may conclude on balance that the release of certain areas of greenfield land will result in a more sustainable pattern of development than relying on brownfield sites.

- 8.3 It is suggested that this objection site, which addresses the locational accessibility criteria of this advice, and which also addresses and provides a solution to localised flood risk, provides an optimal location adjacent to the existing town centre, makes use of existing service infrastructure and in part regenerates a vacant brownfield site making efficient use of poor quality and poorly drained land, should be given priority for higher density and earlier phased release housing.
- 8.4 This is particularly the case when the current Local Plan preferences favour An Camus Mor, effectively a new community which still requires to be linked to the existing town centre and be provided with all the necessary infrastructure to deliver it, and peripheral housing sites at H1, H2 and H3.
- 8.5 It is acknowledged that the objection site is within the river Spey floodplain, but as this is based on the SEPA 1 in 200 year flood risk mapping exercise, then similarly substantial areas of sites H1, H2 and H3 must be similarly constrained.
- 8.6 It is to be expected that the Local Plan would adopt an equitable approach to site selection and as these 3 sites have been incorporated as preferred locations for housing through the Local Plan, it would be expected that the Dalfaber Road objection sites could also be incorporated with the same proviso that *“Part of this site lies within the SEPA’s indicative 1in 200 year flood risk area. A detailed flood risk assessment will therefore be required to accompany any development proposals for this site.”* Such a condition would be entirely acceptable for the allocation of the Dalfaber Road locations being incorporated for housing development into the adopted Local Plan
- 8.7 Based on the equitable analysis of the criteria established by SPP 3 Planning for Homes it is suggested that the objection sites at Dalfaber Road more fully comply with the criteria established by this policy guidance than the currently selected sites in the finalised Local Plan and the substantial Greenfield release at An Camus Mor.
- 8.8 It is recognised that these locations have a significant historical perspective in having been identified /approved some time ago, or through promotion through the Structure Plan, but it must be remembered that the Local Plan process is the transparent process for the assessment and incorporation of all relevant sites for development.
- 8.9 It is appreciated that there is concern for the flooding impacts that these sites may be at risk from, but no acknowledgement has been given to the benefits that development in these locations can deliver to the resolution of these risks to the existing community in Dalfaber Road.

9 Flooding

- 9.1 SEPA is Scotland's flood warning authority. Under the Environment Act 1995, they are required to operate formal flood warning schemes in partnership with local authorities and the police. SEPA is also responsible for providing advice to local authorities on flood risk for planning purposes, and advice on flood prevention. In spatial terms this advice is provided via the Scotland wide Flood Map
- 9.2 SEPA's web site provides advice on this matter and how to use their Flood Map. In particular it states

The flood map provides a Scotland wide picture of the areas at risk of flooding from rivers and the sea by providing a flood outline for areas estimated to be at risk of flooding from rivers or the sea if there were no flood defences.

The flood map has primarily been developed to provide a strategic national overview of flood risk in Scotland. It should enable local authorities to take a more proactive approach to flood risk management. By being aware of the land at risk of flooding and commissioning more detailed flood risk assessments as appropriate, authorities can develop their avoidance, alleviation and assistance strategies to better manage flood risk through their planning, flood prevention and emergency planning functions together with SEPA's flood warning role.

It will help local authorities and others to understand flood risk when considering where new homes, businesses and other developments should be built. It also supports [Scottish Planning Policy \(SPP\) 7 Planning and Flooding](#).

It does not provide enough detail to accurately estimate the flood risk associated with individual properties or specific point locations.

- 9.3 It is therefore inappropriate to reject a well located site for development on the grounds that it is within the 1/200 year SEPA flood risk area when SEPA clearly states that **"It also supports Scottish Planning Policy (SPP) 7 Planning and Flooding"**.

9.4 SPP 7 Planning and Flooding states

DEVELOPMENT ON FUNCTIONAL FLOOD PLAINS

16. Functional flood plains store and convey flood water during times of flood. These functions are important in the wider flood management system. New development on the functional flood plain will not only be at risk itself, but will add to the risk elsewhere. Cumulative effects will arise from proposals which individually may seem of little consequence. For planning purposes the functional flood plain will generally have a greater than 0.5% (1:200) probability of flooding in any year.

SCOTTISH PLANNING POLICY 7: Planning and Flooding 5

17. Built development should not therefore take place on functional flood plains.

Piecemeal reduction of the flood plain must be avoided because of the cumulative effects on storage capacity. There may be exceptions for infrastructure if a specific location is essential for operational reasons or it is incapable of being located elsewhere. In such cases, it should be designed to remain operational in times of flood, not impede water flow and the effect on the flood water storage capacity should be kept to a minimum.

