



Scotland

## Cairngorms National Park LDP 2020 Main Issues Report: RSPB Scotland response

### Long term vision for the Cairngorms National Park

***We propose to use the vision and long term outcomes set out in the Cairngorms National Park Partnership Plan as the 'vision statement' for the Local Development Plan. Do you agree with this approach?***

We note that using the vision and long-term outcomes that are in the Partnership Plan will help with consistency between the two plans. However, as we advised in response to the Partnership Plan Main Issues consultation, we consider that the vision and long term outcomes should be amended so that they put the conservation of nature first. The visitor and rural development outcomes are predicated on a sustainable natural heritage. The first National Park aim as set out in the National Parks (Scotland) Act 2000 is “to conserve and enhance the natural and cultural heritage of the area.” Although the National Park Authority’s general purpose is to ensure that the National Park aims are collectively achieved, subsection 9 (6) requires the authority to give greater weight to this first National Park aim when it appears that there is a conflict between this and other aims. This principle should be reflected in the wording of the LDP vision and outcomes.

We therefore suggest again that the Vision should be reworded and reordered to read “An outstanding National Park, where nature and people thrive together, enjoyed and valued by everyone.” Similarly, the first outcome should be reworded so that it reads “A special place for nature and people...”. A strong emphasis on the outstanding natural heritage of the National Park is required at the outset in the first outcome.

### Main Issue 1: Over-arching development strategy

***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?***

RSPB Scotland agrees that the preferred option for the overall development strategy is more appropriate than the alternative option as detailed on page 15 of the Main Issues Report. It is appropriate to focus most new development on main strategic settlements, with smaller scale development being accommodated in the intermediate and rural settlements. However, we are concerned about both the scale of development being planned, and the intended distribution of new development (reflected in the preferred allocations) across the different strategic and intermediate settlements. We will explain these concerns below.

As the Evidence Paper on conservation confirms, the National Park is one of the best places in the UK for nature. Half of the National Park is designated under the Nature Directives as being of European importance for nature. The National Park is home to 25% of the UK’s rare animal, insect,

lichen, fungi and insect species, and contains 59 SSSIs. It has Scotland's most extensive semi-natural pine forest. The National Park is one of the most important sites in the UK mainland for breeding wading birds, but populations of waders such as lapwing (a Cairngorms Nature Action Plan priority species) and redshank have significantly declined in recent years<sup>1</sup>. However, much of the Park's special wildlife is already threatened by many and varied pressures, including the impacts of new development and disturbance caused by recreation by both residents of and visitors to the Park.

Forests in Badenoch and Strathspey and the species (including Capercaillie) to which they are home are particularly vulnerable to these pressures due to their proximity to the majority of the National Park's population and being in the area of greatest development pressure in the Park. Wetland and wet grassland - important habitats for waders - are also under pressure, including from new development. These pressures are likely to increase as a result of the A9 dualling.

The first aim of the National Park is to conserve and enhance the natural and cultural heritage of the area. If there is any conflict between this aim and any of the other three aims, greater weight must be given to the first aim. The Partnership Plan acknowledges that conservation of the natural and cultural heritage underpins the economic, social and recreation value of the National Park.

Two of the public interest priorities for land use in the National Park as set out in the Partnership Plan, are (a) to secure favourable condition of designated sites through addressing pressures on sites (including disturbance); and (b) to safeguard species for which the National Park is particularly important. Amongst the big conservation challenges for the next five years identified in the Partnership Plan, are to protect and enhance species – including to address declining and fragile populations of key species including Capercaillie, freshwater pearl mussel and other Cairngorms Nature priorities.

RSPB Scotland is concerned that the scale of development envisaged in the Main Issues Report will increase the pressures on the sensitive habitats and species in the Park, may conflict with the first national park aim, and may compromise the ability of the Park to address the above public interest priorities and conservation challenges.

We note that the National Records of Scotland projections indicate that between 2014 and 2039, the population of the national park will decrease by around 4%, whilst the number of households in the park will increase by 6% (an additional 542 households). However, these projections are made on the basis of several assumptions, and do not take into account future changes that may alter population growth or household formation, including local planning policies (NRS, 2017<sup>2</sup>). There would be significant differences in the changes of population and numbers of households between different parts of the national park, partly as a result of the spatial strategy of the LDP (especially how allocations are distributed) and the nature of the housing allowed to be built. For example, we note that the proposed Housing Supply Targets for the period 2020-2029 total 519 for the Highland part of the park (i.e. Badenoch and Strathspey) in contrast to 154 for the Aberdeenshire part.

Strathspey is the last remaining stronghold for Capercaillie in the UK, holding 83% of the UK population of an estimated 1,114 birds. Human disturbance causes Capercaillie to avoid using large areas of otherwise suitable woodland, putting pressure on the existing population and hindering its

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<sup>1</sup> CNPA (2013) *The Cairngorms Nature Action Plan 2013-2018*

<sup>2</sup> National Records of Scotland (NRS) (2017) *Household Projections for Scotland's Strategic Development Plan Areas and National Parks: 2014-based* [online] [www.nrscotland.gov.uk/files//statistics/household-projections/sd-np-14/2014-based-house-proj-sdp-np.pdf](http://www.nrscotland.gov.uk/files//statistics/household-projections/sd-np-14/2014-based-house-proj-sdp-np.pdf)

recovery. Large areas (21-41% according to a study by Summers *et al.*, 2007<sup>3</sup>) of woodland may already be avoided by Capercaillie as a result of disturbance. Capercaillie are largely confined to the few areas of woodland in Strathspey which are currently little-visited, and focused in the northern part of the area. RSPB Scotland is therefore concerned about the proposed strategy to focus most new residential development to Strathspey and particularly its northern half.

In order to limit the increase in pressure on the core Capercaillie area, we believe that the total extent of residential land allocated in Aviemore, An Camas Mor and Carr-Bridge should be reduced, and could be redistributed if necessary to other settlements (for example Kingussie, Newtonmore and Grantown-on-Spey) outside this core area.

