
**CAIRNGORMS NATIONAL PARK
DEPOSIT LOCAL PLAN
PUBLIC LOCAL INQUIRY 2009**

**ADDITIONAL HEARING
STATEMENT**

APRIL 2009

Representations on Behalf of
The Mar Estate
Objection Ref: 394a, b, o
Braemar Development Strategy



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APPENDIX 1 – ADDITIONAL DOCUMENTS

1 INTRODUCTION

This Additional Hearing Statement has been prepared by Halliday Fraser Munro Planning on behalf of The Mar Estate (not the Proprietors of the Mar Centre as referenced) It responds directly to the Hearing Statement produced by CNPA in respect of the settlement of Braemar and should be read in conjunction with Initial Hearing Statement previously submitted.

2 CNPA POINTS OF CASE & RESPONSES

2.1 394a CORRIEMULZIE AND INVEREY

The CNPA suggest no change to the Plan in respect of these objections as they relate to Corriemulzie and Inverey. After discussion with the CNPA officers we no longer wish to pursue these objections and formally withdraw them. For the avoidance of doubt this only relates to the locations at Corriemulzie and Inverey and these will be taken forward in discussion with the CNPA outside of the Local Plan Inquiry process.

2.2 394b TOURISM/HOLIDAY ACCOMMODATION SITES

We have discussed this with CNPA officers and no longer wish to pursue this objection. Again, we will pursue this concept in discussion with the CNPA outside of the Local Plan Inquiry process.

2.3 394o ADDITIONAL BUSINESS/COMMERCIAL LAND ALLOCATION

CNPA raised a number of individual points upon which we wish to expand:

- a) that they have identified 3 sites that are considered to ***“provide potential for economic growth and consolidation in scale with the needs of Braemar”***

The sites identified are:

Reference	Site Name and Suggested Use	Comments
ED1	Ambulance Station <i>May provide opportunity for small scale economic development</i>	This allows for only very limited development set within a residential area and therefore does not offer any significant benefit to Braemar
ED2	Mews Square <i>is a key facility within the centre of the village and has capacity to support additional retail and business units to consolidate the current development</i>	Although it is good to see this site identified, it is an existing site and simply represents some vacant property. We suggest that part of the problem with this development is that it turns its back on the centre of the village and doesn't offer modern or the most advantageous format for new commercial use. Its allocation will have no new significant positive impact on the economic vitality of the village.
ED3	Caravan and Camp Site <i>provides continued support to the provision of tourism accommodation within Braemar and will be protected from adverse development. Where appropriate, enhancement opportunities will be supported.</i>	This simply retains the caravan site for its existing use.

In our view, therefore, is that these allocations are not sufficient to support the development of a viable and sustainable community at the heart of the Park and are only really a token gesture.

b) That The Mar Estate raised no objections at the Deposit Stage

The Mar Estate objected via Savills (see MAR 1.2) and suggested that, generally, Braemar could accommodate further development. In any event it was only at the 1st Modification stage where the three business sites were introduced.

c) That Policy 27 allows for business development inside and outside of settlements and new proposals will be assessed against this policy

This may be the case but the Plan also identifies new employment land in most of the key settlements. As indicated previously Braemar is considered a key settlement and should have new employment land included within it as part of a well-considered development strategy. This should be in conjunction with the local community, local landowners, the business community and other key stakeholders such as Scottish Enterprise Grampian.

Policy 27 may theoretically allow for new well-justified business development anywhere in the Park but the Local Plan should have developed settlement strategies to support the uniqueness of individual settlements.

2.4 394a ADDITIONAL HOUSING ALLOCATIONS AT BRAEMAR

CNPA raised a number of individual points that we wish to respond to:

a) Issues not raised at the Deposit Stage

This is not the case. The Mar Estate's concerns were raised at the Deposit Stage by Savills (Document MAR 1.2). Halliday Fraser Munro have since taken over as lead consultant in this Inquiry representing The Mar Estate and this has been intimated to the Park on a number of occasions. We appreciate that this point could have been easily missed by the officer preparing the Hearing Statement.

