

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 SARAH GRAHAM

Organisation HALLIDAY FRASER MUNRO

Address [REDACTED]

[REDACTED]

..... Postcode [REDACTED]

Email [REDACTED]

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

Name

Organisation REDIHAVEN 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)

Policy 1.11 'LongTerm Designations'
Policy 1.5 'AffordableHousing'
Settlement: Aviemore Site LTH1
Settlement: Grantown-on-Spey Site H2

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

Please see attached letter.

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

Please see attached letter.

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**



HALLIDAY FRASER MUNRO

CHARTERED ARCHITECTS & PLANNING CONSULTANTS

10662/LET.001/SG

04.04.19

CAIRNGORM NATIONAL PARK AUTHORITY
FREEPOST NAT21454
GRANTOWN-ON-SPEY
PH26 3BR

Dear Sir/ Madam,

CAIRNGORMS NATIONAL PARK PROPOSED LOCAL DEVELOPMENT PLAN 2020: RESPONSE ON BEHALF OF REIDHAVEN ESTATE

On behalf of Reidhaven Estate, please treat the below as a representation to the Proposed Local Development Plan 2020. This response relates to policy 1.11 'Long Term Designations', policy 1.5 'Affordable Housing' and the settlements of Aviemore and Grantown-on-Spey.

Policy 1.5 Affordable Housing

Policy 1.5 outlines that in the settlements of Aviemore, Ballater, Blair Atholl and Braemar that developments of 4 or more houses should include provision for 45% affordable housing. Reidhaven strongly object to the requirement for 45% affordable housing as it relates to Aviemore.

Scottish Planning Policy (SPP) clearly states in paragraph 129 that the level of affordable housing "**should generally be no more than 25% of the total number of houses**". Reidhaven note that Aberdeenshire Council attempted to introduce a requirement for more than 25% affordable housing in their 2017 Local Development Plan and it was dismissed by the Reporter as contrary to SPP.

Reidhaven also suggest that if there is such a great need for affordable housing within Aviemore, then additional allocations should be made, and the release of site LTH1 should be brought forward. In addition, it is not clear if An Camas Mor will be required to deliver 45% affordable housing. The current application states no less than 25% but this is to be agreed through a Housing Delivery Plan. Reidhaven are concerned that housing sites in Aviemore are being expected to pick up the affordable housing shortfall generated in part by the lack of delivery of An Camas Mor.

Change requested: Remove section a) of policy 1.5 requiring developments in Aviemore, Ballater, Blair Atholl and Braemar to require 45% affordable housing.

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REGISTERED OFFICE: [REDACTED] W: hfm.co.uk

Registered in Scotland, Registration Number: SC312492

Policy 1.11 Long term designations

Policy 1.11 outlines circumstances where sites identified as long term housing (LTH) in Aviemore could be considered for early release. The policy outlines that early release of site will only be considered where An Camas Mòr will not be delivered within the plan period **and** this results in a shortfall in the 5 year effective land supply. Reidhaven object to the requirement for both the lack of delivery of An Camas Mòr and a shortfall in housing land to be met. Reidhaven suggest that the policy should be re-worded to: *“should An Camas Mòr prove undeliverable **or** the 5 year effective land supply not be met”*. This would provide greater flexibility and allow either non delivery of An Camas Mòr, or an ineffective land supply to trigger early release. It would be unreasonable to require both. It also ensures that Aviemore will have the opportunity to grow rather than be stifled by the failure of An Camas Mòr to deliver development. The lack of development in the town is creating an affordable housing shortfall, which additional development could help alleviate.

Change requested: see track changes to policy 1.11 in the box below (red text denotes change):

Long term housing designations are identified in Aviemore to set out the settlement’s preferred direction of future growth, to assist in the forward planning of infrastructure and landscape enhancement/mitigation and to ensure that in the event of An Camas Mòr proving undeliverable, a 5-year effective land supply will be maintained. These sites are not relied upon to meet the housing land requirement up to 2030 and are not expected to be released for development during the Plan period.

Early release of the land will only be considered when there is strong evidence that An Camas Mòr will not be delivered in the Plan period ~~and:~~ **or** ~~this results in~~ **there is** a shortfall in the 5-year effective land supply that cannot be met by:

- i. windfall provision assuming previous trends; or
- ii. constrained sites which are likely to become available for development within the relevant 5-year time frame.

b) the long term designations are demonstrably deliverable within the relevant 5-year time frame.

Site LTH1, Aviemore

Reidhaven support the allocation of site LTH1. Site LTH1 is well located for development and is the logical direction to grow the Aviemore. The site is free from constraints and is not subject to any nature conservation designations. In landscape terms, the site can accommodate development, although careful masterplanning will ensure development is well integrated. It is logical to extend the settlement north, the sites represent a sustainable extension to Aviemore, with good connectivity to the existing settlement. There are existing bus links passing the site on the B9125, and the site is within 1 mile of the train station.

