

Cairngorms National Park - Proposed LDP 2020

Objections

Policy/Proposal: Cromdale - Site ED1

Site: ED1: The Smoke House

Objector: Mr. R.V Locatteli and Ms. J. A Bremner

Summary of Objection: The objector seeks a broader, more flexible allocation within the plan for a range of uses including business/employment, residential, tourism and leisure for their site at Rosebank Cottage in Cromdale.

Objection:

1. The economic priorities for the National Park are set out in The Cairngorms Economic Strategy 2015-2018. Its overall aim is to “Grow the economy of the Park by strengthening existing business sectors, supporting business start-ups and diversification, and increasing the number of workers employed in the Park”.
2. The current Local Development Plan 2015 contains economic development and tourism allocations with the purpose of protecting existing operations and to encourage new development in particular areas. The objection site is shown as a site allocated for employment under policy ED1: The Smoke House.
3. The Proposed Local Development Plan 2020 seeks to support the delivery of economic development through its economic development policy, and through the allocation of employment sites. We support the policy objective for employment creation. However, we consider that a greater level of flexibility is required in some settlements and on some allocated sites so that the employment objective can more realistically be achieved across the plan as a whole.

4. In particular, we consider that the allocation of land at Rosebank Cottage in Cromdale should be broadened so as to allow for a greater range and mix of potential end-uses, leading to a greater likelihood of the site being re-developed and brought back into community use as an asset.

5. A study by CNPA in 2011 recommended that economic development could best be supported through the allocation of some larger sites in more strategic settlements, more limited allocations within intermediate settlements and an appropriate and supportive planning policy for proposals in smaller settlements. The study concludes that a supportive and flexible policy approach is the most suitable way for delivering employment uses including small business units.

6. Our suggested more flexible approach would be consistent with the conclusions from this study, and with the text within the extant LDP which seeks to support mixed uses meeting objectives for the village. Cromdale is not a strategic or intermediate settlement, and we do not agree that an allocation just for employment use is the best way of achieving jobs and the environmental benefits of re-development. Rather, we consider that this relatively large site would more realistically be re-developed with either a mixed-use scheme of residential, business, retail and tourist uses, or any one of these uses, that would help ensure viability and the cross-funding of required redevelopment following the collapse of previous smoke house and safety fencing businesses.

7. Whilst the buildings and yard area to the rear of the site are of former industrial and storage use, the building fronting onto the main road (A95) is a residential property, and whilst a single employment end-use cannot be entirely ruled-out, given the size of the site and the market in Cromdale we consider that more flexibility in allocated end-use would provide a greater chance of seeing the site become developed as opposed to declining into a state of being a local eye-sore, detracting from the very aims of the plan in seeking to create an environment in which local people, and young people in particular, wish to stay, live and work.

8. We also believe it fair and reasonable, and consistent with the legal and policy presumption in favour of sustainable development, that all policy allocations within the LDP should be removed from the need to produce protected species, flood, contamination or other reports. The effectiveness of a site should be inherent within the adopted plan allocation. It should be for the planning authority to first produce these reports and undertake such surveys where considered necessary, in support of policy allocations, and before they are adopted, so that developers, investors and the local community all have confidence in the policy allocations within the plan and are satisfied in advance as to their effectiveness.

9. The restrictive policy emphasis within the Proposed LDP 2020 is neither necessary nor desirable. The revisions proposed below will better achieve the desired policy objectives for economic development within the National Park, with a positive rather than negative policy emphasis.

Proposed Changes:

- (i) Site ED1 should be changed in title to "M1" to reflect "Mixed-use".
- (ii) The name of the site should be changed from "The Smoke House" to "Rosebank Cottage" to better present the site for redevelopment purposes, and to more accurately reflect the current name of the property.
- (iii) The site allocation should be changed from "Economic Development" to "Mixed Use" to include residential, tourism and leisure as well as business/employment uses.
- (iv) The text and annotations relating to flood risk and drainage impact assessment should be deleted from page 155.
- (v) The text in relation to Developer Obligations on page 153 should be deleted and replaced as follows:

Planning Obligations

Contributions to community infrastructure, including - where relevant - affordable housing, will only be sought from new private housing development where proven not to make the proposal unviable and where proven to be legally required and related in scale and kind to the proposed development.

- (vi) Policy 2.5 on page 32 should be changed from "Protecting Existing Economic Activity" to "Promoting Economic Activity". The words "mixed-use development" should be added after the words "Proposal for...". The word "only" should be removed from the policy sentence. i.e. Policy 2.5 should state:

2.5 Promoting Existing Economic Activity"

Proposals for mixed-use development or the alternative use of allocated economic development or tourism sites and non-allocated sites or buildings currently in, or last used for, economic, employment or tourism purposes will be supported where:

- It is satisfactorily demonstrated that it is not practical for financial or other reasons to sustain the existing or last economic, employment or tourism use; or*
- the site or buildings are unsuitable for the business needs and impact adversely on the built or natural environment, local character or neighbouring properties.*

- (vii) Paragraph 4.44 on page 37 should be deleted. The sub-heading should be changed from "Protecting Existing Economic Activity" to "Promoting Economic Activity". The words "mixed-use development" should be added at paragraph 4.45 after the words "tourism facility or site,.....". The words "only" and those in the last bullet-point should be removed from the sentence at paragraph 4.45. It should be for the planning authority, in refusing an application, to demonstrate that there would be a harmful economic impact. It should not be for the applicant to have to demonstrate this, given the policy presumption in favour of

sustainable development i.e. paragraph 4.45 and its associated sub-heading should be changed so as to read:

Promoting Economic Activity

4.45 Any proposals for the change of use of an existing economic, employment or tourism facility or site, including to a mixed-use development, will be considered acceptable where it is satisfactorily demonstrated that the business and/or premises:

- *is not suitable for another economic, employment or tourism use;*
- *is no longer needed or the premises is no longer suitable for the needs of the business;*
- *is not practically or economically viable.*

(viii) The text on page 155 of the Proposed LDP 2020 should be changed so as to delete the word "small" from the first sentence, add the words "with mixed use potential" and to change the name "The Smoke House" to "Rosebank Cottage" i.e. *"A site with mixed use potential at Rosebank Cottage could provide for economic development, either as part of a mixed-use scheme to include residential, tourism, leisure and business/employment uses, or for any one of these uses"*.

(ix) The Table in Appendix 1 on page 217 should be amended so as to include Site Ref/Name "M1 - Estimated capacity 15 units" under the heading for Cromdale on page 218.

(x) A definition of "Mixed-Use" should be included within the Glossary on page 220. This should state **"Mixed-Use: An allocation for economic development and housing uses, offered to provide maximum flexibility for a range of uses including business/employment, residential, tourism and leisure, to achieve maximum potential for site development"**.

Simon Harrison Associates, March 2019.