

REPRESENTATION FORM

Introduction

The Proposed Local Development Plan (the Plan) sets out a strategy for future development in the Cairngorms National Park. It includes sites and proposals for development as well as the policies that will be used to make decisions on applications for planning permission. We aim to formally adopt the Plan in 2020 when the Local Development Plan 2015 comes to an end. The Plan focuses on the five year period until 2025. It also includes development proposals for the 10 year period until 2030, as well as providing a general indication of the likely scale and location of development as far as 20 years into the future.

How to comment

You can use this form to submit your comments on the Plan. Please complete a separate form for each part of the Plan you want to comment on.

All comments should be submitted no later than 5pm, Friday 5 April 2019.

Email: planning@cairngorms.co.uk

Post:

**Cairngorms National Park Authority
FREEPOST NAT21454
Grantown-on-Spey PH26 3BR**

You must submit your name and address to ensure your comments can be considered valid. This is because the Cairngorms National Park Authority (CNPA) is required by legislation to contact you in relation to your response.

Fair Collection Statement

As a registered Data Controller, the CNPA will collect, store and use your personal data for the purpose of informing the content of the Cairngorms National Park Local Development Plan 2020. You may request to see personal information held by the CNPA at any time. Information will be shared with the Scottish Government Department of Planning and Environment Appeals and may be published on our website. We will not publish address details but may publish the name of the person who has completed the form. By completing and submitting the form, you are consenting to the above.

Your details

Name **COLIN MACKENZIE**

Organisation **G H Johnston Building Consultants Ltd**

Address [REDACTED]

[REDACTED]

..... Postcode [REDACTED]

Email [REDACTED]

If you are representing a third party, please give their details below.

Name

Organisation **JOHN GORDON & SON**

Address [REDACTED]

[REDACTED]

..... Postcode [REDACTED]

Email [REDACTED]

REPRESENTATION FORM

1. Which section of the Plan would you like to comment on? (Please state clearly which policy, settlement, site reference number, paragraph number etc, your comment relates to)
CARRBRIDGE PROPOSALS
ED3: FORMER SAWMILL: ALLOCATED FOR ECONOMIC DEVELOPMENT

2. What is your comment on this section of the Plan?

3. Please state clearly what change/s you wish to see made to the Plan to address your comment

Proposed Change to Local Development Plan

That ED3 is modified to read:

"allocated for economic development and/or a mix of compatible housing, business, tourism and community uses for which a masterplan will be prepared, incorporating a landscape "buffer" and proposed upgrading of the A9 " .

What happens next?

Following the consultation period, all responses will be collated and assessed. The Proposed Local Development Plan and all consultation responses will then be submitted to Scottish Ministers and subject to an Examination by an independent Planning Reporter. You can keep up to date with progress on www.cairngorms.co.uk and Facebook and Twitter via [@cairngormsnews](https://twitter.com/cairngormsnews)

Queries

If you have any queries about the consultation process, please contact a member of the Planning Policy team.

Email: planning@cairngorms.co.uk

Telephone: **01479 873535**

Cairngorms National Park Authority
14 The Square, Grantown-on-Spey, PH26 3HG
www.cairngorms.co.uk

Clear

Submit

CNPA LOCAL DEVELOPMENT PLAN 2020

REPRESENTATION FORM – TEXT FOR BOX NO. 2

The Land and its Status

This objection concerns 3.7 ha. of land owned by John Gordon & Son, Sawill, Balblair Road, Nairn. This is part of the company's timber processing and distribution estate, which at Carr-bridge included large-scale storage and haulage operations.

John Gordon and Son operates within an indigenous industry which supports more than 25,000 jobs. John Gordon and Son itself employs over 90 principally at its Nairn base, and generates some £2.5m annually to the Highland economy. Its landholding at Carr-bridge is available for redevelopment.

The company may reconfigure the site for its own purposes, but equally, it believes that the site presents an important opportunity for Carr-bridge and the National Park, and that the local development plan should be responsive to options as to its most sustainable contribution, going forward.

The proposed local development plan allocates the land (3.7 ha.) for economic development. This represents the minimum that would reasonably be expected, given that the land has been used for 50 years in association with timber processing and distribution; and allocated previously for business and industry.

