
CAIRNGORMS NATIONAL PARK AUTHORITY

Title: REPORT ON CALLED-IN PLANNING APPLICATION

Prepared by: MARY GRIER, PLANNING OFFICER
(DEVELOPMENT MANAGEMENT)

DEVELOPMENT PROPOSED: FULL PLANNING PERMISSION FOR THE REFURBISHMENT OF THE EXISTING SITE AND THE SITING OF 38 ADDITIONAL HOLIDAY LODGES AT GLENMORE CARAVAN AND CAMPING SITE, AVIEMORE.

REFERENCE: 08/286/CP

APPLICANT: FOREST HOLIDAYS LLP, BATH YARD, MOIRA, DERBYSHIRE.

DATE CALLED-IN: 8TH AUGUST 2008

RECOMMENDATION : APPROVE WITH CONDITIONS



Fig. 1 - Location Plan

BACKGROUND TO THE AMENDED REPORT

1. This application was initially discussed at the CNPA Planning Committee meeting on November 14th 2008, with Members voting to defer a decision on the application pending the submission of a business plan / economic impact assessment and also amendments to the proposed car parking arrangement and the provision of increased areas for informal camping. The information was recently submitted and this report has been produced following an assessment of the additional information. For the purposes of clarity please note that all new text in this report will appear in bold type.



Fig. 2 : Open northern area



Fig. 3 : southern 'Pinewoods' area

SITE DESCRIPTION AND PROPOSAL

2. Full planning permission is sought in this application for the refurbishment of the existing caravan and camping site at Glenmore, and also for the siting of 38 holiday lodges on the site.¹ The identified site area encompasses all of the existing Glenmore Caravan and Camping site, which extends to an area of approximately 7.9 hectares. The site is located in Glenmore, close to the shores of Loch Morlich, between Aviemore and the Cairngorm Mountains. The overall site area is a type of L shape and is essentially made up of two connected parcels of land. The larger of the two areas is in the north east where part of the site runs adjacent to the public road, while the southern, eastern and much of the western boundaries of this area consist of woodland. The remaining western boundary adjoins one of the

¹ Planning permission was sought for 40 lodges when the application was initially submitted. However, two lodges have been omitted on the proposed layout in response to concerns raised by the CNPA and other consultees.

commercial enterprises in Glenmore (shop, café and ski school) and is also adjacent to the public car park which serves Loch Morlich. The second area of the site is to the south west of the aforementioned larger area, essentially extending to the south adjacent to Loch Morlich. Much of the east and south of this area is surrounded by existing woodland, while the western boundary has less dense woodland separating it from the sandy beach area on the shores of Loch Morlich.

3. The overall site is currently used for camping and caravanning and the only permanent structures existing are for administration and servicing purposes, including a small reception building, as well as two recently constructed toilet / shower / laundry blocks. The site currently accommodates a total of 218 pitches, which are available for use by tents, touring caravans and motorhomes. There are no static caravans on the site. The majority of pitches are used for relatively short periods, although a number of pitches are available for use on a seasonal basis.² Over half of the total number of existing pitches on the site have the benefit of electrical hook up facilities.
4. The larger more northerly area of the site had a network of tarmac surfaced roads, off which there is direct access to the pitches, which consist of a mix of hardstanding or open grass areas. The majority of pitches are located in this large area which has a predominantly open nature, although it is interspersed with some areas of strategic planting. The second area of the site has a more enclosed woodland atmosphere and is appropriately known as 'Pinewoods.' A total of 28 hard surfaced pitches are located in this area, with many of those having a history of being used on a seasonal basis. The pitches are arranged along the perimeter of a tarmac surfaced road which loops around the area.
5. The subject site is affected by a number of natural heritage designations. All of the 'Pinewoods' area as well as the western section of the larger open area is on land which is identified in the Ancient Woodland Inventory. In addition, the western area of the 'Pinewoods' section is within the Cairngorms Special Area of Conservation (SAC) and Cairngorms Special Protection Area (SPA), while all of the 'Pinewoods' area is also within the Glenmore Forest Site of Special Scientific Interest (SSSI).

² In 2008, 54 of the 218 pitches were utilised on a seasonal basis, which essentially involves users parking their caravan on a pitch for several months.



