

## **RESPONSE TO MAIN ISSUES REPORT FROM MAR ESTATE, BRAEMAR**

I thank you for the opportunity to respond to consultation for this stage of the Planning Process which will culminate in the new Development Plan for 2020 onwards. I acknowledge that by its nature the Main Issues Report is generalist in approach, but at the outset I would comment that many laudable generalisations are open to subjective judgement which could lead to diametric differences of opinion. I should also point out that my comments relate particularly to Braemar and its local area, as opposed to the Park as a whole.

Long Term Vision- I agree with the vision statement in the absence of any other, but am concerned that as it is so non specific, it could mean different things to different people, and hence lead to the conflict it is designed to avoid. So a guarded yes to this first question.

Overall Development Strategy- The preferred option appears to suggest that Development in the Park is driven by Strategy – is this the case? In Braemar the reality in recent years has been significant private investment in a wide variety of projects from a tripling in size of the village shop to a new restaurant/all day cafe both increasing employment demand and opportunity; from the community hydro scheme to the refurbishment of the Royal Observation Corps post both drawing public interest to the village; from the new Highland Society Centre to the Fife Arms Hotel, both projects reaching far beyond the Park in terms of visitor attractions and employment demand. I do not believe any of these investments have been delivered by any Development Strategy, and I neither believe that the proposed Development Strategy recognises the challenges and opportunities that exist in meeting the various demands that will exercise themselves on Braemar. Braemar is at the heart of the Park, and as such should be THE strategic settlement epitomising the four statutory aims of the Park.

Designing Great Places – My answer to the first question is OK as far as it goes; and to the second question, yes, but ensure there is the flexibility to enhance the distinctive heterogeneous nature of the village which could be threatened by the homogeneous nature of modern housing development.

Impacts from A9 – non applicable to Braemar. However what about the A93 where substantial upgrading is required south of Glenshee to enable equivalent access from the south east as is afforded by the standard of the A93 from the east/Aberdeen.

Housing – Housing need for Braemar cannot be extrapolated from National or Regional trends – this is a local need which is driven by local pressures and demands. The current system of allocating H1 sites with attendant affordable does not address local housing needs. The reality can be seen in recent and proposed housing developments in the village – new housing stock creates an additional demand by providing a new supply irrespective of existing local demand. Larger sites are very difficult to finance particularly in view of the high costs of site infrastructure. Suggesting one site will satisfy 10 years of demand just will not happen. Increasing the affordable element to 35% will only compound the problem. There is no provision in the Report for self build plots for which there is continuous local demand, which will enhance the character of the village, while ‘multiple’ housing sites do exactly the opposite. Self and Custom build is now a clear Government priority with the Scottish Government showing its support through the announcement in late 2017 of a new £4

million self-build loan fund and a new Challenge Fund to encourage the establishment of pilot custom and self-build schemes. Local Authorities should be supporting this Government priority in their land-use allocations and planning policies, especially in areas where there is high local demand and where the housing market makes it difficult for locals to purchase property for financial or other reasons.

**Affordability of Housing** – As stated above changing the affordable percentage is likely to provide fewer affordable units as the economic feasibility of development becomes stretched. This issue has been examined during previous LDP reviews where the eventual decision by the CNPA to restrict affordable housing requirements to 25% was based on viability concerns. Building costs in Braemar are significantly higher than elsewhere in the regional area where housing opportunities to develop are many and varied – making development more onerous in Braemar can only reduce its likelihood. The Mar Estate is willing to meet with the CNPA, Community Council, and Invercauld Estate to develop a different strategy relevant to the pressing needs of Braemar – something which should happen as an urgency as needs are critical.

**Economic Development** – I am not sure as stated before that development in Braemar is either driven or enabled by Plan. However some assistance with provision of small business units would be helpful as I cannot see speculative development of these will be forthcoming without grant or other incentive.

**Impacts on Nature Designation** – In my view this question is so far removed from the causes of capercaillie decline in Upper Deeside that this proposal is not worthy of constructive comment.

**Planning Obligation** – In short this imposes more cost on developers which will either drive up the price of housing or reduce development, both things which it is acknowledged are not desirable. Also there is no recognition of the increased costs of development in remote settlements. Planning obligations should be proportionate and fair with scope to negotiate these on the basis of development viability.

**Flood Risk** – Provided the requirements are reasonable, my answer is yes.

**Upland Areas** – As another Park document is in circulation advocating increased forest cover to include trees providing a commercial long term return, this policy would seem at odds with the implicit need for associated hill track infrastructure. I am not convinced that the existing planning regime for hill tracks is not sufficient.

**Braemar site specific questions**– I disagree with just about every statement made on page 44. ‘Braemar is a small village at the western end of Upper Deeside’ could be replaced by ‘Braemar is an internationally known village which encapsulates everything the CNPA is about – a thriving energetic community conserving and enhancing the natural and cultural heritage of the area. While promoting use and enjoyment of the area through substantial private investment both in terms of people and resources’. Now is that not an aspiration that the Main Issues Report should be addressing?

