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**CAIRNGORMS NATIONAL PARK  
AUTHORITY  
LOCAL PLAN INQUIRY**

**WRITTEN SUBMISSIONS  
STATEMENT  
HOUSING LAND**

APRIL 2009

On behalf of Glenmore Properties Ltd  
Objector ref 453



**HALLIDAY | FRASER | MUNRO**  
PLANNING

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## 1. INTRODUCTION

This Written Submissions Statement has been prepared by Halliday Fraser Munro on behalf of our Client – Glenmore Properties Ltd. Halliday Fraser Munro Planning are a professional planning consultancy covering the north east of Scotland. All of our Consultants are Members of the Royal Town Planning Institute with the majority of those having been employed within a Local Authority Planning team. We have significant experience of policy formulation, the interactions of these policies with local authority development control functions and their effect on development scenarios.

Our aim, during this process, is to create policies and land allocations that are realistic and work for everyone. We will, therefore, identify both relevant issues and potential solutions within this Statement. The following Statement will summarise our objection, the Cairngorms National Park Authority's (CNPA) position including any Modifications or Agreement on particular issues, and then set out what we believe to be the key issues. We will conclude by recommending a course of action that would enable the objection to be resolved.

## 2. OBJECTION SUMMARY

**Policy Reference & Title:** Housing Land

**Objector Reference:** 453

### **Objection Summary:**

- Housing Land allocations are based on a low growth scenario;
- A low growth scenario such as this will not help the CNP achieve its aim and vision of 'thriving and sustainable communities';
- The housing numbers suggested have been calculated on a projections basis rather than information.

### 3. THE CAIRNGORMS NATIONAL PARK AUTHORITY'S POSITION

#### 3.1 DEPOSIT LOCAL PLAN (Document CD6.11)

In July 2007, the Cairngorms National Park Authority published its Deposit Local Plan (**Document CD6.11**). This contained Tables 2, 3 and 4 that provided information on the housing land requirement calculation and the phased land supply by local authority area. The housing land requirement calculation suggested 1639 houses were required in the CNP up to 2016.

#### 3.2 RESPONSE TO OBJECTION - PROPOSED MODIFICATIONS

In response to our client's objection (**Document GP15**), the CNPA stated that a detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind the housing policies.

#### 3.3 DEPOSIT LOCAL PLAN – FIRST MODIFICATIONS (Document CD6.12)

In June 2008, the Cairngorms National Park Authority produced the Deposit Local Plan – First Modifications (**Document CD6.12**). The Housing Land tables were revised but did not increase the overall numbers to be allocated.

#### 3.4 FURTHER MODIFICATIONS

The Deposit Local Plan – Second Modifications (**Document CD6.13**) did not amend the Housing Land tables. The Officer Proposed Post Inquiry Modifications (**Document CD7.28**) slightly reduced the overall housing land requirement for the CNP.

Our client's objection is therefore maintained.

#### 3.5 CNPA STATEMENT OF CASE

The CNPA Statement of Case on Housing Land (**Document GP 16**) provides further clarification on the Authority's position. The CNPA consider that:

*'Topic Paper 1 "Statutory National Park Context" (CD 7.21), Topic Paper 3 "Approach to Housing Land Supply and Affordable Housing" (CD 7.23), and Topic Paper 4 "Site Selection" (CD 7.24) set out the context for the Local Plan*

*within a National Park and the approach to the allocation of land, including issues surrounding the collection of data. The allocations are a response to housing needs within the Park for all sectors of the community; they reflect the centres/levels of population and demand taking account of geography and settlement pattern.'*

This effectively confirms that the CNPA do not consider that the housing land allocations require to be increased or amended. We would suggest that there is scope for increasing the numbers and locations of these allocations.

#### 4. PLANNING ISSUES AND PROPOSED SOLUTIONS

##### PROPOSED SOLUTION

As a solution to address our Client's objection, we would suggest that the growth scenario for the CNP should be revised in order to meet the aims and vision of the CNP of a population level and mix to support current and future communities and businesses. Housing figures should be revised and greater justification provided as to how they have been calculated.

Topic Paper 3: Housing Land Supply and Affordable Housing (**Document CD7.23**) sets out the approach taken by the Park in identifying land for housing. Section 3 refers to a specific outcome (part of the Vision) for 2030 as "thriving and sustainable communities throughout the Park".

Part 4 of that Topic Paper also sets out some of the Park's strategic objectives:

- a) Encourage a population level and mix in the Park that meets the current and future levels of its communities and businesses.
- b) Make proactive provision to focus settlement growth in the main settlements and plan for growth to meet community needs in other settlements.
- d) Ensure that there is effective land and investment for market and affordable housing to meet the economic and social needs of communities throughout the Park.

We don't believe that the housing allocations are "proactive" or "plan for growth" in many of the communities throughout the Park as required by the Park's own adopted objectives and strategies. The allocations effectively produce an east-west split with settlements such as Aviemore receiving a greater allocation and many of the eastern settlements being effectively left as they are. The allocations, therefore, do not meet the Park's strategic objectives as set out above or help the villages and towns in the east of the Park to become more viable and sustainable communities.

The housing allocations not only require to be increased, but also should be distributed more evenly throughout the CNP. Some of the intermediate settlements on Speyside have capacity to accept further development that would sustain the local economy and population.

The above amendments would allow our Client's objection to be removed.