The Basis for the Change Sought

The objection is founded on concern that the land need not be unnecessarily restricted or bound by historic use, and that the promotion only of economic development for either a large-scale single user or smaller business premises - in the event that it is not required by John Gordon & Son - is either uncertain or lacking substantive demand required to deliver the critical mass of development and servicing that would enable the entire landholding to be built-out, and therefore deliver comprehensive environmental remediation and renewal of the site as a whole.

This is particularly so when the local development plan differentiates "tourism" *which could be "economic development"* and "housing" which is the primary land use need of the communities within the National Park; and that either of these uses would be appropriate *per se*, or as part of a mix of uses embracing subdivision of the site. Two or more uses: housing, economic development tourism/community use would be suited to the location and compatible with one another in principle, subject to a masterplan; and appropriate provision would be made for the A9 dualling and associated "buffer" within the site.

The justification below for a *proposed change of policy wording* explains the merits of the proposal at site level, in the context of the structure of the village; and in relation to the role of the National Park within the region and further afield. In that regard, the proposal is demonstrated to be consistent with sound *site planning*; with the

settlement objectives for Carr-bridge and with the *settlement strategy*, promoted in the local development plan for the National Park.

Site and Position

The site adjoins Carr-bridge to the west. The land is flat, well drained, sheltered to the south/west by rising afforested land and is largely, self-contained, visually. There is no inherent landscape value and no desirable line of view west of the A9.

The site lies within the identified *settlement boundary*, off one of a series of radial routes which provide a framework for the shape and structure of Carr-bridge.

The village (as evidenced by the other residential land allocations made in the development plan [H1 & H2]) has grown towards the outer limits of these routes.

There is good access along Station Road; and service networks are close-by. The site is convenient to the village centre, local facilities, primary school and public transport; and within 100m of the rail station.

With regard to the position of the site, the existing village edges extend a comparable distance from the centre in the direction of Dalrachny.

The A9 has not previously - and in light of the ED3, would not in future - present any barrier to development.

The site involves previously used, *brownfield land*. Existing neighbouring development and uses comprise business, housing, transport and recreational forest.

The land is clear of the flood plan. 80% is acknowledged to present no flood risk and there is at least 10m difference in levels to the River Dulnain.

Redevelopment for *community uses* would rid the village environment of the heavy haulage traffic movements (north and south along Main Street) associated with the historic timber processing use.

A major visitor attraction is located off the B9153 at the southern entry point to the village. The site sits well with a network of off-road paths and tracks linking the village and recreational forest.

Principles

The principle of development at the site is therefore established and redevelopment expected. The land is brownfield and within the settlement envelop. Its use for housing, business and/or tourism would be consistent with the shape and structure of Carr-bridge, with the locational characteristics of the other allocations and with accessibility to facilities and services. A good access under the A9 with obvious spare capacity is in situ and serves housing (amongst other uses).

In terms of the village limits, the A9 is porous. There are no over-riding landscape considerations to the west; and the principle of developing beyond the trunk road is established in similar circumstances at Aviemore. A9 widening would be protected.

Spatial Strategy

Spatial Strategy

The spatial strategy of the plan is founded on upgrading key connections and growth of a sustainable economy and communities within a hierarchy of places.

It states that the A9 improvement will "*strengthen and improve connections*" north and south of the Park (para. 3.1); is "*designed to deliver economic growth*" (3.2); that upgrading the Highland Main (rail) Line is to achieve the "*fastest journey time between Inverness and the central belt*" (3.4); and that "*once completed (these linkages) are likely to increase the accessibility of some of the settlements including linking them more effectively with locations outwith the Park, such as Inverness. This is likely to increase the demand for development ... and could bring increased opportunities for inward investment within the Park*" (3.5).

"There are clear opportunities for growth and development within and around the existing settlements of the Park, both to maintain their status and to provide the new homes, businesses and other facilities that are needed to ensure their future sustainability (3.6).

Deriving from its position within the National Park beside the A9 and railway - as the northernmost *intermediate settlement* closest to Inverness, and as the closest *intermediate settlement* to Aviemore (and an Camas Mor) – Carr-bridge is as well located as any community in the Park to build upon objectives which seek to benefit from connections to centres outwith the Park, and to support Aviemore, as the strategic economic driver for sustainability of the Park's Spey-side corridor.