To answer the questions:

The 'right' issues for Braemar are far wider as expressed throughout this response.

The proposed settlement objectives should be more bold and reflect the reality of what is happening in the village.

I do not agree with the preferred site options – much more flexibility is required.

There is a lot of open space in and around Braemar whose protection is not in doubt, but yes there should be protected open spaces in the village.

The proposed settlement boundary is the boundary that was imposed without consultation when Unitary Development Plans were first introduced some years ago. This boundary is constricting the village to an unacceptable level and must be redrawn.

The Mar Estate, through the call for sites stage, has identified a number of less sensitive sites where some development, housing or otherwise, could be appropriate. The basic premise for rejecting these sites seems to be based on a 'no change' strategy for the village. The clear and consolidated message from the village (see the joint response on behalf of the Community Council, Mar Estate and Invercauld Estate) is that is not appropriate, that the challenges the village faces are unique and that the planning policies and allocations required to address those challenges need to be specific to the village. No change is not an option if the CNPA wishes to support a positive future for Braemar.

As before the Mar Estate thanks the CNPA for the opportunity to comment and remains very willing to assist in the development of the 2020 Plan.

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Mar Estate

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# Cairngorms National Park Local Development Plan 2020 Main Issues Report

## Comments Form

### Introduction

We are asking for your views on the big issues that the Cairngorms National Park Local Development Plan 2020 will need to address and the options for tackling them. The Main Issues Report sets out choices for the land allocations that could be made for development, and for policies that will be used to make decisions on applications for planning permission. This consultation is your chance to influence the new Local Development Plan to help make sure it:

- provides the homes, jobs and services that our communities need
- protects and enhances the Park's unique environment and cultural heritage for future generations

The consultation runs from **17 November 2017 to 2 March 2018.**

- All documents are available to view at **www.cairngorms.co.uk**
- Comments can be emailed to **planning@cairngorms.co.uk**
- Or posted to:  
**Cairngorms National Park Authority  
FREEPOST NAT 21454  
Grantown-on-Spey PH26 3BR**

**Please use extra sheets if required.**

Alternatively, an online version is available to complete at **www.cairngorms.co.uk**

**All comments must be received by 5pm on Friday 2 March 2018.**

### Your details

Title ..... MR.

Name ..... STEVE CRAWFORD

Organisation (if applicable) HALLIDAY FRASER WILKES

Address ..... FOR MAR ESTATE

.....

Email ..... [REDACTED]

Telephone [REDACTED]

Please tick if you are happy to receive correspondence via email

Please tick to confirm you are happy for us to hold and use your personal data according to fair collection purposes

Please note we will not store personal data for anyone aged 16 or under – please tick if you are aged 16 or under

### Data protection

Your details will only be used for purposes associated with the Main Issues Report consultation and Cairngorms National Park Local Development Plan 2020. You may request to see personal information held by the CNPA at any time.

### Fair collection statement

As a registered Data Controller, the Cairngorms National Park Authority will collect, store and use your personal data for the purpose of informing the content of the Cairngorms National Park Local Development Plan 2020. We will not publish any address information, but may include your name against any comments, if you have confirmed that you are happy for us to do so in the 'Your Details' section.

## Key Questions (Y/N – delete as appropriate)

### Planning in the Cairngorms National Park

Q: We propose to use the vision and long-term outcomes set out in the National Park Partnership Plan as the 'vision statement' for the Local Development Plan.

Do you agree with this approach? **Select**

Please explain your answer

SEE ATTACHED STATEMENT

Please explain your answers

SEE ATTACHED STATEMENT

### Progress in delivering the current Local Development Plan

Q: Do you agree with our conclusions about the changes that need to be made to policies in the existing Local Development Plan? **Select**

Q: Do you think any other changes are needed? **Select**

Please explain your answers

SEE ATTACHED STATEMENT

### Main Issue 3 Impacts and opportunities from the A9 and Highland Main Line upgrades

Q: Do you agree with our proposals to allocate new employment land to take advantage of the opportunities for inward investment associated with the A9 and rail upgrades? **Select**

Q: Do you agree that we should seek to support those communities that are at risk of being by-passed by the A9 dualling project? **Select**

Please explain your answers

SEE ATTACHED STATEMENT

### Main Issue 1 Over-arching development strategy

Q: Do you agree that the overall development strategy of the current Local Development Plan remains appropriate, and that we should use this as the basis for the next Local Development Plan?

Please explain your answer

SEE ATTACHED STATEMENT

### Main Issue 4 Housing

A) How much new housing do we need and where should it be built?

Q: Do you agree with our proposed Housing Supply Targets for the next Local Development Plan?

Q: Do you agree that the proposed Housing Land Requirements are sufficiently generous?

Q: Do you agree with our overall conclusions about the need for additional new housing sites in the new Local Development Plan?

