

<b>Date :</b>			
<b>Issue:</b>	<b>GS/HI – allocated site Granttown on Spey</b>		
<b>Objector(s):</b>	Mrs. Beryl McRae	<b>Objection ref(s):</b>	402
	Mr. and Mrs. L Evans		014
	Miss Margaret Ann Campbell		101
	Bryan Grozier		046
	Goldcrest (Highland) Ltd., c/o Claire Smith, Ryden LLP		445c
	Frank Jemmett		090
	Janet Eileen Jemmett		028
	Alistair McLeod		062
	Basil Dunlop		358a
	SEPA		399r(g)

<b>Reporter :</b>	Mrs. Jill Moody
<b>Procedure :</b>	Written Representation

## 1.0 Overview

- 1.1 This statement sets out the CNPA response to the objections raised to the Deposit Local Plan as modified, in respect of proposal site allocation GS/HI in Granttown on Spey. It supplements the response made by the CNPA in its report to Committee (CD7.3, 7.4 and 7.5). The representations received are objections to the allocation of proposal site GS/HI for housing purposes, on the basis of concerns about an allocation of this nature being contrary to the aims of the national park, traffic concerns, its impact on neighbouring properties such as the caravan park, care home and hospital, and also concerns regarding the site being susceptible to flooding.

## 2.0 Provision of the Local Plan

- 2.1 The CNP Deposit Local Plan (CD6.11) identifies proposal site GS/HI for housing development. The text associated with the proposed allocation initially stated that the site had a capacity for around 200 units. This was amended in the Deposit Local Plan 1<sup>st</sup> Modifications (CD6.12) to reflect the current situation. The text as modified states that “a detailed planning application is with the National Park Authority for the development of this 9.6ha. site.
- 2.2 Proposal site GS/Env is surrounded on three sides by proposal site GS/HI. The Deposit Local Plan identifies GS/Env as one of a number of open spaces and land which contributes to the setting of Granttown on Spey, and will be protected from adverse development.

## 3.0 Summary of Objections

- 3.1 Ten objections have been received raising the following issues –
- Questioning the need for such a large housing allocation in Granttown on Spey (**014**);
  - Objects to and queries specific aspects of the current planning application on the land (**014**);
  - Objecting to the Local Plan on the basis that the area of ground between Grant House and Ian Charles Hospital should be allocated for expansion of those facilities (**402**);
  - The Plan makes an over allocation for housing in Granttown on Spey, which would impact on sustaining other smaller settlements in the area. As a result it is requested that the extent of site GS/HI be reduced (**445c**);

- Objecting on the basis that the proposed housing development at GS/HI would adversely impact on the character of Granttown on Spey (101), and also requests that the area between the caravan park and Seafield Court be allocated as open space (101, 028 and 062);
- Objection to housing in part of the site GS/HI, between Granttown on Spey Caravan Park and Seafield Court, on the basis that development would have a significant adverse impact on the economic prosperity of Granttown campsite (028);
- The allocation of land for housing in Granttown on Spey does not support the aims of the National Park, and the CNPA should not be pressured by land owners to allocate land (046);
- Development of GS/HI would exacerbate current traffic management problems within Granttown on Spey and in particular at the junction of Seafield Avenue with High Street / The Square (090 and 028);
- Concerns regarding the density and scale of housing on GS/HI (028);
- Expressing concern about the depiction of two areas (a shelter belt alongside the land on the northwest side of the Seafield Court houses and also a small area against the woodland fence at the former shooting range on the north side) at the Mossie as brown development land (358a);
- Objecting on the basis that a flood risk assessment submitted in connection with a current planning application on the site (06/320/CP refers) highlighted that a large area of proposal site GS/HI is susceptible to flood inundation and that the allocation has not been modified accordingly (399r(g)).

