

No.	Page No.	Plan text and/or question	HIE Response
1.	8	<p><b>Over-arching development strategy</b></p> <p>CNPA propose using the vision and long-term outcomes set out in the CNP Partnership plan as the vision statement – see below:</p> <p><i>‘An outstanding National Park, enjoyed and valued by everyone, where nature and people thrive together.’</i></p> <p>It also sets out the following long term outcomes for the National Park:</p> <ul style="list-style-type: none"> <li>• Conservation – a special place for people and nature with natural and cultural heritage enhanced</li> <li>• Visitor experience – people enjoying the Park through outstanding visitor and learning experiences</li> <li>• Rural development – a sustainable economy supporting thriving businesses and communities</li> </ul>	<p>HIE agrees with this approach.</p>
1.	15	<p><b>Over-arching development strategy</b></p> <p>Preferred option and reasonable alternative options</p> <p>Preferred option:</p> <p><i>“Subject to our conclusions on Main</i></p>	<p>We believe that the overall approach to settlement needs to be cognisant of the changes that are likely to be brought by the transformation of the A9 in to a dual carriageway, and the planned improvements in rail.</p> <p>These present opportunities for southern Badenoch for stronger economic growth and re-invigoration of these rural settlements, which</p>

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		<p><i>Issue 4 B (p30) in respect of housing growth around Aviemore, and subject to a minor amendment to reclassify Dalwhinnie as a ‘rural settlement’, we therefore propose to retain this overall development strategy as the basis for the next Local Development Plan.</i></p> <p><i>This would mean that most new development would continue to be focused on the main ‘strategic’ settlements in the National Park, with smaller-scale development being accommodated in the ‘intermediate’ and ‘rural’ settlements in order to meet local needs. Small-scale development which adds to existing groups of buildings in rural areas would also continue to be permitted. The remainder of the National Park would be subject to a more restrictive approach to development, which aims to support the use of land for conservation, forestry/woodland expansion, agriculture and recreation use.”</i></p> <p>Reasonable Alternative Options</p> <p><i>“We could promote an alternative development strategy by spreading development more evenly throughout the National Park. However, if we took this approach it would mean more new development taking place in smaller</i></p>	<p>will eventually have greater access to the economic strength of the southern Highlands and the Central Belt. To that end, we suggest that the designation of Dalwhinnie as an intermediate settlement remains unchanged.</p> <p>Whilst we acknowledge the need to retain the essential character of the wilderness in some areas of the National Park and to retain the natural heritage, which so many visitors come to see, we believe that the opportunities from the improved links in road and rail need to be accommodated in terms of all the relevant parts of the Park, and in particular in improving the economic viability of Southern Badenoch and that careful consideration needs to be given to ensuring that these infrastructure improvements are managed in a way that allows sustainable growth in this area.</p> <p>While it is correct that there should be a focus on development in the A9 corridor, much of the park has less good transport links and there is still a need for land for commercial development in these areas, so where a proposal matches the broader economic development aims, this should be recognised.</p> <p>We propose that what we suggest supports the Scottish Government’s strategy of inclusive growth and will create less danger of ‘pricing out’ local people from a lack of housing supply and a lack of land for local business expansion in the southern part of the Park.</p> <p>Further opportunities for development and community asset acquisition may present through discussions with Crown Estate Scotland around its approach to land reform.</p>

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		<p><i>settlements. This is unlikely to make the best use of existing and proposed infrastructure and could have a negative impact on the unique character of the National Park. We do not think this would be appropriate. As a result, we do not think there is any reasonable alternative to the preferred approach outlined above.”</i></p>	
2.	18 & 19	<p><b>Designing great places</b></p> <p><i>“Although the current Local Development Plan includes a policy on sustainable design it does not make any specific reference to the six qualities of successful places. We therefore think that the new Local Development Plan will need to address this by including a new policy focused on designing great places. We think this should apply to all developments as the qualities of successful places are applicable to all scales of development. We therefore propose that the new policy will set out an over-arching requirement for all new developments to show how they have been designed to meet the six qualities of successful places. Supplementary guidance, published alongside the new Local Development Plan, could be used to provide more detail on our expectations for the highest standards of design and outline how the six qualities will be applied in practice within the National Park. This could include guidance on how the six qualities apply to different scales of development, along with guidance on the level of supporting information that will be required to be submitted alongside planning applications, to ensure that the new approach is proportionate. The current Local Development Plan also sets</i></p>	<p>We agree with this. For there to be sufficient further development in the Park without it negatively impacting on the Park’s character and sense of place, there needs to be clear design guidance. The absence of this in the past is all too manifest in the building legacy of the second half 20<sup>th</sup> century.</p> <p>We would further suggest that an important part of place-making is ensuring clear perceptual boundaries between the between the built environment and the un-built, which can be achieved with a greater density of buildings, thus using the limited land resource more efficiently and we suggest that the design guidance makes some reference to this.</p> <p>It should also be recognised that good design does not have to result in increased cost. The policy should be careful not to increase development costs in what is already an expensive area for property development.</p>

