



Cairngorms National Park Local Development Plan 2020 Main Issues Report

Comments Form

Introduction

We are asking for your views on the big issues that the Cairngorms National Park Local Development Plan 2020 will need to address and the options for tackling them. The Main Issues Report sets out choices for the land allocations that could be made for development, and for policies that will be used to make decisions on applications for planning permission. This consultation is your chance to influence the new Local Development Plan to help make sure it:

- provides the homes, jobs and services that our communities need
- protects and enhances the Park's unique environment and cultural heritage for future generations

The consultation runs from **17 November 2017 to 2 March 2018.**

- All documents are available to view at **www.cairngorms.co.uk**
- Comments can be emailed to **planning@cairngorms.co.uk**
- Or posted to:
Cairngorms National Park Authority
FREEPOST NAT 21454
Grantown-on-Spey PH26 3BR

Please use extra sheets if required.

Alternatively, an online version is available to complete at **www.cairngorms.co.uk**

All comments must be received by 5pm on Friday 2 March 2018.

Your details

Title

Name

Organisation (if applicable)

Address

Email

Telephone

Please tick if you are happy to receive correspondence via email

Please tick to confirm you are happy for us to hold and use your personal data according to fair collection purposes

Please note we will not store personal data for anyone aged 16 or under – please tick if you are aged 16 or under

Data protection

Your details will only be used for purposes associated with the Main Issues Report consultation and Cairngorms National Park Local Development Plan 2020. You may request to see personal information held by the CNPA at any time.

Fair collection statement

As a registered Data Controller, the Cairngorms National Park Authority will collect, store and use your personal data for the purpose of informing the content of the Cairngorms National Park Local Development Plan 2020. We will not publish any address information, but may include your name against any comments, if you have confirmed that you are happy for us to do so in the 'Your Details' section.

Key Questions (Y/N – delete as appropriate)

Planning in the Cairngorms National Park

Q: We propose to use the vision and long-term outcomes set out in the National Park Partnership Plan as the 'vision statement' for the Local Development Plan.

Do you agree with this approach? **Y/N**

Please explain your answer

Please explain your answers

Progress in delivering the current Local Development Plan

Q: Do you agree with our conclusions about the changes that need to be made to policies in the existing Local Development Plan? **Y/N**

Q: Do you think any other changes are needed? **Y/N**

Please explain your answers

Main Issue 3 Impacts and opportunities from the A9 and Highland Main Line upgrades

Q: Do you agree with our proposals to allocate new employment land to take advantage of the opportunities for inward investment associated with the A9 and rail upgrades? **Y/N**

Q: Do you agree that we should seek to support those communities that are at risk of being by-passed by the A9 dualling project? **Y/N**

Please explain your answers

Main Issue 1 Over-arching development strategy

Q: Do you agree that the overall development strategy of the current Local Development Plan remains appropriate, and that we should use this as the basis for the next Local Development Plan? **Y/N**

Please explain your answer

Main Issue 4 Housing

A) How much new housing do we need and where should it be built?

Q: Do you agree with our proposed Housing Supply Targets for the next Local Development Plan? **Y/N**

Q: Do you agree that the proposed Housing Land Requirements are sufficiently generous? **Y/N**

Q: Do you agree with our overall conclusions about the need for additional new housing sites in the new Local Development Plan? **Y/N**

Please explain your answers

Main Issue 2 Designing great places

Q: Do you agree that the new Local Development Plan should include a new policy requiring development proposals to show how they meet the six qualities of successful places? **Y/N**

Q: Do you agree that we should include a clearer policy in the new Local Development Plan to set out when tools such as masterplans and development briefs will be used?

B) Housing growth around Aviemore

Q: Do you agree that we should include long-term development land in the Local Development Plan which could be released for development in the event that An Camas Mòr does not progress as envisaged? **Y/N**

Please explain your answer

Main Issue 5 The affordability of housing

Q: Do you agree that we should increase the affordable housing requirement to 35% in Ballater and Braemar, and to 45% in Aviemore and Blair Atholl? **Y/N**

Q: Do you agree that we should include policies to require a greater mix of house types and sizes, including more smaller homes? **Y/N**

Please explain your answers

Main Issue 6 Economic development

Q: Do you agree that the new Local Development Plan should identify a limited number of new economic development sites? **Y/N**

Please explain your answer

Main Issue 7 Impacts on Natura designations

Q: Do you agree that the new Local Development Plan should include a more co-ordinated approach towards delivering wider packages of capercaillie mitigation and conservation measures? **Y/N**

Please explain your answer

Main Issue 8 Planning obligations

Q: Do you agree that the new Local Development Plan should include a revised and more rigorously justified policy on planning obligations? **Y/N**

Q: Do you agree that this should be supported by more specific guidance in the plan about what planning obligations will be required in different settlements/locations? **Y/N**

Please explain your answers

Main Issue 9 Flood risk and climate change resilience

Q: Do you agree that the new Local Development Plan should include a stronger policy requirement for SUDS to be considered in all new development proposals? **Y/N**

Please explain your answer

Main Issue 10 Land management in upland areas

Q: Do you agree that the new Local Development Plan should include an amended policy to reflect the National Park Partnership Plan's presumption against new hill tracks in open moorland areas? **Y/N**

Please explain your answer

Settlements

Please tick which settlement you are commenting on.
Comments for different settlements should be provided on separate sheets.

An Camas Mòr	<input type="checkbox"/>	Cromdale	<input type="checkbox"/>	Killiecrankie	<input type="checkbox"/>
Angus Glens	<input type="checkbox"/>	Dalwhinnie	<input type="checkbox"/>	Kincraig	<input type="checkbox"/>
Aviemore	<input type="checkbox"/>	Dinnet	<input type="checkbox"/>	Kingussie	<input type="checkbox"/>
Ballater	<input type="checkbox"/>	Dulnain Bridge	<input type="checkbox"/>	Laggan	<input type="checkbox"/>
Blair Atholl	<input type="checkbox"/>	Glenlivet	<input type="checkbox"/>	Nethy Bridge	<input type="checkbox"/>
Boat of Garten	<input type="checkbox"/>	Glenmore	<input type="checkbox"/>	Newtonmore	<input type="checkbox"/>
Braemar	<input type="checkbox"/>	Glenshee	<input type="checkbox"/>	Strathdon	<input type="checkbox"/>
Bruar & Pitagowan	<input type="checkbox"/>	Grantown-on-Spey	<input type="checkbox"/>	Tomintoul	<input type="checkbox"/>
Calvine	<input type="checkbox"/>	Insh	<input type="checkbox"/>		
Carr-Bridge	<input type="checkbox"/>	Inverdrurie & Coylumbridge ..	<input type="checkbox"/>		

(Y/N – delete as appropriate)

Q: Have we identified the right issues for this settlement (where relevant)? **Y/N**

Q: Do you agree with the proposed settlement objectives? **Y/N**

Q: Do you agree with the preferred site options (where relevant)? **Y/N**

Q: Do you agree with the protected open spaces (where relevant)? **Y/N**

Q: Do you agree with the proposed settlement boundary (where relevant)? **Y/N**

Please explain your answers

If you have any other general comments on the topics you think the Local Development Plan 2020 should address, please let us know.

