

## Local Development Plan 2020 - Main Issues Report

### Cairngorms Business Partnership (CBP) Summary and Response

#### Introduction / Executive Summary

The CBP welcomes the opportunity to comment on the 'Main Issues Report' (MIR) issued for consultation by the Cairngorms National Park Authority. The CBP considers that our 370+ members are fundamental to the collective delivery of the four aims of the National Park. A draft of this note has been sent to all of our members seeking feedback and that has been incorporated into our final response.

We note that the MIR states that consultations have already taken place with key stakeholders to seek input on the main drivers for change (p10). We are disappointed not to have been considered as a key stakeholder and have not been specifically consulted. The 'Main Issues' in our view are those selected by the National Park Authority. Whilst many of the main issues identified are key to our members they are not all reflective of the main issues we see as important drivers in the collective achievement of the National Park Aims.

Fundamentally we believe that basing the Local Development Plan (LDP) on, and accepting, the premise that the population of the National Park will decrease over the period of the plan is flawed. This does not reflect the ambition of our members and would be severely damaging to the economy of the National Park.

We are particularly concerned that the plan is based on statistics that predict that the population of young people is predicted to decrease by 21% and working age people is predicted to decrease by 10% out to 2039. This is the key challenge for the Park and a forecast we should be looking to change as a key driver rather than accept it as an input into the key drivers for change. Such a reduction in population would put the collective achievement of all our aims at significant risk particularly the cultural heritage articulated in the first aim and economic and community sustainability.

A thriving population and growing workforce are essential to the collective delivery of the four aims and we do not believe the MIR addresses this. **Our key conclusion is that reversing the forecast population decline and demographic imbalance should be a 'main issue' that needs to be addressed for change in the LDP.** We believe that this development plan needs

to be closely integrated with the Economic Development plan (and other plans) and as it stands the suggestions and predictions would not support an ambitious Economic Development plan.

Our answer, to the question on page 8, is, therefore, no. We do not believe that the current vision and long term outcomes set in the Cairngorms National Park Partnership Plan should act as the vision statement for the LDP. We believe a more ambitious vision around a growing population (particularly of working age and below) and robust and diverse economy supporting the collective achievement of the four aims should be articulated both through the development of this plan and through the development of next Economic Strategy. This needs to be a vision for the next 30 years at least.

We believe passionately in all four aims of the National Park. On page 5 of the report the legislation is misquoted and should read “if, it appears to the authority that there is a conflict”. We believe the underlined words are important and we would again ask for clarity on the process used within the CNPA Board for assessing conflict and any delegation of these powers to officers.

We have not commented on individual settlement based issues and land allocations at this time. We have provided brief initial feedback on each of the issues that the CNPA consider to be the main issues.

## **Main Issues Identified by the Cairngorms National Park Authority**

### **Main Issue 1 - Over-arching development strategy**

We agree with the focus on new development in existing settlements subject to the need for significant additional development land to that set out in the MIR to support the key issue of reversing the predicted declines in young and working age population. It should also be taken into account that some of the smaller settlements are often locally remote and whilst small are very important strategically to large geographic areas.

There is some confusion around the Map on page 14 in what differentiates communities. This appears contradicted in the parts of the rest of the document for example on page 35 Blair Atholl is placed on a par with Aviemore in relation to affordable housing and this is not reflected in the map where Blair Atholl is represented as an intermediate settlement. All settlements in the National Park should be given the ability to thrive and it is disappointing that south of Newtonmore and Ballater the MIR does not classify any settlements as Strategic. We believe settlements such as Blair Atholl and Braemar are strategic both in their local and National Park wide context.

### **Main Issue 2 - Designing great places**

We agree with the adoption of government planning policy guidelines in respect of 'great places' with the exception of the addition of the line 'the highest standards of design'; government policy calls for high quality design and we believe this language should be used. As a National Park we should aspire to sustainable design ie appropriate design and siting for place and purpose, whilst applying this overarching aspiration proportionately for new developments to avoid adversely impacting on cost, viability and ultimately affordability of housing. To 'create easier movement' we must work to provide employment near communities, it is notable that no key employment sites (map page 14) are included south of Newtonmore and Ballater and we would question the omission of Blair Atholl, Braemar and Dalwhinnie.