RSPB Scotland is very concerned regarding the proposed allocation of An Camas Mor as a strategic settlement. You will be aware of our comments on the recent planning application for fresh permission for the development and on the associated Habitats Regulations Appraisal. To date, we remain unconvinced that the development would not adversely affect the integrity of the nearby Special Protection Areas, particularly in view of the scale and location of the site. It is likely that we would object to the proposed allocation of An Camas Mor if it is retained, for the detailed reasons we have provided in response to the recent planning application. There is no requirement for a site to be allocated in a plan just because it has planning permission. In fact, the national park wide consideration that can be given through the development plan process to meeting housing need shows that there are other less environmentally damaging options available to meet housing need. The Main Issues Report shows that the allocation of some additional smaller sites would allow the stated housing land requirements to be met, in the absence of any development at An Camas Mor.

We are also specifically concerned about the scale of new development (over 100 houses) proposed for Carr-Bridge, which is intended to be only an 'intermediate settlement' and is surrounded by several important Capercaillie woodlands. We consider that the extent of allocated land in Carr-Bridge should be significantly less than that proposed by CNPA in the Main Issues Report.

## **Main Issue 2: Designing great places**

***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?***

We agree, and we consider that all scales of development proposals should be required to demonstrate how they meet the six qualities, as per the preferred option. Many development proposals in the national park will be individually small-scale and outside allocated sites. It is important that all developments display all of the six qualities of successful places, especially in such a sensitive and important environment as the national park. We welcome the intention to produce supplementary guidance on this topic.

***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?***

We agree, and believe that masterplans and development briefs should be required to provide details of how the biodiversity value of the site will be enhanced.

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<sup>3</sup> Summers, R.W., McFarlane, J. and Pearce-Higgins, J.W. (2007) Measuring Avoidance by Capercaillies *Tetrao Urogallus* of Woodland Close to Tracks. *Wildlife Biology*, 13(1), 19-27

***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?***

We believe it is sensible to identify new economic development sites so that economic development is directed towards more sustainable and less environmentally sensitive locations. It is essential that economic development is not to the detriment of the environment. Economic development in the National Park should be of a small scale, limited to that required to sustain existing local communities. Our comments on specific employment sites identified in the MIR are included in Annex 1.

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

RSPB Scotland has no comments in relation to this question.

**Main Issue 4: Housing**

***Do you agree with our proposed Housing Supply Targets for the next Local Development Plan?***

No. Please refer to our comments above regarding the overall development strategy of the LDP. We believe that the proposed Housing Supply Targets (HSTs) should be reduced. Scottish Planning Policy confirms (at paragraph 115) that the HST is a *policy view* of the number of homes to be delivered, taking into account various matters including environmental factors, issues of capacity, and the aims of National Parks. In the case of the Cairngorms National Park, amongst the foremost considerations should be the importance and sensitivity of, and existing pressures on, the National Park's natural environment. These, together with the statutory aim and the public interest priorities for the Park regarding nature conservation (and to provide appropriate land for housing to meet *local* need) mean that the HSTs should be reduced to the minimum necessary to meet local needs only.

***Do you agree that the proposed Housing Land Requirements are sufficiently generous?***

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

The comments below are in response to both of these questions.

RSPB Scotland considers that the proposed Housing Land Requirements (HLRs) are too generous and inappropriate, given firstly our view that the Housing Supply Targets should be reduced (please see our answer above).

We welcome the recognition in the MIR that the importance of the Park for nature conservation limits the amount of land appropriate for development. In view of this importance, we believe that it is not appropriate to apply the Scottish Planning Policy 10-20% 'margin for generosity' to the housing supply targets to determine the HLRs for the National Park. We note that the new Loch Lomond and Trossachs National Park LDP did not apply a 10-20% margin to the housing supply target. In the examination of that LDP, the reporter concluded that the application of such a margin would be unwise, taking into account the sensitive character of the environment and the first statutory aim of the park to conserve and enhance the natural and cultural heritage of the area.

Furthermore, 'topping up' the supply with additional housing sites as proposed in the MIR would itself provide sufficient generosity and flexibility in supply, making the application of a 10-20% increase on the HSTs even less appropriate and not necessary.

We do however agree that the large strategic sites in the existing LDP may be challenging to deliver. This is particularly the case for An Camas Mòr, where it may be impossible for the developer to demonstrate that the significant development can be delivered without adversely affecting any Special Protection Area. We therefore agree that it would be sensible to increase flexibility in the supply of housing sites by identifying alternative 'top up' sites that can be developed only in the event that the larger sites fail to be delivered. Our comments on specific sites (including North Aviemore) can be found elsewhere in our MIR response.

In the Highland and Aberdeenshire parts of the Park, for the period 2020-2029, the expected housing contributions from existing LDP sites already exceed the proposed HSTs by 67% and 57% respectively. The addition of some 'top up' sites as proposed in the MIR would increase these excesses.

Taking into account all of the above points, we consider that the total amount of allocated land should be considerably reduced, to reduce the associated environmental impacts and ensure that there is not a significant oversupply in housing.

In addition, as the evidence paper on rural development notes, Scottish Planning Policy (paragraph 121) advises that National Park authorities are not required to meet the housing land requirement in full in their area. We advocate that in accordance with SPP, the CNPA and The Highland Council should arrange for some of the National Park's housing land requirement for the Badenoch and Strathspey Housing Market Area (HMA) to be met in the adjacent HMA (Inverness HMA).

***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?***

We agree with the statement in the MIR that it will be challenging to deliver the An Camas Mòr (ACM) development. The CNPA will be well aware of our concerns in relation to this particular development, and we believe that it may be impossible for the developer to demonstrate that the development can be delivered without adversely affecting any Special Protection Area. This hurdle, in addition to other major obstacles and significant infrastructure costs, may mean that the ACM development fails to be delivered.

RSPB Scotland agrees that, out of the three options set out in the MIR to address this uncertainty, the preferred option is the most appropriate one.

We note that the preferred option entails the identification of long term development land at 'North Aviemore' held in reserve and initially embargoed from development, but which could potentially be released for early development in particular circumstances. It is stated that these circumstances could include the emergence of strong evidence that the ACM site was constrained for the entire Plan period.