What happens next?

Consultation responses will be collated and a report of the consultation published. We will use this to inform the preparation of the Proposed Cairngorms National Park Local Development Plan 2020. We expect to publish this for a further period of public comment in late 2018.

We will regularly update on progress via www.cairngorms.co.uk and on Facebook and Twitter via [@cairngormsnews](https://twitter.com/cairngormsnews) and [#BigParkBigQuestions](https://twitter.com/BigParkBigQuestions).

Queries

Cairngorms National Park Authority,
14 The Square, Grantown-on-Spey, PH26 3HG
Tel: 01479 873535 Email: planning@cairngorms.co.uk

SNH advice on Main Issues Report for the Cairngorms Local Development Plan 2020

We have a number of general points that provide context to our settlement/allocation specific advice. Rather than repeat these points for each settlement, we provide them below:

- For clarity, our comments and advice on allocations/settlements reflect only the natural heritage matters that we lead on under the protocol between the Park Authority and SNH. This means that we have restricted our advice on allocations to areas protected for nature conservation, as the Park Authority are responsible for identifying and dealing with issues related to placemaking, local landscapes, wildness, protected species and biodiversity.
- We have provided advice for individual allocations based on the size of the allocations in relation to the size of the existing settlement. This means that some of our advice is precautionary, because for many allocations there is limited information at this stage about the proposed number of units, making it difficult to provide more site specific advice.
- Open space: There has been a reduction in amount of protected open space proposed in the MIR for some settlements, compared to the open space identified in the current (2015) Local Development Plan (LDP). In relation to protected open space, the LDP states in paragraph 13.14 that "*Land is identified where it is important to the amenity, setting and the overall fabric of settlements. These areas also provide locally important habitats or landscape features, or are important recreational resources within settlements...*". We agree with this statement, particularly where such open space is important for protected areas. It is not clear from the Main Issues Report (MIR) why there has been a reduction in protected open space in some settlements, although it appears to be related to redrawing of settlement boundaries. It would be helpful for the future proposed LDP to provide explanation of why some settlement boundaries have been redrawn, and why areas currently identified as protected open space have been excluded. This would enable us to provide advice on the potential effects of this change on areas protected for nature conservation.
- River Special Areas of Conservation (SACs): We have recommended developer requirements for allocations with potential connectivity with the River Tay, River Spey or River Dee SACs. Where developer requirements are necessary, it would be helpful for the proposed LDP to include some text explaining the reasons for the requirement. This would help prospective developers understand why there is a developer requirement, enabling them consider their options and incorporate measures from the outset to avoid or minimise impacts where possible. For example, text could be added such as '*Development connected to or in close proximity to river Special Areas of Conservation (SACs) has the potential to cause: sediment release during construction resulting in pollution, affecting water quality and potentially smothering habitat and species; disturbance to species (usually otter) from noise and activity during construction, and/or, in areas previously unused by people, from increased human activity (particularly dog walking) by occupiers once built; changes to water quality or quantity from abstraction and/or discharges from new development. Measures to avoid or minimise disturbance, pollution, effects on water quality or quantity should be incorporated into proposals where relevant. A construction method statement, species survey and protection plan may also be required. Cumulative effects caused by existing or planned proposals in combination with the individual development also need to be considered. Where there is potential for connectivity with a river SAC, development proposals must demonstrate that there would not be an adverse effect on the integrity of the SAC.*'
- Capercaillie Special Protection Areas (SPAs): We have recommended developer requirements for allocations with potential connectivity to the Badenoch and Strathspey SPAs (Cairngorms, Abernethy Forest, Craigmore Wood, Kinveachy Forest, Anagach Woods) or the Deeside SPAs (Glen Tanar, Ballochbuie) classified for capercaillie.

SNH advice on Main Issues Report for the Cairngorms Local Development Plan 2020

Where developer requirements are necessary, it would be helpful for the proposed LDP to include some text explaining the reasons for the requirement. This would help prospective developers understand why there is a developer requirement, enabling them consider their options and incorporate measures from the outset to avoid or minimise impacts where possible. For example, text could be added such as '*There are seven Special Protection Areas (SPAs) important for capercaillie in the Deeside, Strathspey and Badenoch area. In Badenoch and Strathspey these are: Cairngorms, Abernethy Forest, Craigmore Wood, Kinveachy Forest and Anagach Woods SPAs, with Ballochbuie and Glen Tanar SPA in Deeside. Capercaillie are sensitive to disturbance from human activity on foot (particularly off-lead dog walking) and by bike, ski or horse. Woodlands outwith SPAs provide additional habitat that supports the population of capercaillie within SPAs. This means that impacts in one location supporting capercaillie (whether an SPA or supporting woodland) may have an effect on other capercaillie SPAs in the wider area. Cumulative effects caused by existing or planned proposals in combination with the individual allocation also need to be considered. Where there is potential for connectivity with capercaillie SPA(s), development proposals must demonstrate that there would not be an adverse effect on the integrity of the SPA(s).*'

STRATEGIC SETTLEMENTS

SETTLEMENT: An Camas Mor

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

We agree more with the preferred site option than the alternative. This is because although the proposed number of houses for both ACM and THC031 remains at 1,500, and the site assessment indicates that the core built development area would remain the same, the extended THC031 boundary adjoins the River Spey SAC (and SSSI for the same interests). Extending into this area increases the potential for impacts on water quality (through flooding and erosion) and disturbance of SAC species. It is probable that water quality impacts could be reduced through careful siting and design, however it is likely that people (including those walking dogs) will be attracted to the river side, increasing the risk of disturbance.