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		<p><i>out requirements for masterplans and development briefs for a number of key development allocations. However, we think the new Local Development Plan could include a revised policy approach to set out more clearly the circumstances where these design tools will be used to deliver high quality developments on the ground, eg the scale of development proposals and places that will require masterplans, development briefs, design statements etc.”</i></p>	
3.	22	<p><b>Impacts and opportunities from the A9 and Highland Main Line upgrades</b></p> <p><i>“We think the new Local Development Plan should be used, as far as possible, to make the most of the new development opportunities that the A9 and rail upgrades are likely to present. We have identified a limited number of new economic development sites, which we think will be well-located to take advantage of the potential for new inward investment as a result of these transport upgrades. These are located at Aviemore, Carr-Bridge, Dalwhinnie and Kincaig. You can find more detail on these sites in the settlement section (p60). These sites will also help to address the overall demand for economic development land within the National Park (see Main Issue 6, p40). We also think that the new Local Development Plan could play a role in helping to support those communities that are at risk of being ‘by-passed’ as a result of the A9 dualling project. The settlement section of this report (p60) identifies those communities where we think this may be an issue, and proposed settlement objectives are included to help support local</i></p>	<p>We support these proposals. These proposals seem to conflict with the proposed re-designation of Dalwhinnie.</p>

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		<p><i>facilities and amenities in these areas. Options for addressing the affordability of housing in the Park, including in areas where there is a high level of second/ holiday home ownership, are considered further in Main Issue 5 (p34). These options should help to mitigate any adverse impact on housing affordability resulting from the A9 dualling.”</i></p>	
4.	25 - 32	<p><b>Housing</b></p> <p><i>“National records for Scotland indicates a 4% decline in population between 2014 – 2039”.</i></p> <p><i>“The population of pensionable age in the Park is projected to rise by 23 and the number of people aged 75 and over is expected to rise by 97%. The number of children aged 16 or under within the National Park is projected to decrease by 21% and the number of people of working age is predicted to decrease by around 10% over the 25 year period. Across Scotland, the projections suggest a 1% increase in both the under 16 and working age populations over the same period.”</i></p> <p><i>“At the same time as the overall population is falling, the projections show an increase of 6% in the number of households in the National Park from 8653 in 2014 to 9195 in 2039.”</i></p> <p><i>“We have used the information in the HNDAs and other evidence to assess the future need for housing in the National Park. The numbers of new homes (called ‘Housing Supply Targets’) that we think are needed in each local authority area during the lifetime of the next Local Development Plan are outlined in Table 1.”</i></p>	<p>We agree with the CNPA that these estimates should be treated with a great deal of caution.</p> <p>Although the trend hitherto has been for ageing of rural populations we suggest that this trend may not be as marked as in the future due to social preferences for millennials, the improvements in both physical and digital connections, SDS’s and HIE’s own activities supporting talent attraction and the Park Authority’s proposed changes to affordable housing policy.</p> <p>There is clear evidence that a lack of housing is already a constraint on growth for local firms. Prevailing social trends would suggest that households are becoming more fragmentary and numerous.</p>

