

Representation



Ristol
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Date: 2nd March 2018 To: CNPA From: Atholl Estates

Cairngorms National Park Authority – Local Development Plan 2 – Main Issues Report. Submission on behalf of Atholl Estates by Ristol Consulting Limited.

Planning in the Cairngorms National Park

Response:

Qualified support for this approach as the basis for the ‘vision statement’ for the LDP. In relation to Priority 7 - Housing, the Partnership Plan states that an approach will be adopted that seeks to increase the provision of affordable homes in perpetuity and by “*..identifying sites in the next Local Development Plan where the affordable housing contribution will be more than the normal national maximum of 25% because of acute affordability pressures and the shortage of supply.*”

Whilst it is acknowledged that there are areas in the CNP which experience these pressures, as evidenced in the HNDA, it is contended that the LDP should consider more closely the variations in affordability of housing that exist throughout the Park area, in particular, within the Blair Atholl area where the median house price (£129,000) is amongst the lowest in the CNP area, reflecting the availability of affordable housing within existing housing stock.

Increasing the provision of affordable housing from the current level of 25% to 45% for Blair Atholl as is suggested in the Main Issues Report, could have a negative impact on the delivery of new housing where proposed sites are small scale and profitability margins will be tight. This would be a disincentive to land owners and housebuilders. It is questionable whether social housing providers will wish to develop this far north of Perth. Higher affordable housing quotas should be reserved for the larger sites elsewhere in the Plan areas where there is a greater likelihood of these targets being met due to land values and profit margins. The Housing Evidence Paper supporting the Main Issues Report recognises the lack of smaller 2-3 bedroom properties and it is suggested that greater emphasis should be given to achieving a range and mix of house types on sites through policy and design briefs rather than the blunt instrument of affordable housing quotas.

Progress in Delivering the current Local Development Plan

Response:

Qualified support for conclusions in respect of housing land supply targets and the need to allocate further land. However, a suggested increase in the percentage of affordable housing provision is not supported due to a lack of robust information contained within the HNDA regarding the north Perthshire area in general and the Blair Atholl area in particular. Increasing the affordable housing contribution will act as a disincentive to landowners and house builders and could adversely affect the delivery of new homes. Affordable housing contributions should remain at their current level of 25% and increased policy emphasis given to achieving a mix and range of house types, in particular, 2-3 bedroom houses which by their very nature, will be more affordable.

Suggest that additional flexibility should be introduced into the New Housing Development policy to more closely reflect the further guidance given in the corresponding Supplementary Guidance (SG) relating to Replacement Housing. The SG provides guidance on the circumstances where the general approach (same site, similar footprint, re-use materials etc) may be departed from in instances where there are negative environmental/landscape effects. Picking up on the issues raised under Main Issue 10: Land Management in Upland Areas, it is suggested that the potentially negative impacts arising from the creation of new or upgraded existing access tracks to service remote ruinous properties which could be redeveloped in compliance with policy, should be specifically highlighted in the policy. In appropriate circumstances, the policy would allow consideration to be given to alternative locations for replacement houses, subject to the guidance contained in the SG.

Main Issue 1: Over-arching development

Response:

Support is given to the continued identification of Blair Atholl as an 'Intermediate Settlement' in the Plan, recognising its role as a location for economic, tourism and housing development.

In addition, however, it is suggested that the strategy should be loosened slightly to recognise the potential contribution that could be made from rural settlements towards meeting the Park's overall housing land requirement through the identification of small scale housing developments. The Plan supports the development of small sites to help increase the delivery of housing in the short term due to their small size. However, it is considered that further opportunities exist within the rural settlements which, if they were sensitively located and designed, would not negatively impact on the character of the National Park and would provide additional flexibility, range and choice in the housing market.

As part of this, it is requested that further consideration is given to the inclusion of Aldclune within the Plan as a 'rural settlement'. Aldclune may be described as a 'dispersed' rural settlement and is similar in character to the rural settlement of Calvine, which is already identified in the adopted Plan. Aldclune is variously described as a 'hamlet' and 'village' in various web searches and, in terms of the number of properties, is similar in scale to Calvine and is larger than Killiecrankie, which is also identified as a rural settlement. In line with the statements contained within other rural settlements in the Plan, it is suggested that Aldclune should be added with a defined settlement boundary and that a development site is identified to meet local needs. This is outlined in a separate submission.

