

## Cairngorms National Park Proposed Local Development Plan 2020 – Submissions

### Agent Details-

Organisation	Galbraith
Address	[REDACTED]
Postcode	[REDACTED]
Email	[REDACTED]

### Interested Party Details-

Organisation	Invercauld Estate
Address	[REDACTED]
Postcode	[REDACTED]
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### Site T1 – Caravan Park at Braemar

Invercauld Estate supports the inclusion of an extension to this existing allocation.

The site consists of the current caravan park as per the allocation in the adopted LDP (2015) as well as capacity for further expansion and development of the site to the south by way of the extension proposed. The Estate welcomes the inclusion of a southern extension.

The Estate is committed to supporting the local community and tourism economy. The inclusion of the expansion to Site T1 in the Proposed Plan provides an opportunity to further support the local community by realising the need to continue to develop tourism offerings. Supporting the continued provision of jobs in rural Aberdeenshire is a key commitment which the Estate is determined to play a part in meeting, this can be done in part by continuing to support the vital tourism economy (as outlined in the Evidence Paper: Rural Development – Part 3 Economic Development). The Estate has also undertaken research with Jura Consultants which suggests demand for significant additional tourism accommodation of different types in the Braemar area. The Estate also welcomes the commitment to reinforcing Braemar and its role as a local service centre, this is in light of supporting opportunities for further tourism-related development and enhancing current offerings present within the settlement.

In line with the site specific developer requirements in the allocation overview, it is noted that in order to support the sustainable growth and development of the caravan park to the south, the existing flood risk to the site must be adequately addressed. The Estate is at present actively engaging with SEPA in order to find a workable solution to realise the full potential of the site. As a result of the investigative work conducted to date, the flood risk to the site, potential mitigation measures required and future development potential have all been reviewed and dialogue is progressing in a positive manner. The Estate is committed to pursuing a viable solution with SEPA and other partners so as to deliver further development as outlined in the Proposed Plan allocation for the extension to the caravan park.

In line with continuing dialogue with the Cairngorms National Park Authority, Aberdeenshire Council and SEPA, the Estate wishes to adopt a collaborative approach so as to realise the further development potential on site. The work commissioned by the Estate to date illustrates this

commitment. This work acknowledges the developer requirements as outlined in the Proposed Plan and the Estate wishes to address these in order to realise future growth of the established tourism operations on site.

Therefore, the allocation of the site for continued use in a tourism related capacity is welcomed by the Estate and work will continue to address the flood risk posed to the site, so as to realise the development potential of the extension as identified. It is the intention of the Estate to sufficiently address comments made by SEPA, the Cairngorms National Park Authority and Aberdeenshire Council in this regard so that it may meet the increasing tourism demand in Braemar in support of the local economy.

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### Site H5 – North Braemar

Invercauld Estate supports this proposed allocation.

This site in part replaces land at Balnellan, to the south of the settlement, which was identified as a potential housing site in the Main Issues Report but subsequently removed due to concerns over flood risk.

The Estate has been actively engaging with the local community throughout the LDP preparation process and in tandem with the Call for Sites, Main Issues Report (Appendix A is the joint submission made by the Community Council, Invercauld Estate and Mar Estate) and Proposed Plan stages. A number of open door community engagement events have been hosted by the Estate and information has been made available in the local newspaper (The Braemar Buzzard), through the Estate’s website and local social media. Various meetings and discussions have also been held with the Community Council and numerous local businesses and groups. The Estate believes that these discussions have been beneficial for all parties and have helped create an open and transparent forum in which to discuss the proposed North Braemar allocation. Given the importance of the site to the future sustainable growth of the settlement, much time and effort has been invested by the Estate and its project team so as to ensure that the vision for the site meets the needs of the community first and foremost.

Consistent with the findings of the public consultations undertaken to date by the Estate, the Proposed Plan identifies a significant unmet need for additional housing provision in Braemar, including affordable properties. This housing need is widely recognised locally, by residents, businesses and community organisations. It is reflected in a community-led Housing Needs & Demand Assessment carried out a few years ago and in the Community Action Plan.

The Proposed Plan also seeks to reinforce Braemar’s role as a local service centre by supporting opportunities for further tourism-related and small-scale business development. However, these objectives must be balanced against the need to conserve the settlement’s unique character and historic built form.

Invercauld Estate firmly believes that Site H5 can be sensitively and sustainably developed over time to meet the housing and employment needs of a growing community while still respecting the established character of the Conservation Area and creating a new 'sense of arrival' to Braemar from the north. In this respect, the Estate is fully committed to the masterplan-led approach as articulated in the Proposed Plan.