We assume that this long term development land held in reserve would be both the site labelled 'North Aviemore' on the settlement map on page 63, and site THC045. The MIR does not give an indication of the number of houses envisaged on the North Aviemore and THC045 sites, although we understand that the figure for North Aviemore is approximately 500. We note that the sites are considerably smaller than ACM, and their size and location mean that they are likely to have less overall impact on the Capercaillie population and associated SPAs, and the impact may be more straightforward to mitigate. However, they are still sizeable sites and are very close to Kinveachy forest – a particular stronghold for Capercaillie. The sites should not be allocated unless it is

concluded beyond reasonable scientific doubt that development on the sites would not adversely affect the integrity of any Natura site. The potential impacts should be fully considered in the HRA of the Proposed Plan, and suitable mitigation requirements should be outlined in the Plan itself.

It would be essential that residential development is only permitted at North Aviemore and site THC045 if it is established beyond doubt that residential development at ACM will not happen (e.g. if the planning permission lapses and can no longer be implemented). Otherwise, there is a risk that there would be an even greater oversupply of housing, with resultant greater and unacceptable pressures on the designated sites, sensitive habitats and species in the area.

It is critical that CNPA ensures that there is no 'loophole' that could allow development of *both* ACM and the alternative sites North Aviemore and THC045. The risk would be considerably reduced if the new LDP does not include ACM as an allocated site, but simply refers to it as a site with planning permission (contributing towards the housing land supply). We would seek a clear statement in the LDP that the ACM site ceases to be suitable for development in the event that the existing planning permission lapses.

### **Main Issue 5: The affordability of housing**

***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?***

RSPB Scotland has no comment in response to this question.

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

Yes. As noted in the evidence paper on housing, the average household size is projected to drop from 2.15 people in 2012 to 1.93 people in 2037, and the number of 1-person households in the Park is projected to increase by 21% between 2014 and 2039. Yet compared with Scotland as a whole, the National Park has a higher proportion of larger homes and a lower proportion of smaller homes. Requiring developments to include more smaller homes would help to address this imbalance. Smaller homes would also generally (all other things being equal) have lower environmental impacts than larger homes. We suggest that the policy requirements for developments to include a mix of house types and sizes, with particular emphasis on smaller homes, should be firm and specific – perhaps setting a minimum required proportion of smaller homes. Otherwise, there is a risk that new residential developments in the national park will continue to be dominated by larger homes, not meeting the local need for smaller and affordable homes. In turn, that would result in additional housing land being required (over and above that allocated in the LDP) in order to meet local need, which would put more pressure on the National Park's sensitive environment.

### **Main Issue 6: Economic development**

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

We believe it is sensible to identify new economic development sites so that economic development is directed towards more sustainable and less environmentally sensitive locations. It is essential that economic development is not to the detriment of the environment. Our comments on specific employment sites identified in the MIR are included in Annex 1.

## **Main Issue 7: Impacts on Natura designations**

### ***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?***

We welcome the identification of impacts on Natura sites as a 'main issue', and agree that one of the biggest conservation issues for the next LDP is ensuring that development does not adversely affect Capercaillie populations and the associated Special Protection Areas.

RSPB Scotland believes that in relation to Capercaillie conservation, it would be appropriate to have a combination of the approaches detailed in the 'preferred option' and the 'reasonable alternative option'.

As the MIR states, new development can contribute to impacts on Capercaillie mainly through increasing recreation in forests where Capercaillie are present. Whilst much of the recreation activity generated from new development occurs in the immediate vicinity of the development site (as stated in the MIR), a new development will have further reaching effects. On the basis of assumptions made by the CNPA, it can be assumed that at least 28% of the outdoor visits made by adult residents would be to woodlands. 25% of visits to the outdoors would be made by motor vehicle, and of these, over half (57%) would involve a round-trip of between 2 and 20 miles. Those further-afield visits may increase recreational disturbance to Capercaillie, potentially in areas which were previously little-visited, especially when combined with the visits generated by other developments.

We have calculated that at the time of writing, planning applications approved (or resolved to be approved, excluding An Camas Mòr) since the adoption of the current Cairngorms National Park LDP result in a net addition of 145 homes, and 101 tourist accommodation units<sup>4</sup> in the Core Capercaillie Area within Strathspey. Using CNPA methodologies to predict numbers of visits<sup>5</sup>, the new homes can be predicted to result in an additional c. 75,000 recreational visits each year<sup>6</sup>. Of these visits, roughly two-thirds (50,000) would be on foot from home, and a quarter (some 18,800) would involve using a car to access a recreational 'setting off point', half of which would be within 5 miles of the home. So these new homes would result in several thousand visits each year to the Strathspey woodlands.

However, most of these planning applications have been small-scale, for single or just a few homes. Potential effects in terms of recreational disturbance on Capercaillie have largely been ignored or been considered insignificant by the decision-makers in the assessment of these individual applications. Consequently, most of the approved developments have not been required to undertake or contribute towards any associated mitigation measures.

We acknowledge that trying to predict the levels and patterns of recreation generated by individual development proposals is fraught with difficulty and uncertainty. However, it is clear that whilst individual small-scale developments may be considered to have negligible or trivial impacts in terms of increased recreational pressure on Capercaillie woodlands, in combination with other

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<sup>4</sup> A holiday cabin/cottage, an individual hotel room, and an extension to bunkhouse/dormitory accommodation are each regarded as a single 'tourist accommodation unit'.

<sup>5</sup> CNPA (2016) *Report on predicted levels and patterns of recreational use of the outdoors by An Camas Mor residents*.

<sup>6</sup> Assuming an average household size of 1.93 people.

developments they may result in significant cumulative impacts, and potentially adverse effects on SPAs contrary to the Habitats Regulations.

We would therefore support a proposal to design a strategic package of mitigation measures to address the cumulative impacts of development. We suggest that the example of strategic mitigation in relation to the Thames Basin Heaths (TBH) Special Protection Area in South East England should be followed as a model for similar strategic mitigation in the Cairngorms National Park. In the TBH case, the strategic mitigation involves the provision of both Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM). The aim is to avoid increased recreational use of (and thus disturbance and harm to) the TBH and its birds and habitats, by residents of the new residential developments<sup>7</sup>. Both SANG and SAMM are funded by developer contributions levied on the housebuilders/applicants (following the polluter pays principle).