### Main Issue 2 Designing great places

Q: Do you agree that the new Local Development Plan should include a new policy requiring development proposals to show how they meet the six qualities of successful places?

Q: Do you agree that we should include a clearer policy in the new Local Development Plan to set out when tools such as masterplans and development briefs will be used?

Please explain your answers

SEE ATTACHED STATEMENT

**B) Housing growth around Aviemore**

Q: Do you agree that we should include long-term development land in the Local Development Plan which could be released for development in the event that An Camas Mòr does not progress as envisaged?

Please explain your answer

**Main Issue 5 The affordability of housing**

Q: Do you agree that we should increase the affordable housing requirement to 35% in Ballater and Braemar, and to 45% in Aviemore and Blair Atholl?

Q: Do you agree that we should include policies to require a greater mix of house types and sizes, including more smaller homes?

Please explain your answers

SEE ATTACHED STATEMENT

**Main Issue 6 Economic development**

Q: Do you agree that the new Local Development Plan should identify a limited number of new economic development sites?

Please explain your answer

SEE ATTACHED STATEMENT

**Main Issue 7 Impacts on Natura designations**

Q: Do you agree that the new Local Development Plan should include a more co-ordinated approach towards delivering wider packages of capercaillie mitigation and conservation measures?

Please explain your answer

SEE ATTACHED STATEMENT

**Main Issue 8 Planning obligations**

Q: Do you agree that the new Local Development Plan should include a revised and more rigorously justified policy on planning obligations?

Q: Do you agree that this should be supported by more specific guidance in the plan about what planning obligations will be required in different settlements/locations?

Please explain your answers

SEE ATTACHED STATEMENT

**Main Issue 9 Flood risk and climate change resilience**

Q: Do you agree that the new Local Development Plan should include a stronger policy requirement for SUDS to be considered in all new development proposals?

Please explain your answer

SEE ATTACHED STATEMENT

**Main Issue 10 Land management in upland areas**

Q: Do you agree that the new Local Development Plan should include an amended policy to reflect the National Park Partnership Plan's presumption against new hill tracks in open moorland areas?

Please explain your answer

SEE ATTACHED STATEMENT

## Settlements

Please tick which settlement you are commenting on.  
Comments for different settlements should be provided on separate sheets.

An Camas Mòr .....	<input type="checkbox"/>	Cromdale .....	<input type="checkbox"/>	Killiecrankie .....	<input type="checkbox"/>
Angus Glens .....	<input type="checkbox"/>	Dalwhinnie .....	<input type="checkbox"/>	Kincraig .....	<input type="checkbox"/>
Aviemore .....	<input type="checkbox"/>	Dinnet .....	<input type="checkbox"/>	Kingussie .....	<input type="checkbox"/>
Ballater .....	<input type="checkbox"/>	Dulnain Bridge .....	<input type="checkbox"/>	Laggan .....	<input type="checkbox"/>
Blair Atholl .....	<input type="checkbox"/>	Glenlivet .....	<input type="checkbox"/>	Nethy Bridge .....	<input type="checkbox"/>
Boat of Garten .....	<input type="checkbox"/>	Glenmore .....	<input type="checkbox"/>	Newtonmore .....	<input type="checkbox"/>
Braemar .....	<input checked="" type="checkbox"/>	Glenshee .....	<input type="checkbox"/>	Strathdon .....	<input type="checkbox"/>
Bruar & Pitagowan .....	<input type="checkbox"/>	Grantown-on-Spey .....	<input type="checkbox"/>	Tomintoul .....	<input type="checkbox"/>
Calvine .....	<input type="checkbox"/>	Insh .....	<input type="checkbox"/>		
Carr-Bridge .....	<input type="checkbox"/>	Inverdrue & Coylumbridge .....	<input type="checkbox"/>		

**(Y/N – delete as appropriate)**

- Q: Have we identified the right issues for this settlement (where relevant)? **Select**
- Q: Do you agree with the proposed settlement objectives? **Select**
- Q: Do you agree with the preferred site options (where relevant)? **Select**
- Q: Do you agree with the protected open spaces (where relevant)? **Select**
- Q: Do you agree with the proposed settlement boundary (where relevant)? **Select**

Please explain your answers

**SEE ATTACHED STATEMENT**

**If you have any other general comments on the topics you think the Local Development Plan 2020 should address, please let us know.**

**SEE ATTACHED STATEMENT**

### What happens next?

Consultation responses will be collated and a report of the consultation published. We will use this to inform the preparation of the Proposed Cairngorms National Park Local Development Plan 2020. We expect to publish this for a further period of public comment in late 2018.

We will regularly update on progress via **www.cairngorms.co.uk** and on Facebook and Twitter via **@cairngormsnews** and **#BigParkBigQuestions**.

### Queries

Cairngorms National Park Authority,  
14 The Square, Grantown-on-Spey, PH26 3HG  
Tel: 01479 873535 Email: [planning@cairngorms.co.uk](mailto:planning@cairngorms.co.uk)