Fig. 4 : Proposed (amended) layout in the open area of the site

6. As detailed at the outset of the report this planning application concerns two aspects of development, one of which is the refurbishment and upgrading of existing site facilities (including a significant re-arrangement of the general layout and pitch locations) and the second aspect which is the construction of new structures in two areas of the site, in the form of 38 holiday lodges. Dealing firstly with the refurbishment and upgrading works, it is proposed to alter the existing pitch layout. All of the pitches in the 'Pinewoods' area as well as some of the pitches in the most easterly section of the larger open area would be removed and a new pitch layout would be developed in the larger open area of the site. The new layout would accommodate a total of 206 pitches, which is a reduction of 12 pitches from the current numbers. Forest Holidays intend to provide over half of the pitches with electrical hook ups. 51 of the pitches would have refurbished or new hard standing, thereby providing all weather / all season pitches. Many of the formal pitches would be created by either utilising some of the existing hard standings, or alternatively creating pitches with a robust surface through the use of expanded mesh, which would also have the benefit of allowing grass to grow through in order to retain a natural appearance. A natural local stone base would be used on pitches which are anticipated to have the heaviest use. Many other pitches on the site would have either a grass mesh or plain grass surface and would be capable of accommodating tents as well as caravans and motorhomes.
7. **In light of members concerns regarding the potential diminishment of traditional 'ad hoc camping' opportunities at the site, the layout has been amended. The original site plan identified areas which had the potential to accommodate approximately 72 'free camping pitches.'** The term 'free camping pitches' refers to the fact that the area of each pitch is not specifically identified and campers are free to choose their location within the general area of the pitches. The amended

site layout plan now includes a significantly increased area which would be available for 'free camping.' The additional area identified also has the potential to be shared by caravans depending on the variable demand throughout the year.



Fig. 5 : Originally proposed site layout



Fig.6 : Amended site layout

(turquoise blue shading on each plan identifies the extent of area available for 'free camping')

Many other improvement works, some of which are outside the scope of this planning application, are also planned as part of the overall upgrading programme.³ The re-arrangement of the pitch layout and the development of the lodges would result in the extent of hard standing on the site being reduced by approximately 2,872 square metres.

8. Arising from concerns raised in letters of representation, there was some debate at the planning committee meeting in November 2008 regarding the size of the formal pitches and in particular whether or not compliance with a '6 metre rule' could be achieved.⁴ In a letter dated 18 December 2008 (please see copy attached) the applicants have set out the situation. Each formal pitch is proposed to have a stable, dry all weather pitch area measuring 10m x 5m, with a further adjacent grassed area (also measuring 10m x 5m), thereby creating an overall combined pitch / plot size of 10mx10m. The letter sets out an example of a caravan and awning being placed on a pitch and highlights the fact that the pitch size would allow a separation distance of 7.7 metres between adjacent caravans and 5.9 metres between an awning and a caravan on an adjacent pitch. The applicants have also made reference in their submission to the Model Standards in Touring Parks in Scotland (1989), noting that the separation distances that can be achieved on the Glenmore site exceed the required standards of 6m and 3 m

³ Improvement works mentioned in supporting documentation include drainage, landscaping, roads, man holes and the provision of additional water stand points, bin storage and recycling facilities.

⁴ The '6 metre rule' is operated on some Caravan and Camping Club sites.

respectively. It is my understanding that the '6 metre rule' referred to by representees is in fact the 6m separation distance referred to in the Model Standards



Fig. 5 : Proposed lodge layout in the eastern area of the site

9. The 38 holiday lodges which are proposed as the second aspect of the proposal are to be located in two separate areas of the site. 27 lodges are proposed in the eastern area of the larger open part of the site. The site layout plan shows the detached lodges positioned either side of the existing principal loop road in the eastern corner of the site. A total of nine lodges are proposed in the area at the centre of the circular road and they are arranged in a type of organic cluster. The remaining eighteen lodges in this area are arranged in a more linear form⁵ on the periphery of the circular access road. **In response to Members concerns regarding the distribution of car parking, parking bays in this area have been reconfigured into larger groups, with associated proposals for landscaping. Small informal paths would be created to provide access from the car parking areas to the lodges. In response to concerns regarding road safety in the vicinity of the car parking areas, the applicants have made the point that the proposed amendments would allow easier identification at ground level of the car parking areas, while the landscaping would screen parked vehicles when viewed from higher ground. It is also stated that a 5 mph speed limit would be in force throughout the site.**

⁵ Several of the lodges are proposed at angles in order to achieve increased privacy, as well as enhanced views outwards.

