



Cairngorms National Park Local Development Plan 2020 – Main issues Report

Response by Alvie & Dalraddy Estates

February 2018

1. Introduction

The introduction is misleading. If there is a conflict between the first statutory aim for Scottish National Parks and any of the other aims, only if in the opinion of the National Park Authority should the first aim be given greater weight.

2. Cairngorms National Park Partnership Plan Vision Statement

We do not agree that Cairngorms National Park Partnership Plan vision statement should be the vision for long term outcomes. (Question page 8)

The Park and its economy is not just about tourism. There is too much emphasis on tourism and treating the Cairngorms National Park as a playground for our urban population. There is insufficient recognition of the needs and aspiration of local residents. There is insufficient emphasis on rural production including agriculture (food production), forestry, renewable energy and quarrying. This rural area should also be recognised for flood mitigation and carbon capture.

The economy of the Cairngorms National Park is becoming increasingly dependent on tourism and government related employment. It is becoming less of a balanced rural economy with a mix of economic activities.

3. Development Strategy

We are concerned that the current Local Development Plan has resulted in the growth in the number of second and holiday homes, encouraged homes within the park to be occupied by people commuting to work outside the Park and by people moving into the Park to retire. The shortage of suitable housing in some areas for those working within the Park, the predicted ageing population and population decline are all indicative of local development that is not meeting the needs of the area and its residents. It is no longer a vibrant rural economy.

Large areas of land within the Cairngorms National Park has been abandoned for agriculture, this land should not be sterilised from future development due to its current perception of wildness. There is already too much emphasis on tourism and insufficient support for other economic activities and land uses such as renewable energy, timber production and exploitation of our natural resources.

Housing should be built in response to local demand, not based on speculation. Villages and towns within the Park were developed to support the surrounding rural economy. There is a growing split between some of the larger conurbations within the Park and the surrounding rural economy with housing being occupied as second or holiday homes, by people retiring into the area and by families residing within the Park but commuting elsewhere. Some community councils are becoming representative of those who are not economically active within the area. There is a danger that the economically active within a community could become disenfranchised.

The focus should not be on further development of the main settlements. The main settlements should not be expanded further at the expense of outlying communities. The development strategy for outlying areas and smaller communities must promote and encourage far more than recreation and conservation.

The development strategy should be about enhancing our local economy. Economic development will create demand for housing where it is required.

The current development strategy has been inappropriate. It should not be used for the next Local Development Strategy. (Question page 15)

4. Designing Great Places

We do not agree that the Local Development Plan should include the stated 6 qualities of successful places. (Question page 19)

Development must be far more than just desirable house sites. It must include the provision of jobs, productive activities that pay for the goods and services we require or desire, the provision of goods and services we consume. Some productive activities will not necessarily be particularly pleasant or welcoming.

It is irresponsible and selfish to create a safe and pleasant, welcoming community that imports all that it consumes, exports its rubbish and survives off funds generated elsewhere. What residents should aspire

to is a self sufficient economically sustainable community that generates a surplus of funds that can be invested in further improvements within the community or in helping others less fortunate than ourselves.

Development should ideally be initiated by investors with a consensus of agreement of residents of the area, guided by national strategies and requirements. Development should not be micro managed by government agencies. Successful economic development is predominantly the product of entrepreneurs, not government officials.

We do not agree that the new Local Development Plan should include master plans and detailed development briefs. (Question page 19)

The Local Development Plan should provide a flexible general framework within which further economic development is encouraged. The more prescriptive the Local Development Plan the more further investment will be discouraged.

5. Connectivity Infrastructure Upgrades

The identification of land for activities that will create employment should be left to the local communities and those who own the land. (Question page 22)

We are concerned at the apparent lack of some services and facilities such as toilets and rubbish collection.

By-passed communities have suffered and should be supported. (Question page 22)

Once vibrant economically active towns such as Kingussie are now in decline. Some communities have lost their only shop. Good transport access and the provision of good digital connectivity / broadband are two facilities that will encourage investment in activities that will generate wealth and provide employment. The Local Development Plan should encourage and facilitate investment in economic activities not restrict and discourage such development.

6. Housing

Between 1950 and 2000, Badenoch & Strathspey had a vibrant and growing population driven by investment in a range of economic activities, particularly tourism. The predicted decline in the Park's overall population and in the proportion of economically active residents is possibly symptomatic of the adverse impact the Cairngorms National Park Authority's plethora of plans, strategies and bureaucracy has had on our local economy.

The provision of housing used to be instigated by demand from those who were economically active within the community. Towns such as Grantown, Kingussie and Newtonmore were planned to provide housing, goods and services to support the surrounding rural economy.

More recently demand for housing has been generated by the Cairngorms National Park Authority promoting this area as a nice place to have a holiday or second home, to retire to or to live in but work

elsewhere. Housing has been provided by housing developers wherever housing is permitted by the Local and Park Authorities. The link between housing, jobs and economic development has been watered down or lost.

