

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 Craig Gunderson.....

Organisation Savills (UK) Ltd.....

Address [REDACTED].....
[REDACTED].....

..... Postcode [REDACTED].....

Email [REDACTED].....

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

Name

Organisation Invercauld Estate.....

Address [REDACTED].....
[REDACTED].....

..... Postcode [REDACTED].....

Email

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)

Please see supporting statement.

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

Please see supporting statement.

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

Please see supporting statement.

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

Monaltrie Park, Ballater

Response to Cairngorms National Park Proposed
Local Development Plan





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Appendix 1 – Preliminary Concept Masterplan

1. Introduction

- 1.1. Savills Planning is pleased to submit this representation on behalf of Invercauld Estate to the Cairngorms National Park Authority (CNPA) Proposed Local Development Plan (PLDP) (2019) consultation. This report details the Invercauld Estate's support for the proposed housing site at Monaltrie Park in Ballater for inclusion in the forthcoming adopted Local Development Plan (LDP).
- 1.2. A preliminary concept masterplan (Appendix 1) has been prepared by McCreddie Design in support of the proposed site allocation and submitted to demonstrate how this site can be successfully developed.
- 1.3. The key design considerations are contained within this report, with conclusions outlining the overall acceptability of the site in land use terms for housing as well as commentary regarding the sites effectiveness, with reference to Planning Advice Note (PAN) 2/2010, as per the representation made to the Main Issues Report (2018).
- 1.4. Within the CNPA LDP (March 2015) the subject site at Monaltrie Park is allocated for residential development (Reference: H1). The allocation has a capacity for 50 units, plus an identified future phase for 200 homes *'should future needs require, land adjacent to the site will be released to consolidate the development with the village.'* As such, it has been acknowledged by CNPA that there is potential to accommodate a total of 250 units at this location.
- 1.5. The adopted LDP lists the objectives that the masterplan will be required to address. These include flooding, zoning, land uses, connectivity and movement – including access and connectivity with the Deeside Way, identification of Ballater's distinctive design characteristics, conservation proposals, habitat and landscape issues, integration alongside the Highland Games site and other community facilities, etc.
- 1.6. The PLDP (2019) continues to recognise Monaltrie Park's development potential. The CNPA has identified the site as a residential allocation (Reference: H1) to be brought forward to deliver up to 250 homes. Invercauld Estate are supportive of the allocation at Monaltrie Park, Ballater in the PLDP (2019).
- 1.7. Invercauld Estate is also preparing representations to the PLDP for sites located in Braemar.

2. Site Context

Site Description

- 2.1. The site relates well to Ballater and is contained within the settlement boundary. It is located at the northern edge of Ballater and is bounded to the immediate north west and south east by existing residential development, to the south by an area of open space and to the north east by agricultural land and the settlement boundary.
- 2.2. The site has good levels of connectivity and is approximately 500m from the primary school and 1km from the town centre. A bus stop is located 500m away on Tulloch Road, with the nearest major road (A93) located 2.5km from the site. A core path runs along the west and east of the site offering strong pedestrian links to the centre of Ballater. The site is vegetated by grass and shrubs and has not been subject to any previous development. The topography of the site varies between 193.5m and 198.5m above Ordnance Datum (AOD).
- 2.3. The River Dee flows in a north easterly direction past Ballater and is located some 240m to the south east of the site at its closest point. The Ballater Burn originates on the hillslope immediately to the north of Ballater and flows eastwards approximately 400m to the north of the site before joining the Tullich Burn approximately 1.5km to the north east of the site.
- 2.4. An old railway embankment (now a footpath) extends along the south eastern boundary of the site, separating it from the housing development and River Dee beyond. Immediately adjacent to the development site, the footpath embankment ranges in height from 0.9m to 1.1m.
- 2.5. It is considered that residential development of the site would provide an opportunity to create a sustainable long term residential development. Inclusion of the site as a residential development location within the wider urban area would provide a positive addition to the town. Monaltrie Park is the only development site of material size located adjacent to the existing settlement that can make a genuine contribution to housing within Ballater.
- 2.6. The proposed preliminary concept masterplan (Appendix 1) clearly shows the potential of the site and how it can be delivered in a sensitive and sustainable manner to ensure positive benefits for the strategic centre of Ballater.

Design Considerations

- 2.7. The concept masterplan supporting this representation has been designed around the known site constraints and opportunities. Reference should be made to this masterplan to assist in understanding the approach taken in illustrating how a development could be seen to fit into this setting.
- 2.8. The concept masterplan indicates the residential mix could include detached, semi-detached, cottage apartments, terraces and apartment villas. This indicative residential mix has been set within the site in combination with landscaping proposals including a new park to the north east.

- 2.9. Potential exists to create multiple access points from the site onto the Core Paths that lie adjacent and provide a highly accessible site for pedestrians that maintains a strong visual outlook.