10. The remainder of the lodges (eleven of the overall forty) are proposed in the 'Pinewoods' area of the site. At the outset of the application thirteen lodges were proposed in this area. However, in response to concerns raised about the positioning of lodge no's 1 and 2 in the extreme south of the site, those two lodges have now been omitted. Other work to be carried out in the Pinewoods area as detailed earlier in this report includes the removal of all 28 pitches from this area,⁶ the cessation of use of the westernmost portion of the loop road i.e. the road section closest to the beach, and the regeneration of the redundant pitches and the road. The eleven new holiday lodges are proposed to be positioned in the woodland area to the east of the remaining section of the loop road. Initial proposals for the regeneration of the western portion of the loop road suggested that some level of surfacing may need to be provided in order to facilitate its use by emergency vehicles accessing land outwith the site boundaries. However, this measure has been reconsidered. The applicants acknowledge advice from the **Forestry Commission** and **Scottish Natural Heritage** and the measures now proposed include the complete removal of the road surface on the western loop road,⁷ the spreading of forest leaf litter over the remaining mineral soil in order to aid the natural regeneration of the field and shrub layer, and also the planting of 40 local provenance Juniper plants in the restored area. Vehicles requiring emergency access to the lands beyond would instead utilise the eastern side of the existing loop road, which would also serve the proposed lodges in this area.
11. **The proposed car parking arrangements in the Pinewoods area of the site were also the subject of discussion in the course of deliberations on the proposal in November. Three options for amended car parking proposals were examined by the applicants. The first option involves utilising the existing hardstanding currently in place. The various benefits of this approach have been outlined, and include limiting the impact of car parking on the forest floor, being less visually obtrusive due to the fact that they are already in existence and have a weathered appearance, and also the convenience of the parking locations for guests in the lodges, due to their proximity. The second option is the creation of a new central car park within the centre of the Pinewoods area, adjacent to the central**

⁶ With the exception of hardstanding associated with some of the existing pitches, which will be utilised to create car parking areas to serve the proposed lodges. This would minimise the need for additional construction work in this forested area.

⁷ Material lifted is intended to be used to improve the hard standings on other pitches within the campsite.

pathway. The applicants have however expressed some concerns regarding the appropriateness of this option as it would involve the introduction of approximately 564 m² of new hardstanding into this sensitive area and would also necessitate the loss of 8 trees. The final option detailed would involve the complete removal of car parking facilities from the Pinewoods area and its provision instead on land immediately to the north. Whilst this option would facilitate the provision of car parking in a coherent group and would avoid vehicular traffic entering the Pinewoods area, this arrangement would however result in the loss of 7 all weather caravan and camping pitches. The applicants have also alluded to further disadvantages associated with this option, including the visual prominence of such a parking location, as well as a degree of inconvenience for guests accessing the Pinewoods lodges. Site layout plans illustrating the three options have been provided. The applicants have ultimately concluded following an examination of the merits of each of the proposals, that Option 1 is the most appropriate.



Fig. 7 : Proposed site layout in the Pinewoods area

12. A similar design of holiday lodge is proposed throughout the site, with design variations occurring only in the context of them being either two or three bedroom lodges. The lodges have a gable fronted elongated form, with an external finish of vertical timber cladding, under a concrete tiled roof⁸ (consisting of two monopitch elements with a 25° and 15° pitch). The majority of glazing is proposed on the front gable elevation, which would

⁸ The proposed clay roof tiles are intended to have a slate like appearance.

serve the living, dining and kitchen areas. In order to ensure privacy for each of the adjacent lodges other windows on the side elevations serving bedroom and bathroom areas are significantly smaller and are positioned at higher levels. The design also includes a large deck area which extends along the front of each lodge, over which the lodge roof extends in a canopy like effect, to provide shade and shelter as required. Each lodge is proposed to sit on pilings which are intended to “ensure minimum disturbance to the forest floor and negate any necessity for concrete hardstandings.” Four of the lodges would be equipped for all abilities use. Those lodges, which would be DDA compliant, are to be located close to the site entrance and reception building.⁹

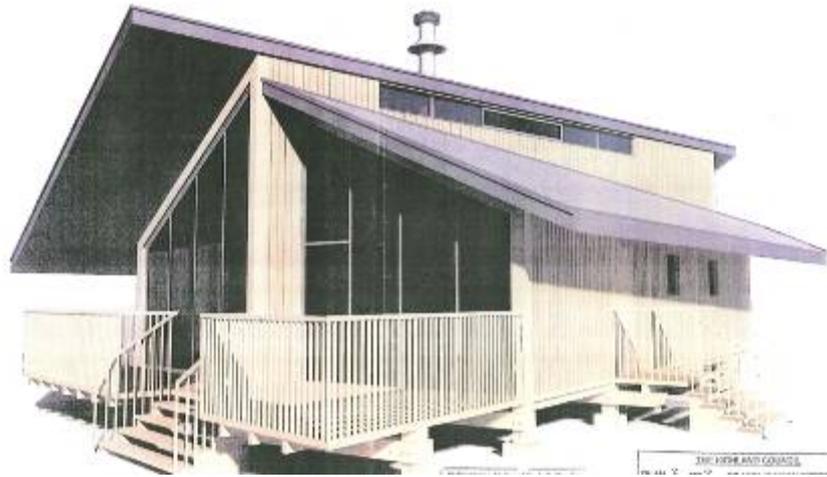


Fig. 11 : 3D impression of front and side lodge elevation

13. Supporting information provided with the application indicates that FSC timber would be used and would where possible, subject to availability and cost, be locally sourced. The applicants have provided a list of sawmills which they anticipate could be able to provide the required supply of local FSC timber.¹⁰ Forest Holidays LLP also state that they are “committed to promoting green initiatives for all new developments with the overall intention of reducing the carbon footprint of same.” The applicants propose to attain a Level 4 BREEAM rating for the lodges. A variety of energy efficiency measures are proposed as part of the lodge construction. Measures detailed include the use of timber framed, double glazing units; the provision of thermal lined curtains; the installation of treble A rated appliances; dual flush toilet systems; low flow showers with automatic shut off valves; low energy fluorescent /LED lighting;

⁹ Lodges numbers 29, 30, 39 and 40 have been designed as DDA compliant.