No other existing *intermediate settlement* offers that locational advantage and potential to fulfil the strategic objectives of the plan; nor is able to offer a strategic site which if developed, would secure the redevelopment and remediation of a large tract of brownfield land.

This could come about by embracing the attractiveness of the National Park for:

- housing - in addition to meeting the inherent needs of the Park, Carr-bridge could reinforce an established pattern of sustainable commuting (including via the Invernet *commuter rail* service) drawing on employment in the Inner Moray Firth/Inverness economic growth corridor (recognized in NPF3 as of national significance) to attract and hold people within the Park, and support its services;
- business - operators, particularly specialist small-scale concerns seeking the prestige of location within the Park, and diversifying the local economy;

- tourism - embracing a growing market demand for high-spec accommodation and facilities, complementary to the major attractions in Carr-bridge, but comfortably close to the focus of outdoor recreation towards Aviemore and Glenmore.

The capacity of the site to embrace these uses and deliver environmental renewal would reflect well against the strategic objectives; and the potential for eg. 60% of the site (2.0 ha.) to accommodate 30-40 houses, would accord with the scale of development promoted at ED1 and ED2. Moreover, this level of residential development in Carr-bridge would accord with the capacity range of the *intermediate settlements* for housing demonstrated by the allocation of less than 20 houses in Tomintoul and over 80 in Braemar.

These indicators that the site could be promoted for the right scale of development accords also then, with ... "*...the development strategy also identifies intermediate settlements which will accommodate development to meet wider needs, albeit at a more modest scale...*(Fig 3 Development Strategy) identifies Carr-bridge as an "*intermediate settlement*". ..."*Within intermediate settlements, development will be of a scale which contributes towards meeting wider needs within the Park, but primarily supports local communities to ensure their future sustainability...*" (5.4).

"*For those who own significant areas of land, the development strategy provides an opportunity to plan in the long term for rural housing, business development and environmental enhancements across their estates*" (3.11).

John Gordon & Son does own a significant tract of (brownfield) land as part of the company estate and its redevelopment and environmental benefits may require a long-term view. The "*lead-in*" period for promoting mixed uses - which would surely include housing at such time as the other allocated sites in Carr-bridge are taken up - should commence with this development plan.

Carr-bridge Objectives

The mix of land uses (and the land) above would accord with the individual settlement objectives for Carr-bridge, as development would:

- *support and maintain services because* housing would hold the local population and therefore the patronage for local shops and facilities, and support local employment;
- *support the delivery of housing (particularly affordable and mid-market accommodation) that meets local needs because* the site would broaden the choice in housing land, and deliver a wider mix of *mainstream* uses which would improve viability, dependent on a critical mass of development;

- *support proposals for business (including small units), tourism and recreation because it would present land in a community where no comparable alternative identified, and it would support the renowned reputation of Carr-bridge as a local tourist centre;*
- *support redevelopment for the benefit of the community because it would deliver housing, economic uses and tourism which, if combined could improve the prospects for development and remediation, in the economic and environmental interests of Carr-bridge and the Park;*
- *support proposals for safe active travel around the village because it would be linked to off-road routes, walks and paths; and*
- *support opportunities that utilise the benefits of A9 dualling for Carr-bridge because the village is readily connected to Inverness (and the south) and for that the advantages of location and accessibility may be material in securing investment in development, land and the community.*

The mix of land uses promoted would maximise developer obligations in support of these objectives, namely: a 25% contribution to affordable homes and to increasing the primary school and community leisure capacity.

Summary

ED3 is the largest site allocated for development in any of the *intermediate settlements*. It therefore lends itself to sub-division for mixed uses and a scale of development appropriate to the local grain and character. A mix of housing, economic development and/or tourism would fit with the shape and structure of the village.

As the primary land use demand within the Park, housing would increase *the certainty* of development and could be the catalyst for a viable package of uses. Taken forward together these would enhance the prospects for securing development and land renewal; and would demonstrate an added commitment to securing efficient use of (brownfield) land, sought in national policy.

No part of this proposition would be inconsistent with the local development plan: all would help to deliver the settlement strategy, local objectives and a sustainable future for Carr-bridge. A masterplan would be a "major proposal" and the right balance of uses, layout and other characteristics of development would derive as part of statutory community engagement.