A similar strategic mitigation scheme should be implemented in the Cairngorms National Park. This scheme should include recreation management measures, including provision of a well-resourced ranger service, as well as the provision of well-designed SANGs. It should also include a requirement for developers to provide information to the occupants of their developments, on the sensitivities of the National Park's habitats and species and advice on responsible access. RSPB Scotland would be pleased to assist in the design and implementation of such a scheme. The efficacy of various mitigation measures is currently unknown, and it is essential that the effectiveness of mitigation measures is robustly monitored, and mitigation adapted accordingly. The mitigation scheme should cover all of the areas of the National Park that support Capercaillie populations, including parts of Perth and Kinross and Aberdeenshire.

Under the current legislation regarding Section 75 agreements, CNPA and the relevant councils may find it difficult to require an individual small-scale development to contribute towards such a strategic mitigation scheme, if not all of the measures within the scheme are demonstrably required to mitigate the 'trivial' impacts of that individual development. We refer CNPA to the recent Supreme Court judgment regarding the Aberdeen City and Shire Strategic Transport Fund<sup>8</sup>. The proposed provisions in the Planning (Scotland) Bill for an infrastructure levy in Scotland may address this legal obstacle, if the infrastructure levy covers green infrastructure and ecological mitigation such as recreational management measures. However, it is currently uncertain whether the levy will be introduced at all; its scope is not yet confirmed; it would be councils rather than the CNPA who would be responsible for collecting it; and if it is introduced it is likely to be phased in gradually from 2022 at the earliest. It is important that strategic mitigation for Capercaillie does not 'fall through the gap' between the possible new infrastructure levy and the existing/amended Section 75 provisions. RSPB Scotland will be seeking amendments to the Bill and reassurances from the Scottish Government in relation to this important issue, and CNPA may wish to do the same given the pressing need for a strategic approach to mitigation for Capercaillie, and the need to secure funding for this.

We welcome the proposal to support the growth of good Capercaillie habitat in the locations where it will have least disturbance from people. This should be in addition to, rather than instead of, robust mitigation measures to minimise and prevent an increase in disturbance in current

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<sup>7</sup> See for example [www.surreyheath.gov.uk/residents/planning/planning-policy/thames-basin-heaths-special-protection-area-avoidance-measures](http://www.surreyheath.gov.uk/residents/planning/planning-policy/thames-basin-heaths-special-protection-area-avoidance-measures)

<sup>8</sup> [www.supremecourt.uk/cases/uksc-2016-0157.html](http://www.supremecourt.uk/cases/uksc-2016-0157.html)

Capercaillie woodlands, so that the current Capercaillie population is protected *in situ*. Otherwise, the current population is likely to be simply displaced into the new habitat. We would be pleased to discuss the proposals for new Capercaillie habitat, to help ensure that the most appropriate locations are chosen. It will take a long time for new habitat to become suitable for Capercaillie, so it is important that such habitat provision occurs as early as possible.

We note that the MIR seems to suggest that it is intended not to continue the current LDP approach of requiring individual development proposals to demonstrate that they will not have an adverse impact on Capercaillie populations and include mitigation measures to address their own impacts. We believe that this approach will still be necessary in some cases, notwithstanding the overall more strategic approach to mitigating the cumulative effects of new development. The planning authority will still need to carry out an appropriate assessment of individual development proposals that would have a likely significant effect on a SPA. A proposed development (particularly one which is not on an allocated site) may well have specific impacts on Capercaillie habitat that have not been accounted for in the design of a strategic mitigation scheme, especially if the development is very close to Capercaillie habitat. Therefore the new LDP should still require applicants to provide evidence to inform an appropriate assessment and detail site-specific mitigation measures where relevant.

### **Main Issue 8: Planning obligations**

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

**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?**

We consider that a revised policy on planning obligations should include specific guidance on where and when contributions towards measures to mitigate effects on natural heritage will be required. Please also see our comments above regarding a strategic mitigation scheme for Capercaillie, and the possible new Infrastructure Levy.

### **Main Issue 9: Flood risk and climate change resilience**

**Do you agree that the new Local Development Plan should include a stronger policy requirement for Sustainable Drainage Schemes to be considered in all new development proposals?**

We believe that there should be a presumption that all new development should have a sustainable drainage system (SUDS), unless there is robust justification for a development not incorporating one. This is particularly relevant given that one of the Public Interest Priorities for the National Park relates to water and flood management. The SUDS should be designed to have multiple benefits including biodiversity enhancement. RSPB and WWT has produced guidance *Sustainable drainage systems: Maximising the potential for people and wildlife*, to which we request you refer<sup>9</sup>.

The new LDP should also promote natural flood management where appropriate, especially in the Natural Flood Management Priority Areas shown in the Partnership Plan. Natural flood management options should always be considered first, with hard engineering only used as a last resort.

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<sup>9</sup> [ww2.rspb.org.uk/Images/SuDS\\_report\\_final\\_tcm9-338064.pdf](http://ww2.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf).

## Main Issue 10: Land management in upland areas

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

We note that the Partnership Plan's presumption against new hill tracks in open moorland areas is stated to be for landscape conservation reasons rather than for other environmental reasons. We also note that the same presumption is proposed to be included in the LDP, in the landscape policy. RSPB Scotland has no comment to make on the desirability of including such a presumption for landscape conservation reasons, but consider that a presumption is desirable for wider environmental reasons.

As stated in the MIR, unsuitably located and/or poorly constructed hill tracks can have detrimental impacts on sensitive habitats including peatland, and on hydrology. The effects of new tracks on recreation levels and patterns can be detrimental— especially if a track will allow easier access to previously little-visited and undisturbed locations supporting protected species such as golden eagles. We recommend that CNPA also refers to the SNH (2015) guidance *Constructed tracks in the Scottish Uplands*.

### Other points

#### **Do you agree with our conclusions about the changes that need to be made to policies in the existing Local Development Plan?**

#### **Do you think any other changes are needed?**

We believe that parts 2 and 3 of Policy 1 in the current LDP are overly flexible, encouraging unsustainable dispersed development in more environmentally sensitive rural locations of the Park, and reliance on the private car, and a revised policy should set out stricter sustainability criteria against which proposals for housing in the countryside should be assessed.