#### **4.0 Summary of Cairngorms National Park Authority Response**

- 4.1 The site contributes to the housing land supply set out in proposed modifications to Tables 3 and 4 (CD7.28) of the Local Plan, and has been assessed through the site selection criteria set out in Topic Paper 4 (CD7.24). As part of the overall strategy and as an identified strategic settlement, Granttown on Spey is considered to have the capacity to accommodate the provision of land for housing growth to meet the social and economic needs of the local area. Additional information has become available in the course of the Local Plan process regarding natural heritage interests on the site which shows the increased significance of the site to the natural heritage of the National Park and the CNPA recognise the importance of the site in this respect. This is considered to mean that the full allocation area may not be suitable for development and additional surveys are likely to be required when considering any development proposal in order to clarify the extent of area appropriate for development. The site has also been allocated for residential development in the adopted Badenoch and Strathspey Local Plan since 1997 (CD6.6).
- 4.2 Proposal site GS/HI has a current, outstanding planning application and the text associated with the site was amended in the Deposit Local Plan 1<sup>st</sup> Modifications (CD6.12) to reflect this. A number of the objections detailed above focus on issues which are specific to the current planning application and are therefore not pertinent at this time in establishing the appropriateness of allocating proposal site GS/HI for housing purposes. Such detailed issues will be more appropriately assessed in the context of the current planning application on the land.

#### **5.0 CNPA Commendation to Reporter**

- 5.1 The Cairngorms National Park Authority commend to the Reporter that the objections detailed above are rejected and that acceptance is confirmed of the allocation of proposal site GS/HI for residential development and also proposal site GS/Env for open space / environmental protection.

## 6.0 Assessment / Scope of Evidence

- 6.1 **014** questions the need for such a large housing allocation in Granttown on Spey.
- 6.2 **Response** : The CNP Local Plan, in line with SPP3 – Planning for Housing (CD2.4), and the objectives of the CNP Park Plan (CD7.1) is required to deliver effective housing land for the Local Plan period on the basis of the housing needs established for the area (see proposed modified background text to Housing policies CD7.28). This is further clarified through Topic Paper 3 Approach to Housing Land Supply and Affordable Housing (CD7.23). The development strategy, as defined in Housing Policy 22 (Page 45) and explained at paragraph 5.52, seeks to allow for new housing development within the settlements of the National Park. The housing allocation in the CNP Local Plan for Granttown on Spey has been made in this context.
- 6.3 **014** also objects to specific aspects of the current planning application on the land identified as proposal site GS/HI and GS/Env. Several issues are raised including density, questioning the need for a development of the scale proposed, querying the definition of protected open space, flooding queries and also querying the affordable housing provision and the provision of civic amenities.
- 6.4 **Response** : The majority of issues and queries raised relate to the specific detail of a current planning application (CNPA planning file ref. no. 06/320/CP refers) on the lands encompassed in proposal site GS/HI and GS/Env. The appropriate forum in which to consider the matters raised is therefore in the assessment and determination of that current planning application.
- 6.5 Of the objections more generally relating to the Local Plan, it is commented that no reference is made to the ratio of affordable homes. In response to this, the CNPA wish to point out that the amended text in the Deposit Local Plan 1<sup>st</sup> Modifications (CD6.12) clarifies that there is a current planning application on the land which is proposed for allocation as GS/HI. Existing requirements for the provision of affordable housing would be applied in the assessment of that application. In the event of an future development proposals coming forward on the land, Policy 21 of the Deposit Local Plan refers to ‘Contributions to Affordable Housing’ and sets out a comprehensive policy to ensure the delivery of a wide range of housing options to a wide range of households in the Park.
- 6.6 **402** objects to the allocation of the land between Grant House and Ian Charles Hospital, on Castle Road East, for residential development and states that it should be for expansion.
- 6.7 **Response** : The Cairngorms Landscape Capacity for Housing Study (Granttown Final Report, page 10) (CD7.19) concludes that there are opportunities for considerable settlement expansion across the area defined as ‘Low Lying Fields’ to the west of Granttown on Spey. The area of land mentioned by objector 402 is identified in the Cairngorms Landscape Capacity for Housing Study as part of a much larger site area with “opportunities for considerable housing development. The proximity of this area to the town centre and the level topography would provide opportunities for denser forms of development.”
- 6.8 **445c** objects on the basis that the Deposit Local Plan makes an over allocation for housing within Granttown on Spey and consequently suggests that the extent of proposal site GS/HI be reduced, and that land be allocated for housing in Nethy Bridge instead.

