

AGENDA ITEM 8

APPENDIX I

CONSULTATION SUMMARY REPORT

AVIEMORE HIGHLAND RESORT

Development Brief Consultation Summary

Context

The Cairngorms National Park Local Development Plan (LDP) identifies sites for future development. These include a number of sites which had planning permission at the time of plan preparation / adoption, including the Aviemore Highland Resort (AHR). AHR is a key site within Aviemore and has significant development potential. Whilst part of the site has extant planning permissions for housing development, outline planning permission that was granted in 2011 for the wider site has now lapsed.

The Development Brief

The purpose of the Development Brief is to guide the development of the wider AHR by providing a land use and development framework that can inform the preparation and consideration of future planning applications. This aims to provide greater certainty for both the local community and the developer.

The Draft Development Brief was approved for wider consultation by the Planning Committee in May 2017.

Consultation

A seven week public consultation was undertaken for the Development Brief from 14th August to 29th September 2017.

CNPA worked with VABS and Aviemore and Vicinity Community Council (AVCC) to plan the consultation to try and reach as many people and groups as possible. Two drop-in events were held in a marquee on the Village Green in Aviemore on 17th and 22nd August as it is a central and accessible location with the potential for higher numbers of people passing by. The events ran from 2.30pm until 7.30pm to allow more people to attend, for example after school in the afternoon or work in the evening. A total of 30 people attended the two events.

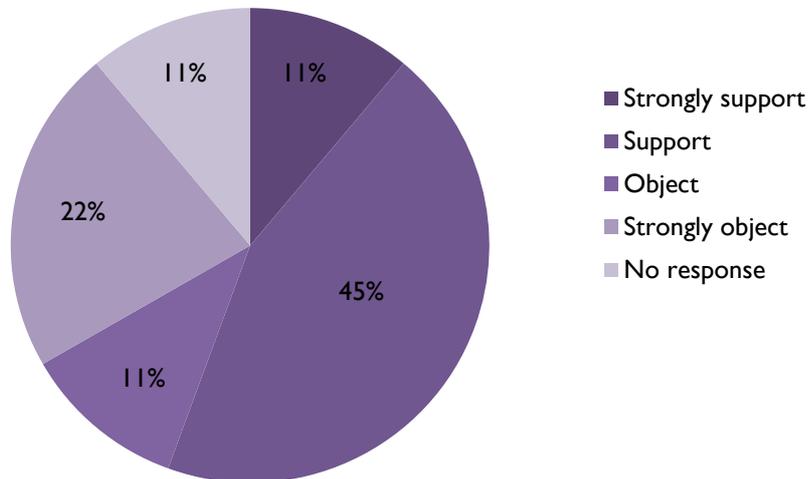
To publicise the events and consultation itself, information was posted on VABS and AVCC's facebook pages and other community pages as well as the CNPA website. Emails and letters were sent out to relevant community groups including the Aviemore Business Association and Aviemore Community Company. A notice about the events was also put in the Strathspey and Badenoch Herald and printed posters containing information about the events and about how to respond were put up around Aviemore – including the notice board on the Green, the Community Centre / Primary School, Co-op, Post Office and Tesco.

Whilst efforts were made to engage people in the consultation, a total of only nine responses were received via Survey Monkey, email and post, along four responses from SNH, SEPA, The Highland Council Roads department (THC) and RSPB.

Comments received

Of the nine respondents, the majority were in support of the development brief, with one objecting and two strongly objection.

Figure 1: Respondents overall opinion of the Development Brief



The few number of respondents combined with a majority of those expressing support for the development brief suggests that there is not strong opposition to the principle of development on this site, and is not contentious.

The survey contained questions about each part of the Development Brief, however respondents generally made comments in respect of the whole development brief, with some responding to one or two specific questions. The following is a summary of the responses received and our proposed actions in respect of amendments to the development brief. **Appendix I** of this report contains all the responses received.

Area I

One respondent highlighted that there was a previous requirement to upgrade and enhance the pond in Area I. SEPA further added that the Development Brief should highlight the need for the retention and enhancement of these waterbodies and to ensure an adequate buffer around them.