Section 3F of the Town and Country Planning (Scotland) Act 1997 requires all planning authorities to include in their local development plans, policies requiring all developments to be designed to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use, through the installation and operation of low and zero-carbon generating technologies (LZCGT). The existing LDP does not contain such a policy requirement as required by Section 3F, and the new LDP should do so, and should also require all planning applications to be accompanied by an energy statement that demonstrates how the development would satisfy this requirement.

SPP states at paragraph 205: "Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO<sub>2</sub>) emissions." Policy 10 of the current LDP would not specifically require applicants to undertake such an assessment. We believe a revised policy should specifically require applicants to provide details of an assessment of the likely effects of the development on carbon dioxide emissions, and suitable mitigation measures implemented to minimise carbon emissions.

The collapse of the opencast coal industry in Scotland in 2013 demonstrated the importance of securing appropriate financial guarantees for the restoration and aftercare of sites with significant long-term liabilities. Financial guarantees might be required to secure ongoing and long-term mitigation, for example measures required by planning conditions or in site aftercare schemes, as

well as to secure restoration of sites. We recommend that CNPA should set out clear policy/supplementary guidance along the lines of guidance that has been developed by East Ayrshire Council which gives details and risk ratings for different types of financial guarantees<sup>10</sup>. Supplementary guidance would also help to ensure there are robust processes for ensuring financial guarantees are appropriately quantified and monitoring to minimise financial and legal risks to the authority as well as risks to the environment and communities. We also recommend that consideration is given to the approach by East Ayrshire Council to compliance monitoring - the council is now undertaking quarterly compliance monitoring of major development in the region, including quarries, landfill, onshore windfarms and electrical transmission lines. Results are reported to the planning committee and published on the council website. We recommend that CNPA follows this approach and conducts annual reviews of the provision of financial guarantees for major developments with significant restoration and aftercare liabilities. This will help avoid a situation where liabilities pass to planning authorities in the case of failure of the developer to make adequate financial provision.

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<sup>10</sup> [www.east-ayrshire.gov.uk/Resources/PDF/P/Planning-SG-FinancialGuarantees.pdf](http://www.east-ayrshire.gov.uk/Resources/PDF/P/Planning-SG-FinancialGuarantees.pdf)

## Cairngorms National Park LDP 2020 Main Issues Report:

### RSPB Scotland response

#### Annex 1: Comments on settlement-based issues

The table below contains site-specific comments on various sites identified as either preferred or not-preferred in the Main Issues Report, and some more general comments on specific settlements. The table does not include more general points which apply to many sites, e.g. the need to consider a site's contribution towards cumulative impacts on designated sites and Capercaillie, and for sites to provide mitigation and/or contribute towards a strategic mitigation scheme in relation to those impacts.

The red, amber, green labels reflect the degree of concern we have about the sites at this stage. The environmental impacts of all sites taken forward into the Proposed Plan should be carefully assessed, and mitigation for those impacts clearly identified, including through the SEA and HRA processes (as well as at the planning application stage). It is likely that we would object to, or express significant concerns regarding, the proposed allocation of those sites labelled red. We believe it is more likely that impacts can be mitigated to an acceptable level for those sites labelled green or amber.

Settlement	Site / area	Comments	Red,Amber,Green
An Camas Mor	THC031	Please see our comments in relation to Main Issues 4A and 4B, and our comments in relation to the recent Section 42 planning application for the An Camas Mor Development.	Red
Aviemore	North Aviemore	Please see our comments in relation to Main Issue 4B. This site should only be developed if it is established beyond doubt that the An Camas Mor development will not take place. The site is close to Boat of Garten, Carrbridge and Kinveachy SPA, which hold significant populations of Capercaillie. Recreational impacts (of this development alone and in combination) on Capercaillie should be carefully assessed. This site also holds a breeding population of lapwing which will also require consideration.	Amber

Settlement	Site / area	Comments	Red,Amber,Green
Aviemore	THC045/THC059	Please see our comments in relation to Main Issue 4B. This site should only be developed if it is established beyond doubt that the An Camas Mor development will not take place. Recreational impacts (of this development alone and in combination) on Capercaillie should be carefully assessed. This site is located close to the Kinveachy SPA and adjacent undesignated woodland (both very important for Capercaillie) are already under considerable pressure from mountain biking and other recreation which is affecting the distribution of Capercaillie. Access between site THC045/THC059 and Kinveachy is somewhat limited due to the barrier of the A9. The creation of an underpass or footbridge across the A9 here would improve access between this site and Kinveachy, so would be undesirable from a Capercaillie conservation perspective.. We are also concerned about the impact of this site in combination with the other proposed sites in North Aviemore.	Amber
Aviemore	EP3 Dalfaber Drive	Potential impacts on Capercaillie do not seem to have been taken into account during the consideration of previous planning applications on this site. There is a need to consider how development here would contribute to cumulative impact on Capercaillie.	Amber
Aviemore	AHR THC007-0014 The Aviemore Highland Resort	Any development at this site would need to be carefully considered and may require appropriate mitigation. This site is within walking and cycling distance to the Cairngorms SPA which is generally well-zoned for recreation, but under a great deal of pressure from large number of visitors.  Craigellachie National Nature Reserve (NNR) lies to the north of this site and Capercaillie use the upper slopes of the reserve during the winter. It is also possible to access the Kinveachy SPA from the Craigellachie NNR which may lead to an increase in recreational disturbance to Capercaillie. Improved access as a result of the A9 dualling scheme could also add to the impact and therefore requires careful thought.	Amber
Ballater	H1 Monaltrie Park and forest to the/south east of Ballater- Pannanich	This site provides relatively easy access to Tullich and Pannanich woods which both have populations of Capercaillie. We are concerned that any developments in this area would lead to an increase in recreational activity which could be detrimental to Capercaillie.	Amber