¹⁰ The sawmills listed are located in Boat of Garten, Newtonmore, Corpach near Fort William, Nairn, Mosstodloch and Dingwall.

and the provision of hot water cylinder lagging at a minimum of 50mm. In addition, in response to the suggestions of the CNPA's ecology officer, the applicants have sought the advice of the Bat Conservation Trust in relation to the possibility of incorporating bat boxes into the lodge design. The Bat Conservation trust have confirmed that bat boxes can be fitted to the underside of the eaves of the proposed lodges quite readily and Forest Holidays are willing to continue to work with the Bat Conservation Trust to ensure that roosting opportunities are created on the site.

14. Details have been provided of the intended phasing programme for the overall development of the site. Phase 1 of the programme would involve the construction of 15 lodges in the eastern area of the site,¹¹ as well as the full site refurbishment works. The second phase of operations would include the development of the remainder of the lodges in the eastern area of the site and also the lodges in the Pinewoods area,¹² as well as the associated corralling of the adjacent area which it is proposed to regenerate. The corral would consist of a low temporary fence¹³, which is anticipated to have a life span of approximately 10 years.
15. Planting proposals submitted in conjunction with this application state that new planting would integrate with the Caledonian forest setting, whilst also respecting the safety and expectations of the visitor. In terms of the proposed landscaping measures for the larger, more open area of the site, the plan includes proposals for the planting of groups of trees between existing gaps in the line of trees along the roadside boundary of the site. In areas close to the site entrance it is noted that there are views into the site below the canopy of the existing trees and it is proposed that such gaps will be planted with a mix of understorey species, including holly, juniper and heather. All works would be carried out by hand within the spread of existing trees in order to prevent damage to their roots. Elsewhere within the open part of the site, it is proposed to plant a mixture of Scots

¹¹ Lodge no's 14 – 28, which are located along the periphery of the existing access road.

¹² Forest Holidays have confirmed that all Phase 2 development areas would remain available for caravan and camping purposes during the 2008/2009 season, prior to the commencement of Phase 2 works in 2009/2010.

¹³ The fence would consist of round posts (750mm high), with twin line wires supporting rabbit netting (600mm high). Posts would be spaced at 10 metre intervals and a number of small signs would also be placed on the fence adjacent to the main paths between the campsite and the beach to indicate that habitat restoration is taking place in the area

pine, Silver and Downy birch and Aspen trees in small groups and individually, interspersed between the proposed holiday lodges.

Proposal justification

16. The applicants have provided background details to justify the development proposal in a document entitled 'Planning Statement of Support' as well as in a number of additional letters submitted in response to various queries raised by the CNPA. Forest Holidays state that their ultimate aim is to create a modern and up to date site. The proposed development is intended to "significantly improve and upgrade the existing site facilities, accommodation and layout of the site to provide better and more user friendly facilities." The applicants expect that the combination of improved touring and camping facilities together with the proposed lodges would draw increased visitor numbers to the site during the shoulder months, thereby expanding the holiday season and bringing increased economic benefit to the area.
17. Reference is made to the significant level of capital expenditure that would be required even to undertake the programme of improvement and refurbishment works at the site. As a result Forest Holidays have chosen to introduce "high quality timber lodges" onto the site in order to generate additional revenue to repay the capital investment. It is stated that "without the financial return that the lodge development can bring, it is extremely unlikely that a financial case can be made for the significant investment."
18. In terms of the proposed lodges the applicants state that their location and positioning has evolved through a lengthy process and comprehensive analysis of the site and the surrounding area. The rationale for the location of 27 lodges in the eastern area of the site is partly to do with the fact that it can be developed with the minimum hindrance to the operation of the remainder of the site, particularly as the internal road network serving this area can provide direct access without conflicting with traffic on the remainder of the site. Forest Holidays also contend that the choice of eastern location to accommodate 27 lodges was influenced by the fact that "they can be shouldered against the backdrop of the dense native woodland" thereby allowing the lodges to be "discretely obscured in vistas from the surrounding mountains and hills." In terms of the proposed siting of the remaining 11 lodges in the 'Pinewoods' area, supporting documentation describes the

condition of this area at present becoming degraded in physical, environmental and ecological terms. The status of this area, lying within an SAC, SPA and SSSI is recognised and led the applicants to reconsider their original intention to locate the majority of the lodges in the pinewoods. Instead the approach taken is considered by the applicants to "offer significant environmental and ecological improvement by a substantial reduction in accommodation and a withdrawal from the boundary of the SAC and SPA." The approach of locating just 11 lodges in discrete locations back into the woodland is considered to alleviate the demand on the most degraded area of the site and would result in a net reduction in accommodation of 17 units in the Pinewoods area (from 28 seasonal pitches to 11 lodges).