SNH also highlighted that it would be useful to consider the scale of tourist accommodation on the site further in relation to bed spaces and capercaillie SPAs.

Response / Actions: *First comment noted and Development Brief will be amended to include requirement to ensure the protection and enhancement of the existing pond.*

Given the strategic nature of the development brief, it is not possible to predict the potential scale of future tourist accommodation in respect of bed spaces on the site with any accuracy. The Habitats Regulations Appraisal (HRA) has assessed a potential maximum level of additional woodland lodges,

however it is considered more appropriate for this and any other proposals for tourism accommodation to be examined in detail at the planning application stage.

Area 3

One respondent expressed support for the protection of area 3a. The importance of area 3b as a buffer was highlighted and is well used for walking and cycling. The respondent felt that this area should continue to be protected from development. Another added that removing bike trails and limited access to the outdoors is unacceptable.

SEPA highlighted that Area 3c lies within a medium likelihood of flooding and agree that this area should be protected and enhanced. They also add that no development should be permitted adjacent to the watercourse to maintain open space for natural watercourse migration and reducing impacts of overtopping and supporting bank stability.

SNH support importance placed on greenspaces and green networks within the Development Brief.

Response / Actions: *Support for the protection of Area's 3a and 3b is welcomed. The development brief does not propose to remove any bike trails or restrict access to the outdoors. It seeks to support access and connectivity within the site and enhance links to adjoining areas.*

Area 3c is identified as a green network on account of the Milton burn running through it and includes a buffer around the burn.

Areas 4 and 5

One respondent felt that shops and/or houses in Area 4 will spoil this open space. They also felt that development in Area 5 should be restricted to no more than 2 storeys in height as this will affect the views and unique setting of the Resort and Scandinavian village. The resort should retain an open aspect.

SNH suggest highlighting the potential for connectivity (as per Area 3c) with the SAC and SPA's in the development brief to enable future developers to be aware of the higher level environmental assessment likely to be required from the outset.

Response / Actions: *Comments are noted in respect of Area 4. Area 4 already sits within a context of development to the north and south, and it is considered that this area remains suitable for an appropriate scale of development. Any future development would be subject to a landscape impact assessment as part of the planning application. The Development Brief already states that development in Area 5 should 'generally not exceed 2 storeys'.*

The Development Brief has been subject to a HRA assessment which has considered and assessed the impacts of the whole site on Natura designations. The Natural Heritage section has been amended to reflect the outcomes of the HRA which includes ensuring the proposal will not have an adverse effect on the integrity of any European sites and therefore it is not considered necessary to specify this in the Area 4 / 5 section.

Area 6

SEPA highlighted potential encroachment of flood risk in this part of the site but note that assuming the development is progressed in line with condition 3 of the decision notice, there should be no issues.

SNH added that whilst the site has existing permission, the development brief should highlight the sites connectivity to the capercaillie SPA's and the River Spey SAC (in the same way as Area 3c).

Response / Actions: *It is considered that on the basis the planning permission on the site has been approved and reference is already made to relevant designations within the Natural Heritage section, it is not necessary to include this within the section for Area 6.*

Community facilities

One respondent highlighted that land for a sports centre/ Curling rink had previously been offered in the AHR and queried whether it could be included in the Development Brief.

Response / Actions: *There is currently a site identified for community facilities as well as an existing sports facility in Aviemore and therefore it is not considered necessary to include this without justification.*

Design / Accessibility

It was raised that pavements in some modern developments in Aviemore are narrow and do not support adequate accessibility for all – the development brief should ensure pavements are wide to accommodate wheelchairs and prams.

SEPA expressed support for reference to use of SUDS and requested the addition of the following: *'SUDS are to be designed into the development from the outset in accordance with CIRIA's The SUDS Manual C753 and The Controlled Activities Regulations General Binding Rules 10 and 11. This should also address any existing surface water issues.'*

In addition SEPA suggested that the Development Brief highlights opportunities to retrofit SUDS into existing buildings and roads, particularly Area 2, as well as introducing grey water recycling and other water saving measures which may help to manage surface water flooding and water quality.