18. On some parts of coastal and estuarial flood plains, a managed realignment of the coast may help to create new areas of functional flood plain and extend inter-tidal habitats inland. New development should not be permitted in such areas unless the potential flooding issues are addressed, consistent with this SPP.

LANDRAISING

19. Landraising which permanently elevates a site above the functional flood plain of a watercourse, or elsewhere if flooding is an issue, may have a role. Proposals for landraising should:

- be linked to the provision and maintenance of compensatory flood water storage to replace the lost capacity of the functional flood plain;*
- have a neutral or better effect on the probability of flooding elsewhere, including existing properties;*
- not create a need for flood prevention measures elsewhere;*
- not create 'islands' of new development but should adjoin developed areas out with the functional flood plain; and*
- be set back from the bank of the watercourse. In the context of this SPP the land created by landraising will no longer be part of the functional flood plain and landraising is not to be construed as a flood prevention measure.*

- 9.5 It is critical therefore to take all this advice together and not to judge the acceptability of a site for development purposes purely on the content of paragraphs 16 and 17 of this SPP. SEPA's flood map advice stresses support for SPP 7 and that includes paragraph 19.
- 9.6 The Local Plan acknowledges that the identified housing sites H2 and H3 required to submit a detailed flood risk assessment but this requirement is just as appropriate for the objection sites in Dalfaber Road.
- 9.7 Perhaps more importantly the development sites in Dalfaber Road, which fully accord with the requirements of landraising, not only provides extremely well located sites for development but addresses an existing identified risk, as SEPA's flood map suggests that all properties in Dalfaber Road and the existing main line railway embankment are within the 1/200 year risk area.
- 9.8 By allowing housing to fund and develop two landraising platforms at either end of the elevated portion of land that is occupied by the existing housing in Dalfaber Road, the risk to the existing houses is reduced, the elevated landraising areas can provide a sustainable location for new development and the remaining undeveloped areas can be improved to accommodate the appropriate volumes of flood plain storage capacity.
- 9.9 The principles of this are shown on the attached plans and the compensatory storage areas between the River Spey and the proposed development areas provide the landraise material and the buffers that this SPP policy requires.
- 9.10 Discussions have been held with representatives of the local Community Council to attempt to integrate their views into the optimum form of landraising for the properties in Dalfaber Road. Whilst they were aware of SEPA's flood map for this area of Aviemore, and they were aware of Highland Council's earlier intentions in the 1990's to promote a formal flood defence barrier between the Spey and all the properties in Dalfaber Road, they remained of the opinion that there was no flood risk threat to these properties. This view was expressed by the Chairman and Secretary of the Community Council (who both live in Dalfaber Road) because of their belief that peak flooding on the Spey at Aviemore was diminishing as the peak flooding events were caused by rapid snow thaw. As they believed that the volume of snow on the Cairngorms was decreasing year on year, then the threat from rapid snow melt was also

diminishing and that there was no need to consider a flood defence proposal for Dalfaber Road. The community therefore declined to engage in any discussions re Landraising as they considered it unnecessary in relation to their views about flood risk in the area.

9.11 Whilst they are entitled to their opinion, the situation is that either flood risk is real or not. If there is a risk, then it is only correct that the Local Plan should at least address the issue and determine how the matter should be addressed, and if the community are correct and there is no flood risk, then the objection sites are clearly suitable for housing development. Whichever view prevails the solution of landraising and the removing of the flood risk, perceived or real, is worthy of acceptance and the allocation of the objection sites for housing should be progress through the Local Plan

9.12 It is therefore suggested that these objection sites should be incorporated into the housing allocations for Aviemore and be given priority for early development in line with the policies of SPP 3 and SPP 7.

10. Designing Places

10.1 The Scottish Government has established guidelines to help ensure that the development process achieves quality and sustainable environments. This policy is set out in Designing Places, as set out below

10.2 *Designing Places*

The development plan

A development plan sets out the policies and proposals against which planning applications will be assessed. The plan should be a powerful means for promoting development that achieves the local council's agreed objectives and of preventing development likely to frustrate those objectives.

Some aspects of a plan may be controversial. They will have implications for how people live, how the local economy performs, how the environment changes, and how much land and property are worth.

In particular a plan must set out the council's policies on design and the physical form of development. The plan will not go into great detail, but it should explain how its priorities are distinctly different from those of other places. Saying that the council is committed to good design, or that development should respect its context, is not enough. Many local authorities have said just that for years, without significant results.