Settlement	Site / area	Comments	Red,Amber,Green
Grantown-on-Spey	Forest south east of Grantown-on-Spey	Capercaillie continue to persist very close to Grantown although their numbers are lower than those around the Aviemore area. For example, the Anagach SPA is heavily disturbed by recreation and Capercaillie are confined to the quietest areas of the SPA. If developments do take place in Grantown it will be important to maintain quieter areas of the SPA through careful recreation management.	Amber
Grantown-on-Spey	THC038	We would not wish to see this site allocated, and agree with its identification as 'not preferred', as it adjoins woodland containing Capercaillie. Development here is likely to increase recreation and mountain biking within the wood to an unacceptable level.	Red
Grantown-on-Spey	THC039 and THC040	Several woodlands near to these proposed development sites contain Capercaillie, although they have declined in recent years. The location and layout of these woods mean that they do not receive much recreational access as there are few tracks and paths in the sensitive areas. We therefore agree with the identification of these sites as 'not preferred', and consider that other sites in the settlement would be more appropriate for development than these ones.	Amber
Kingussie	THC053	This site is within the core breeding wader area in the National Park. In addition, Transport Scotland is considering using land at Dellmore as wetland habitat to offset impacts of the A9 dualling at Insh Marshes. Development on THC053 may negatively affect the local wader population and compromise the delivery of offsetting habitat at Dellmore. We are also concerned that this site may be at risk from the 1:200-year flood event.	Amber
Newtonmore	H1	Please see our comments in response to Main Issue 1, regarding the desirability of redistributing the extent of allocated housing land so that less is located in the core Capercaillie area and more is located outside that area (such as at Newtonmore). However, H1 is important for breeding waders and falls within the 1:200-year floodplain. Measures to mitigate or offset the impacts on breeding waders should be required if these sites are allocated.	Green
Newtonmore	THC051	Site THC051 is important for breeding waders and falls within the 1:200-year floodplain. Measures to mitigate or offset the impacts on breeding waders should be required if this site is allocated.	Amber
Blair Atholl	PKC003, PKC 005, PKC006	PKC003 and PKC005 and PKC006 are all in close proximity to the River Tay Special Area of Conservation, and PKC006 is adjacent to the Glen Tilt Woodlands SSSI. We agree with the identification of these sites as 'not preferred'.	Amber

Settlement	Site / area	Comments	Red,Amber,Green
Boat of Garten	THC044	30 houses have already been built adjacent to this location which borders a very heavily disturbed Capercaillie wood. Development on this site would likely result in disturbance extending into areas of better habitat for Capercaillie. The mitigation work undertaken for the current development has not had time to establish and currently remains untested. We would therefore be opposed to development on THC044, and agree with the identification of the site as 'not preferred'.	Red
Boat of Garten	THC043	We are opposed to building 4-5 houses this far out of the main village as it will impact further on Capercaillie and we advise that another alternative site is found for this proposal.	Red
Boat of Garten	T1 Caravan Park	An increase in the number of caravans/stances permitted here should be subject to a requirement to provide information to guests/visitors about the sensitivity of the surrounding woodland and responsible access, to prevent disturbance to Capercaillie.	Green
Braemar	AB002, , AB003, AB005, AB006 and AB007	Given the potential impacts on Morrone Birkwoods SAC and SSSI from development on sites AB002, AB003, AB005, AB006 and AB007, we agree with the identification of these sites as 'not preferred'.	Red
Carr-Bridge	All sites	The woodland and farmland around Carr-Bridge are important for Capercaillie and breeding waders, and we would not support further development in this settlement without rigorous assessment to determine the impacts of development on protected and priority species, and identification of robust mitigation.	Amber
Carr-Bridge	THC066	We would be opposed to new residential development at this location as it would likely adversely affect Capercaillie by increasing recreation in nearby important habitat.	Red
Carr-Bridge	H1	We consider that a proposal for 72 houses which has already been proposed at this location is too many, and that especially given the resulting loss of forest, it would push recreation further south and closer to more sensitive Capercaillie woodlands. A development at this location requires detailed assessment of its potential impact it would have on Capercaillie. We would likely object to the allocation of the larger H1 site which would result in the loss of a significant amount of woodland.	Amber
Carr-Bridge	H2 Crannich Park	A development at this site would likely lead to more recreation in Carr Plantation which could push recreational visits into the more sensitive areas further south. Development here should be subject to robust assessment which considers all potential recreational impacts.	Amber

Settlement	Site / area	Comments	Red,Amber,Green
Carr-Bridge	T1 Landmark	The expansion of this site for tourist development is likely to be acceptable to RSPB Scotland provided that there are measures in place to ensure that it does not result in increased recreation in the surrounding woodland.	Green
Carr-Bridge	THC057	As with H1 and H2 in Carr-Bridge the loss of the forest area would push recreation further into nearby areas that are currently undisturbed and used by Capercaillie and could result in increased disturbance.	Amber
Cromdale	THC018 to THC021	These sites are in an area which has a high density of breeding waders and are not sustainably located for housing development, so we agree with their identification as 'not preferred'.	Amber
Glenshee	PKC008, PKC009, PKC010	These sites are all located within a key area for populations of breeding curlew and oystercatcher, and recreation from occupants of new homes here would be likely to have an impact on those populations that would be difficult to mitigate. We therefore agree with the identification of these sites as 'not preferred'.	Red
Kincraig	H1, THC046 and THC054	Developments in Kincraig have the potential to increase recreation in currently quieter areas of Inshriach Forest which could adversely affect Capercaillie.	Amber
Nethy Bridge	THC017	A development at THC017 may lead to more recreation in sensitive areas of Craigmore wood so out of all of the sites shown in Nethy Bridge, this is our least preferred.	Amber
Nethy Bridge	All other sites	Development on these sites would increase recreation in surrounding forests, including to the west and south, into Abernethy Forest SPA. Developments would require to be subject to long term recreational management measures to ensure they do not adversely affect Capercaillie.	Amber