SEPA also suggest the inclusion of a district heat network on the site and request the requirement for a Feasibility Statement to be included within the Development Brief. They suggest the following wording: *'A Feasibility Statement will be required to address the provision of heat and power to the development including the consideration of or connection to a District Heating Network'*.

Response / Actions: *The Development Brief refers to Designing Streets Policy Guidance which includes guidance on footways. This will also be a matter for the Roads Authority to ensure that any proposals meet relevant standards and therefore it is not necessary to specify this in the development brief.*

The 'Design' section of the Development Brief already includes reference to SUDS and it is not considered necessary to include further reference to appropriate regulations which should already be followed as a matter of course. This level of detail is not provided in respect of other design features and for consistency should be kept at a general level.

Natural Heritage

RSPB expressed concerns about the impact of new housing and other development in Strathspey and the AHR site's proximity to several SPA's and supporting woodlands. They highlighted the need for a strategic approach to addressing the cumulative impacts of development on sensitive species such as capercaillie.

RSPB and SNH both highlighted that the Craigellachie NNR is not addressed in the Development Brief. SNH recommended that improvements to access and signage for the NNR should be incorporated. RSPB highlighted that the improved access to Craigellachie should be identified as well as the potential for increased disturbance to capercaillie and Peregrines as a result of increased recreation in the area. It was suggested that mitigation measure could include providing homeowners with information on responsible access. It was also suggested that appropriately sited information boards are displayed to highlight the problems of recreation disturbance.

SEPA would strongly support the deculverting of any burns /ditches / drains on the site.

SEPA support the requirement for pollution prevention and environmental management to be addressed by applicant. Suggested inclusion - 'All construction works should be undertaken according to best practice as outlined in the relevant NetREgs Pollution Prevention Guidelines and replacement Guidance for Pollution Prevention'.

SEPA considered that the requirement for all development on the site to connect to public infrastructure as per PAN79 and LDP Policy 10, should be reflected in the Development Brief.

Response / Actions: *It is acknowledged that there are ongoing issues regarding recreational impacts on designated sites in the wider Aviemore area. A Habitats Regulations Appraisal is being undertaken for this development brief which will assess the potential impacts of its principles on nearby designations and protected species. The HRA process will identify any further actions or mitigation required before the development brief can be adopted.*

The Development Brief will be amended to include specific reference to Craigellachie NNR for context however it is not appropriate to incorporate a requirement for improvements to enhance access and signage as this can only be required to mitigate any impacts identified through the HRA.

Potential impacts on Natura designations, including Kinveachy SPA are being considered and assessed as part of the HRA.

Development Brief already requires proposals to address potential impacts from pollution and siltation from construction sites and pollution from waste water. It is not considered necessary to include further reference to appropriate regulations which should already be followed as a matter of course. It is also not considered necessary to require the development to connect to public infrastructure as this is already contained within Policy 10 of the LDP.

Transport / Roads

SNH felt that the Development Brief puts greater emphasis on infrastructure that facilitates the use of private cars rather than active travel and public transport. They recommended revising this section to better reflect the priority of travel modes outlined in SPP (2014). This could be achieved by including further detail on active travel and public transport connections and re-ordering paragraphs. THC also suggested incorporating measures for cyclists such as appropriate traffic calming and cycle parking as well as encouraging connectivity of active travel routes with the A9 cycle route improvements.

It should be highlighted that a transport assessment should detail accessibility to all sites by all modes of travel, with a greater focus on non-motorised travel and should include consideration of safe routes to school.

In respect of the proposed through road (North –South link road), THC suggested consideration of the provision of a more direct route through the site for pedestrians and cyclists.

Response / Actions: *Agree to include recommendations from SNH and THC to include greater emphasis on active travel, including identifying opportunities to link up with A9 cycle improvements and improving active travel through the site. The design brief does refer to designing streets guidance which covers design aspects of street design to support non-motorised travel.*

Developer obligations

One respondent who objected to the Development Brief felt there has not been sufficient investment in community infrastructure, education, recreation and leisure facilities, medical facilities and transport. They felt that further development should not be undertaken until these have been addressed.

RSPB suggested the inclusion of a potential requirement for contributions towards nature conservation measures, specifically around recreational management.