SETTLEMENT: Aviemore

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

With regard to allocations within the proposed Aviemore Highland Resort Development Brief area (THC007 – 014), we reiterate our call for sites consultation advice of 19 September 2017:

“We recommend that the following natural heritage issues are taken into account: (1) The Aviemore (Butchers) Burn runs through the north east of the proposed allocation, flowing into the River Spey Special Area of Conservation (SAC) downstream. We are aware that otter use the watercourse and surrounding riparian area - otter are a qualifying interest of the SAC. Should this allocation be taken forward to MIR, we recommend the inclusion of developer requirements to demonstrate - by way of a species survey and protection plan, and construction method statement - that disturbance to otter, damage to habitat supporting otter, as well as changes to water quantity and quality will be avoided or minimised to prevent an adverse effect on the integrity of the SAC. Our advice is that there should be no development within 10m of the burn (a greater distance may be required should breeding otter be found), to avoid disturbance and provide a corridor for otters to continue to move, rest and forage along the burn. The buffer should apply to both sides of the burn and the existing trees and natural vegetation should be retained. (2) Otter are also a European Protected Species (EPS). In addition to the requirements for the SAC, an otter survey and species protection plan should be used to inform development at this location and demonstrate that regulations for EPS will be complied with. (3) The proposed allocation includes housing. The Park Authority will be aware from other housing development proposals that recreational activity from residents is likely to have a significant effect on capercaillie Special Protection Areas (SPAs). This would be caused by increased human activity and dog walking causing additional disturbance to capercaillie. The proposed allocation is likely to have a significant effect on the closest SPA, Kinveachy Forest, which due to connectivity between the capercaillie SPAs in the Park, means it is also likely to have an in significant effect on the Cairngorms, Abernethy Forest, Craigmore Wood and Anagach Woods SPAs. A Habitats Regulations Appraisal would be required to demonstrate that there will not be an adverse effect on the integrity of the SPAs. (4) The Craigellachie National Nature Reserve (NNR) is also located to the west, just outwith the proposed allocation, however at present access to the NNR from the Resort (and wider area) is difficult to find. It would be helpful to include improvements to access and signage to the NNR from within the Resort as part of the development brief. With regard to construction works, peregrine

falcons nest within the NNR. In addition, construction that causes loud and unpredictable noise should not take place within 300m of the peregrine nest site during the breeding season (March - May) as this would cause disturbance, which would be an offense under the Wildlife & Countryside Act 1981 (as amended in Scotland)."

We also have the following comments on the individual Aviemore allocations in the MIR:

THC006 – we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment.

THC007 – we agree that this location has potential for future housing, subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs).

THC008 – we agree that this location has potential for future housing, subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs).

THC009 – we agree that this location has potential for future mixed use including housing, subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs).

THC010 - we agree that this location has potential for some housing, subject to the buffer identified in the site assessment and a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population).

THC011 - we agree that this location has potential for some housing, subject to it being contained within the open area as identified in the site assessment, and a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population).

THC012 - we agree that this location has potential for development as the site has existing planning permission. We agree with the proposed removal of the woodland scrub riparian boundary from the allocation for the reasons given in the site assessment. Should a new or revised planning application be submitted, development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs).

THC013 - we agree that this location has potential for future housing, subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs).

THC014 – we agree that this location has potential for development as the majority of the site has existing planning permission. Should a new or revised planning application be submitted, development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs).

THC045 land south of Achantoul – we agree that this location has potential for future housing, subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation would extend development outwith the existing settlement pattern and is in a prominent location alongside the main route into Aviemore from the north, it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC059 site to north of Aviemore – we agree that this location has potential for future housing, subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population). Particular consideration would be required as to how the A9 dualling will affect access opportunities into Kinveachy forest in particular. As this allocation would extend development outwith the existing settlement pattern and is in a prominent location alongside the main route into Aviemore from the north, it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC061 – we agree that this location has potential for future mixed use including housing, subject a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). Particular consideration would be required as to how the A9 dualling will affect access opportunities into Kinveachy forest due to changes at the Granish junction.

North of Aviemore - we agree that this location has potential for future mixed use including housing, subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality, a there is watercourse connectivity between the allocation and the SAC), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). Particular

consideration would be required as to how the A9 dualling will affect access opportunities into Kinveachy forest due to changes at the Granish junction. As this allocation would extend development outwith the existing settlement pattern and is in a prominent location alongside the main route into Aviemore from the north, it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

Have we identified the right issues for this settlement (where relevant)?

Yes, for the matters within our remit.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open spaces appear appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes, although the settlement boundary would need to be amended should An Camas Mor not proceed and the allocations at THC045/059 and North Aviemore come forward instead.

SETTLEMENT: Ballater

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

The existing allocation is for 250 houses at AB017 - we are agree with this preferred option. However the inclusion of an additional 20 houses should not pose obvious issues for matters within our remit. Both options would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from abstraction, if relevant) or the Deeside capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open spaces appear appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

SETTLEMENT: Grantown on Spey

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

THC028 – we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward however, it would need to be subject to a developer requirement that development proposals must demonstrate that there

would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC038 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward however, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality), or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC039 - we agree that this location has potential for some housing, subject to it being contained within the eastern area as identified in the site assessment and a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality) as there appears to be watercourse connectivity to the SAC, or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC040 – it is not clear from the site assessment why this allocation is not preferred, so we are unable to agree or disagree with its classification as unsuitable for development. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality) as there appears to be watercourse connectivity to the SAC, or Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC048 – we neither agree nor disagree with this allocation being classed as unsuitable for allotment development, as the reasons given for non-preferred are not related to our remit.

THC055 – we neither agree nor disagree with this allocation being classed as unsuitable for development. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs (eg through increased recreation

disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC064 - we neither agree nor disagree with this allocation being classed as unsuitable for development. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human visits depending on the type of economic/tourism venture proposed).

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open spaces appear appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

SETTLEMENT: Kingussie

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

THC053 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC, Insh Marshes SAC, River Spey - Insh Marshes SPA (eg from development activities affecting water quality) as there appears to be watercourse connectivity to the SAC. The River Spey – Insh Marshes SSSI and Ramsar site cover much of the same area and so also appear to be connected to the allocation site. Consideration of the potential impacts on these areas protected for nature conservation would also be required.

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open spaces appear appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

SETTLEMENT: Newtonmore

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

T1 – there is no site assessment for this allocation, although the MIR identifies that it is a “new site allocation”. We assume that it is a change of development type rather than a completely new allocation. It is not clear what the implications of this are for our remit, therefore we are unable to agree or disagree with its inclusion. Our advice is that any new built development or change of use would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality) as there appears to be watercourse connectivity to the SAC via the Allt Lraidh on the eastern boundary.

THC004 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment.