Settlement	Site / area	Comments	Red,Amber,Green
Tomintoul	ED3	As mentioned in the description of Tomintoul on page 89 of the MIR, the area has secured funding through a Heritage Lottery Funded (HLF) Landscape Partnership project. The Cairngorm National Park Authority was the lead partner in this funding bid. The Tomintoul and Glenlivet Landscape Partnership (TGLP) project aims to promote rural regeneration and encourage more visitors to experience the natural and cultural heritage of the area. The allocation of ED3 for economic development conflicts with the outcomes of the TGLP project, as the land is currently being managed at a wildflower meadow, grant-funded through the TGLP project. The wild flower meadow was established in 2017 to increase the biodiversity value of this area. An HLF-funded bird hide has recently been erected to view breeding waders immediately next to the same area. The location of the bird hide was chosen to overlook both the areas of breeding waders as well as the established wild flower meadow, which attracts a range of seed-eating birds such as twite and linnet. The bird hide will help visitors and the local community learn more about the natural heritage of the area as the interpretation planned will link to the wider Landscape Partnership project and encourage more visitors to this part of the National Park. Development of site ED3 could compromise the outcomes of the TGLP Project, and significantly reduce the biodiversity value of the site and adjacent land and the value of the bird hide to the local community and visitors to the area.	Amber
Tomintoul	H1 and H2	As noted in the site assessment in the SEA Environmental Report, the fields adjacent to sites H1 & H2 are important for breeding wader birds, such as lapwing, redshank and oystercatcher. RSPB Scotland has been monitoring breeding waders in these areas since 2011. Careful planning would be required if these sites are to be developed to avoid detrimental impacts on the breeding waders. For example, tree belts would not be appropriate as a boundary treatment for these sites, as these would deter waders from surrounding land. A low hedgerow or fence would be more appropriate.	Amber
Bruar and Pitagowan		The woodland in the Bruar area supports Capercaillie and is already a busy tourist location, with some problems associated with irresponsible recreation. It should therefore be covered by the strategic approach to Capercaillie conservation that is advocated in the MIR.	Amber

Settlement	Site / area	Comments	Red,Amber,Green
Dalwhinnie	Area around Dalwhinnie	The river valley around Dalwhinnie forms part of the River Spey Special Area of Conservation (SAC) and has a high density of breeding waders. This area will be under pressure from the A9 dualling programme with some parts of the dualling affecting wader breeding areas. The surrounding hills form part of the Drumochter Hills Special Protection Area (SPA) designated for breeding dotterel, golden eagle and merlin. Any new development at Dalwhinnie could increase recreational pressure on the designated sites and bird populations.	Amber
Dinnet		Development may increase recreation in nearby woodland which contains Capercaillie. We are also concerned that some of the sites shown in the MIR would involve a significant amount of tree removal, close to the high-quality woodland and wetland sites of Muir of Dinnet National Nature Reserve, so the effects on habitats and species should be fully considered.	Amber
Glenmore	T1 and T2 Camp site and Glenmore Lodge	Development here would probably increase pressure on the surrounding sensitive areas for Capercaillie. However, we recognise there is a great opportunity at both these sites and within Glenmore more generally to educate people on how they can enjoy the woods in a responsible matter. Any development within the Glenmore corridor requires careful assessment and should follow the guidelines set out in the Glenmore and Cairngorm Strategy.	Amber
Inverdrue and Coylumbridge	T1 Campsite	This campsite is close to several SPAs which are designated for Capercaillie, and other supporting woodland. Similar developments have encouraged the formation of informal 'guerrilla' mountain bike trails which can result in disturbance to Capercaillie. Development on this site could require a recreational management plan and other possible mitigation to prevent an adverse effect on Capercaillie.	Amber

## Cairngorms National Park LDP 2020 Main Issues Report: RSPB Scotland advice on Habitats Regulations Appraisal

RSPB Scotland wishes to provide the following comments about the preliminary 'Habitats Regulations Assessment' report prepared in relation to the Main Issues Report, and about the next stages of Habitats Regulations Appraisal (HRA) for the Plan.

### Section 1: Introduction

We note that the report sets out the screening process and preliminary assessment undertaken on three key issues to inform the preparation of the Main Issues Report, and is not a record of a full HRA. However, we also note that the report gives some indication of how CNPA intends to progress with the HRA for the emerging LDP. We therefore provide some comments on this to assist the work of CNPA.

### Section 3: Details of Natura 2000 sites within the CNP and potential vulnerabilities relevant to the Main Issues Report

The descriptions within Table 3 of the 'vulnerabilities to change/potential effects of the plan', in relation to Abernethy Forest, Anagach Woods, Cairngorms, Craigmore Wood and Kinveachy Forest SPAs, are not comprehensive. In all of these cases the potential effects on Capercaillie are described as being simply 'disturbance from construction and recreation arising from neighbouring development'.

It is known that Capercaillie avoid woodland close to roads and tracks. Summers *et al.*, 2007<sup>1</sup> found a mean 'avoidance distance' of 62.5m for lightly used tracks, and 90.5m for heavily used tracks. Disturbance therefore results in loss of effective habitat for Capercaillie. In addition, development of some of the sites shown in the MIR may result in direct loss of habitat for Capercaillie. These potential effects of the plan, on actual or effective habitat, should be noted in Table 3.

In addition, the description of 'recreation arising from *neighbouring* development' (emphasis added) implies that only development adjacent to a SPA may give rise to recreational disturbance in that SPA. As CNPA is aware<sup>2</sup>, it can be predicted that a quarter of the recreational visits by the residents of new developments in Strathspey would be started by car in order to access a recreational 'setting-off point'. Of those journeys by car to setting off points, 43% would end 1 and 5 miles from the home; 14% between 5 and 10 miles; 13% between 10 and 15 miles; and 6% between 15 and 20 miles<sup>3</sup>. Almost half (46%) of residents' recreational trips taken on foot would entail a walk of 2 - 8

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<sup>1</sup> Summers, R. W., McFarlane, J. & Pearce-Higgins, J.W. (2007) "Measuring avoidance by Capercaillies *Tetrao urogallus* of woodland close to tracks" *Wildlife Biology* 13: 19-27

<sup>2</sup> CNPA (2016) *Report on predicted levels and patterns of recreational use of the outdoors by An Camas Mor residents*.

<sup>3</sup> One-way journey distances, based on Table 10 in CNPA (2016)

miles<sup>4</sup>. So, development several miles away from a SPA is likely to result in recreation (and therefore potentially disturbance to Capercaillie) within that SPA. We therefore suggest that Table 3 should refer to 'development within reasonable travel distance', or 'development within 20 miles' of the SPA, and not simply 'neighbouring development'.