SNH noted it would be beneficial to include active travel and public transport infrastructure as part of the final section on roads to ensure they are taken into account. THC highlighted that the need for further public transport and active travel contributions should be established. THC also suggested seeing recommendations in Aviemore Active Travel Audit

for considering developer contributions for improvements to Grampian Road, town centre parking and signage.

THC highlighted the need to ensure the contributions and improvements of the existing permissions Section 75 still go ahead.

Response / Actions: *The HRA has assessed the likely impacts of the Development Brief on nearby designations which have included recreational disturbance which is known to be a concern. It is not possible to include a requirement for a contribution specifically for this site, without evidenced justification. However, a more strategic approach is being explored to consider the impacts of recreational disturbance from development in the wider Aviemore area.*

It is agreed that the 'Roads' section within the Developer Contributions section will also need to highlight that a contribution towards public transport and active travel may be required.

Comments Received

Overall Support for the development brief. Area 4/5 - Were you aware that this is where MAHR were offering the Aviemore Sports Centre Project a leased site for their planned Sports Centre. Don't know where the project has got to but does it need to be considered as part of the plan? Given the 'Santa Claus Land' development, wouldn't Area 5 now be most appropriate for any ice rink facility (if it ever happens?)

Roads - We Currently have a student (Edn Uni Masters in Environmental Science) looking at the impact of incremental urbanisation on water courses, using Milton Burn as an example / case study. Due to report in October. NE corner of the site naturally 'wet' - potential to utilise area as a water/wetland habitat and 'breakout' to counteract cumulative impacts on the burn.

Roads / Area 6 - Pavements why do recent developments have narrow width pavements - not wide enough to walk 2 abreast (think adult and toddler) or push a buggy or wheelchair along - incompatible with safe active travel - can this plan ensure this development adopts full width pavements as a standard?

Area 3a - Should resist all pressures and applications to build on this. Strongly support that this area is not suitable for development.

Strongly support development brief.

Support development brief.

Strongly object to development brief. Easy access to the outdoors is the biggest point of living working and visiting. Removing bike trails and limiting access to the outdoors is shocking.

Support development brief. Community Council is in favour of a structured approach to development. The brief is clear. In respect of Area 3 - We note that the area is for woodland lodges. In the previous 'Masterplan' there was a condition that the pond at this location was to be upgraded to improve the biodiversity. What has changed?

Support development brief.

Strongly object to development brief. To date there has been no real investment in community infrastructure or a sustained plan to attract and keep "local talent". The below must come before any increase in housing within Aviemore and its environs: Education- the school was too small before it was finished more areas for education required. Free recreation spaces- this includes swing parks and skate/bike areas. Public leisure facilities- it's a crime that an area as densely populated as Aviemore cannot provide adequate leisure and recreation facilities for its residents Considered retail opportunities- a blanket ban on the "major" chains including but not exclusive to fast food outdoor equipment shops and any further expansion of supermarkets Medical facilities- a world class medical facilities delivering the care required for Aviemore to be an outdoor capital..... not another "nursing home" catering to palliative care but an up to date facility, A transport network which works- sufficient car parking to make the Main Street from Mackenzies to the petrol stations car free with the protection of no "out of town" shopping outlets. Electric buses to run into the Main Street. A community buy out of Cairngorm mountain. Only once the above have been addressed could any further expansion be warranted or completion of the

above as building works take place.

Object to the development brief. Re Area 4/5 - 2/3 story shops and houses in area 4 will spoil this small open space, and area 5 retail and housing should be no higher than 2 storey, as it will completely hem in Scandinavian Village Resort and detract from the views of the holidaymakers and the general appearance of the resort, which is quite unique in its beautiful setting. An open aspect for the resort while building around the edges would look much better, in my view.

Regarding proposed development AHR, I would not like to see further development of Aviemore Highland Resort, I would just like to see the company making good use of existing hotels and restaurants, and maintaining grounds around resort. Object to Area 3 - Area 3(b) is not only an important buffer. It is an area that is well used by the public for walking, cycling and dog exercising. And that is right up to the roadside fencing and not just the open area on the west side of the Horse Field. It is important that all that area is protected and not left open to the whims of a roads authority. A condition on the planning permission, put there by CNPA, says that it should be protected. CNPA should make sure that it is.

