

05 APR 2019

Cairngorms National Park
Proposed Local Development Plan 2020
Consultation 25 January – 5 April 2019



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 Andrew McCracken

Organisation W.T.A.A.

Address [REDACTED]

[REDACTED]

..... Postcode [REDACTED]

Email [REDACTED]

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

Name

Organisation

Address

.....

..... 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)

Section 31 - Grantown-on-Spey, town map and page 110 developer contributions schedule

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

Disappointed that no site is allocated for allotments. CNPA is giving us mixed messages. A representation made at the time of the planning applications for development of housing site H1 was rejected by CNPA case officer on the basis that allotments were not an infrastructure requirement which had been identified through the LDP process. Now when we seek to have them identified through the LDP process the new LDP's site assessment report into sites suggested for allotments asserts that such sites should be identified via a planning application! Surely the whole point of the LDP process is to identify sites in advance so as to give the community as much certainty as possible about what is likely to happen, and have the chance to comment as early as possible – NOT to let things emerge out of nowhere in the form of ad hoc planning applications?

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

Recognition of the site which has been granted planning permission, both within the town map and in the broader context of revision/clarification of paras 4.158 and the developer contributions schedule.

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

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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)

Para .4.158 and developer obligations schedule on page 110

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

Para. 4.158 of the draft LDP states that developer contributions may be sought to create or enhance community facilities where a shortfall has been identified, but that contributions would only be sought where (a) this (a shortfall) is the case and (b) there is an established project to create a community facility. On (a), there is an established waiting list held by both the Willow Tree Allotments Association (WTAA) and the Highland Council. On (b), as well as constituting itself formally the Allotments Association has secured planning permission for the development of allotments on a site in the town, with agreements to lease the land from the landowner and a programme of applications for development funding. It is therefore beyond dispute that both tests of para. 4.158 are satisfied. However the proposals map's failure to recognise the site for which planning permission has been granted, together with the ambiguities in wording between para. 4.158 and the developer obligations schedule on page 110, make it significantly less likely that developer contributions would be sought towards creation or enhancement of allotments as a community facility. The developer obligations schedule only refers to "increasing capacity at strategic community leisure facilities serving Grantown on Spey" leaving it open to developers to avoid contributing to the establishment of an allotments site, either by arguing that it is not a "strategic" facility or arguing that if a site is not already in operation there is no capacity to "increase", or both. This is particularly reprehensible given that the site which has planning permission (and only awaits funding for its development) is located between sites H2 and C1, either or both of which could easily accommodate one or more contiguous "increases in capacity" to meet future additional demand.

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The wording of the developer obligations schedule should refer to "establishing or" increasing capacity at community leisure facilities and in order to put disputes about what strategic means beyond doubt should specify that "these strategic community leisure facilities will include allotments (existing or with planning permission)".

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