Demand for housing in many areas within the park exceeds the supply. The housing supply targets will largely depend on what the Park and Local Authorities will allow, not on local demand. This will be tempered with what is affordable. The more restrictions and costs placed on housing developers the less affordable will be the houses they build. Demanding that a percentage of houses built are affordable results in the other houses built becoming more expensive to compensate for those sold at below the cost of providing these houses. We are in danger of encouraging housing schemes split into unaffordable mansions on the prime sites with ghettos of closely packed cheaper housing elsewhere.

Whether or not the Housing Supply Targets are realistic is dependent on what the Park and Local Authorities allow or restrict. (Question page 29) Local demand and what the landowner or local community will allow is now less relevant.

Are the proposed Housing Land requirements sufficiently generous? No and irrelevant. (Question page 29)

Land for housing and its location should be dictated by demand within an overall framework and national strategy. From our experience the demand for housing will continue to exceed supply in many areas of the Cairngorms National Park given the restrictions and associated costs put on new housing by the Park and Local Authorities.

There is a need for additional housing sites in some areas of the Park. (Question page 29)

The housing shortfall would be mitigated if landowners and house builders were not discouraged by taxation plus the costs and restrictions put on planning.

Recent changes in the law on letting of domestic tenancies will discourage the letting of houses by the private sector. It is anticipated the provision of houses to let by the private sector will decline placing more demand for public sector houses to let plus houses to buy. This change in the incentive for the private sector to provide houses for long term let could have a significant impact on the provision of affordable housing in our rural areas.

There is insufficient incentive to develop / refurbish properties that are currently empty, many of which are below current standards for habitation but could be brought back into use and are part of our heritage.

7. Housing Growth around Aviemore

The demand for housing in Aviemore was the result of the development of downhill skiing on Cairngorm attracting tourists coming for recreation during the winter months. This allowed tourism in Badenoch & Strathspey to develop throughout the year. Although downhill skiing has declined on Cairngorm as a result of climate change and recent poor management, the demand for additional housing in the Aviemore area is anticipated to exceed the supply for the foreseeable future.

In response to housing demand Rothiemurchus Estate instigated a report on the feasibility of An Camas Mor in 2005. We understand a planning application was submitted in 2009 but not determined until 2010. Further negotiations and impediments resulted in planning not being consented until 2014 and a proposed Section 75 agreement only produced in draft in February 2018. This history of bureaucratic delays and restrictions is symptomatic of planning within the Cairngorms National Park and part of the reason for the supply of new housing not keeping up with demand.

The Cairngorms National Park Authority should make every effort to facilitate and encourage this development. We understand housing will be built at An Camas Mor in response to demand.

This development should not preclude other landowners putting forward proposals to help meet the shortfall in housing in this area. Landowners should not have to rely on the Local Development Plan or the Local Authority dictating where land for housing development must be located. (Question page 33)

8. Affordable Housing

The increase in house prices within the Cairngorms National Park is the result of demand exceeding supply for a number of reasons.

- The Cairngorms National Park Authority has promoted the area as a nice place to visit, recreate, holiday, live in, retire to and commute from. This has increased demand.
- The planning process has proved to be both slow and unnecessarily restrictive.
- The most affordable accommodation is rented. Local authority rented accommodation has been reduced with many houses being sold under the right to buy, the provision of private sector rented accommodation is discouraged through taxation and regulation.

Recent changes as a result of the Private Housing (Tenancies) (Scotland) Act 2016 will further discourage private sector tenancies and exacerbate the availability of affordable housing.

Do we agree that the Cairngorms National Park Authority should increase the affordable housing requirement to 35% in Ballater and Braemar, 45% in Aviemore and Blair Atholl? No; new houses should be built in response to demand. (Question page 39)

The policy of requiring a percent of houses built to be sold at below a particular price results in developers selling the remaining houses at a higher price in order for the developer to achieve an acceptable profit margin. If the sums don't add up and the developer cannot make a profit, houses will not be built. Increasing the percent of new houses that must be sold at below a particular price will increase the price of houses that are not "affordable".

Attempts by the Park and Local Authorities to micro manage the housing stock is one of the reasons for the shortfall in suitable housing in parts of the Park.

Instead of discouraging the building of houses for rent and dismantling the private rented sector through regulation and taxation, the Cairngorms National Park Authority should persuade the government to

encourage an increase in the number of houses available for rent. Following the second world war the housing shortage was at least partially solved by building Council houses for rent. For a changing or transient community providing houses for rent facilitates economically active people to move where there is work and their skills are required.

The Cairngorms National Park Authority should also encourage shared equity schemes where the landowner or developer retains some of the equity. On caravan parks, static caravan owners own the structure but rent the land on which it is located and pay for the services provided by the landowner. Some of these static caravans are triple grazed timber structures that meet most building standards. The result is a domestic dwelling that is sold at well below the cost of what “affordable” houses are being sold at in areas where the demand is high.

Encouraging the development of residential caravan parks would help resolve the housing shortage. Such structures are also well suited to providing retirement and sheltered homes. Within the Cairngorms National Park the National Records of Scotland predicts there will be a large increase in the population of pensionable age.