Design Evolution of Masterplan

- 2.10. Discussions have taken place with both CNPA and the Ballater Highland Games Committee regarding boundary alterations to the proposed allocation.
- 2.11. The outcome of these discussions, which took place over several months, resulted in an amendment to the original allocation boundary proposed and this amendment is now reflected in the PLDP (2019) and in the appended preliminary masterplan. This amendment to the boundary ensures an equitable resolution can be reached to secure the future of the Highland Games in the heart of the community, adjacent to the proposed residential allocation at Monaltrie Park, Ballater.
- 2.12. Issues relating to visitor parking and suitable land for expansion have been the focus of discussions to date. Given the content of the proposed allocation at Monaltrie Park these issues will be resolved and finalised through further dialogue during the planning application process.

Effectiveness of the Site

- 2.13. The Scottish Government's priority in relation to housing delivery, is to plan for a generous and effective land supply, ensuring flexibility within the development plan in recognition of present economic times as outlined in Scottish Planning Policy (SPP) (2014).
- 2.14. SPP promotes the provision of a range of effective housing sites as well as the provision of a generous supply of land for each housing tenure to maintain a five-year supply of effective housing at all times.
- 2.15. The requirement to maintain an effective housing land supply as set out in SPP is complemented by PAN 2/2010: 'Affordable Housing and Housing Land Audits'. This sets out criteria to identify housing sites that can be successfully brought forward through the planning system (PAN 2/2010, Paragraph 55, Page 17).
- 2.16. The effectiveness of the site for housing has been considered in line with the criteria set out in Paragraph 55 of PAN 2/2010.
- **Ownership** – the site is in the ownership and control of Invercauld Estate who are willing to release it for residential development.
 - **Physical** – the site forms a logical residential development site within Ballater. There are no known insurmountable physical constraints relating to slope, access, flooding or ground conditions affecting the site that would make it unsuitable for residential development.
 - **Contamination** – work undertaken to date on ground conditions does not identify any contamination issues. There is a history of coal mining in the wider area that will require further assessment but this is not expected to be a barrier to development.

Monaltrie Park, Ballater

Response to Cairngorms National Park Proposed Local Development Plan



- **Deficit funding** – no public funding is required to make the site viable and enable it to be brought forward for residential development.
- **Marketability** – the site is highly marketable. Savills is currently in discussions with a number of delivery partners. Residential units on the site can be delivered from 2021.
- **Infrastructure** – there are no known abnormal infrastructure issues that require to be addressed to allow development of the site.
- **Land use** – the site is located immediately adjacent to an established residential area, on the edge of the existing settlement. Residential use of the site is therefore consistent with the wider pattern of land use in the area. The site is also within easy reach of other ancillary land uses such as schools, public transport etc.



3. Response to Proposed Local Development Plan

What section of the Plan would you like to comment on?

- 3.1. The site forms the Monaltrie Park residential allocation (Reference: H1) within the adopted LDP (2015).
- 3.2. The residential allocation has been carried forward into the PLDP (2019).

H1: Monaltrie Park	Allocated for Housing	8.1 ha
Indicative Residential Capacity: 250 units		

- 3.3. The allocation in the PLDP (2019) at Monaltrie Park comprises:
 - First phase of 50 dwellings
 - Capacity for a mix of uses including business and community uses
 - Masterplan for the whole site is required
 - Boundary and open space is indicative with the former being clarified in the masterplan.

What is your comment on this section of the Plan?

- **We support the continued residential allocation ‘H1’ at Monaltrie Park, Ballater.**
- 3.4. Invercauld Estate’s landholding covers the H1 housing allocation, which makes a genuine contribution to the housing land supply across the CNPA. Ballater has been identified as a strategic settlement within the PLDP, therefore, increasing the importance of delivering much needed housing in the settlement.
 - 3.5. Clearly, our client’s landholding constitutes an important allocation within the forthcoming LDP 2020, helping to meet established housing supply targets, providing the opportunity to deliver quality housing within a high amenity setting.
 - 3.6. Invercauld Estate fully supports the residential allocation identified at Monaltrie Park in the PLDP (2019).
 - **We support the revised site boundary supporting development of up to 250 houses.**
 - 3.7. It should be noted that the Invercauld Estate fully supports the revised site boundary at the H1 allocation in the PLDP (2019) given the importance of making optimum use of this land release, alongside appropriate landscaping in accordance with the location of the site and its edge of settlement context.

What section of the Plan would you like to comment on?

- 3.8. Policy 1: New Housing Development (Section 1.5 Affordable Housing) outlines that there is a requirement for 45% of the total number of dwellings on development sites in Ballater to consist of affordable housing.

1.5 Affordable Housing

Developments consisting of four or more dwellings should include provision for affordable housing amounting to:

a) 45% of the total number of dwellings on the development site in the settlements of Aviemore, Ballater, Blair Athol and Braemar;

b) 25% of the total number of dwellings on the development site in all other settlements.

Proposals for fewer than four market dwellings will also be required to make a contribution towards affordable housing. This will be a monetary payment towards meeting housing need in the local community.

Developers seeking to negotiate a reduction in affordable housing provision must demonstrate through a Viability Assessment that the requirements make an otherwise commercially viable proposal unviable.

What is your comment on this section of the Plan?