- 6.9 **Response** : The CNP Local Plan, in line with SPP3 – Planning for Housing (CD2.4), and the objectives of the CNP Park Plan (CD7.1) is required to deliver effective housing land for the Local Plan period on the basis of the housing needs established for the area (see proposed modified background text to Housing policies CD7.28). This is further clarified through Topic Paper 3 Approach to Housing Land Supply and Affordable Housing (CD7.23). The development strategy, as defined in Housing Policy 22 (Page 45) and explained at paragraph 5.52, seeks to allow for new housing development within the settlements of the National Park. The housing allocation in the CNP Local Plan for Grantown on Spey has been made in this context. Grantown on Spey is identified in the Deposit Local Plan as one of the strategic settlements in the National Park and as such it is reasonable and appropriate to allocate the extent of land proposed for residential development within such a settlement. The extent of land proposed for housing development is also broadly consistent with the allocations which have existed since 1997 through the Badenoch and Strathspey Local Plan (CD6.6).
- 6.10 The objector requests that the extent of the allocation be reduced at proposal site GS/HI and that a site for future housing should instead be identified in Nethy Bridge. The objector has also made a submission specifically in relation to the allocation of land in Nethy Bridge (445b refers) and this matter will therefore be addressed in the appropriate written statement.
- 6.11 **101, 028 and 062** all request that the area of land between Grantown on Spey caravan park and the residential development in Seafield Court be allocated as open space. **101** also objects on the basis that a sizeable housing development at proposal site GS/HI, which it is speculated would be based on a ‘central belt’ concept, would adversely impact on the character of Grantown on Spey and suggests that development should only be at the hospital end of the town. **101** requests that the extent of the proposed allocation at GS/HI be reduced, involving development only at the hospital end of the town and also that the number of units be reduced by a third.
- 6.12 **Response** : The Cairngorms Landscape Capacity for Housing Study (Grantown Final Report, page 10) (CD7.19) concludes that there are opportunities for considerable settlement expansion across the area defined as ‘Low Lying Fields’ to the west of Grantown on Spey. The text associated with proposal site GS/HI was amended in the Deposit Local Plan 1<sup>st</sup> Modifications (CD6.12) to omit reference to site capacity and refer instead to there being a current planning application on the land. In the absence of any reference to the suggested capacity of the site, requests for a reduction in the number of units are not considered relevant.
- 6.13 An important distinguishing landscape characteristic of the ‘low lying field’ area is its openness, which allows clear views from the town towards the woodlands beyond. The CNPA are satisfied that the distribution of the proposed allocation of GS/HI allows for key views to be retained, particularly by maintaining views between Castle Road and the end of the Mossie Road to the woodlands to the west. The view from Seafield Road is already partially interrupted by the caravan park and consequently housing between this and Seafield Court would have little impact upon this characteristic.
- 6.14 In terms of the objectors concerns regarding the development on proposal site GS/HI being based on a ‘central belt’ concept, this is not a matter which is considered relevant in determining the principle of allocation of the site for residential purposes. The detailed nature of any proposal and its appropriateness to its location will be assessed in the context of a planning application.