THC022 - we agree with the rationale given in the site assessment that at present this allocation is not required, but may have longer term potential. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (eg from development activities affecting water quality, as the site is in close proximity to the River Calder, a tributary and part of the River Spey SAC). As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC051 - we agree with the rationale given in the site assessment that the site is not suitable for development. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC, Insh Marshes SAC, River Spey - Insh Marshes SPA (eg from development activities affecting water quality). The River Spey – Insh Marshes SSSI and Ramsar site cover much of the same area and so also appear to be connected to the allocation site. Consideration of the potential impacts on these areas protected for nature conservation would also be required. As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open spaces appear appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

INTERMEDIATE SETTLEMENTS

SETTLEMENT: Blair Atholl

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

PKC002 – we neither agree nor disagree with this allocation being classed as unsuitable for development, as the reasons given for non-preferred are not related to our remit.

PKC003 – we agree with the allocation being classed as partially suitable for housing for the reasons given in the site assessment.

PKC004 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Tay SAC (eg from construction activities and waste water affecting water quality).

PKC005 - we agree with the allocation being classed as partially suitable for housing for the reasons given in the site assessment.

PKC006 – we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Tay SAC (eg from construction activities and waste water affecting water quality). Depending on the scale and location of development, consideration of the potential impacts on the Glen Tilt Woods SSSI may also be necessary.

PKC007 - we agree with the rationale given in the site assessment for matters within our remit.

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open spaces appear appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

SETTLEMENT: Boat of Garten

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

THC043 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment and because it is unlikely to pass Habitats Regulations tests in relation to capercaillie SPAs. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs (eg through loss of supporting habitat and/or through increased recreation disturbance to capercaillie due to the increase in human population). As this allocation would extend

development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC044 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs (eg through loss of supporting habitat and/or through increased recreation disturbance to capercaillie due to the increase in human population). As this allocation would extend development outwith the existing settlement pattern into the woodland, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC058 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward for economic/employment use, and if economic development generates increased human activity in the wider area (eg bike hire shop), then it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs through increased disturbance. As this allocation would also extend development outwith the existing settlement pattern, if taken forward it would be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC074 – we agree with this location being classed as being unsuitable as an allocation but having potential for an individual planning application for the reasons given in the site assessment. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs (eg through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs).

THC075 - we agree with this location being classed as being unsuitable as an allocation but having potential for an individual planning application for the specified number of units, for matters in our remit.

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes. However, we recommend the addition of an issue. As the Park Authority will be aware, a key issue for future housing (or other development that increases human activity in the surrounding woodlands) in Boat of Garten is the high likelihood of significant effects on capercaillie in Speyside, both from individual developments and cumulatively with development in the wider area. Such impacts include loss of woodland habitat to accommodate built development, or disturbance caused by off-lead dog walking and increased numbers of people being active in areas used by capercaillie. The woodlands adjoining Boat of Garten provide important habitat for capercaillie that support populations of SPA capercaillie in the wider Badenoch and Strathspey area. Capercaillie are an asset used to promote the village, so it is vital that future development, particularly housing, is brought forward in a way that safeguards the capercaillie population, enabling both it and the village to flourish. We therefore recommend adding text such as 'safeguarding capercaillie while enabling the village to thrive' to the list, so that this issue is recognised upfront.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open spaces appear appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

SETTLEMENT: Braemar

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

For all allocations: We have previously highlighted to the Park Authority a potential issue with proposed and future needs for water abstraction from the River Dee SAC, largely from development in Aberdeenshire. The River Dee and tributaries flow through and around Braemar. Additional development at Braemar that relies upon water abstracted from the Dee may give rise to a cumulative likely significant effect on the SAC. If water supplying development is proposed to be sourced from the SAC, each proposal would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the SAC. This would have to demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC. Other potential impacts on the SAC that would need to be assessed on a site by site basis include sedimentation from construction activities causing pollution where there is watercourse connectivity.

AB002 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, the boundary should be redrawn to exclude the Morrone Birkwood SSSI. (Development within the SSSI is likely to have an adverse impact on the integrity of the SSSI and be incompatible with the objectives for designation.) It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from development activity as there appears to be watercourse connectivity to the SAC, as well as abstraction if relevant), Morrone Birkwood SAC (which adjoins the site, so could be affected for example by changes to groundwater flow/hydrology) or the Deeside capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

AB003 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from abstraction if relevant) or the Morrone Birkwood SAC (eg through changes to groundwater flow/hydrology) or the Deeside capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). Consideration of the potential impacts on the Morrone Birkwood SSSI would also be necessary. As this allocation would extend development at the edge of the existing settlement pattern, if taken forward it may be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

AB004 - we agree with this location being classed as being unsuitable as an allocation but having potential for an individual planning application for the reasons given in the site assessment. If taken forward either in the proposed LDP or as a planning application, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from development activity as there appears to be watercourse connectivity to the SAC, as well as abstraction if relevant).

AB005 – we agree with this location being classed as being unsuitable as an allocation for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from development activity as there appears to be watercourse connectivity to the SAC, as well as abstraction if relevant) or the Deeside capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

AB006 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from construction activity causing pollution as there appears to be watercourse connectivity with the SAC, and abstraction if relevant), Morrone Birkwood SAC (eg through changes to groundwater flow/hydrology) or the Deeside capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). Consideration of the potential impacts on the Morrone Birkwood SSSI would also be necessary. As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

AB007 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from abstraction if relevant), Morrone Birkwood SAC that is in close proximity to the site (eg through changes to groundwater flow/hydrology) or the Deeside capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). Consideration of the potential impacts on the Morrone Birkwood SSSI would also be necessary.

AB009 - we agree that this location has potential for some housing in the area as identified in the site assessment subject to, if relevant, development proposals demonstrating that there would not be an adverse effect on the integrity of the River Dee SAC from abstraction.

AB019 - we agree that this location has potential for extension of the caravan park in the area as identified in the site assessment subject to, if relevant, development proposals demonstrating that there would not be an adverse effect on the integrity of the River Dee SAC from abstraction.

AB021 - we agree with this location being classed as being unsuitable as an allocation but having potential for occasional overflow car park use. This is subject to the car park area being surfaced with material able to withstand flood events and not likely to result in fine particle pollution in run-off or exacerbate flood events, to avoid significant effects on the River Dee SAC.

AB022 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from development activities affecting water quality, as well as abstraction if relevant) or the Deeside capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

AB023 - we agree that this location has potential for some housing as identified in the site assessment subject to, if relevant, development proposals demonstrating that there would not be an adverse effect on the integrity of the River Dee SAC (from development activities affecting water quality, as well as abstraction if relevant) or the Deeside capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs).

AB24 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from development activities affecting water quality, as well as abstraction if relevant) or the Deeside capercaillie SPAs (through increased recreation disturbance to capercaillie, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation would extend development outwith the existing settlement pattern and is in a prominent location, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

Have we identified the right issues for this settlement (where relevant)? Y/N
Yes.