In their original representation (MAR1.2) Savills' indicated:

"The Estate has considered the scope for both short term and medium to long term development and we would welcome the opportunity to discuss our thoughts. Of particular interest is the scope for a 20-30 house development on land which currently lies outwith the village envelope but within the Conservation Area.

*We regularly receive requests from local families wanting to build or buy a house of their own to enable them to live and work in the area. It is impossible to satisfy demand and because of this we have considered where best the Estate could provide a site for a substantial development on which a high proportion (i.e. in excess of CNPA minimum standards) of Affordable Housing together with recreational facilities could be located ... **we ask that the Deposit Local Plan is amended accordingly.** We believe there is scope for further development outwith the village envelope that would enhance Braemar. The village envelope boundary should remain flexible."*

In particular the letter from Savills requested discussion with the CNPA on the aspects that their letter raised. It also indicated that Savills (as the Estate's management consultants) receive regular requests for houses or land from local families. Further evidence on housing demand and need in Braemar is discussed later.

b) That no further allocations are justified in terms of the current housing needs established for Braemar

We have made general and more detailed comments on the Housing Land Supply in our written statement (reference 394i) and have duplicated the relevant parts of that statement here.

The CNPA response relies on the content of Topic Paper 1 (CD7.21), Topic Paper 3 (CD7.23) and Topic Paper 4 (CD7.24) in their justification for their land allocation strategy. They also state in the Hearing Statement on Housing Land that "*The assessment and general apportionment of numbers is arrived at by reference to population and household projections by University of Manchester and GROS and studies carried out by Heriot Watt University and the Three Dragons consultancy. Specific allocations are made by identification of sites in accordance with the hierarchy of settlements.*" (page 1, CNPA Hearing Statement – General Housing Land Supply).

Topic Paper 3: Housing Land Supply and Affordable Housing (CD7.20)

This paper's purpose is to set out the approach taken by the Park in identifying land for housing. Of particular note is section 3 which states a specific outcome (part of the Vision) for 2030 is "*thriving and sustainable communities **throughout** the Park*" and that "*people will be able to access housing that meets their needs through rent or purchase.*"

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.**

The Topic Paper also summarises the findings of various studies. Of particular note is evidence from the CD 7.9 which states "*That all areas within the Park were under pressure [for affordable housing] but that it was greatest in Upper Deeside, Aviemore and Tomintou*" (para 2.11, page 8)

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.

SPP3 also requires that planning "*authorities allocate more than enough land, i.e. a generous supply, to help ensure delivery of homes*" (CD 2.4, paragraph 33). Paragraph 35 sets out how forecasts and projections should help inform housing allocations. It states "*The Scottish Government's national objectives, reflected in targets for greater economic and population growth, imply higher overall household growth than central projections indicate.*" This clearly suggests that using centralised data on growth projections i.e. projecting past trends, will not achieve the Government objectives and that higher growth scenarios should be adopted.

Paragraph 43 of SPP3 also requires that "*Development plans should be capable of responding to changes as necessary. They should identify triggers for future phases of effective sites, such as where the annual audit of housing land ... indicates that availability of housing land and/or completions is not keeping pace with identified requirements*". We have lodged an example of where this approach has been adopted on Document MAR 1.7 and suggest that this general approach be adopted by the CNPA. In order for that to have effect it

will be important to identify future development sites that can come forward in the circumstances where the triggers are activated.

Braemar Housing Land Allocations

Our objection related specifically to the allocations in Braemar as this is where our Client's landholding and interests are. As indicated above we believe that the housing land allocations are generally too low and will not help deliver the required affordable housing so often emphasised in the CNPA background papers as being of key concern.

In Braemar the housing allocations are for sites that have an existing consent. The CNPA, in their housing allocations, have already identified a key problem with these types of sites i.e. that they were given consent prior to the Park's affordable housing policies being in place. In theory, therefore, Braemar is at a disadvantage as it will not be able to achieve a rate of affordable housing that other settlements can by virtue of their non-consented housing allocations having to meet a more stringent standard. Indeed, land allocations are about creating a policy provision to meet a rolling 5-year supply of housing. The purpose of this is to get over the potential stop-start effect of only allocating enough land for the first 5 years. Table 4 (second Modifications CD6.13) sets out the 2006-2011 and 2011-2016 housing land allocations. For Braemar only the existing consents make up all of the land allocations up to 2016 and there are none beyond that. 2016, of course, is only some 7 years away and only 6 years from the date that the Plan is likely to be Adopted.