19. Various issues raised by consultees and objectors (and which will be discussed later in this report) have been addressed by the applicants in recently submitted correspondence. In terms of capacity issues, reference is made to occupancy figures for the summer of 2008, where occupancy of the site at the height of the season in July was 91.39% of the 218 pitches available. Lower occupancy figures were recorded in June and August, and in the past occupancy rates outwith the peak summer season have fallen as low as 10%. The applicants make the case that the proposed refurbishment of the site would result in the provision of 206 pitches, in addition to the proposed lodge development, and therefore suggest that the site would have the capacity to continue to accommodate the visitor numbers experienced at the height of the season in July 2008. Forest Holidays state that they remain "committed to providing a full range of pitches to meet the needs of all visitors from premium pitches with hardstanding to camping space on grass." In response to various concerns expressed regarding the potential high costs of rental of the lodges, Forest Holidays state that the lodges would provide accommodation to suit various levels of expenditure. Although all are of the same design and exterior finish, the lodges would have three varying standards of interior accommodation, ranging from an 'entry level' lodge which would have basic internal facilities, to the more luxuriously appointed upper level lodge. The rental prices of the units would reflect the standard of the internal fit and through such a mechanism would provide a wide range of accommodation "to suit the spectrum of visitors to the National Park irrespective of income of ability."

Economic Impact Analysis

20. In response to the concerns raised by Members upon deciding to defer a decision on this application, the applicants commissioned an Economic Impact Analysis.¹⁴ It is noted at the outset of that analysis that displacement is difficult to assess for accommodation developments. Nonetheless the findings of the report demonstrate that the net economic benefits of the proposed "Forest Holidays development to the area should substantially outweigh displacement." In order to inform the Economic Impact Analysis various methods of research were used including 'reviewing the local context,'¹⁵ reviewing existing supply and occupancy rates, and comparing the occupancy rates achieved by modern Forest Holiday lodges elsewhere in Britain with the averages for the area in which they are located.
21. Forest Holidays rationale for the proposed development is to "increase the utilisation of the Glenmore site through providing lodges that have proved popular with the market elsewhere to complement an improved caravan and camping site in one of Britain's prime year round tourism destinations." Pitch occupancy rates from 2006 to 2008 at the Glenmore site were compared with unit occupancy rates in Scotland as a whole, with figures indicating that pitch occupancy rates in 2006 and 2008 were significantly higher at Glenmore than the average achieved nationally. The occupancy figures however illustrate a high degree of seasonality, with occupancy at Glenmore as low as 3.2% in some winter months. Unit occupancy rates for 2008¹⁶ for lodge accommodation already operated by Forest Holidays at their site in Strathyre in the Loch Lomond and Trossachs National Park and also sites in England (Keldy in the North York Moors National Park and Deerpark near Liskeard in Cornwall) was also provided for comparison purposes. Occupancy rates in the lodge accommodation at Strathyre for example ranged from 48.2% in January to a peak of 93.8% in September. Occupancy rates were significantly above the average self catering occupancy rates for Scotland, and a similar situation was experienced in relation to the other sites detailed, with figures well above average rates for the wider area. Reference was also made to the self catering occupancy figures recorded for Badenoch and Strathspey in 2007, where the annual average was 51%.

¹⁴ The Economic Impact Analysis was carried out by Steve Westbrook, Economist with Brian Burn Associates.

¹⁵ Reviewing the local context included examining visitor patterns, types of accommodation used, length of stay, expenditure etc..

¹⁶ 2008 occupancy figures provided were from January to October.