Do you agree with the protected open spaces (where relevant)? Y/N
Yes, the proposed protected open spaces appear appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N
Yes.

SETTLEMENT: Carrbridge

Do you agree with the proposed objectives?
Yes.

Do you agree with the preferred site options?

THC030 - we agree that this location has potential for some employment use as identified in the site assessment. We reiterate our call for sites advice that should the use change from employment "... *to include housing, then the Park Authority will be aware from other housing development proposals that recreational activity from residents is likely to have a significant effect on capercaillie Special Protection Areas (SPAs). This would be caused by increased human activity and dog walking causing additional disturbance to capercaillie*". If the allocation type is changed and housing proposed, a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the Badenoch and Strathspey capercaillie SPAs would be necessary.

H1/THC033 - we agree that this location has potential for some housing in the non-woodland area as identified in the site assessment subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. Particular consideration would be required as to how the A9 dualling will affect access opportunities to/from Carrbridge into Kinveachy forest in particular. The current Development Brief should be retained and updated if necessary to reflect any changes as a result of the proposed LDP or HRA.

H2/THC034 - we agree that this location has potential for housing as identified in the site assessment, subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. Particular consideration would be required as to how the A9 dualling will affect access opportunities to/from Carrbridge into Kinveachy forest in particular.

THC057 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. Particular consideration would be required as to how the A9 dualling will affect access opportunities to/from Carrbridge into Kinveachy forest in particular. As this allocation would extend development outwith the existing settlement pattern and be in a prominent location next to the main route into Carrbridge from the south, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC066 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. Particular consideration would be required as to how the A9 dualling will affect access opportunities to/from Carrbridge into Kinveachy forest in particular. As this allocation would extend development outwith the existing settlement pattern and be in a prominent location next to the main route into Carrbridge from the north, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC067 - we neither agree nor disagree with this allocation being classed as unsuitable for development, as the reason given for non-preferred is not related to our remit. If taken forward (eg for a smaller number of houses), it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. Particular

consideration would be required as to how the A9 dualling will affect access opportunities to/from Carrbridge into Kinveachy forest in particular.

THC068 - we agree that this location has potential for some economic development on the amended site as identified in the site assessment subject to, if relevant (eg if economic development generates increased human activity in the wider area, eg bike hire shop), a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. Particular consideration would be required as to how the A9 dualling will affect access opportunities to/from Carrbridge into Kinveachy forest in particular. As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC069 - we agree that this location has potential for employment use as identified in the site assessment. We reiterate our call for sites advice (for THC030) that should the use change from employment "... *to include housing, then the Park Authority will be aware from other housing development proposals that recreational activity from residents is likely to have a significant effect on capercaillie Special Protection Areas (SPAs). This would be caused by increased human activity and dog walking causing additional disturbance to capercaillie*". If the allocation type is changed and housing proposed, a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs.

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

The single area identified as protected open spaces appears appropriate. However, we note that the larger area previously included as protected open space between the A938 and the River Dulnain (below Bogroy) has been removed from the settlement boundary and therefore is no longer protected open space. This area provides a buffer between development and the Dulnain, which is part of the River Spey SAC. It is not possible to agree or disagree with the revised open space allocation without an explanation of why the change has occurred, as we cannot assess what it means for matters within our remit, particularly the SAC. However, we can advise that it would likely be beneficial for this area to be reinstated as protected open space (and included in the settlement boundary), to avoid inappropriate development affecting the SAC (as well as providing other benefits, for example for placemaking, biodiversity and recreation).

Do you agree with the proposed settlement boundary (where relevant)? Y/N

The proposed settlement boundary in the MIR is much reduced from the boundary in the current (2015) LDP, with the previously included open space between the A938 and the River Dulnain (below Bogroy) being removed. It is not possible to agree or disagree with the revised settlement boundary without an explanation of why the change has occurred, as we cannot assess what it means for matters within our remit, particularly for the River Dulnain, which is part of the River Spey SAC. However, we can advise that it would likely be beneficial for the 2015 LDP settlement boundary to be retained, so that the previously included protected open space between the A938 and the River Dulnain (below Bogroy) is included. This would retain the buffer between development and the Dulnain, which should avoid inappropriate development affecting the SAC (as well as providing other benefits, for example for placemaking, biodiversity and recreation).

SETTLEMENT: Cromdale***Do you agree with the proposed objectives?***

Yes.

Do you agree with the preferred site options?

THC018 – we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity affecting water quality as the site is in close proximity to what appears to be watercourse connectivity to the SAC, and from increased human activity, particularly dog walking, causing disturbance to otter). The River Spey SSSI covers much of the same area and so also appears to be connected to the allocation site. Consideration of the potential impacts on this area protected for nature conservation would also be required. It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. As this allocation is well outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC019 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity affecting water quality as the site is in close proximity to what appears to be watercourse connectivity to the SAC, and from increased human activity, particularly dog walking, causing disturbance to otter). The River Spey SSSI covers much of the same area and so also appears to be connected to the allocation site. Consideration of the potential impacts on this area protected for nature conservation would also be required. It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. As this allocation is well outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC020 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the site is in close proximity to the SAC, and from increased human activity, particularly dog walking, causing disturbance to otter). The River Spey SSSI covers much of the same area and so also appears to be connected to the allocation site. Consideration of the potential impacts on this area protected for nature conservation would also be required. It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. As this allocation is well outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC021 - we agree with this location being classed as being unsuitable for development, however we are not sure about the site assessment statement that the site has “*no major constraints*”. This is because there appear to be a number of drains/watercourse connecting the site to the Burn of Cromdale, a tributary and part of the River Spey SAC. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity due to potential connectivity with the Burn of Cromdale). It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

There has been a reduction in the larger north eastern area identified in the 2015 LDP as protected open space, compared to the area proposed in the MIR. The Burn of Cromdale, a tributary and part of the River Spey SAC, runs through the area that is included in the current (2015) LDP. It is not possible to agree or disagree with the revised open space allocation without an explanation of why the change has occurred, as we cannot assess what it means for matters within our remit, particularly the SAC. However, we can advise that it would likely be beneficial for this area to be reinstated as protected open space (and included in the settlement boundary), to avoid inappropriate development affecting the SAC (as well as providing other benefits, for example for placemaking, biodiversity and recreation).