Braemar itself is constrained through a combination of topography, landform (including the River Dee and the Clunie Water) and land that is susceptible to flooding in severe weather events. The proposed expansion of the settlement to the north therefore represents a logical and sustainable direction of future growth.

The Proposed Plan gives the site an indicative residential allocation of 30 units, including affordable housing (the accompanying Action Plan erroneously states 20 units). It also notes that there are opportunities to provide complimentary land uses. Based on community feedback to date, the Estate considers that there is potential for enhanced community facilities and an opportunity to incorporate appropriate commercial and other activities to replicate the general mixture of uses that is prevalent in the wider village.

Informed by the findings of the studies commissioned to date in relation to infrastructure/services connections and associated costs, and the need to provide affordable housing (the target in the Proposed Plan for Braemar being 45%) and other developer contributions, it is anticipated that a somewhat larger number of houses will be required to ensure that the project is both viable and deliverable.

In accordance with Scottish Government guidance, the masterplan-led design process should determine the optimum housing numbers for this first phase of development. In this respect, the Estate is acutely aware of the importance of this site to the setting of Braemar and the approach from the Castle to the north. The Estate's mission statement entitled '*Braemar – A Sustainable Future*' (Appendix B) states that "*the design of streetscapes, individual buildings and public spaces must integrate comfortably with the vernacular architecture and layout of Braemar, be sensitive towards the Conservation Area, follow a clear logic and not appear 'bolted on'*".

The Estate is therefore keen to ensure that the development is of a high standard in terms of its layout, architecture and materials to ensure its cohesion with the existing development pattern, the distinctive character of the Conservation Area, and the local building vernacular. In this regard, a higher density of development could achieve the integration with the existing settlement that is so desired by the community by avoiding a lower density 'suburban' type layout.

Invercauld Estate recognises there are local concerns relating to the form and quality of development proposed for the site but believes its vision, and the masterplan-led approach and principles for development set out in the Proposed Plan, will address these concerns. The need for new housing needs to be met and Site H5 offers the best solution. The Estate supports the LDP requirement for a masterplan and will continue to fully engage with the community, to provide reassurance that the development will achieve a high quality, enhancing the character of the village.

To conclude, it is considered that residential-led development at North Braemar would make a positive contribution towards the stated settlement objectives for Braemar as follows:

- *Enhance the role of Braemar as a local service centre*

The confirmed allocation of Site H5 would signal a significant development in the recent history of Braemar and would offer a natural progression of the Victorian development of Castleton. In line with recent tourism-related investment in the settlement, the delivery of a residential-led development of the scale and nature proposed would help to further enhance the role of Braemar as a local service centre, tourism hub and most importantly serve the growing needs of the local community.

- *Support opportunities to enhance and diversify the local economy, enhance the role of tourism and improve car parking provision*

As stated above, the Estate believes that a range of ‘complimentary uses’ can be accommodated within the development. While the scale and nature of these uses would be subject to further discussion with the local community as the masterplan progresses, it is currently envisaged that the development could include community facilities, small-scale business units and possibly some car parking provision to alleviate traffic pressure within the core of Braemar itself.

- *Conserve and enhance Braemar’s distinctive built heritage and the integrity of its Conservation Area*

The Estate has an excellent delivery record having been responsible for the majority of the Victorian buildings within the Conservation Area in Castleton. To ensure continuity of this legacy, it has already appointed an experienced project team including architects, landscape architects and planners to progress the masterplan in consultation with the community, the National Park Authority and other key stakeholders. As stated above, a key objective of the brief is to ensure that the development of Site H5 is appropriate to its setting and delivers a sensitive and logical extension to the settlement.

- *Deliver housing to meet local needs particularly affordable housing*

The Estate acknowledges that there is a significant unmet need for additional housing provision in Braemar, including affordable properties. While the site has an indicative allocation of 30 units, it is considered that it is capable of delivering more which would help to ensure the viability of the project and the delivery of much needed affordable housing. Furthermore, a higher density of development would be more in keeping with the built form and pattern of development within the Conservation Area, thus avoiding a modern ‘suburban’ type layout that would be wholly out of character.

- *Support proposals for small scale business development*

Once again the reference to ‘complimentary uses’ as part of the allocation is welcomed. The need for small-scale ‘start-up’ business units has been noted through various interactions with the community to date. Subject to further consultation and an assessment of likely take-up/demand, such uses could form part of the final masterplan for the site.

With continued co-operation between the National Park Authority, local businesses, the community and the Estate, it is envisaged that North Braemar can be successfully realised in a manner that meets the needs of all interested parties.

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### Policy 1 – New Housing Development

Section 1.5 - Affordable Housing of Policy 1 - New Housing Development states that *“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 Atholl and Braemar”*.

The policy goes on to state that *“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”*.