22. The Economic Impact Analysis then examined the existing provision of self catering accommodation in the Aviemore / Glenmore area¹⁷ and estimated that the total number of potentially competing units is estimated at approximately 200. The projected demand for the proposed lodges on the Glenmore site suggests that an average occupancy of at least 70%¹⁸ could be achieved once the lodges have been built and marketed. This would represent 9,709 unit nights per annum (or approximately 36,409 visitor nights per annum). Based on all the supply and demand information the report calculates that the development of the lodges would result in a displacement of just 4.2% of the annual visitor nights that comparable properties in the Glenmore / Aviemore area are estimated to attract currently. It is however accepted that particular operators close to Glenmore might experience slightly higher displacement levels than the average, although the overall impact is likely to be reasonably widely distributed across many accommodation types and other locations within the National Park.
23. Although acknowledging that there would be a degree of displacement resulting from the development of the proposed lodges on the Glenmore caravan and camping site, the Economic Impact Analysis also includes a section on the net visitor expenditure and employment impact of the proposed development. The proposed lodge element of the development would attract an additional 28,802 visitor nights per year to the local area, with previously carried out surveys showing expenditure figures indicating that the average spend per person per day, excluding accommodation costs, was £41 for those on a short break, while £53.50 was the average spend for those on a longer break.¹⁹ Applying the average spend estimates to the projected additional 28,802 bednights likely to be generated by the development of the proposed lodges, would result in additional annual visitor expenditure (i.e. net of assumed displacement) of approximately £1.6 million. In addition to the additional spend in the economy, reference is also made to previously carried out research²⁰ which suggests that

¹⁷ The list included lodges, chalets, villas and log cabins listed in the Visit Scotland 'Freedom of the Highlands' brochure for 2008, as well as "other sites with a significant number of units."

¹⁸ Unit occupancy is predicted to average 85% for the six months from November to April (although it is noted that this is dependant on the availability of skiing and snowsports activities in the area) and 55% for the six months from May to October.

¹⁹ Figures taken from the Cairngorms National Park Visitor Survey 2003- 2004. When adjusted to reflect current prices, the expenditure is calculated at £49 per day for short stays and £64 per day for longer stays.

²⁰ The previously carried out research referred to is taken from the 2006 Cairngorm Funicular Impact Study, which was carried out by the company commissioned to prepare this Economic Impact Assessment.

approximately £37,000 of visitor expenditure in the Cairngorms National Park would support 1 full time equivalent job (fte). It is therefore concluded that the proposed development of holiday lodge accommodation on the Glenmore site would have an employment impact of 43 fte's and it is also suggested that this would have the potential to rise to at least 45 fte's as a result of the additional caravan and camping visitors that might be attracted to the site as a result of the proposed improvements. Also on the subject of employment, the Economic Impact Assessment notes that Forest Holidays intend to employ three additional direct staff to manage the site, as well as planning to use the local labourforce for ancillary services such as maintenance, cleaning and servicing of the lodges. The combined impact of all of the activities and expenditure generation would result in an employment impact in the relatively short term in the National Park area of approximately 50 full time equivalent jobs, with the annual impact predicted to grow subsequently through further increases in occupancy as a result of repeat visits, recommendations and continuing marketing.

24. The Economic Impact Assessment "demonstrates that the net economic benefits of the Forest Holidays development to the area would substantially outweigh displacement."

Business Strategy

25. In a letter to the CNPA dated 18 December 2008 Forest Holidays included details of their business strategy for the future development of the site at Glenmore (copy attached). The site is currently run and operated on the basis that it is open for twelve months of the year. Occupancy figures for the off peak periods demonstrate that demand would have to increase by 90-500% to achieve full occupancy, with this fact considered to provide a clear indication that "there is currently not the demand for caravanning / camping outwith June, July and August." The strategy is therefore to increase visitor numbers (both caravanning/camping and in all weather lodges) during the other nine months of the year. Forest Holidays consider that the proposal demonstrates that the overall site will remain able to cater for the peak visitor caravanning and camping numbers, as well as facilitating the development of the proposed lodges.
26. Forest Holidays business case for the development of the site is based on the fact that the site in its current caravan and camping mode only performs well for 25% of the year, while the development of lodges is a product which performs well for 100% of the year (as demonstrated through figures for other Forest

Holidays operated sites) and is in the view of the applicants compatible with the Glenmore site. In conjunction with the development of the proposed lodges, it is the aim of Forest Holidays to “stimulate demand for camping and caravanning during the off peak period by improving the infrastructure of the site to make camping and caravanning more attractive during the more wet and cold months and providing activities and local business links.”

27. Reference is also made in the supporting letter of 18 December 2008 to ‘existing tie ins and cross marketing with local businesses.’ Forest Holidays currently promote 21 locally based businesses through their Forest Experience Card. Visitors at the Glenmore camping and caravan site can avail of a range of discounts from local businesses and services including cafes, restaurants, climbing, skiing, canoe hire, taxis and hairdressers etc..

Financing

28. Although normally outside the scope of consideration in a planning application, the issue of financing of the proposed development and in particular whether or not it would have implications for the ‘public purse’ was raised by the CNPA Planning Committee when considering the application in November 2008. As a result the recent submission from Forest Holidays addresses this point, firstly outlining the structure of Forest Holidays LLP, in which the Forestry Commission has 49% ownership, with the Camping and Caravanning Club (CCC) owning the remaining 51%. The Glenmore site has been leased to Forest Holidays LLP by the Forestry Commission for a period of 75 years and it is stressed that the Forestry Commission does not provide any financial input into the company. The CCC provided a £10 million capital investment at inception for urgent works and initial operating costs. Additional investment in all sites operated by Forest Holidays LLP is generated from income, and through bank financing. The submission from the applicants concludes on the matter of financing that Forest Holidays LLP contributes “to the public purse not draw from it, whilst upgrading and significantly improving the asset (land)” that is leased and will ultimately be returned to the public upon the expiry of the lease.