Development plans should contain a positive and sustainable vision of an area's future priorities based on a thorough understanding of how the area functions, the challenges it is expected to face and community requirements

The plan must set out the council's distinctive vision for how its area will develop. It should summarise its appraisals of the most important features of the area's character and identity.

The plan should also set out key design policies relating to issues that are particularly important locally, and to specific areas and sites where change is expected. It should explain how the planning process should deal with design, such as by specifying where urban design frameworks are needed and in what circumstances a development brief should be prepared.

The plan should specify what degree of detail will be expected in planning and design guidance; in what degree of detail proposals should be presented at different stages in the planning application process; and in what circumstances planning application design statements will be needed, for example, in relation to particular types of development of more than a specified size. It should also specify which

areas or sites need guidance with the status of supplementary planning guidance and how guidance should be prepared.

An effective plan will set out concisely the local authority's priorities in relation to design, leaving the detail to be provided in guidance documents.

The aim is to provide a land use framework within which investment & development can take place with confidence

- 10.3 If the Cairngorm National Park Authority wish to create a special place then their aspirations must become more ambitious and in line with this advice the development plan requires to be **a positive and sustainable vision** of an area's future.
- 10.4 The incorporation of the objection sites with a specific requirement to provide a positive development statement that integrates the community with the River at this sustainable location is an opportunity that the Local Plan cannot afford to ignore.

11 Integration with An Camus Mor

- 11.1 As stated earlier this objection does not object to the principle of development at An Camus Mor. It is recognised and accepted that An Camus Mor, if developed appropriately could make a substantial contribution to sustainable development in the Highlands and Aviemore in particular.
- 11.2 However if this is not done in an integrated and sustainable way another significant opportunity to create an exemplar development will be lost. It is acknowledged that this process will require a great deal of additional work but the National Park Authority should ensure that this opportunity is maximised.
- 11.3 Where the current details are failing this aspiration is in relation between An Camus Mor and the centre of Aviemore. It is acknowledged that this community will in part stand alone but it will require the centralised commercial facilities to survive but more importantly, in line with planning policy, it will require to be integrated with the transport facilities provided in the centre of Aviemore
- 11.4 The details currently examined for this proposed development also clearly show that the vast majority of responses to the An Camus Mor proposals have voiced concerns about such physical linkages with Aviemore Town Centre.
- 11.5 In support of the sustainability issues associated with the integration of An Camus Mor with Aviemore town centre it is suggested that a major new road way crossing the Spey is inappropriate, but what is critical is a direct core footpath and cycle way connection as direct as possible from the centre of An Camus Mor with Aviemore town centre.
- 11.6 It is clear that the acceptance of the objections sites in Dalfaber Road associated with relevant land raising, provides a logical bridge fall location for this direct integration link between the existing and new community.
- 11.7 It is therefore recommended that along with the acknowledgement and incorporation of these sites as sustainable locations for additional housing development that the opportunity to resolve the uncertainty of the provision of the Spey crossing link be identified and incorporated into the plan.

12 Conclusions

- 12.1 This objection has analysed all the relevant planning policy issues that require to be considered in relation to this location, and the allocations in the Local Plan.
- 12.2 It is acknowledged that there are concerns about the potential of developing within the River Spey floodplain but the issue of flooding has been a matter of concern in the community of Aviemore for a number of years.
- 12.3 There are only a limited number of properties which have had a history of being flooded but the SEPA Floodmap shows all of the properties in Dalfaber Road as being at risk.
- 12.4 It is acknowledged that SEPA have caveated their advice, but this does not explain the inconsistency applied by the National Park Authority in accepting other locations within the 1 in 200 year risk areas as being suitable for development, (subject to a flood risk assessment), but not sites which are more sustainably located to accommodate development.
- 12.5 There is a need for consistency and an equitable approach to the identification of appropriate locations for housing development.
- 12.5 It is suggested that the potential sites at Dalfaber Road are better located in relation to accessibility to the town centre and transport facilities, are capable of accommodating higher density affordable housing and, through landraising, able to offer a solution to the history of flood damage in this specific area of Aviemore
- 12.6 This location also provides the Park Authority with an opportunity to create an exemplar sustainable high density development adjacent to the Town Centre of Aviemore, and the proximity of the River Spey, in keeping with the Government's advice in Designing Places.
- 12.7 In addition there is a real opportunity to respond to other objectors concerns to the Local Plan and integrate An Camus Mor with the centre of Aviemore by accommodating an appropriate core footpath and cycleway crossing over the Spey.
- 12.7 It is therefore recommended that this objection is upheld and the sites identified through Objection 387 be allocated for landraising and housing development, subject to the provision of a detailed flood risk assessment to accompany any development proposals for these sites.