We are not opposed in principle to the development of new housing in sustainable locations and of an appropriate scale in the National Park, and recognise that this site is well placed close to the centre of Aviemore and that development here will help to provide affordable housing and other socio-economic benefits. However, we are concerned about the potential impact of housing developments of any scale within Strathspey, on sensitive species and their populations. There is a need for a strategic approach to addressing the cumulative impacts of housing and other developments in Strathspey on sensitive species such as capercaillie.

The site is within walking, cycling and convenient driving distance to several Special Protection Areas of which capercaillie is a qualifying interest (Cairngorms, Abernethy Forest, Anagach Woods, Craigmore Wood and Kinveachy Forest) and supporting woodlands. Development at the site could lead to a significant increase in recreational activity within the five SPAs and supporting forests, including the nearby Craigellachie National Nature Reserve (NNR).

We note that Craigellachie National Nature Reserve (NNR) is not addressed in the Draft Development Brief. This NNR is connected to Aviemore via an underpass which will be developed further as part of the A9 dualling scheme which would improve access to the NNR. The upper slopes of the NNR support capercaillie which could potentially be disturbed by recreation. The boundary of the NNR is next to the Kinveachy SPA which holds one of the best capercaillie metapopulations within Badenoch & Strathspey. Peregrines also hold territory on the cliffs above the NNR and could potentially be disturbed by increased recreation. We consider that these potential impacts should be highlighted as issues requiring to be addressed by development proposals. We also recommend that as part of the mitigation measures required, the developer should provide to homeowners

information on responsible access and the sensitivities and importance of the surrounding designated sites; capercaillie and other sensitive species. Further interpretation can also be provided with appropriately sited panel board displays to promote responsible access, sensitive time periods and details of suitable areas for certain types of recreation and highlight the problems of recreational disturbance.

In the 'Developer Contributions' section of the development brief, we suggest that a potential requirement for contributions towards nature conservation measures (and in particular recreational management) should be highlighted.

Flood risk

1.1 We have reviewed the information provided with this consultation and we note that part of the application site lies within the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Maps* and may therefore be at medium to high risk of flooding.

1.2 Scottish Planning Policy states (paragraph 255) that "the planning system should promote flood avoidance by safeguarding flood storage and conveying capacity, and locating development away from functional floodplains and medium to high risk areas". It further defines (glossary) that "for planning purposes the functional floodplain will generally have a greater than 0.5% (1:200) probability of flooding in any year". Therefore built development should not take place on the functional floodplain.

1.3 Part of Area 6 which is proposed for residential development lies within the medium likelihood flood extent. The Draft Development Brief states that this site has existing planning permission and 27 units out of 140 have already been built. We are aware that a FRA was provided in support of this residential development in 2007. The 2007 flood extents show some encroachment onto the site during a 200 year event.

1.4 However we are assuming that the residential development will be progressed in line with condition 3 of the decision notice for the residential development (05/306/CP) and that all development will be outwith the 1 in 200 year flood extent.

1.5 Properties in some parts of Aviemore were flooded during Storm Desmond in December 2015, however we hold no new records of flooding at the application site. As we have no new flood risk information that would indicate that the flood risk to the site has changed since the application was approved, then we would have no issues with the proposed residential development in Area 6.

1.6 Area 3c is also within the medium likelihood flood extent. However the Draft Development Brief states that Area 3c forms part of the Green Network proposals, and that it should be protected and enhanced. We support that there is to be no development adjacent to the watercourse, and highlight that by maintaining open space allows for natural watercourse migration, reduces impacts of any overtopping, and ensures bank stability.

1.7 Parts of the area covered by the development brief have been identified as being at medium to high risk of surface water flooding. In many cases surface water flooding can be managed by appropriate drainage methods, however we consider water quantity aspects of

surface water drainage to largely be the remit of local authorities to consider in conjunction with Scottish Water, and who we feel are better placed to provide more detailed advice on this matter.

Protection of the water environment

2.1 We welcome and support the recognition of the importance of protecting the water environment in relation to the burn running through Area 3c and the reference to Policy 4 on page 10 supporting the retention and improvement of existing ponds, the proposed provision of species rich grassland, and proposed green spaces.