Based on the analysis of housing need and demand (as outlined in the Evidence Paper: Rural Development – Part 1 Housing), the total number of affordable homes required over the Plan period of 2020-2029 is 366 (rising to 403 if the 10% generosity is applied). This equates to 49% of all dwellings required across the National Park during the Plan period. This indicates that a lack of affordable housing throughout the National Park has been an issue for a significant period of time. It also suggests that rather more needs to be done to address this issue and the National Park Authority cannot rely on the provisions of Policy 1 and the commitment of landowners/developers alone. A long-term, cohesive strategy needs to be driven forward jointly by the National Park Authority, the respective Local Authority Housing Services, and Registered Social Landlords (RSLs) to truly tackle this issue.

The justification for seeking to increase the percentage requirement for affordable housing in *inter alia* Braemar to 45% (from the 25% ‘benchmark’ figure quoted in national planning policy) is set out in the aforementioned Evidence Paper.

As a key landowner in the Braemar area, Invercauld Estate acknowledges that there is significant demand for good quality housing across a wide range of prices, including those within the technical ‘affordable’ definition, which is not currently being met.

However, as the promoter of the land that is subject to the residential-led allocation to the north of the settlement (Site H5), the Estate is also acutely aware of the other financial considerations that come into play when assessing the viability of development projects and ensuring that they are

successfully delivered within the timeframes envisaged. With regard to this specific allocation for example, preliminary assessments suggest that costs in respect of infrastructure provision and services connections are likely to be significant.

Equally, the Estate is seeking to achieve high standards of design and materials at Site H5, to ensure the development sits comfortably with the character of the historic village and the Conservation Area. Indeed, the Proposed Plan requires in respect of Site H5 that: *“Development must achieve a high standard of design in terms of layout and architecture. Streetscapes and individual buildings must integrate with the vernacular architecture and layout of Braemar and be sympathetic to the adjoining Conservation Area.”* This is expected to result in significant additional development costs.

While the Estate is committed to providing adequate housing that is affordable to local people, it is seriously concerned that the 45% requirement for Braemar is unrealistic. Aside from the issue of development viability, the Estate questions the ability of local RSLs, Aberdeenshire Council and community groups to play their part in funding and delivering 45% affordable housing. In this respect, there is a real risk that development projects will not come forward at all, thus jeopardising the overall quantum of affordable housing to be delivered during the Plan period.

The Estate acknowledges the proposal within Policy 1.5 that gives scope to seek to reduce the affordable housing requirement in consultation with the National Park Authority in the event that the full 45% provision risks the viability of a development project and jeopardises its delivery. However, this statement needs to go much further in recognising that flexibility is essential.

The Estate believes that a fully co-ordinated affordable housing strategy for the National Park needs to be prepared. This should bring together all relevant agencies with landowners and developers and should fully address the viability in providing high levels of affordable housing. It should also explore the availability of public funding for the construction of these properties and set out commitments by RSLs and the Council to build more homes in the Braemar area. Without such a strategy, the Estate regrettably is unable to support the 45% affordable housing requirement, as it is not considered to be realistic. We therefore object to Policy 1.

Separate comments will be submitted by Savills in relation to Policy 1 and the Estate’s land interests in and around Ballater.

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### Policy 2 – Supporting Economic Growth

Sections 2.2 and 2.3 of Policy 2 – Supporting Economic Growth support proposals for tourism-related accommodation and other tourism/leisure development in principle where *inter alia* they have “no adverse environmental or social impacts on the site or neighbouring areas”.

The Evidence Paper: Rural Development – Part 3 Economic Development acknowledges that tourism plays a pivotal role in the local economy. In this respect, tourism is by far the main source of employment in the National Park (43%) and the Evidence Paper advises that appropriate LDP policies and site allocations are needed to ensure the continued success of this key employment sector.

Given the importance of tourism-related development to the prosperity of the National Park, Invercauld Estate objects to Policy 2.2 and 2.3 on the basis that “no adverse environmental or social impacts” sets an unrealistically high bar. The current wording fails to acknowledge that ‘economic benefits’ should also be taken into consideration alongside environmental and social factors in the assessment of development proposals and planning applications. Amending these policies to ensure these issues are incorporated would ensure that all three factors (social, economic and environmental) are considered ‘in the round’ and that a suitable balance is struck in the pursuit of sustainable development. This would also accord with collective achievement of the four statutory aims of the National Park as required under the National Parks (Scotland) Act 2000 sections 1 and 9(1). We implore the National Park Authority to make appropriate amendment to Policies 2.2 and 2.3 therefore.



## **MAIN ISSUES REPORT - JOINT RESPONSE FROM BRAEMAR COMMUNITY COUNCIL, INVERCAULD ESTATE AND MAR ESTATE**

In recent years, a number of Braemar's community groups and landowners have participated in a collaborative programme of discussions. The aim has been to arrive at agreement on a long term sustainable vision for the village.

