

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 Philip Graham

Organisation Savills

Address [REDACTED]

.....

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

Email [REDACTED]

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

Name Crown Estate Scotland

Organisation

Address C/O Savills (as above)

.....

..... Postcode

Email

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

We would like to make the following representations:

- Tomintoul Settlement

To express support for the allocations identified- ED1, ED2, H1, H2 and T1.
To note the de-allocation of ED3 and the policy and Settlement objectives which support a flexible approach to development which supports the local economy.

- Glenlivet Settlement

To express support for the Settlement objectives

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

- Tomintoul Settlement

Crown Estate Scotland (CES) are supportive of the employment allocations (ED1 and ED2), the housing allocations (H1 and H2) and the Tourism development allocation (T1). CES are keen to see a flexible approach that allows the various interested parties, including the Development Trust and the Tomintoul and Glenlivet Landscape Partnership, to promote development opportunities that sustain the community and boost the local economy.

We note that ED3 has been de-allocated and we understand this is for biodiversity purposes. We also note that Policy 2 'Supporting Economic Development', as well as the 'Settlement objectives' which both support a flexible approach to economic development where it supports the community and local economy. As such, CES are content that proposals for economic development on alternative land will be supported subject to assessment against all relevant policies.

- Glenlivet

CES consider that their previous Main Issues Report comments are positively reflected within the 'Settlement objectives' for Glenlivet. In addition, policy wording within Policy 1 and Policy 2 (as stated above) will allow for organic development of housing and business respectively.

- Policy 1: 'New Housing Development'

It is our opinion that there will be appropriate building groups within the CNP which can accommodate greater growth than that outlined at Paragraph 1.2. CES considers that there is scope and necessity for some rural building groups could increase in size beyond the one third limit. There may be circumstances where a larger development can be absorbed through careful design and would also be needed to create the critical mass required to support local facilities such as schools and to make the costs of servicing sites more economic. In doing so, this would assist with viability of proposals at building groups. We consider that, since the PLDP 2020 has Policy 3: Design and Place-making, the detail of this policy should provide security that appropriate growth can be achieved and inappropriate development will not take place if a more flexible approach is taken to the amount of growth. CES would also encourage CNPA to be supportive in its policies towards new build in conjunction with the renovation/redevelopment of redundant buildings which are particularly expensive projects. Appropriate new build can play an important enabling role in these situations.

We consider that within Paragraph 1.3 it should be made clear that a house associated with a new/proposed business may also be permissible, not just established businesses. Given the nature of the Park, any new businesses may require associated housing immediately if they are to be successful. Staff accommodation may also be essential given the distances to settlements across the Park.

At point b) a clear definition of rural brownfield land should be provided or linked to in the Glossary, this will avoid unnecessary use of resource in terms of pre-application enquiries on whether land is rural brown-field or not. Perth and Kinross Council have recently provided helpful clarification within their Draft Housing in the Countryside Supplementary Guidance, for example detailing their opinion on non-traditional agricultural buildings which are redundant etc.

CES are supportive of Paragraph 1.6 'Affordable housing exception sites'. However, we would request clarification that such proposals can be discussed at the pre-application stage to avoid abortive time and spend for both the applicant and the Planning Authority. In particular it should be made clear at the pre-application stage the precise information required and some security provided that the commission of reports to prove viability will not be wasted.

- Policy 2: 'Economic Development'

CES consider that there should be more explicit reference to CNPA support for development of huts and for the wider hutting movement. It is noted that there is a paragraph under Policy 2 which states that "Proposals for huts will be considered on their merits against relevant policies of the plan". However, we consider that there should be more detailed policy text in support of huts and hutting and that this paragraph should be deleted with a more detailed consideration provided at Section 2.3 "Other tourism and leisure developments". Hutting provides a low cost, low/no impact and sustainable means of accessing the National Park and would therefore allow for greater interaction with the Park for those without significant financial resources to utilise other holiday accommodation options. Conversely, provision of huts would allow those who are keen to have a second stay location within the Park to do so without adding to the pressure on the housing market brought by second home owners. In addition, huts are low impact, small buildings that are entirely removable. When this is contrasted with other types of visitor accommodation, it is clear that huts are appropriate under the relevant policies of the PLDP2020. We therefore consider that a more positive statement of support, potentially including the definition of "Huts" from SPP, would be a way to remove any ambiguity within the policy and show support for this very laudable form of accommodation which fits so well with the Park's objectives.

- Policy 5: 'Landscape'

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

- Tomintoul

A substitution of the open space land shown south of Delanbo Road and north of T1 with an extended T1 tourism allocation.

- Glenlivet

No change.

- Policy 1: 'New Housing Development'

Wording to be added to paragraph 1.2 to state that where appropriate under Policy 3: Design and Placemaking rural building groups may have potential to expand beyond one third through new housing development.

Wording to be added to paragraph 1.3 to make it clear that a new house associated with a new/proposed business may be permissible. At point b) wording to be added to provide a clear definition of Rural Brownfield land or to link to an expanded definition within the LDP2020 Glossary.

- Policy 2: 'Economic Development'

To insert wording specifically outlining the support for hutting proposals at Section 2.3 "Other tourism and leisure developments".

- Policy 5: 'Landscape'

Additional wording to require all proposals for paths and tracks/private ways to adhere to SNH Guidance part A) Paragraph 5.2.
To delete part B) of Paragraph 5.2

- Policy 7: 'Renewable Energy'

Explicit support for Ground Mounted Solar within the policy.

The addition of a sub-section to refer to the benefits of private wire solar array development for electricity primarily used on site.

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