For the same reason, the lists in Table 3 of 'relevant settlements' for each of the SPAs are incomplete. For example, the list for Abernethy Forest SPA should include An Camas Mór, Aviemore, Boat of Garten, Carr-Bridge, Grantown-on-Spey, Kingussie, Nethy Bridge, and Inverdrue & Coylumbridge.

The lists of 'relevant settlements' in Table 3 are also inconsistent with the settlement assessments in Table 6 – e.g. for Abernethy Forest SPA, Table 6 discusses sites in Boat of Garten, Nethy Bridge, Aviemore and An Camas Mór, whereas Table 3 lists only two of these settlements as being relevant to the SPA.

#### **Section 4: Screening of the Main Issues**

It is not clear exactly what criteria and methodology were used in the exercise to 'screen' sites for likely significant effects on SPAs. The report states that the impact would be primarily increased recreational disturbance resulting from:

- "New housing close to SPAs...",
- "New housing close to non-designated woods which we know are important areas for Capercaillie, these are the Inshriach and Uaith Lochans area", and
- Sites proposed for economic development, as these have the potential to include activities which have a potential disturbance effect, e.g. new mountain bike centres.

As explained above, even if new housing is several miles away from a SPA it is still likely to have an effect on that SPA in terms of increased recreational disturbance. In addition, there are several other areas of woodland in Strathspey which are important for Capercaillie.

We are unsure as to why several residential or economic development sites (notably in Aviemore, Grantown on Spey, Boat of Garten, Carr Bridge and Nethy Bridge, and THC031 An Camas Mór) have been screened out as not having a LSE on SPAs designated for Capercaillie, and disagree with the results of this exercise.

For example, in Grantown in Spey it is not clear why H1 has been screened out whereas H2 has been screened in. Both are within convenient travelling distance of important Capercaillie woodlands including Anagach Woods SPA, and are of very similar size to each other. ED1 has been screened out despite the recognition (as referred to above) that economic developments may generate recreational disturbance effects.

We are concerned that the settlement assessments detailed in Table 6 are incomplete, and give the impression that not all sites with likely significant effects (or minor residual effects) on SPAs would be fully assessed in a HRA. For example, in relation to Abernethy Forest SPA, the settlement assessment for Aviemore states that *new* housing allocations in Aviemore would be taken forward for full assessment. It does not confirm (as it should) that housing allocations proposed to be carried forward from the current LDP will also be fully assessed at the next stage. In relation to Kinveachy Forest SPA, the settlement assessment only mentions THC7-14 and not any other potential allocations.

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<sup>4</sup> Table 11 in CNPA (2016)

Several settlement assessments refer to the HRA for An Camas Mór, noting that it concluded that there would be no LSE on Capercaillie provided that mitigation was undertaken as recommended by the 'Recreational Management Plan (SNH, and CNPA, 2016)', and found no minor residual effects. You will be aware that RSPB Scotland provided comprehensive comments on a draft version of that HRA, highlighting several shortcomings that significantly reduce confidence in its conclusions. Key shortcomings are listed below.

### **Section 6: Mitigation strategy**

We note that it is proposed to undertake a full assessment based on the method used for the An Camas Mór HRA. We highlighted several major shortcomings of that HRA, and it is important that these are addressed if a similar method is used in relation to the emerging new LDP:

- the use of national data to predict the population size of An Camas Mór and the number and distribution of recreational visits, potentially resulting in substantial underestimates; and the absence of baseline data on existing local patterns of recreation against which to compare those predictions;
- the use of unwise assumptions in the recreational activity modelling (for example that recreational visits by ACM residents involving a round trip journey of more than 20 miles would not result in significant disturbance to Capercaillie);
- insufficient consideration of the impacts of recreational activities other than walking and mountain biking – such as horse riding; motorbiking and e-biking; and commercial dog walking;
- incomplete consideration of potential setting-off points for recreational activity and the resultant lack of certainty that all potential disturbance impacts on Capercaillie and all potentially affected areas had been identified;
- lack of recognition that there would be minor residual effects and lack of an in-combination assessment;
- insufficient detail on mitigation measures to address the impacts identified, and on their likely effectiveness;
- inadequate consideration of the potential 'knock-on' implications of the mitigation measures – including in terms of impacts on other species and habitats; and potential displacement effects on visitors.

One of the most fundamental shortcomings of the HRA work undertaken to date regarding An Camas Mór has been the absence of robust baseline data on current recreation patterns and levels in woodland used by Capercaillie. It is critical that the HRA of the emerging plan is informed by such data.

### **Future HRA work**

RSPB Scotland has developed a habitat suitability model for Capercaillie in the Cairngorms National Park. This model uses data from the 2003-04, 2009-10 and 2015-16 National Capercaillie surveys (collectively these hold more than 300 Capercaillie sightings) and hierarchical distance sampling approaches to model relationships between the Capercaillie density and important environmental parameters, including:

- topographical (e.g. altitude, slope),
- land cover (e.g. percentage cover of native pinewood, conifer plantation, broadleaf woodland);
- forest quality and structural characteristics (e.g. tree density, browsing pressures).

Using this model, we have been able to predict spatial patterns of Capercaillie density across the National Park under current conditions, but we have also been able to visualise how densities may alter under different scenarios of land cover change, including the National Park's own Woodland Expansion strategy. This work was conducted as part of a RSPB research project to simulate future Capercaillie population change under different scenarios of land cover and climate change, which is currently being written up for submission to a peer-reviewed journal.

The habitat suitability model could prove to be useful for informing the CNPA about the potential impacts of developments on Capercaillie on two fronts. Firstly, it would provide an estimate of the potential losses of Capercaillie due to direct habitat loss within the footprint of proposed developments. Secondly, although the model does not currently make provision for the effects of recreational disturbance on Capercaillie, it is possible that it could be adapted for that purpose. Specifically, the existing model framework permits an exploration of the nature of the relationship between Capercaillie densities and proxies of recreational disturbance (e.g. measures of proximity to path networks, or actual/modelled estimates of intensity of path usage), which could then potentially be utilised to predict likely impacts of future recreational disturbance under different proposed development scenarios.

We would welcome an early opportunity to discuss with you the CNPA's proposals and progress in relation to the HRA of the emerging LDP, and how our habitat suitability model and the James Hutton Institute's 'CaperMap' work could be used to inform your work.