Do you agree with the proposed settlement boundary (where relevant)? Y/N

The Burn of Cromdale, a tributary and part of the River Spey SAC runs through the area that is included in the current (2015) LDP settlement boundary. We note that the proposed settlement boundary has been reduced in the MIR, although there is no explanation for why. In relation to matters within our remit, it is not possible to agree or disagree with the revised settlement boundary without the explanation, as we cannot assess what it means for the SAC in particular. However, we can advise that it would likely be beneficial for the 2015 LDP settlement boundary to be retained, so that the previously included protected open space is included. This would retain the buffer between development and the Burn of Cromdale, which should avoid inappropriate development affecting the SAC (as well as providing other benefits, for example for placemaking, biodiversity and recreation).

SETTLEMENT: Dulnain Bridge

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

THC032 - we neither agree nor disagree with this allocation being classed as unsuitable for development, as the main reason given for being non-preferred are not related to our remit. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the site is in close proximity to the SAC). It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. This allocation is sizeable

compared to the existing settlement on the same side of the River Dulnain, would extend development beyond the existing settlement pattern, and is in a prominent location next to the main route through Dulnain Bridge. Therefore, if taken forward, it may also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC041 - we neither agree nor disagree with this allocation being classed as unsuitable for development, as the main reason given for being non-preferred are not related to our remit. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the site is in close proximity to the SAC). It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. As this allocation is sizeable compared to the existing settlement on the same side of the River Dulnain, and would extend development outwith the existing settlement pattern, if taken forward it may also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC042 - we agree with this allocation being classed as unsuitable for development. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the site is in close proximity to the SAC). It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs.

THC070 - we neither agree nor disagree with this allocation being classed as unsuitable for development, as the main reason given for being non-preferred are not related to our remit. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the site is in close proximity to the SAC). It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs.

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open space appears appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

SETTLEMENT: Kincaig

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

THC046 - we neither agree nor disagree with this allocation being classed as partially suitable for economic development, as the main reasons given for being non-preferred are

not related to our remit. However, given the prominent location between the A9 and main route adjoining Kincaig, and as this allocation would extend development outwith the existing settlement pattern, if taken forward it would be beneficial to have a Development Brief that provides clear guidance on issues such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc.

THC054 - we neither agree nor disagree with this allocation being classed as partially suitable for economic development, as the main reasons given for being non-preferred are not related to our remit.

THC062 - the map provided in the site assessment shows an allocation that appears to be from Braemar and the MIR shows an aerial photograph, so it is not possible to be sure of the precise boundary. However we agree with this general area being classed as protected open space.

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open space appears appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

SETTLEMENT: Nethy Bridge

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

THC002 – for matters within our remit, we agree with this allocation being classed as partially suitable for housing development, subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the site adjoins the River Nethy, a tributary and part of the SAC, and appears to have watercourse connectivity with the SAC). It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. As this allocation would extend development outwith the existing settlement pattern, if taken forward it would also be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC003 – for matters within our remit, we partially agree with this allocation being classed as suitable for housing development if it is amended to include only the land identified being outwith the flood plain / not having a significant flood risk (as exacerbating flood risk could affect the River Spey SAC interests), and subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the site adjoins the River Nethy, a tributary and part of the SAC).

THC005 - we neither agree nor disagree with this allocation being classed as unsuitable for development, as the main reasons given for being non-preferred are not related to our remit. If taken forward, it would need to be subject to a developer requirement that development

proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. As this allocation would extend development outwith the existing settlement pattern and is in a prominent location next to the public road, if taken forward it may be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC017 – we agree with this allocation being classed as unsuitable for development. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the site is in close proximity to the Allt Mor, a tributary and part of the River Spey SAC, and from increased human activity, particularly dog walking, causing disturbance to otter). It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. As this allocation would extend development well outwith the existing settlement pattern and is in a prominent location next to the public road, if taken forward it would be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

H1/THC035 - we neither agree nor disagree with this allocation being removed as an allocation / being classed as unsuitable for development, as the main reason given for being non-preferred are not related to our remit. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. As this allocation would extend development outwith the existing settlement pattern and is in a prominent location next to the public road, if taken forward it may be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC036 – we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Abernethy Forest SPA (and other connected capercaillie SPAs in the wider Badenoch and Strathspey area) and the Cairngorms SAC. Abernethy Forest SSSI and Abernethy NNR covers much of the same area as the SPA. Consideration of the potential impacts on these areas protected for nature conservation would also be required.

THC037 - we agree with this location being classed as being unsuitable for development for the reasons given in the site assessment, particularly the area that falls within the Abernethy NNR. If taken forward in the proposed LDP, the boundary should be amended to exclude the NNR, and the allocation would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Abernethy Forest SPA (and other connected capercaillie SPAs in the wider Badenoch and Strathspey area) and the Cairngorms SAC, which adjoin the site. Abernethy Forest SSSI and NNR covers much of the same area as the SPA, with the NNR extending into the proposed allocation. Consideration of the potential impacts on these areas protected for nature conservation would also be required. As this allocation would extend development outwith the existing settlement pattern and is in a prominent location on both sides of the public road, if taken forward it would be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape,

placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

THC052 - we neither agree nor disagree with this allocation being classed as unsuitable for economic development, as the main reasons given for being non-preferred are not related to our remit. If taken forward, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (as there appears to be watercourse connectivity), and on Badenoch and Strathspey capercaillie SPAs (if economic development generates increased human activity in the wider area).

THC060 – for matters within our remit, we agree with this location being classed as being unsuitable as an allocation but having potential for an individual/windfall planning application. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the site is in close proximity to the River Nethy, a tributary and part of the River Spey SAC).

THC063 - we neither agree nor disagree with this allocation being classed as unsuitable for economic development, as the main reasons given for being non-preferred are not related to our remit. If taken forward in the proposed LDP in preference to THC002 for partial housing, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the site adjoins the River Nethy, a tributary and part of the SAC, and appears to have watercourse connectivity with the SAC). It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs (if economic development generates increased human activity in the wider area). As this allocation would extend development outwith the existing settlement pattern and is in a prominent location next to the public road, if taken forward it would be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

There has been a reduction in the amount of land identified in the 2015 LDP as protected open space, compared to the area proposed in the MIR. It is not possible to agree or disagree with the revised open space allocation without an explanation of why the change has occurred, as we cannot assess what it means for matters within our remit, particularly for the areas protected for nature conservation adjoining the proposed settlement boundary and in the immediate vicinity (such as the River Spey SAC, Abernethy Forest SPA and SSSI, Abernethy NNR, Cairngorms SAC). However, we can advise that it would likely be beneficial for this area to be reinstated as protected open space (and included in the settlement boundary), to avoid inappropriate development affecting areas protected for nature conservation (as well as providing other benefits, for example for placemaking, biodiversity and recreation).