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		<p>Table 1 : Proposed Housing Supply Targets</p> <table border="1" data-bbox="398 344 1032 651"> <thead> <tr> <th>Local Authority Area</th> <th>2020-2024</th> <th>2025-2029</th> <th>2030-2039 (indicative target)</th> </tr> </thead> <tbody> <tr> <td>Aberdeenshire</td> <td>77 (26 affordable)</td> <td>77 (26 affordable)</td> <td>154 (52 affordable)</td> </tr> <tr> <td>Angus</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Highland</td> <td>301 (161 affordable)</td> <td>218 (100 affordable)</td> <td>436 (200 affordable)</td> </tr> <tr> <td>Moray</td> <td>15 (5 affordable)</td> <td>15 (5 affordable)</td> <td>30 (10 affordable)</td> </tr> <tr> <td>Perth &amp; Kinross</td> <td>16 (7 affordable)</td> <td>16 (7 affordable)</td> <td>32 (14 affordable)</td> </tr> <tr> <td><b>CNPA Total</b></td> <td><b>409</b> <b>(199 affordable)</b></td> <td><b>326</b> <b>(138 affordable)</b></td> <td><b>652</b> <b>(276 affordable)</b></td> </tr> </tbody> </table> <p><i>“The proposed Housing Supply Targets are lower than the targets in the 2015 Local Development Plan. We think this is reasonable and appropriate in light of the range of evidence from the most recent HNDAs and NRS projections.”</i></p> <p><i>“We think there is a case for increasing flexibility in our supply of housing sites by identifying a limited number of smaller sites in some communities. We think that topping-up the supply with smaller housing sites in this way will help to increase housing delivery in the short term, as smaller sites are likely to be delivered more rapidly.”</i></p>	Local Authority Area	2020-2024	2025-2029	2030-2039 (indicative target)	Aberdeenshire	77 (26 affordable)	77 (26 affordable)	154 (52 affordable)	Angus	0	0	0	Highland	301 (161 affordable)	218 (100 affordable)	436 (200 affordable)	Moray	15 (5 affordable)	15 (5 affordable)	30 (10 affordable)	Perth & Kinross	16 (7 affordable)	16 (7 affordable)	32 (14 affordable)	<b>CNPA Total</b>	<b>409</b> <b>(199 affordable)</b>	<b>326</b> <b>(138 affordable)</b>	<b>652</b> <b>(276 affordable)</b>	<p>Given the reservations regarding the data, and our own active strategy of attracting new talent, we are of the opinion that the targets for housing should be at least at the 2015 levels and should err on the generous side i.e. be increased by 15 – 20%. Furthermore, we are of the view that, given some of the document’s policy directions on affordable housing (perpetuity and planning requirements for levels above 25%) and the consequences this will have in increasing the attractiveness of the area for younger families, taking a lower level of 10% may make the Park a victim of its own success in terms of housing provision.</p> <p>Hence, we do not agree with your proposed housing targets in your plan and believe these could be more ambitious.</p> <p>We welcome a more flexible approach and including Laggan in the list of settlements for additional housing land but also suggest including Dalwhinnie and Tominoul, the latter appears to have this reflected in the proposed development plan map.</p>
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		<p><b>Housing growth around Aviemore</b></p> <p><i>“In August 2017 the CNPA Planning Committee agreed to approve a further planning permission in principle for the same development, with different conditions and subject to the conclusion of a legal agreement covering planning obligations. This will result in a new planning permission in principle for the proposed new community ...</i></p> <p><i>... if An Camas Mòr is not developed as anticipated we are unlikely to be able to meet our annual housing land requirement from 2022 onwards ...”</i></p> <p><i>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?</i></p>	<p>Discussions with the Tomintoul &amp; Glenlivet Development Trust and Highlands Small Communities Housing Trust have identified that community facilities can best be achieved with a mixed development where services and infrastructure can be shared. For the housing, mixing ownership can also maximise benefits and reduce development risk (eg rental, co-ownership; plots for development; contracts with social housing companies and commercial sales). Live-Work housing options could also be evaluated.</p> <p>HIE is of the opinion An Camas Mor represents a particularly good opportunity for place making in the Park, and through its capacity will enable a large number of homes to be delivered at little risk to the park’s essential landscape and feeling of wildness and wilderness. In consequence, we consider that it is preferable that Am Camas Mor is able to proceed rather than alternative sites that it is proposed will be designated.</p>