Main Issue 2: Designing Great Places

Response:

Whilst it is accepted that the LDP is required to comply with Scottish Planning Policy, it is considered that applying this test for all developments, including small scale developments such as extensions, would be far too onerous for the applicant to demonstrate and provide information on. The benefits for such an approach for small scale developments would be negligible in the wider scheme of things. Furthermore, it is considered that setting such a requirement for all applications could result in requests for further information from the applicant who may struggle to understand the relevance of such information for certain small scale applications, which could in turn, lengthen the application process. It is suggested that, in this instance, the alternative approach put forward, that the policy be restricted to larger developments only, should be adopted in the LDP and that this would more readily comply with the spirit and intention of Government policy.

Main Issue 4: Housing

Response:

The overall approach of increasing flexibility in the supply of housing sites by identifying a limited number of smaller sites in some communities is supported. It is agreed that the supply of smaller sites will increase housing delivery in the short term and help provide a range of opportunities for developers. This objective could be greatly enhanced, however, through the identification of further small scale housing opportunities within the 'rural settlements' identified in the Plan. It is considered that there are a number of opportunities within these rural settlements which could be more proactively identified in the Plan which would not negatively impact on the unique character of the National Park if they were sensitively located and designed.

In this respect, it is requested that consideration is given to the inclusion of Aldclune within the Plan as a 'rural settlement'. Aldclune may be described as a 'dispersed' rural settlement and is similar in character to the rural settlement of Calvine, which is already identified in the adopted Plan. Aldclune is variously described as a 'hamlet' and 'village' in various web searches and, in terms of the number of properties, is similar in scale to Calvine and is larger than Killiecrankie, which is also identified as a rural settlement. In line with the statements contained within other rural settlements in the Plan, it is suggested that Aldclune should be added with a defined settlement boundary and that a development site is identified to meet local needs. This is outlined in a separate submission for individual settlements.

Main Issue 5: The affordability of housing

Response:

The justification for increasing the affordable housing requirement to 45% in Blair Atholl is questioned. The evidence contained within the HNDA does not provide conclusive proof that there is an acute shortage of affordable housing in Blair Atholl that would justify an increase in the current level of provision from 25% to 45%. The Rural Development – Housing paper provides the background information for this issue, which in turn, draws upon the HNDA, National Records for Scotland, housing waiting lists etc. The Evidence Paper acknowledges that HNDA's require information to be gathered and analysed at a functional Housing Market Area (HMA) level but concludes that the relatively small area of north Perthshire that is within the Park does not function as a discreet HMA in its own right and that consequently, no firm conclusions relating to housing

need can be drawn solely from the HNDA. Disaggregation and the use of other sources of information are required. The Evidence paper then goes on to examine estimated population change and projected household size/formation rates combined with the information from the HNDA to arrive at a total housing requirement for the 5 year period, but notes that “ *this is a blunt means of assessing need and demand within the area and further investigation is required*”. Nonetheless, the conclusion is that the total 5 year housing requirement for the Perth and Kinross area is 16 units of which 7 require to be affordable (Social Rent and Below Market Rent).

It is requested that further consideration be given to the proposed increased level of affordable housing contribution for Blair Atholl on the basis that this area does not function as a discreet HMA in its own right and that consequently, those needing housing will most probably be willing to look across a wider area to have their housing needs met. It is also contended that the median house price in Blair Atholl (c£129,000) compares favourably in terms of affordability with other settlements within the Park and indicates that there is a stock of affordable housing available and that house price alone does not indicate a pressured area

An increase in the level of affordable housing provision to 45% may also jeopardise the delivery of what are predominantly small sites in this area. It is questionable whether social housing providers would wish to take on the construction and maintenance of relatively small developments of 3-4 houses so far from Perth and there must also be concern over the ability of developers to cross subsidise affordable housing provision to this level in these scenarios. It is contended that the option to increase affordable housing provision is not appropriate for the Blair Atholl area and that this option is best reserved for those areas where there are larger housing sites which are better able to deliver affordable housing. Analysis of Perth and Kinross Council housing waiting list indicates that there is need for 2 bedroom units. This could be achieved through appropriate planning policy/proposals within the Plan for each individual site and it considered that, together with the retention of the existing level of 25%, this would be the most appropriate policy response to the issue of affordable housing provision.

Settlements (Blair Atholl)

Response:

Clarification is sought on the apparent change in allocation of EP2 which the Main Issues Report proposes to amend to a new allocation for “*tourism as the visitor gateway*”. This site is currently allocated in the adopted Plan as “EP2 – Ranger Base” reflecting the planning consent granted for a new gateway centre including extended rangers/interpretation building, new retail units, car park and visitor square. It is not clear from the Main Issues Report whether this is simply a change in title to more accurately identify the site as primarily tourism-based use or whether a more fundamental change is being suggested ie removing the retail elements that formed part of the consent. No reason has been given in the Main Issues Report for this amendment. The Proposed Plan should more clearly indicate the range of uses for site reflected in the planning consent as it is considered that the retail elements are an important ingredient in the ‘gateway’ experience. Early engagement from the Park Authority is sought in order to clarify this matter.

