

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 Angus Dodds.....

Organisation Savills.....

Address [REDACTED].....

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

Email [REDACTED].....

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

Name John Forbes Leith.....

Organisation J and M Forbes Leith Partnership.....

Address [REDACTED].....

[REDACTED].....

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

Email [REDACTED].....

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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)

Introduction and allocation ED2, Kincaig, pages 162 and 165

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

The Introduction to the Proposed Local Development Plan sets out very clearly that conservation and enhancement of the natural and cultural heritage of the area is the prime aim of the Park Authority, and this aim should take primacy over all of its other aspirations.

One of the Park Partnership Plan's key outcomes – to deliver rural development that supports a sustainable economy bolstering thriving businesses and communities, is also hugely important to the Park in the context of creating a place that will be attractive and affordable for workers and long term residents. In the circumstances it seems important to ensure that the Park can promote a settlement development strategy that encourages balanced settlements that offer a range and choice of housing and services across all of the settlements and rural areas within the Park.

In this regard, and as we have argued in previous representations in relation to sites in Kincaig, it is considered important to ensure that this LDP can be used as a vehicle to allow the maximum amount of flexibility for new development across the Park. For this reason we welcome the proposed allocation of employment land at site ED2 in Kincaig (pages 162 and 165), as we think that this will help to deliver the desired outcome of the Park Partnership Plan.

However, beyond this, we would also like to support non-site specific policies that allow for appropriately scaled development to take place across the Park on appropriate and well-serviced sites. Ensuring that suitably flexible policies are in place to encourage such development as opportunities arise, will also help to deliver important outcomes as set out in the Park Partnership Plan.

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

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

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Email: planning@cairngorms.co.uk

Telephone: **01479 873535**

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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)

Policy 1, New Housing Development, (pages 20 -31)

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

We would concur with the Park Authority's view that providing a range of different accommodation types (including affordable housing) across the Park is fundamentally important if the Park is to retain working age people to provide and support the Services that are needed to allow it to thrive. Only by adopting this approach is the Park likely to achieve its aim of ensuring that ongoing conservation and enhancement of the natural and cultural heritage of the area will take place. We consider that the best way to do this is to make sure that policies relating to affordable housing are suitably flexible to allow opportunities to provide this to be seized whenever and wherever they may arise, subject to detailed, site specific policies.

Within the policy itself, we agree with the overall thrust of the 'housing delivery in settlements' section (1.1) which supports housing developments within settlements where these reinforce and enhance the character of the settlement. Similarly, we support the overall thrust of the 'Housing Development in Existing rural groups' (1.2), which recognises that a rural group is three or more buildings. We also support the statement that residential development should provide a mixture of dwelling types and sizes to help secure a balanced housing stock, with an emphasis on smaller dwellings (1.4). We also support the policy and commentary on affordable housing (1.5).

The Proposed Local Development Plan speaks in terms of housing of 'allowing choice and incremental growth to meet local demand'. We note the aspiration set out in paragraph 4.7 that new housing should be affordable and meet community needs. We also note the aim that all communities should have some options for new housing.

Accordingly we also support the overall thrust of the section on 'affordable housing exception sites'(1.6), as it quite pragmatically supports the provision of affordable housing even on unallocated sites when a clear demand can be shown to exist. It is also important to support the further commentary on viability, which allows for some market housing to cross-subsidise affordable housing which may simply not be effective without support of this kind.

In areas like the National Park, it is important that the Park Authority takes a pragmatic approach to delivering affordable housing, as the Park is simultaneously relatively remote with attendant low land values, but also something of a honeypot for tourists, due to its National Park status. This has led to tourism playing a disproportionately important role in the local economy, and affordability of housing therefore becoming a critical local issue. Ensuring that a relatively permissive and flexible policy is in place in terms of affordable housing, should help allow much needed affordable housing to be delivered whenever sites and opportunities arise.

More generally, we would also like to support non-site specific policies that allow for appropriately scaled housing development of all tenures to take place across the Park on appropriate and well-serviced sites. Ensuring that suitably flexible policies are in place to encourage such development as opportunities arise, will also help to deliver important outcomes as set out in the Park Partnership Plan.

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In offering narrative support to Policy 1, Paragraph 4.24 of the Proposed Local Development Plan states that "Housing Development should maximise opportunities for infill, conversion, small scale development, and the redevelopment or reuse of derelict and underused land." In this regard, the Park Authority's approach to housing is not dissimilar to that of many Local Authorities across the Country and is supported.

It is agreed that in most settings the overall strategy of concentrating most development adjacent to existing settlements is a sustainable approach. However for the Cairngorms National Park, it is important that there are a range of potential sites for housing both in settlements and across wider rural areas. This is particularly the case here, as historically, delivery of housing has not been sufficient to meet housing need (paragraph 4.12), and the maintenance and growth of the population of the Park is a key Partnership Plan Policy (paragraphs 4.1.4 and 4.1.6). It is therefore important that housing policies within the Park are sufficiently flexible to help encourage housing delivery that may actually align with currently unmet housing demand. For this reason the principle of including section 1.3 'other housing in the countryside' is supported.

However in order to help better achieve the Park Authority's aspirations on a range of different sites across the Park, we would suggest that section (1.3) is amended to remove the wording "reinforce the existing pattern of development, and:"

The reasoning behind the suggested amendment is to clarify any potential dubiety that may exist in making reference to an "existing pattern of development" in areas (rural) where often no development at all has taken place. We are concerned that in its current wording this part of the policy could inhibit rather than encourage development if Officers' interpret this as requiring some pre-existing development to have taken place nearby as an initial qualifying principle in order to justify future development on brownfield sites or where there is a justification based on an active business use. There will be many locations across the Park where no such development has in fact taken place, but where the highlighted requirements of section 1.3 can be met.

In addition, we would suggest that a further qualifying criterion should be added to section 1.3 that might allow for exceptional building design in the area. Accordingly, a further section c.) could be included to read:

"would provide a dwelling/s of exceptional architectural design and resource efficiency".

This would create a 'hook' that may encourage and inspire individuals that are keen to build exemplary houses worthy of the dramatic landscapes of the Park.

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