- 6.15 **028** objects to the allocation of proposal site GS/HI on the basis that it would have a significant impact on the economic prosperity of the Grantown on Spey caravan and campsite, which in turns makes a significant contribution to the economy of the town as a whole. A number of other comments are also included in the objection in relation to specific details relating to the current planning application on the land, including density, design and landscaping.
- 6.16 **Response** : The Cairngorms Landscape Capacity for Housing Study (Grantown Final Report, page 10), (CD7.19) concludes that there are opportunities for considerable settlement expansion across the area defined as 'Low Lying Fields' to the west of Grantown on Spey. Section 2.3 of the Landscape Capacity for Housing Study discusses opportunities and constraints for development and notes that the openness of the fields contrasting with the wooded slopes behind is already compromised to some extent by the presence of the caravan park.
- 6.17 The existing use of the caravan and camping park on Seafield Avenue and the proposed allocation of GS/HI on the adjacent land for residential purposes are considered to represent compatible uses, with examples of similar adjacent land uses already existing elsewhere within the National Park (examples include Boat of Garten caravan and camping park and Ballater caravan and camping park). There is no evidence to suggest that the proximity of an allocated housing site to an existing tourist facility such as the caravan and camping park would impact on the economic prosperity of such a facility. Any potential impacts of a specific development proposal would be more appropriately considered and assessed and where necessary mitigated against in the course of a planning application.
- 6.18 The Local Plan also offers a further degree of protection to the existing caravan and campsite, through its proposed allocation as GS/EDI. The supporting text acknowledges that it provides continued support to the provision of tourist accommodation in Grantown on Spey. The text also clarifies that it "will be protected from adverse development."
- 6.19 In terms of the specific issues which have been raised with regard to the current planning application on the lands encompassed in proposal site GS/HI and GS/Env, the CNPA consider that the appropriate forum in which to consider that such matters is in the assessment and determination of that current planning application.
- 6.20 **046** objects on the basis that the allocation of proposal site GS/HI does not support the four aims of the National Park.
- 6.21 **Response** : The Local Plan and its proposed allocations have also been subject to Strategic Environmental Assessment (SEA) (CD7.14, 7.15 and 7.16) throughout its development, including in the consideration of the allocation of sites. As detailed in para. 1.12 of the Plan, the SEA assessed the likely significant environmental effects. The proposed allocation of site GS/Env and the confinement of the proposed housing allocation to the extent of area identified in proposal site GS/HI was informed by the SEA and an awareness of the natural heritage value of the land proposed as GS/Env. Policy I of the Deposit Local Plan is the overarching policy dealing with Development in the Cairngorms National Park, with one of the key aspects of the policy being (a) which states that "development will be supported where the aims of the Park are collectively achieved in a co-ordinated way."

- 6.22 Site GS/HI is proposed for allocation in accordance with the Cairngorms Landscape Capacity for Housing Study (CD7.19) which concludes that there are opportunities for considerable settlement expansion across this area which is included within the area identified as 'Low Lying Fields.' The land forming proposal site GS/HI consists mainly of formerly grazed pastures in a flat open landscape.
- 6.23 The setting of the town is characterised in part by open space leading to woodland, and it is also characterised by woodland immediately adjacent to the built up area, particularly in the south of the town. The CNPA accept that the allocation of proposal site GS/HI would reduce the proportion of open space area. However, the CNPA are satisfied that it will retain important views from parts of the town, and by developing closer to the woodland, would continue this alternative characteristic pattern.
- 6.24 Some areas of the 'low lying fields' which have been identified as having a higher natural heritage value have been excluded from the housing allocation and have specifically been identified as open space / for environmental protection (GS/Env refers).
- 6.25 The CNPA are aware that land within proposal site GS/HI has been used by breeding wading birds. It is also accepted that the deterioration of breeding habitat may be one of the key factors in the decline of breeding waders. There is sufficient evidence to indicate that parts of the GS/HI allocation are of high biodiversity value and are a significant contribution to the special qualities of the National Park. One of the most significant natural heritage interests of the allocation is the assemblage of breeding waders including UK BAP Priority and Cairngorms LBAP Priority species like lapwing, curlew and redshank. The 2008 HLM Survey (see supporting documentation) indicates a very high breeding wader density over the suitable areas of low-lying grassland and wetland habitat (including parts of GS/ENV) on the site, particularly the area between the hospital, the burn and the birch woodland. This area is considered the second best site for breeding waders in the National Park based on density compared to 46 other regularly surveyed breeding wader sites (from Mitchell 2007). In a national context, Badenoch and Strathspey is considered the most important area for breeding waders on the UK mainland. This high density is due to the mosaic of habitat types present, the hydrology and the land management of the site (a long history of livestock grazing). It should be noted that breeding waders are experiencing significant declines across the UK and in Scotland (including Badenoch & Strathspey).
- 6.26 In addition, parts of the allocation, for example the areas directly behind the hospital and Grant House, include an interesting mix of unimproved mesotrophic grassland, base-rich mire and improved acid grassland. This important habitat mosaic supports a diverse community of plants (including fungi) and invertebrates as well as birds, mammals and amphibians. In particular, the mesotrophic grassland and base-rich mire are an uncommon habitat type in the Park and both these vegetation communities are UK BAP Habitats (Upland Calcareous Grassland and Upland Flushes, Fens and Swamps). These parts of the allocation have a significant invertebrate biodiversity interest including 5 UK BAP species of butterfly, extensive communities of hoverflies and the only known Scottish site for a species of leafhopper.
- 6.27 While efforts have been made to increase the proposed allocation GS/ENV to protect a proportion of the natural heritage value of the site, it is still the case that the most significant natural heritage of the site (the breeding waders, the associated grassland and mire habitats and invertebrate communities) will be compromised if the full allocation of GS/HI is developed. The CNPA therefore recognise that there is a need to balance the requirements

for housing land against the first aim of the National Park which seeks to conserve and enhance the natural heritage of the area.