Do you agree with the proposed settlement boundary (where relevant)? Y/N

We note that the proposed settlement boundary has been reduced in the MIR, although there is no explanation for why. In relation to matters within our remit, it is not possible to agree or disagree with the revised settlement boundary without the explanation, as we cannot assess what it means for areas protected for nature conservation adjoining the

proposed settlement boundary and in the immediate vicinity (such as the River Spey SAC, Abernethy Forest SPA and SSSI, Abernethy NNR, Cairngorms SAC).

SETTLEMENT: Tomintoul

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

As the principle of development has already been established for the existing allocations within the current (2015) LDP, we have no further comments to make on them.

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open spaces appear appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

RURAL AND LANDWARD SETTLEMENTS

The following settlements/rural areas have no defined settlement boundaries or open space, had no allocations in the current (2015) LDP or in the MIR: Angus Glens, Bruar and Pitagowan, Calvine, Glenlivet, Strathdon. We therefore have no comments on them.

We were unable to find site assessments for Killiecrankie or Glenmore. We have the following advice for these settlements:

- **Killiecrankie:** There were no allocations in the current (2015) LDP and no new proposed allocations in the MIR. The single area identified as protected open space appears appropriate. However, we note that a second area to the north west that was previously included in the 2015 LDP as protected open space has been removed. This area provides a buffer between development and the River Garry, which is part of the River Tay SAC, as well as the Pass of Killiecrankie SSSI. It is not possible to agree or disagree with the revised open space allocation without an explanation of why the change has occurred, as we cannot assess what it means for matters within our remit, particularly the SAC and SSSI. However, we can advise that it would likely be beneficial for this area to be reinstated as protected open space (and included in the settlement boundary), to avoid inappropriate development affecting areas protected for nature conservation (as well as providing other benefits, for example for placemaking, biodiversity and recreation).
- **Glenmore:** As the allocations in the 2015 LDP and the MIR, as well as the protected open space and settlement boundary remain the same, we have no comments to make other than they appear appropriate for matters within our remit. However, we recommend referring to supporting delivery of the Cairngorm and Glenmore Strategy 2016 (<https://cairngorms.co.uk/wp-content/uploads/2015/11/161221CGStrategy.pdf>) as a proposed settlement objective, to ensure the LDP and future development proposals take account of the Strategy.

There are also several locations within the rural settlements site assessment that are not identified in the MIR. We have the following advice for these locations:

- **Bridge of Gairn.** We neither agree nor disagree with AB001 being classed as being unsuitable as an allocation but having potential for individual planning application(s), as the reasons given for non-preferred are not related to our remit. If taken forward in the proposed LDP, or as planning application(s), it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from development activity, as it is in close proximity to the River Gairn, part of the SAC).
- **Invercauld Estate, Braemar.** We neither agree nor disagree with AB020 being classed as being unsuitable as an allocation but having potential for individual planning application(s), as the reasons given for non-preferred are not related to our remit.
- **Lynchat, Kingussie.** For matters within our remit, we agree with THC029 being classed as being unsuitable as an allocation, as exacerbating flood risk could affect the River Spey SAC interests. The River Spey is in close proximity to the site and there appears to be connectivity to the SAC via drains and an unnamed watercourse to the east of the site. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity affecting water quality or flood risk). It would also need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the Insh Marshes SAC and the River Spey – Insh Marshes SPA, which

are also connected to the site via water courses and would be affected by flood and water quality changes. The River Spey - Insh Marshes SSSI and Ramsar site cover a similar area to the SACs and SPA, and would also require consideration of potential impacts. As this allocation is sizeable in relation to the existing settlement, would extend development well outwith the existing settlement pattern and is in a prominent location between the A9 and main route adjoining Lynchat, if taken forward it would be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

- **Lynwilg, Aviemore.** We neither agree nor disagree with THC050 being classed as being unsuitable as an allocation but having potential for an individual planning application, as the reasons given for non-preferred are not related to our remit. If taken forward in the proposed LDP, or as planning application(s), it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity, as it is in close proximity to the Allt na Criche, part of the River Spey SAC, and/or from water quality and quantity impacts from abstraction and/or discharge, if proposed).

SETTLEMENT: Dalwhinnie

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

THC015 - for matters within our remit, we agree with this location being classed as being unsuitable as an allocation, as exacerbating flood risk could affect the River Spey SAC interests (the River Truim, part of the River Spey SAC, is in close proximity to the site). If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity affecting water quality or flood risk).

THC016 - we agree with this location being classed as being suitable for economic development for the reasons given in the site assessment, subject to flood risk issues being satisfactorily addressed and subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity affecting flood risk or water quality).

THC056 - for matters within our remit, we agree with this location being classed as being unsuitable as an allocation, as exacerbating flood risk could affect the River Spey SAC interests (the River Truim, part of the River Spey SAC, is in close proximity to the site). If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity affecting water quality or flood risk). As this allocation would extend development outwith the existing settlement pattern and is in a prominent location next to the public road, if taken forward it may be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

The one area identified in the 2015 LDP as protected open space has been removed in the MIR. It is not possible to agree or disagree with the revised lack of open space allocation without an explanation of why the change has occurred, as we cannot assess what it means for matters within our remit, particularly for the River Spey SAC. (The River Truim, part of the SAC, adjoins the southern portion of the proposed settlement boundary and is in close proximity to the northern boundary.) However, we can advise that it would likely be beneficial for this area to be reinstated as protected open space (and included in the settlement boundary), to avoid inappropriate development affecting areas protected for nature conservation (as well as providing other benefits, for example for placemaking, biodiversity and recreation).

Do you agree with the proposed settlement boundary (where relevant)? Y/N

We note that the proposed settlement boundary has been reduced in the MIR, although there is no explanation for why. In relation to matters within our remit, it is not possible to agree or disagree with the revised settlement boundary without the explanation, as we cannot assess what it means for matters within our remit, particularly the River Spey SAC. (The River Truim, part of the SAC, adjoins the southern portion of the proposed settlement boundary and is in close proximity to the northern boundary.)

SETTLEMENT: Dinnet

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

For all allocations: We have previously highlighted to the Park Authority a potential issue with proposed and future needs for water abstraction from the River Dee SAC, largely from development in Aberdeenshire. The River Dee and tributaries flow in close proximity around Dinnet. Additional development at Dinnet that relies upon water abstracted from the Dee may give rise to a cumulative likely significant effect on the SAC. If water supplying development is proposed to be sourced from the SAC, each proposal would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the SAC. Other potential impacts on the SAC that would need to be assessed on a site by site basis include sedimentation from construction activities where there is watercourse connectivity.