DEVELOPMENT PLAN CONTEXT

National policy

29. **SPP2 : Economic Development** focuses on a number of themes including securing new development in sustainable locations

and also safeguarding and enhancing the environment. On the latter theme SPP2 recognises the importance of the environment as a resource and notes that a high quality environment can be used to promote an area for business development, as well as provide a range of economic opportunities. There is a strong emphasis on the quality of design, where it is noted that good design involves more than aesthetics and should also embrace energy conservation, good waste management and sustainable urban drainage. The natural and built heritage is also discussed and planning authorities are advised that their consideration of proposals should seek to minimise adverse effects. In a section entitled 'Development in Rural Areas' **SPP2** makes particular reference to the promotion of sustainable economic and social development of the areas communities being a key aim of Scotland's National Parks. It advises that developments should be accommodated where they are appropriate to the purposes and character of the Park and that their siting and design should be of a high quality and support the Park's image and appearance.

30. Other national level advice is contained in **NPPG 14** on **Natural Heritage**. It strikes a positive note stating that conservation and development can often be fully compatible, and the potential for conflict can be minimised. In relation to statutory designations, and in particular National Parks, para. 33 states that "while conservation of the natural heritage will be a key objective in any National Park, the Government considers that due weight must also be given to the social and economic interests of local communities."
31. Under a section entitled Enjoyment and Understanding of Natural Heritage **NPPG 14** acknowledges that "the natural heritage is enjoyed both for its intrinsic value and as a setting for open air recreational and educational activities which depend on its qualities." The benefits of natural heritage linked to open air recreation are recognised in the form of economic benefits to rural communities due to visitors being attracted to an area, as well as indirect benefits to the nation in terms of health and quality of life. Para. 22 of the Planning Guidance advises that Planning Authorities should seek to identify opportunities for promoting the enjoyment and understanding of the natural heritage which are compatible with its conservation.²¹

²¹ Guidance on this has been prepared by Scottish Natural Heritage - *Countryside Recreation and Access Strategies : Guidance for Local Authorities* (1997).

32. **NPPG 14** also deals with wider natural heritage issues, outwith statutory designations, and stresses that natural heritage is found throughout the countryside, and that efforts should be made to safeguard and enhance the wider natural heritage beyond the confines of nationally designated areas. Among features listed as being of potential value in the development of habitat networks are woodlands, rivers and burns. Para. 50 stresses the importance of trees and woodlands, both as wildlife habitats and in terms of their contribution to landscape character and quality. **NPPG 14** highlights the duty of Planning Authorities, under section 159 of the Town and Country Planning (Scotland) Act 1997, to ensure that wherever appropriate, planning permissions make adequate provision for the preservation or planting of trees.

Highland Structure Plan 2001

33. **Section 2.7** of the Highland Structure Plan discusses the economy and tourism in particular, noting that tourism is a vital element of the Highland economy. The identity of the Highlands includes "its built heritage, rich wildlife, scenic beauty, history and culture" which are described as the foundations on which tourism and recreation activities are based. The Structure Plan strategy aims to build on the Highland identity and to "take a proactive approach to the wise use of the natural environment as a primary resource" for tourism.
34. The Structure Plan notes that tourism makes major demands on infrastructure and facilities and also notes that there is scope for improvement in the quality and level of provision. **Policy T2 on Tourism Development** confirms Highland Council's support for high quality tourism development proposals, particularly those which extend the season, provide wet weather opportunities, spread economic benefits more widely and provide opportunities for the sustainable enjoyment and interpretation of the area's heritage.
35. On the specific topic of tourist accommodation, section 2.7.8 refers to a growth trend in recent years in the self-catering sector. In anticipation of further applications for chalet and other self contained accommodation, the Structure Plan advises that they must be designed for minimal impact on services, road infrastructure and the environment. **Policy T3 on Self catering tourist accommodation** expressly states that permission will only be granted for tourist accommodation proposals on the basis that the development will not be used for permanent residential accommodation.