- 6.28 In terms of the second aim of the National Park regarding the sustainable use of the natural resources of the area, the CNPA suggest that it is more appropriate to assess this in the context of the detail of any planning application that may be made on allocated lands, rather than in establishing the principle of an allocation on the lands identified as GS/HI.
- 6.29 With regard to the third aim of promoting the understanding and enjoyment of the special qualities of the area (including in the form of recreation) by the general public, proposal site GS/Env lies adjacent to proposed allocation GS/HI and would be retained and protected as open space, thereby providing continued opportunities for the general public to enjoy the special qualities of the area. In addition, it is only through the assessment of detailed proposals for the development of GS/HI that it can be definitively established whether or not a development would accord with the third aim of the National Park. Any judgement on the matter is considered premature at the stage of establishing the general acceptability of the allocation of GS/HI for residential development. Supplementary planning guidance, including the Sustainable Design Guide, will also be produced in order to assist further in the formulation of development proposals that are consistent with the aims of the National Park. The allocation of proposal site GS/HI for housing is consistent with the approach advocated in SPP3 – Planning for Housing (CD2.4) and in the strategic objectives of the National Park Plan (CD7.1), of allocating an appropriate supply of land to meet identified housing requirements across all tenures, and in sustainable locations. In principle, this involves directing the majority of new development into existing settlements in order to make efficient use of service infrastructure and capacity.
- 6.30 In response to concerns raised regarding the fourth aim of the National Park which is to promote the sustainable economic and social development of the area, the allocation of GS/HI is considered consistent with this aim. There is clear evidence in the National Park of the extent of housing need (please refer to Topic Paper 3 – Approach to Housing Land Supply and Affordable Housing (CD 7.23)), and the proposed allocation of GS/HI is within the settlement boundary of an identified strategic settlement, and on land which was previously allocated for housing in the Badenoch and Strathspey Local Plan 1997. The allocation of land within the settlement is consistent with the thrust of SPP 3 - Planning for Homes, which seeks to encourage housing at appropriate locations, in order to create successful, sustainable communities. This in turn is considered to offer the potential to promote the sustainable economic and social development of this area of the National Park.
- 6.31 **090 and 028** express concern that the development on proposal site GS/HI would exacerbate the current traffic management problems within Grantown on Spey, and requests that any new development should ensure that adequate improvements are made to junctions and also incorporate other possible traffic management solutions.
- 6.32 **Response :** The land encompassed in proposal site GS/HI is bounded to the south west by Seafield Avenue and to the east by Castle Road East. Given the proximity of the proposal site to the public road network, access arrangements are not considered by the CNPA to be an obstacle to the allocation of the land for housing development. The impact of a specific development proposal on the traffic system in the Grantown on Spey area is a matter which would be more appropriately considered in the context of the assessment of any planning application on the lands, with the assessment being informed by information such as a traffic

impact assessment and consideration of detailed proposals by the Roads Authority for the area.

