

## 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](mailto: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 Philip Graham .....

Organisation Savills .....

Address [REDACTED] .....

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

Email [REDACTED] .....

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

Name Niall Calthorpe's 1959 Discretionary Settlement Trust .....

Organisation .....

Address C/O Savills (as above) .....

..... Postcode .....

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)

We would like to make the following representations:

- To support the Affordable housing exception sites policy (paragraph 1.6)
- To object to the settlement profile for Dulnain Bridge (p126-128). In particular, to object to the non-inclusion of a prospective housing allocation known as THC032 'Ballintomb Wood' within the development proposals listed and shown on the proposals map and to argue for the replacement of H1 with THC032.

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

- Support for Affordable housing exceptions sites policy

We are supportive of the spirit of the policy because we consider that it brings the potential for additional affordable housing which is required to meet local demand. In addition, it also brings more flexibility to the delivery of such housing which is welcome.

The Scottish Government Directorate for Rural Economy and Communities has produced in draft, statistics within a "Rural Economy Narrative" document some of the headlines are as follows:

- "The economy of rural Scotland is crucial to Scotland's overall economic success currently contributing 27% of the total economic output, a figure worth £36.2 billion.
- "Increasing sustainable economic growth in rural Scotland requires a whole system approach, from business support to ensuring that infrastructure, housing, education and social care meet the needs of rural Scotland"

We consider that rural depopulation is a huge challenge to Scotland and the implications for the rural economy, infrastructure and management of "vital ecosystems" is significant.

It should also be noted that private car transport is likely to be transformed during the period of the LDP 2020, with a significant increase in electric vehicle and hybrid vehicle use in advance of a ban on petrol and diesel-only cars by 2032 (Scottish Government). To add to this, a higher percentage of rural residents work at home than their urban counterparts: 22% in remote rural areas, 17% in accessible rural areas and 10% in the rest of Scotland (Scottish Government Rural Scotland Key Facts 2018). Companies are increasingly cutting costs by reducing office floor space and encouraging home working either full or part time. As a result the evidence is there to suggest that commuting and working trends are going to change significantly and that the LDP 2020 should take account of increased potential for sustainable rural living. We consider that the affordable exceptions policy brings potential for this to occur.

We only have a minor point which is that pre-application discussion or similar with relevant authority and/or Registered Social Landlord staff should be encouraged. Early discussion on a site should be facilitated to assist all parties in progressing a site in the most efficient way possible and to set clear steps that should be met to ensure that the planning application process is as straightforward as possible. Our opinion is that this will help all parties involved and will help to avoid abortive cost in terms of developer and Council Officer time (which we understand is under considerable pressure).

- Objection to settlement profile for Dulnain Bridge

We consider that the THC032 'Ballintomb Wood' prospective housing site should be included within the final adopted Local Development Plan 2020 (LDP 2020) and the currently allocated site H1 'Land West of Play Area' should be de-allocated. The THC032 site could then come forward via a 0.8ha immediate residential allocation, 0.8ha longer-term allocation and 2.7ha as native woodland/amenity greenspace. This site has been promoted at the preceding Call for Sites and Main Issues Report LDP review stages.

We note that the aims for 'Policy 1: New Housing Development' state that new housing sites should maintain high quality places where communities can be sustainable and thrive. This should be achieved through the best use of resources and be compatible with natural heritage and landscape qualities of the National Park; integrate with services and facilities; and promote the highest standards of design and environmental quality. Throughout our promotion of the THC032 site we have argued that development at this location meets these parameters, in particular:

- the land is currently mature commercial woodland which is due to be felled, as a result this will leave a gap site at the entrance to Dulnain Bridge. In terms of a placemaking approach to the settlement, there is the opportunity to create a gateway to the settlement through sensitive development of the site;

- We note that the ecology assessment by the Council at the Call for Sites stage rated the ecological impacts as "amber" and commented "The development of the site will result in the loss of AWI (though potentially of lower ecological value)". We consider that the benefits of development would outweigh the loss of an area of ancient woodland, this is because there is potential to replace mature commercial planting with native species better reflective of any semi-natural characteristics evident within the the Long-established woodlands of plantation origin (LEPO). In turn this asset could form part of improved amenity land to serve Dulnain Bridge; form a gateway to the settlement on entrance from the east; and connect to areas of native woodland to the south and west of the proposal site (associated with the river and adjacent wet ground). There is scope for replacement planting on the field to the east of the prospective development site.

- The woodland setting of the housing would be directly in line with the existing settlement form. Development at the road side would bring potential for a safe and welcoming street frontage in line with Designing Streets which positively addressed the road and entrance to Dulnain Bridge.

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

We consider that wording should be added to the Affordable housing exception sites policy (paragraph 1.6) to state that pre-application discussion is encouraged to facilitate development of affordable housing exception sites.

We consider that the THC032 'Ballintomb Wood' prospective housing site should be included within the final adopted Local Development Plan 2020 (LDP 2020) and the currently allocated site H1 'Land West of Play Area' should be de-allocated. The THC032 site can then come forward via an 0.8ha immediate residential allocation, 0.8ha longer-term allocation and 2.7ha as native woodland/amenity greenspace.

## 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](http://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](mailto:planning@cairngorms.co.uk)

Telephone: **01479 873535**

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