AB010 - as the principle of development has already been established for this allocation within the current (2015) LDP, we have no further comments to make on it.

AB011 - for matters within our remit, we agree with this location being classed as being unsuitable as an allocation. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from development activity as there appears to be watercourse connectivity to the SAC, as well as abstraction if relevant). As this allocation would extend development outwith the existing settlement pattern and is in a prominent location next to the public road, if taken forward it may be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

AB012 - for matters within our remit, we agree with this location being classed as being unsuitable as an allocation. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there

would not be an adverse effect on the integrity of the River Dee SAC (from development activity due to proximity to the SAC, as well as abstraction if relevant).

AB013 - for matters within our remit, we agree with this location being classed as being unsuitable as an allocation. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from development activity due to proximity to the SAC, as well as abstraction if relevant), or the Deeside capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs). As this allocation is sizeable in relation to the existing settlement and would extend development outwith the existing settlement pattern, if taken forward it would be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking and relationship to other developments in the vicinity - where relevant, connectivity, biodiversity, etc).

AB014 - for matters within our remit, we agree with this location being classed as being unsuitable as an allocation for economic development, but having potential for an individual planning application for the reasons given in the site assessment. If taken forward in the proposed LDP, it may need to be subject to a developer requirement for a Habitats Regulations Appraisal demonstrating that there would not be an adverse effect on the integrity of the River Dee SAC from abstraction (if proposed).

AB015 - for matters within our remit, we agree with this location being classed as being suitable as an allocation for economic development, subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC from abstraction (if proposed). Consideration would also have to be given to avoiding potential impacts on Muir of Dinnet SSSI, which adjoins the site.

AB016 - for matters within our remit, we agree with this location being classed as being unsuitable as an allocation. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Dee SAC (from development activity due to proximity to the SAC, as well as abstraction if proposed) or the Deeside capercaillie SPAs (through increased recreation disturbance to capercaillie due to the increase in human population, both alone and cumulatively with other developments affecting capercaillie SPAs).

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

The two areas identified in the 2015 LDP as protected open space have been removed in the MIR. It is not possible to agree or disagree with the revised lack of open space allocation without an explanation of why the change has occurred, as we cannot assess what it means for matters within our remit, particularly for the Muir of Dinnet SSSI and the River Dee SAC, both of which are in close proximity. However, we can advise that it would likely be beneficial for this area to be reinstated as protected open space (and included in the settlement boundary), to avoid inappropriate development affecting areas protected for nature conservation (as well as providing other benefits, for example for placemaking, biodiversity and recreation).

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

SETTLEMENT: Glenshee

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

PKC008 – we neither agree nor disagree with this allocation being classed as being unsuitable as an allocation but having potential for individual planning application(s), as the reasons given for non-preferred are not related to our remit. If taken forward in the proposed LDP, or as planning application(s), it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Tay SAC (from development activity, as a watercourse appears to run through the site into the Shee Water, part of the SAC). (The site is also in close proximity to the Forest of Clunie SPA and SSSI, however small scale housing in this location next to existing built development is unlikely to have a significant effect on the SPA interests.)

PKC009 - we neither agree nor disagree with this allocation being classed as being unsuitable as an allocation but having potential for individual planning application(s), as the reasons given for non-preferred are not related to our remit. If taken forward in the proposed LDP, or as planning application(s), it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Tay SAC (from development activity, as a watercourse appears to run through the site into the Shee Water, part of the SAC). (The site is also in close proximity to the Forest of Clunie SPA and SSSI, however small scale housing in this location next to existing built development is unlikely to have a significant effect on the SPA interests.)

PKC010 - we neither agree nor disagree with this allocation being classed as being unsuitable as an allocation but having potential for individual planning application(s), as the reasons given for non-preferred are not related to our remit. If taken forward in the proposed LDP, or as planning application(s), it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Tay SAC (from development activity, as a watercourse appears to run through the site into the Shee Water, part of the SAC). (The site is also in close proximity to the Forest of Clunie SPA and SSSI, however small scale housing in this location next to existing built development is unlikely to have a significant effect on the SPA interests.)

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

SETTLEMENT: Insh

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

THC001 - we neither agree nor disagree with this allocation being classed as being unsuitable as an allocation, as the reasons given for non-preferred are not related to our remit.

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open spaces appear appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

SETTLEMENT: Inverdrue and Coylumbridge

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

THC025 - we neither agree nor disagree with this allocation being classed as being unsuitable as an allocation but having potential for individual planning application(s), as the reasons given for non-preferred are not related to our remit. If taken forward in the proposed LDP, or as planning application(s), it may need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity, as a watercourse in close proximity to the site runs into the River Druie, part of the SAC). This would depend largely on whether significant construction activities were proposed that could cause pollution of the watercourse. For example, if internal remodelling of the existing building(s) were proposed rather than construction activities involving significant groundworks, assessment is unlikely to be required (unless other forms of connectivity with the SAC were predicted). Housing would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of Badenoch and Strathspey capercaillie SPAs. Economic development may also require a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the SPAs if economic development generates increased human activity in the wider area (eg bike hire shop).

THC026 - we neither agree nor disagree with this allocation being classed as being unsuitable as an allocation but having potential for individual planning application(s), as the reasons given for non-preferred are not related to our remit.

THC027 - we neither agree nor disagree with this allocation being classed as being unsuitable, as the reasons given for non-preferred are not related to our remit. If taken forward in the proposed LDP, it would need to be subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the River Druie, part of the SAC, is in close proximity to the site). This would depend largely on whether significant construction activities were proposed that could cause pollution of the watercourse.

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.

Do you agree with the protected open spaces (where relevant)? Y/N

Yes, the proposed protected open spaces appear appropriate.

Do you agree with the proposed settlement boundary (where relevant)? Y/N

Yes.

SETTLEMENT: Laggan

Do you agree with the proposed objectives?

Yes.

Do you agree with the preferred site options?

THC065 – for matters within our remit, we agree with this allocation being classed as partially suitable for housing development, avoiding the area at risk of flooding and subject to a developer requirement that development proposals must demonstrate that there would not be an adverse effect on the integrity of the River Spey SAC (from development activity as the site adjoins the River Mashie, part of the SAC, and appears to have watercourse connectivity with the SAC). As this allocation is sizeable in relation to the existing settlement, if taken forward it may be beneficial to have a Development Brief that provides clear guidance on protected areas as well as other issues (such as landscape, placemaking, connectivity, biodiversity, etc).

Have we identified the right issues for this settlement (where relevant)? Y/N

Yes.