2.2 We note in Area 1, the Woodland Lodge site, there are a number of existing water bodies. We would prefer if the Brief highlighted the need for their retention and enhancement and ensured an adequate buffer strip around these.

2.3 In addition we would strongly support the deculverting of any burns/ditches/drains that may exist on site.

Pollution prevention and environmental management

3.1 One of our key interests is environmental management and pollution prevention measures during the periods of construction. The applicant, through the planning submission, should systematically identify all aspects of construction site work that might impact upon the environment, potential pollution risks associated with the construction proposals and identify the principles of preventative measures and mitigation. This information will help to assess the environmental impact of the proposals prior to determination. In addition, this information can provide the basis for a more detailed environmental management plan and construction method statements, which may be requested as planning conditions.

3.2 As such, we would welcome reference to the requirement for pollution prevention and environmental management to be addressed by the applicant during the construction phase in the Brief. This could be done by adding for example the following wording or similar “All construction works should be undertaken according to best practice as outlined in the relevant NetRegs PPGs and replacement GPPs.”

Drainage

4.1 In line with PAN 79 Water and Drainage, our Planning advice on waste water drainage; Policy and supporting guidance on provision of waste water drainage in settlements, Cairngorms National Park Local Development Plan 2015 Policy 10 and due to the scale of the proposals all development within the development brief area should connect to the public infrastructure and this requirement should be reflected in the Brief. We recommend that the planning authority consult with Scottish Water to ensure that there would be capacity and infrastructure to serve the allocation.

4.2 As the treatment of surface water runoff by sustainable drainage systems (SUDS) is a legal requirement for most forms of development and in line with Scottish Planning Policy (Paragraph 268) and Policy 10 in the Local Development Plan, we welcome the references

to the need for Sustainable Urban Drainage (SUDS), throughout the Development Brief.

4.3 We would however request that the following addition is made to the wording in either bullet point one page 8, or elsewhere, “SUDS are to be designed into the development from the outset in accordance with CIRIA’s The SUDS Manual C753 and The Controlled Activities Regulations General Binding Rules 10 and 11. This should also address any existing surface water issues.” Please note the CIRIA Manual referenced in Policy 10 of the Local Development Plan has now been superseded.

4.4 Much of the Highland Resort site is already developed and we would welcome the inclusion in the Brief of highlighting opportunities to retrofit SUDS to existing buildings and roads, particularly in Area 2 where extensions to existing buildings and car parks is proposed. In addition there is an opportunity to highlight the possibilities of introducing grey water recycling and other water saving measures within the brief which may in turn help surface water flooding and water quality.

Heat networks to achieve low carbon outcomes

5.1 Scottish Planning Policy paragraphs 158 – 160 has a strong policy which requires developments to connect to an existing network and develop district heating networks. As such we would strongly support the use of a district heat network within this site. As such we would welcome the submission of a Feasibility Statement, in support of any planning submission, to look into this provision further, and would request that this requirement is reflected in the Brief. We would expect the Feasibility Statement to address the provision of heat and power to the development including the consideration of a District Heating Network for a development of this size. Proposed developments should connect to any existing heat networks or heat distribution infrastructure where possible, or be designed so they are capable of being connected in the future. We would refer the applicant to our Development Management Guidance on Heat Networks and District Heating for further advice.

5.2 This requirement could be met by adding the following wording or similar to the Brief “A Feasibility Statement will be required to address the provision of heat and power to the development including the consideration of or connection to a District Heating Network.”

Our opinion of the overall development brief is positive (subject to the HRA for the capercaillie SPA and River Spey SAC). This is because the development brief seeks constructive use of an area of existing development, whilst incorporating the principles of good placemaking and safeguarding natural heritage interests within our remit.