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5.	33 - 39	<p><b>The affordability of Housing</b></p> <p><i>“It is also proposed to include a revised policy within the new Local Development Plan to require all housing development proposals to include a mix of house types and sizes, with a particular emphasis on providing smaller homes. This should help to ensure that the open market element of new housing developments meets a full range of local needs, and that more of the new housing available for sale is at the lower end of the market.”</i></p> <p><i>“In particular, it states that the next Local Development Plan should:</i></p> <ul style="list-style-type: none"> <li><i>• identify sites where the affordable housing contribution from new developments should be higher than the normal national maximum of 25% set by Scottish Planning Policy;</i></li> <li><i>• use new policies in the next Local Development Plan to manage the nature of new open market housing so it is better targeted towards local need, eg by seeking a greater mix of house types and sizes, with an emphasis towards</i></li> </ul>	<p>We welcome this approach.</p> <p>HIE welcomes this approach in general but cautions that the proportion of affordable housing for private-sector development should not be so high that it will inhibit developer interest, particularly for larger sites.</p> <p>We recognise that there are many reasons why sites may not be developed as quickly as the latent demand would suggest should be the case. Often the chain of events and causes is a complex. The list may include the extensive prior designation for conservation that the planning authority must accommodate as well as reasons that may arise from the developer. However, we suggest the any new policies etc. need to be carefully considered for any possible unintended consequences in slowing development, and that priority be given to bringing about existing planned development, particularly where it is of a scale to make a significant impact on availability of housing at a price that working people in the area can afford.</p> <p>We support a greater mix of house types and sizes to give greater choice to the less expensive end of the market.</p>



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		<p><i>smaller homes in new developments; and</i></p> <ul style="list-style-type: none"> <li>• <i>apply flexible planning policies to promote majority affordable housing developments and encourage innovative delivery models to maximise the number of affordable homes that are built.</i></li> </ul> <p><i>“All new affordable housing should be retained as affordable in perpetuity, and the new Local Development Plan will make this requirement clear. The new policy could also clarify that all of the types of affordable housing identified in national planning policy, including social rented housing, mid-market rented accommodation, shared ownership, shared equity, and housing sold at a discount (including discounted plots for self-build) could potentially contribute towards the affordable housing policy requirement.”</i></p> <p><i>“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?”</i></p> <p><i>“Do you agree that we should include policies to require a greater mix of house types and sizes, including</i></p>	<p>We agree with flexible planning policies to promote majority affordable housing in suitable sites, but suggest that if the private sector is envisaged as participating then consideration is given to the conditions of each planning consent and whether these cause costs to arise that will discourage the development.</p> <p>We welcome a move to retain affordable housing designations either in perpetuity or for a defined period of time e.g. between 30 – 50 years. Such a designation might help a significantly greater amount of affordable housing stock remain in the market.</p> <p>We believe that these levels, and particularly 45%, are probably too high and are likely to act as too great a disincentive to developers. Furthermore, given the provisions of perpetuity it is possible that proportions along these lines may not be necessary as a greater stock of housing may remain affordable after the first sale.</p> <p>We suggest a more nuanced approach is taken on a Park-wide basis where the plan states that affordable housing proportions will hence forth be between 25% and 40% depending on locality, the wider planning gain provided by the developer and the likely costs that arise from the planning conditions, and that an amount above 25% is agreed with the developer at the time the consent is granted.</p> <p>We fully support this proposal if it means more housing is accessible for purchase by those living and working in the Park.</p>

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		<i>more smaller homes?"</i>	
6.	42 - 43	<p><b>How do we ensure there are sites for business?</b></p> <p><i>"Although it remains difficult to establish precise requirements for new economic development land, we think there is a case for allocating a limited number of additional sites in appropriate locations – particularly where these would be located close to good transport links and existing centres of population."</i></p> <p><i>"We have identified potential scope for new economic development land at Aviemore, Carr-Bridge, Dalwhinnie, Dinnet and Kinraig. As identified previously in Main Issue 3 (p20), a number of these sites will also help to take advantage of the potential for new inward investment resulting from the dualling of the A9. You can find more detail on these sites in the settlement section (p60)."</i></p>	<p>We welcome additional sites and the nearness to transport links and centres of population.</p> <p>We suggest the list should include Newtonmore and Kingussie.</p>
7.	46 - 47	<p><b>How do we protect the Park's unique environment along side development</b></p> <p><i>"The most significant change that would support the capercaillie population that uses the network of protected sites and connecting woodland of Badenoch and Strathspey would be to create significant areas of suitable woodland that is further from existing towns and villages. This would create suitable habitat that would have less disturbance from people and be more likely to support healthy populations of capercaillie across the network of sites."</i></p>	<p>We would suggest that this measure is worded, for clarity, to "... significant areas of suitable woodland that is further from existing towns and villages and development sites, already designated in the existing local plan ...".</p>