- **We object to the requirement to provide 45% of the total number of dwellings for affordable housing on development sites in Ballater as this is an unrealistic expectation.**

- 3.9. The requirement for 45% affordable housing provision in Ballater is a significant requirement and is well in excess of the figures stated in the guidance provided on affordable housing contribution levels in SPP. The proposal will unquestionably risk putting off developers proceeding with any development and may well therefore lead to less rather than more affordable housing being provided. This significant requirement has the potential to pose challenges to the viability of future development at Monaltrie Park. It is understood, the affordable housing requirement in Ballater has been developed with regard to the findings of the Aberdeenshire City and Shire HNDA (2017).

- 3.10. Viability issues need to be treated carefully, particularly when they are combined with developer contributions, such as education, health and infrastructure contributions. Both the remoteness of the settlement and the higher quality design aspirations for the site in question feed into Monaltrie Park's wider viability given the additional costs associated. Build costs and the costs of delivering high design standards will be a key component of the sites viability moving forward. It is crucial that housing sites are able to come forward and not deemed unviable due to overly onerous contribution levels being required or the associated costs of delivering the physical and design ambitions on the site.

- 3.11. The text at Section 1.5 (a) should be amended to read: *'Up to 45% of the total number of dwellings on the development site in the settlements of Aviemore, Ballater, Blair Atholl and Braemar.'*
- 3.12. Notwithstanding, Invercauld Estate is supportive of the flexibility that is provided within the text of Policy 1 (Section 1.5) which states *"Developers seeking to negotiate a reduction in affordable housing provision must demonstrate through a Viability Assessment that the requirements make an otherwise commercially viable proposal unviable."* This proposed wording at Section 1.5 would assist in ensuring housing development in the larger settlements is capable of being delivered.
- 3.13. Flexibility in the application of this policy is paramount given the importance financial viability plays in the delivery of both market and affordable housing in target settlements across the authority area. Affordable housing delivery is intertwined with the delivery of market housing on multiple allocated sites and it is vital both can be adequately provided to benefit future residents.
- 3.14. Importantly, each planning application is judged on a case by case basis and the issue of viability can be discussed and scrutinised as appropriate to ensure the delivery of much needed housing (including affordable) across the CNPA.
- 3.15. The Invercauld Estate, therefore, is supportive of the flexibility that has been included in Policy 1 (Section 1.5) subject to the amendments above and would urge this remains part of the policy to ensure allocated development sites are delivered successfully within the emerging Plan period and remain viable.

4. Summary and Conclusions

- 4.1. The site at Monaltrie Park is a readily developable site for residential use. The site is shown to be effective in accordance with the criteria set out in Paragraph 55 of PAN 2/2010. This report contains information pertinent to the consideration of the suitability of the site at this stage in the development plan process. No insurmountable barriers to the development of the site have been identified through survey work to date. As noted, the allocation boundary has been amended to mitigate potential flood risk and reflect a development that can accommodate the future of the Ballater Highland Games.
- 4.2. This proposed extension to Ballater can be sensitively accommodated, with the first phase able to be delivered within the lifetime of the emerging LDP. Going forward, appropriate mitigation measures and solutions will be incorporated into the development of an overarching masterplan for the residential development of the site. The site will contribute towards much needed additional housing (both private and affordable) in Ballater over the coming years and contribute positively to the housing supply targets across the CNPA.
- 4.3. As noted, Invercauld Estate objects to the requirement to provide 45% of the total number of dwellings for affordable housing on development sites in Ballater as this is an unrealistic expectation. This representation has put forward recommendations for amendments to the wording of Policy 1 (Section 1.5) to ensure development sites remain viable and can make a valuable contribution to affordable housing provision.
- 4.4. To ensure the aims of sustainable development are met, it would be prudent of the CNPA to identify and allocate readily developable sites, effective within the emerging plan period, to ensure housing land supply targets are met. The site at Monaltrie Park is a site that can fulfil this criteria.
- 4.5. This representation made on behalf of the Invercauld Estate fully supports the inclusion of the H1 Monaltrie Park site as a residential allocation for up to 250 houses in the PLDP (2019).



- RESIDENTIAL MIX COULD INCLUDE:**
- DETACHED
 - SEMI-DETACHED
 - COTTAGE APARTMENTS
 - TERRACES
 - APARTMENT VILLAS
 - LIVE WORK
 - START UP SPACES
 - RETIREMENT
 - GUEST HOUSES



LEGEND

	EXISTING TREE COVER
	PROPOSED BUILDING FORMS (INDICATIVE) - RESIDENTIAL / MIXED USES
	PRIMARY INFRASTRUCTURE
	SECONDARY INFRASTRUCTURE & LANES
	EXISTING / PROPOSED PATH NETWORK
	PATH CONNECTIONS FROM SITE
	AMENITY OPEN SPACE
	PROPOSED STRUCTURE PLANTING
	SUDS FEATURES (INTEGRATED)
	SCULPTURE / GATEWAY FEATURES
	HARD LANDSCAPE FOCUS TO SMALL SQUARES & REAR COURTS / LANES
	DIRECTIONAL SIGNS
	TOURIST / VISITOR INFORMATION POINT

Job No: M1360
 Scale: 1:2,500 @ A2
 Date: April 2019