Clarification is sought on the omission of the area to the north of the Blair Atholl caravan park (T1) which formed part of the consent granted by Perth and Kinross Council for future phases of the caravan park and is identified in the adopted Plan as EP3 – Caravan Park. The consent was implemented following the development of the woodland lodges (as indicated in the Main Issues Report) and extant permission therefore exists. No reason has been given in the Main Issues Report for this omission. The additional phases 2-4 of the caravan park should therefore be allocated in the Proposed Plan in accordance with the planning consent. Early engagement with the Park Authority is ought in order to clarify this matter.

Other Settlements – Aldclune

Response:

It is suggested that the Plan strategy should be loosened slightly to recognise the potential contribution that could be made from rural settlements towards meeting the Park's overall housing land requirement through the identification of small scale housing developments. The Plan supports the development of small sites to help increase the delivery of housing in the short term due to their small size. However, it is considered that further opportunities exist within the rural settlements which, if they were sensitively located and designed, would not negatively impact on the character of the National Park and would provide additional flexibility, range and choice in the housing market.

As part of this, it is requested that consideration is given to the inclusion of Aldclune within the Plan as a 'rural settlement'. Aldclune may be described as a 'dispersed' rural settlement and is similar in character to the rural settlement of Calvine, which is already identified in the adopted Plan. Aldclune is variously described as a 'hamlet' and 'village' in various web searches and, in terms of the number of properties, is similar in scale to Calvine and is larger than Killiecrankie, which is also identified as a rural settlement. In line with the statements contained within other rural settlements in the Plan, it is suggested that Aldclune should be added with a defined settlement boundary and that a development site is identified to meet local needs. The site is identified below with the site area and capacity to be decided through further discussion and assessment.



Other general comments on the topics you think the Local Development Plan should address

Response:

Suggest that additional flexibility should be introduced into the New Housing Development policy to more closely reflect the further guidance given in the corresponding Supplementary Guidance (SG) relating to Replacement Housing. The SG provides guidance on the circumstances where the general approach (same site, similar footprint, re-use materials etc) may be departed from in instances where there are negative environmental/landscape effects. Picking up on the issues raised under Main Issue 10: Land Management in Upland Areas, it is suggested that the potentially negative impacts arising from the creation of new or upgraded existing access tracks to service remote ruinous properties which could be redeveloped in compliance with policy, should be specifically highlighted in the policy. In appropriate circumstances, the policy would allow consideration to be given to alternative locations for replacement houses, subject to the guidance contained in the SG regarding landscape fit etc.

This issue is particularly relevant in the Glen Fender area to the north east of Blair Atholl where there are a number of redundant/ruinous properties which could be re-developed under the replacement house criteria of the New Housing Development policy and associated Supplementary Guidance. However, in order to do so, this may require the upgrading/provision of access tracks to service these developments. This in turn, may result in an adverse environmental and landscape impact on the upper moorland areas of Glen Fender, as issue raised under Main Issue 10.



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

Name

Organisation (if applicable)

Address [REDACTED]

..... [REDACTED]
Email [REDACTED]

Telep [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? **Y/N**

Please explain your answer

Please explain your answers

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? **Y/N**

Q: Do you think any other changes are needed? **Y/N**

Please explain your answers

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? **Y/N**

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? **Y/N**

Please explain your answers

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? **Y/N**

Please explain your answer

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? **Y/N**

Q: Do you agree that the proposed Housing Land Requirements are sufficiently generous? **Y/N**

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

Please explain your answers

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? **Y/N**

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?

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? **Y/N**

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? **Y/N**

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

Please explain your answers

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? **Y/N**

Please explain your answer

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? **Y/N**

Please explain your answer

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? **Y/N**

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? **Y/N**

Please explain your answers

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? **Y/N**

Please explain your answer

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? **Y/N**

Please explain your answer

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 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"/>	Inverdrurie & Coylumbridge ..	<input type="checkbox"/>		

(Y/N – delete as appropriate)

Q: Have we identified the right issues for this settlement (where relevant)? **Y/N**

Q: Do you agree with the proposed settlement objectives? **Y/N**

Q: Do you agree with the preferred site options (where relevant)? **Y/N**

Q: Do you agree with the protected open spaces (where relevant)? **Y/N**

Q: Do you agree with the proposed settlement boundary (where relevant)? **Y/N**

Please explain your answers

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

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](https://twitter.com/cairngormsnews) and [#BigParkBigQuestions](https://twitter.com/BigParkBigQuestions).

Queries

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