9. Economic Development

We do not agree that the Cairngorms National Park Authority should spend resources identifying new economic development sites. (Question page 43)

Rather than identifying economic development sites in the hope that a business will appear that suits the site identified, the Cairngorms National Park Authority should act as a facilitator. When a business is looking for a site, the Cairngorms National Park Authority should then identify and facilitate the development of a suitable site.

Further economic development is not just restricted by a lack of suitable land. A lack of infrastructure such as broadband or suitable vehicular access can also restrict development potential.

10. Capercaillie and Conservation

The capercaillie is a species at the edge of its natural range in Scotland that became extinct in Scotland previously. The current population was imported from Scandinavia in the 19th century. This species is not endangered elsewhere in Europe. The recent decline in the number of capercaillie in Scotland is primarily due to climate change. Other factors that may have exacerbated this decline are the increase in predators such as pine marten and disturbance by humans.

We suggest that the Cairngorms National Park Authority should instead concentrate their resources on conserving indigenous species and populations that are endangered globally and in decline locally. (Question page 47)

Paths and access tracks, including hill tracks, concentrates access and disturbance along one linear route where erosion can be repaired and controlled. Disturbance of wildlife can be mitigated by building paths

and tracks and controlling predators. Wildlife disturbance can also be mitigated by more effectively enforcing the Scottish Outdoor Access Code.

Water quality and quantity can be improved by mitigating flooding, particularly of farm land and inhabited areas where there are roads, slurry, fuel stores and septic tanks.

11. Planning Obligations

The more obligations, restrictions, financial contributions and tax imposed on potential developers, the less likely a development will come to fruition. Our observations from the Developers' Forum indicate that many development proposals are frustrated by the restrictions and delays that are the consequence of the planning process.

The Local Development Plan should endeavour to be more flexible with less obligations.

We agree to the policy on planning obligations being reviewed. (Question page 51)

12. Flood Risk

The consequential damage from floods in December 2015 on the rivers Dee and Spey plus their tributaries highlighted the deterioration in flood alleviation measures and their maintenance over the last half century. Part of the problem has been the lack co-ordination between government agencies and riparian interests with maintenance being impeded or prevented by some government agencies.

According to SEPA we can expect the frequency and size of flood events to increase in future. Land and structures above the level where flood waters reached in the past may no longer be safe from flooding in the future.

Currently there is little or no help from government for those seeking to maintain and repair flood banks or other flood alleviation measures. There is also no incentive for landowners to provide areas where water can be held when rivers reach capacity or dams where the flow of water can be controlled. What has been termed "natural flood management" is only one of several options to mitigate flooding and the damage caused by flooding.

The consequences of flooding in December 2015 would suggest that the existing Local Development Plan's policy on flooding was inadequate.

SUDS are only relevant where there is development that is likely to significantly modify the way water soaks into the ground. SUDS would not have prevented most of the flood damage encountered in the floods of December 2015. **SUDS are largely irrelevant to flood mitigation and management in an area the size of the Cairngorms National Park where most of the land is not built on.** (Question page 55)

13. Hill Tracks

Land in the Cairngorms National Park is a working environment where activities take place which employ people and contribute to our rural economy. Access is required.

Hill paths and tracks contain most traffic in a linear form where the impact of this traffic can be managed whilst reducing disturbance of wildlife elsewhere. In order for activities to be cost effective and able to compete with goods and services elsewhere, many hill tracks need to be accessible to motorised vehicles.

We disagree that there should be a presumption against new constructed tracks in open moorland areas. The more people that access open moorland, the greater the disturbance to wildlife and erosion of vegetation and soil. Hill tracks are a cost effective means of managing human traffic. (Question page 58)

14. Settlement Based Issues – Kincaig

This village grew up to provide goods and services to the local community including a railway station, ferry which was replaced by a bridge plus a general store, smithy, 2 hotels, a pub and a primary school. More recently the railway station, shop and smithy have gone as have the hotels. The village provides accommodation for staff employed in the surrounding rural area but a growing proportion of the population is retired, many houses are now occupied as second or holiday homes. Houses occupied by residents who are economically active in the village or immediate surrounding area may now be in the minority.

Whilst there is some demand for affordable housing to buy, for most economically active residents working in the area, even affordable houses to buy are unaffordable. There is however a demand for houses to rent and there is probably a demand for houses made more affordable through shared equity.

The demand for additional small business units is questionable.

Facilities and attractions are provided for visitors which include Loch Insh Watersports, the Highland Wildlife Park, Dalraddy Holiday Park, Alvie Estate, the Badenoch Christian Centre, Lagganlia plus bed and breakfast establishments; most of these are located in the surrounding countryside.

A more important issue for Kincaig is the provision of transport for those who do not or cannot drive.

Sheltered and retirement homes, more affordable homes to rent, better internet and broadband access in the surrounding area plus access to shops for those unable to drive are the main issues.

Housing to the north east and east of Alvie Primary school would provide more houses within walking distance of this school and make the school more part of the Kincaig community.