Braemar has a high level of local need. We have illustrated this in the information provided by Savills but also in the additional Document MAR 1.8 "Braemar Housing Needs Analysis" carried out in May 2007 by the Rural Housing Service on behalf of the CNPA, Aberdeenshire Council and the Braemar Community Council and MAR 1.9. Mar 1.8 reflects the worrying trends in significant out-migration of the younger population and significant in-migration of an older population (CD 7.10 – Population and Household Projections, University of Manchester). Page 3 of that projection indicated almost 34% reduction in the age range 0-15, 10.5% in age range 16-24 and 31% reduction in age range 25-39 between the years 2001 to 2025. In other words the families with children are moving out. Significantly the in-migration showed a 100%+ increase in the over 75s across the same period. This, in our view, is simply starting to store up problems and needs to be addressed by ensuring that new and affordable family housing is delivered now.

MAR 1.8, however, presents a more up to date picture of the housing requirements in Braemar in particular. Section 4.0 provides some evidence of

the house price versus earnings in the area and we suspect that this gap has widened since then. Section 5.1 also suggests that there is more hidden housing need in Braemar (ignoring those wanting to move there from elsewhere) than has been acknowledged in the housing allocations. In recent correspondence from the Estate's management consultant (additional Document MAR 1.9) this housing need is expanded upon.

c) Housing Sites have been assessed through the site selection criteria set out in Topic Paper 4

Only those sites identified by the CNPA in the Deposit Plan have been assessed. We have seen no evidence that alternative, potentially more appropriate sites, identified by objectors have been assessed at all. This should have been done to establish whether there was any better development sites.

d) Braemar is considered to have the capacity (as an intermediate settlement) to accommodate the housing growth to meet the social and economic needs of the area

Strategic Settlements versus Intermediate Settlements

The justification for identifying settlements as either Strategic or Intermediate does not manifest itself clearly in the Plan. We believe that Braemar is set at the heart of the Park. It sits squarely in the centre of the Park and could, if allowed, flourish to become more than a small village serving the tourist industry. With the right critical mass of resident population it could support new jobs, new businesses and retain or attract better services to serve the local population. A mix of age ranges, families and housing types could help achieve this. The Mar Estate, as a key landowner in and around Braemar is committed to making that happen and would like to work with the Park to determine how this can be achieved. We believe that more land should be allocated for new housing around Braemar to allow it flourish as a place to live rather than a place to visit.

Braemar is critical to the success of the Park as a whole and should be considered a Strategic Settlement, in terms of its location but also when compared to other Strategic Settlements such as Grantown on Spey, Kingussie, Newtonmore and Ballater. The fact that Braemar is more isolated than these other settlements makes it more important that its future as a resident community as well as a centre for tourism is more secure.

e) The settlement strategy is to identify settlement boundaries and therefore flexibility is not appropriate

We have made comments on the flexibility issue in objection reference 394i. This is related to the commitment to an annual Housing Land Audit and triggers for releasing future development land where appropriate. MAR 1.7 provides the Moray example of how this could be taken forward. It does, however, require that future housing land be identified now.

On settlement boundaries we note the CNPA comments. Having reviewed the Braemar settlement boundary, however, we cannot see any real justification for the line that is drawn very tightly around the settlement, except that it represents the status quo. It does not match the Aberdeenshire Local Plan settlement boundary (see CD 6.5, Braemar settlement plan) and does not allow for any new housing allocations beyond those already with consent.

3 CONCLUSIONS

We have seen nothing in the CNPA Hearing Statement that convinces us that the changes we have suggested are not justified and therefore seek those changes to be implemented.

APPENDIX 1 – Additional Documents

Additional Document MAR 1.8 - "Braemar Housing Needs Analysis May 2007"

Additional Document MAR 1.9 – e-mail from Savills (L&P) Limited, 27.04.09