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8.	49 - 51	<p><b>How do we provide essential facilities along side development</b></p> <p><i>“For these reasons, we think that the new Local Development Plan will need to include an amended policy approach to planning obligations. This will need to include a revised overarching policy to outline the overall approach we will take towards planning obligations supported by more specific guidance in the Plan about what planning obligations will be required in different settlements/ locations. This will result in a more locally tailored approach, with different contributions applying in different locations based on local circumstances.”</i></p> <p><i>“In order to inform this amended approach we are currently undertaking an assessment of infrastructure needs across the Park. We are working with infrastructure providers and other key stakeholders such as local authorities and the NHS to help inform this revised approach.”</i></p> <p><i>“Do you agree that the new Local Development Plan should include a revised and more rigorously justified policy on planning obligations?”</i></p> <p><i>“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?”</i></p>	<p>We welcome any guidance that improves the certainty for developers.</p> <p>We welcome a systematic and empirical approach to establishing what the needs for public services may be.</p> <p>We agree.</p> <p>We agree.</p>
9.	53 - 55	<p><b>How can planning help protect and prepare for future events (flooding)*?</b></p>	

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		<p><i>“Whilst SUDS are encouraged by the existing Local Development Plan, we think the new Local Development Plan could include a stronger policy requirement for the incorporation of SUDS to be considered within new development proposals. We think this requirement should apply to all built developments, as SUDS can apply at a range of scales.”</i></p> <p><i>“Do you agree that the new Local Development Plan should include a stronger policy requirement for Sustainable Drainage Schemes to be considered in all new development proposals?”</i></p>	<p>We believe that the existing provisions in the local plan are adequate and that any further measures are likely to increase the costs of development with the clear possibility of potentially inhibiting the provision of economic infra structure which is important to meet the needs of the area.</p>
10.	57 - 58	<p><b>How can planning protect the character of our uplands?</b></p> <p><i>“The existing Local Development Plan includes a specific policy on landscape. It outlines a presumption against any development that does not conserve the landscape character and special qualities of the National Park. This has been used effectively to control and mitigate the impacts of new hill tracks in cases where they require planning permission. We think the existing policy will continue to provide an appropriate means for controlling these forms of development in the future. However, we also think that we could give more clarity on the issue of hill tracks by amending the policy to reflect the National Park Partnership Plan’s specific presumption against new tracks in areas of open moorland.”</i></p> <p><i>“Do you agree that the new Local Development Plan should</i></p>	

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		<i>include an amended policy to reflect the Cairngorms National Park Partnership Plan's presumption against new hill tracks in open moorland areas?"</i>	We believe that this presumption should <b>not</b> extend to upland 'brownfield sites' such as the areas within existing skiing resorts e.g. at the Cairngorm Mountain ski resort.
11.		<b>Proposed development land in specific communities</b>	
	61	An Camas Mor	We support the alternative option.
	63	Aviemore	We support the following designations: alternative option THC31 plus sites ED1, ED2, ED3, C1, C2 THC007-0014, EP2, and EP3.
	67	Grantown-on-Spey	We support the preferred option save for retaining the whole of THC039 (both preferred and alternate).
	69	Kingussie	We support the preferred option.
	71	Newtonmore	We support the preferred option and THC022.
	75	Boat of Garten	We support the preferred option.
	79	Carr-bridge	We support the preferred option and THC067.
	81	Cromdale	We support the preferred option and part of THC021 for mixed use.
	83	Dalnain Bridge	We support the sum of preferred option
	85	Kincraig	We support the preferred option save that we suggest the whole of THC054 is included.
	87	Nethybridge	We support the preferred option save that THC 060 and the whole of THC022 is included, possibly with latter having part for mixed use.
	89	Tomintoul	We support the preferred option.
	97	Dalwhinnie	We support the preferred option.
	107	Insh	We support the alternate option.
	113	Laggan	We support the preferred option.