There are also significant infrastructure challenges in relation to roads, transport, cycle and walking pathways and broadband to enable flexible working and sustainable commuting in and between communities.

We would welcome greater clarity on policy for potential developers.

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

We welcome the addition of economic development land into the plan and this could support a new main aim of reversing the forecast dramatic decline in population through inward investment and diversification. We hope to focus on this, with the CNPA, as we develop the new Economic Strategy.

We agree that we should seek to ensure communities along the route benefit from the route.

We believe that we should use this as an opportunity to create a greater sense of arrival into the national park along these key access routes.

### **Main Issue 4 - Housing**

This is a critical issue to our members, to the future viability of our economy and to the collective achievement of the four statutory aims of the National Park. Given the number of hurdles to development, account should be taken of the fact that allocations may not ultimately be deliverable. The proportion of allocated sites in previous local (development) plans that have been developed during the plan's term are clear evidence of this issue. In light of this evidence, and the fact that we need to ensure the underlying population predictions do not come to fruition, we do not think the 10% allowance suggested is anywhere near sufficient.

We have already mentioned that reversing, rather than accepting, a population decrease and imbalance is critical and needs to be a 'Main Aim' in itself. This will have an impact on housing needs and will require more land to be made available for development.

We therefore disagree with the preferred option and believe CNPA should instead look to increase housing supply based on a greater ambition about population retention and growth and recognising the challenges within the National Park of delivering developments on allocated land.

We do not agree with the proposed housing supply targets or the proposed housing land requirements.

### **Main Issue 5 - The affordability of housing**

We do not need to accept the status quo in relation to low paid jobs and should, through the next Economic Strategy, look to diversify our economy and seek inward investment. The CNPA should be leading this work (with ourselves and other agencies) in the collective pursuit of the four aims of the National Park.

Employers report that their staff struggle to find affordable housing even at salary levels way above the mean or median.

Referring to second and holiday homes as 'ineffective' housing stock is not helpful. These properties have provided the backbone to our tourist economy for almost two centuries, either as holiday lets or second homes, where people chose to come to spend their leisure time and disposable income. Statistics comparing our National Park with the rest of Scotland in relation to second home ownership are meaningless. A better comparable would be with other international quality rural tourist destinations and National Parks.

This is a supply side problem and we welcome the focus on providing more affordable homes.

With regard to the increase in proportion of affordable homes required in a new development we would like to see additional research and engagement with developers on the potential impact on the viability of developments before considering a response to this further.

### **Main Issue 6 - Economic development**

We welcome the addition of new economic development land within the proposed plan. We believe that this may need to be increased if we are to target the reversal of the forecast population decline and imbalance as a main issue and hence we would like to see more flexibility built into the LDP.

### **Main Issue 7 - Impacts on Natura designations.**

Conserving and enhancing the natural and cultural heritage of the area is critically important as are the other aims around use and enjoyment of resources and economic and social development.

We are proud that 'around' half of the Park is designated as being of European importance and recognise that 'around half', over half a million acres, is not designated that way. International best practice does not preclude development which is essential to sustain our natural and cultural heritage which are interdependent as articulated in the first statutory aim of the National Park.

In the collective pursuit of the four aims of the National Park we believe that the onus for coordinating and developing and delivering recreational management plans should rest with the Park Authority working in partnership, not developers.

We do agree in a more coordinated approach towards conservation measures is necessary and that the onus and burden for this should sit with CNPA.

### **Main Issue 8 - Planning obligations**

We would welcome more rigorous justification for planning policies adopted by CNPA on planning applications and more specific guidance about potential planning obligations available in advance of applications being made.

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

We agree with the conclusion in principle though would welcome site analysis on the potential impact of this on the economic viability of sites, particularly with the aim of delivering more affordable housing.

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

Whilst surprised that the issue of tracks has been raised as a main issue, we agree with the presumption proposed. Assessment of applications needs to be based on objective cost benefit analysis however to ensure that economically important tracks are not automatically refused consent due to, for example, relatively low impact landscape issues.