- 6.33 **028** states that the density of housing is out of character with the northern end of the town and neighbouring streets (with reference being made in the objection to the suggested capacity of 200 dwelling units on 9.6 hectares, as initially referred to in the Deposit Local Plan(CD6.11), stating that the density is the highest when compared with other development proposals within settlements within the National Park.
- 6.34 **Response** : The Cairngorms Landscape Capacity for Housing Study (Grantown Final Report, page 10) (CD7.19) concludes that there are opportunities for considerable settlement expansion across the area defined as 'Low Lying Fields' to the west of Grantown on Spey. Page 12 of the Landscape Capacity Report also identifies the 'Low Lying Fields' as being appropriate for a higher plot density and a more structured grid layout. The reference to a capacity of 200 dwelling houses, as detailed in the text associated with GS/H1 in the Deposit Local Plan (CD6.11) was omitted in the Deposit Local Plan 1<sup>st</sup> Modifications (CD6.12). No reference is made to development density in the text associated with proposal site GS/H1. The proposed allocation of the site seeks to establish its acceptability as a housing site. It is considered that detailed matters regarding site capacity and density would be more appropriately addressed in the context of a planning application.
- 6.35 **358a** in response to the Deposit Local Plan 1<sup>st</sup> Modifications expresses concern about the inclusion of two areas of land within the proposal site allocation GS/H1. The areas are a shelter belt alongside the land on the northwest side of the Seafield Court housing development and also a small area adjacent to the woodland fence at the former shooting range on the north side of the site.
- 6.36 **Response** : The areas referred to are of limited extent and as such there would be limited benefit in considering them for allocation as areas of open space / for environmental protection. In general the areas which are proposed for allocation as Env are significantly larger in scale and have been allocated due to their overall contribution to the setting of Grantown on Spey. The localised benefits of the areas referred to in objection **358a** may be more appropriately considered in the context of any planning application on proposal site GS/H1, and it is considered that sufficient opportunity continues to remain to ensure the protection of such areas of localised benefit, without their formal designation as an area of open space.
- 6.37 **399r(g)** objects to the allocation of proposal site GS/H1, stating that although the site is not shown to be at risk on SEPA's flood maps, a Flood Risk Assessment recently submitted in connection with a current planning application on the land (CNPA planning file ref. no. 06/320/CP refers) has highlighted that a large area of the site is susceptible to flood inundation and that the CNPA have failed to modify the extent of the proposed allocation accordingly.
- 6.38 **Response** : As detailed in paragraph 1.8 of the Plan, it has been prepared following periods of public consultation, community engagement and detailed discussions with key stakeholders, local development forums and the four Local Authorities. SEPA has fully engaged with the process and provided vital expert input and are continuing to do so at the present time. The CNPA are therefore satisfied that all relevant information and expert advice regarding the extent of flood plains etc. has been sought and is in the process of being received. As already acknowledged by SEPA in objection 399r(g) proposal site GS/H1 is not



shown to be at risk on SEPA's flood maps. It is only through the submission of a Flood Risk Assessment in conjunction with the assessment of a current planning application on the land that information has emerged to indicate that part of the allocation site may be susceptible to flooding. The precise extent of the flood plain in relation to the proposal site GS/HI or any measures which might be appropriate to address the potential flooding issues have not been clarified at this time. In the event of further definitive information becoming available, the final allocation proposals will be re-assessed and where necessary amended.

## **7.0 Other Material Considerations**

7.1 The land included with proposal site allocations GoS/HI and the adjacent GoS/Env is the subject of a current planning application (CNPA 06/320/CP). The application was called in by the Cairngorms National Park Authority in August 2006 and the assessment of the proposal has been on-going since that time, with significant items of further information being sought from the applicants in order to assess the overall impacts of the development proposal.

## **8.0 List of documents (including Core Documents)**

- CD 1.3 The National Parks (Scotland) Act 2000
- CD 2.4 SPP3 Planning for Housing 2003 and 2008
- CD 6.6 Badenoch and Strathspey Local Plan 1997
- CD 7.1 Cairngorms National Park Plan 2007
- CD 7.3 CNPA Committee Report Consultation May 2008
- CD 7.4 CNPA Committee Report 1<sup>st</sup> Modifications October 2008
- CD 7.5 CNPA Committee Report 2<sup>nd</sup> Modifications February 2009
- CD7.14 Strategic Environmental Assessment Environmental Report
- CD 7.15 SEA Non-Technical Summary of Deposit Local Plan
- CD 7.16 SEA and Appropriate Assessment Local Plan Final
- CD 7.17 Appropriate Assessment Granttown on Spey HI
- CD 7.21 Topic Paper 1 Statutory National Park Context
- CD7.23 Topic Paper 3 Approach to Housing Land Supply and Affordable Housing
- CD7.24 Topic Paper 4 Background information regarding allocated sites
- CNPA planning file, reference number 06/320/CP.
- 2008 CNPA Heritage Land Management Survey information
- 2009 CNPA supplementary habitat information