The Braemar Community Action Plan 2017 sets out this vision. It brings together a wide range of actions and projects which the Braemar community thinks are achievable and would deliver benefits for the village. Five themes are identified:

- Visitor experience
- Active Braemar
- Youth and Learning
- Community Capability
- Housing and Economic Development

Delivering some aspects of the Community Action Plan vision will require land or buildings for new developments. The village can already provide for some of these requirements. However, there is a significant need for new housing and business space to meet local needs. This must be delivered at a rate which allows the village to grow organically and enhances the character of Braemar as a place to live and work, not just a tourist destination.

The CNPA has published its Main Issues Report for consultation. We do not believe the report goes far enough to meet the aspirations of the village or to embrace the community's desire to have a planned long term solution to Braemar's development needs.

Braemar needs a good supply of opportunities for much needed affordable and market housing and also business and office space. This needs to be planned for in a long term, as opposed to a piecemeal, fashion. To enable people to live and work in the village year-round, we need to be more ambitious in looking at the sites available. It is important that sufficient options are available given that some sites may not be developed for currently unforeseeable reasons. This is evidenced by the low delivery rate of existing Local Development Plan allocations.

The CNPA should reflect the ambitions of the Braemar community in its emerging Local Development Plan. It should enable the delivery of the Braemar Community Action Plan vision by making adequate land available for the kind of developments the village needs. The plan must not constrict the aspirations of this active and dynamic village community.

Alasdair Colquhoun, Chair, Braemar Community Council.

[REDACTED]

Angus McNicol, Estate Manager, Invercauld Estate.

[REDACTED]

Mark Nicolson, Mar Estate

[REDACTED]

We confirm that we are happy to be contacted at the above email addresses.

**Braemar – A Sustainable Future**

**North Braemar– A Vision of Design and Facility**

For many centuries, Invercauld Estate has been involved in the evolution of Braemar as a settlement, specifically with its development of Castleton on the east side of the River Clunie. This relationship with the village continues to this day and the Estate believes it has a responsibility to facilitate the ongoing enhancement and evolution of the village for its residents, visitors, the environment and the economy of the local area.

Our understanding of the current needs and opportunities for Braemar has developed over the last three years of research and consultation we have undertaken. We are extremely grateful for the ideas, thoughts and passion for the village so many local people have shared with us over this time.

This research has informed the emergence of the following vision for the Estate’s land at the north of the village which has been suggested as a key area for the potential development of Braemar in future:-

***To ensure the needs of Braemar are met and appropriate business, residential and social opportunities are enabled whilst ensuring these are undertaken in such a way that fits comfortably with the context of the existing village and its landscape, that the village’s cultural, environmental and built heritage is conserved, the wider community is involved in the process and ensuring that only a very high standard of design, in terms of both layout and architecture, is employed. Any development must be designed to form an integral and attractive part of the village and strive to merit future inclusion within Braemar’s Conservation Area.***

Specifically, this means:-

1. The design process must consider Braemar Castle as the northern gateway to the village;
2. The whole approach into Braemar must be taken into account, including both sides of the A93, so that any development fits in appropriately and sensitively with the wider landscape at the entrance to the village;
3. The design of streetscapes, individual buildings and public spaces must integrate comfortably with the vernacular architecture and layout of Braemar, be sensitive towards the Conservation Area, follow a clear logic and not appear ‘bolted on’;

4. Housing must be blended with other uses - these other uses will evolve over time and are not all currently known but allowance must be made for them; this is to reflect the successful integration of land uses within the village presently;
5. Buildings must vary in size and affordability to maintain the sense of community found in Braemar and provide opportunities for lifestyle, family and career progression. Affordable housing must be integrated as seamlessly as possible into development;
6. The wider community must be provided with the opportunity to feed into the design process at key stages;
7. Any development should add to the appeal of Braemar and not detract from it;
8. Any development must be financially feasible and deliverable;
9. Any phasing of development must take into account the integration of each phase into the landscape and the village envelope;
10. Visitor as well as resident parking must be considered together with consideration of delivery of the Braemar Gathering and other events in the village;
11. Development of tourism at Braemar is an important objective - the development of North Braemar must consider this key industry in the village whilst not being entirely governed by it;
12. The plans for development prepared by Invercauld Estate must be followed through in what is delivered on the ground. The mechanisms for achieving this are likely to include the Estate undertaking some work itself, joint venture partnerships and/or title controls in any land sales. It is anticipated that the Local Development Plan will also provide a degree of statutory protection to the integrity of the design solutions that are proposed.

*Invercauld Estate*  
*3 October 2018*