However, Reidhaven request that the southernmost part of site LTH1 should be identified for immediate delivery (see indicative phasing diagram below). There are 93 units allocated in Aviemore for immediate release, which are already part of the effective housing land supply and are existing allocations carried forward from the current Local Development Plan. This means that there are no new allocations proposed. We do not believe this level of development is sufficient to sustain the settlement. Scottish Planning Policy requires LDP’s to “allocate a range of sites which are effective or expected to become effective in the plan period”, and so allocation of this site for immediate delivery would ensure a choice of site are available. Additional housing will ensure that there is affordable housing available for local people.



Indicative phasing on site LTH1

In addition, Reidhaven do not think that reliance should be placed on An Camas Mor to meet the housing needs of Aviemore. An Camas Mor is not forecast to deliver any new housing until 2020 at the earliest. The Housing Land Audit 2018 suggests that the site might deliver 54 houses by 2022 but there is a serious doubt as to whether this is realistic given the infrastructure requirements of the site. Also, the site was first submitted for planning permission in 2009, and ten years later the site is still in the planning process. This site is unlikely to deliver the housing requirements, and is at the very least, subject to significant delay.

HLA Site Ref	LDP Allocation Capacity	Remaining Capacity	Effective Supply 2018-2022	Programming 2023-27	Programming 2028-33	Remaining Planning Permissions
WF						
05/00207/FULBS	0	15	15	0	0	15
05/00209/REMBS	0	113	70	43	0	113
09/00114/OUTBS	0	1500	54	135	135	1500
09/155/CP	0	93	33	30	30	93
16/02130/FUL	0	2	4	0	0	6
17/02174/FUL	0	32	32	0	0	0
17/05740/FUL	0	26	24	0	0	24
Grand Total	0	1781	232	208	165	1751

Extract from Highland Council Housing Land Audit 2018

Reidhaven Estate request that the southern section of site LTH1 is released for immediate housing, in order to meet the housing needs for Aviemore, ensuring there is an effective land supply. Additional land should be allocated in order to meet the requirements of SPP that land should be allocated in a range of locations, and to help address the significant shortfall in affordable housing in the settlement.

Change requested: Designate phase 1 of site LTH1 as site 'H3' for 200 houses.

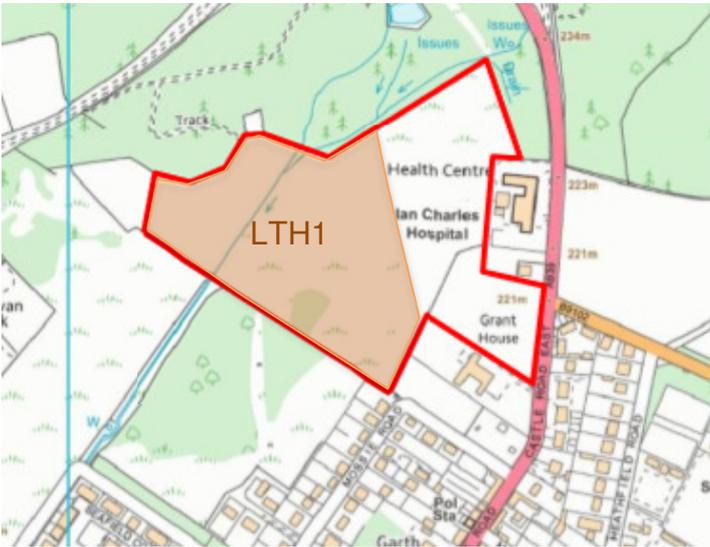
Site H2: Grantown-on-Spey

Reidhaven Estate support the allocation of site H2 in Grantown-of-Spey for 50 dwellings. The estate are aware that the local community want to see the site brought forward, and are committed to bringing forward this site for development. Reidhaven Estate are aware of significant interest from the development industry in relation to this site and are therefore confident it can be delivered. There are no significant impediments to its delivery. It is noted that a flood risk assessment is required due to the proximity of a watercourse, and a drainage impact assessment is required to address surface water. A

low voltage overhead cable will require re-routing or undergrounding but this is a standard issue that is readily dealt with on development sites.

The site is considered to be in an excellent location to expand the town. It is a flat site, with relatively low biodiversity value. The site is well contained by existing development to the south and east, and by woodland to the north. The site is located close to existing services, and is within 600m of the town centre.

The landowner also owns land to the west, and it is suggested that the remainder of the bid site (bid reference THC039) could be identified for future housing or long term housing, which would provide greater certainty for the future direction of growth in the town. The full extent of the bid site is shown below. Allocating additional land as future housing would allow the masterplanning of site H1 to fully consider future options for the development of the site to ensure a well planned settlement extension is developed.



Bid Site THC039

On a point of clarification, it is noted that the Proposals map on page 109 of the Proposed Plan incorrectly labels the site as 'H1'.

Change requested: No change to site H2. Request additional land to the west of site H2 is allocated as 'Long Term Housing' to enable the long term growth of the site to be taken into account in the master-planning of site H2.

I trust the above will be considered in response to the Proposed Plan. Please do not hesitate to get in touch if you require any further information or clarification.

Yours Faithfully,



**SARAH GRAHAM
SENIOR PLANNING CONSULTANT
FOR AND ON BEHALF OF HALLIDAY FRASER MUNRO**