- Area 1: It would be useful to give further consideration to the scale of tourist accommodation here in relation to increased bed spaces and the capercaillie SPAs. We suspect that the capacity for extra bed spaces is limited, so the potential for increased recreation in sensitive capercaillie areas would be minimal. However it would be useful to explore this issue further.
- Area 2: We consider that the proposal is appropriate and welcome the requirement for the retention of the trees and greenspace surrounding the site.
- Area 3: We welcome the importance placed on green spaces and green

networks/linkages in the development brief. These contribute to good placemaking and safeguarding biodiversity. However, we recommend that our call for sites advice of 19 September 2017 regarding improvements to access and signage for the Craigellachie National Nature Reserve (NNR) is incorporated into the development brief. (Note that in providing our advice, we have assumed that our call for sites advice on safeguarding the River Spey SAC, protected species and other natural heritage interests will be incorporated into the proposed LDP 2020 so does not need to be repeated in detail in the development brief.)

- Area 4/5: We refer to our call for sites advice of 19 September 2017 regarding capercaillie SPAs and the River Spey SAC. We have assumed that our advice on safeguarding the River Spey SAC, protected species and other natural heritage interests will be incorporated into the proposed LDP 2020, so does not need to be repeated in detail in the development brief. However, it would be useful to highlight the potential for connectivity (eg as done for the SAC for Area 3c) with the SAC and SPAs in the development brief. This would enable future developers to be aware from the outset of the higher level of environmental assessment likely to be required.
- Area 6: Although this site has existing permission, it would be beneficial to highlight in the development brief the connectivity to the capercaillie SPAs and the River Spey SAC eg (as done for the SAC for Area 3c). This is important as further environmental assessment is likely to be required should an increase in housing numbers come forward in the future.
- Design: This topic is not within our remit, however we welcome the recognition of the need to minimise the effects of climate change, which does affect our interests.
- Natural Heritage: We welcome this section of the development brief. We have no comments to make on the text, as it incorporates everything that we would recommend.
- Transport/Roads: As currently written, this section of the development brief appears to put greater emphasis on providing infrastructure to facilitate use of the private car compared to infrastructure to encourage active travel and use of public transport. Encouraging greater use of active travel and public transport should reduce congestion and pollution, for the benefit of people and nature. Our advice is that sections relating to transport should be revised to better reflect the priority of travel modes identified in Scottish Planning Policy (SPP, 2014) paragraph 273. This could be done by adding more detail on active travel and public transport connections, and by re-ordering the paragraphs so the last paragraph becomes the new third paragraph, with the fourth paragraph remaining as the new fourth paragraph, with the third paragraph becoming the new fifth paragraph.
- Developer Obligations: As above, it would be beneficial to include active travel routes and public transport infrastructure as part of the final section on Roads, to ensure they are included in cost analysis etc. This would help implement the SPP travel hierarchy, with associated benefits to people, placemaking and nature.

- Ensure contributions/improvements agreed via the S75 of previous permission still go ahead – junction improvements at Dalfaber Drive/Grampian Road, bus shelters and bus services. Transport Assessments / statements should detail accessibility to sites by all modes of travel but with a focus on non-car based modes to flush out the need for further public transport and active travel contributions.
- Safer Routes to School consideration required as part of any TA/TS
- We recommend reference is made to the recommendations of the Aviemore Active Travel Audit when considering potential developer contributions, such as:
 - Improvements to Grampian Road (core) – pedestrian drop kerbs and tactile paving
 - Town centre cycle parking
 - Wayfinding /signage

We would also highlight that the AT Audit is currently being updated.

- When considering contributions there is the potential to reduce the speed limit on part of Grampian Road though the main town centre to 20mph to benefit pedestrians and cyclists.
- North – South Link through the site has now been incorporated - consideration should also be given to ensure a direct link is created that provides for pedestrians and cyclists (e.g. explore potential for shared use footway)
- The additional development and associated generated traffic may require for ped/cycle crossings to be provided at strategic locations to ensure safety and priority for non-vehicle modes.
- If any traffic calming measures are proposed throughout the site it is essential that these are designed with cyclists in mind (e.g provision of cyclist bypasses)
- High quality cycle parking should be provided
- The project to upgrade the A9 also includes and upgrade to the associated ped/cycle network, therefore the site should ensure future connectivity to this is possible. The overview plan indicates a non-vehicle access is to be provided along the boundary with the a9 at the woodland lodges. We would welcome further links along this boundary be explored.