36. The **Highland Structure Plan** includes a detailed section on the environment and topics such as nature conservation and landscape are discussed. Para. 2.13.1 notes that the abundance of natural habitats and species is a key element of Highland's identity and constitutes one of the region's main strengths. The **Structure Plan** details the hierarchy of protection of nature conservation interests, but also notes that such interests are not confined only to designated sites. **Policy N1 on Nature Conservation** requires new developments to minimise their impact on the nature conservation resource and enhance it wherever possible.
37. **Section 2.14** of the Plan discusses Landscape where it is declared that "no other attribute of Highland defines more the intrinsic character and nature of the area than its landscape." The Plan notes that associated with such landscapes are the communities that live in harmony with them and the wildlife that is adapted to their conditions. It is advised that the protection and enhancement of landscape and scenery must be positively addressed. **Policy L4 on Landscape Character** states that "the Council will have regard to the desirability of maintaining and enhancing present landscape character in the consideration of development proposals."

Badenoch and Strathspey Local Plan (1997)

38. On the general subject of Tourism and Recreation, section 2.2.9 of the **Local Plan** notes that activities of this nature will continue to make a vital contribution to the economy, but also emphasises that the priority is to ensure that "broadening the range and quality of facilities and accommodation is balanced with protecting the areas exceptional scenic and heritage resources." The plan suggests within communities and on their edges that tourist accommodation, recreation and leisure facilities of a scale appropriate to the community concerned will be promoted.
39. Section 2.2.10 of the Plan, entitled **Tourism**, states that the "Council will encourage the development of tourist accommodation and facilities at suitable sites within or immediately adjoining communities" and that "priority will be given to expansion of existing facilities." This section of the Plan also requires that that tourism proposals should "either associate well with the prevailing pattern of building, or be well absorbed visually by landform and trees.
40. Under the general heading of **Environment** the Local Plan includes a section on **Woodland and Trees** (section 2.5.4) in which it is stated that the "Council will protect existing trees and

established woodland areas including small groups or individual granny pines which are important landscape, wildlife and amenity features of the countryside.” It also clarifies that this includes significant areas of ancient and semi-natural woodlands incorporating important areas of remnant native forest as well as exotic specimens.

41. The landscape conservation policy is detailed in section 2.5.10. It is the policy to conserve areas of landscape importance including waterside land, open areas and scenic views. It is also advised that development proposals will be considered carefully in respect of their impacts on conservation and the environment.
42. The subject site is located within Glenmore Corridor and is part of the land identified on the settlement map as the ‘main area of existing development.’ The Badenoch and Strathspey Local Plan recognises the integrity of the Glenmore Corridor linking from the River Spey into the Cairngorm Mountains. Policy 4.14.1 of the Plan addresses the subject of development and advises that reasonable consolidation and improvement of established businesses is acceptable. However, it is also stated that a strong presumption will be maintained against further new development throughout the area except where it is considered essential for the proper management of visitors.

Cairngorms National Park Plan (2007)

43. The Cairngorms National Park Plan sets out the vision for the park for the next 25 years. The plan sets out the strategic aims that provide the long term framework for managing the National Park and working towards the 25 year vision. Under the heading of ‘conserving and enhancing the special qualities’ strategic objectives for landscape, built and historic environment include maintaining and enhancing the distinctive landscapes across the Park, ensuring that development complements and enhances the landscape character of the Park, and ensuring that new development in settlements and surrounding areas and the management of public spaces complements and enhances the character, pattern and local identity of the built and historic environment.
44. Under the heading of ‘Living and Working in the Park’ the Plan advises that sustainable development means that the resources and special qualities of the national park are used and enjoyed by current generations in such a way that future generations can continue to use and enjoy them. Section 5.2.3 of the Park Plan acknowledges that tourism is one of the primary forms of employment in the Park, although many jobs in this and other

sectors are highly seasonal and with little long term security. Strategic objectives for economy and employment include creating conditions that are conducive to business growth and investment that are consistent with the special qualities of the Park and its strategic location and the promotion of green business opportunities. Section 5.3 of the Plan concerns 'enjoying and understanding the park' noting that the Cairngorms National Park is known for its outstanding environment and outdoor recreation opportunities and advises that the vision for the Park seeks to "go further and develop a world class destination which plays a significant part in the regional and national tourism economy." Strategic objectives for sustainable tourism include : -

- raising awareness of the Park as a premier, year round, rural tourism destination;
- recognising its outstanding natural heritage and its National Park status;
- improving and maintaining the quality of the experience of the Park for all visitors, communities and those working in the tourism industry;
- maintaining a high quality environment by encouraging sound environmental management by all those involved in tourism in the Park;
- developing a wide range of opportunities for visitors to experience and enjoy the special qualities distinctiveness and natural and cultural heritage of the Park; and
- encouraging an optimum flow and spread of visitors across the Park and minimising the social and environmental impact including traffic generated by visitors and conflicts between different forms of recreation.

45. Many of the strategic objectives detailed in relation to outdoor access and recreation are also of relevance in the context of the current development proposal. Objectives include encouraging people of all ages and abilities to enjoy and experience the outdoor environment; promoting high standards of responsible enjoyment of the Park so that its special qualities are understood and appreciated and safeguarded for now and future generations to enjoy; developing a high standard of responsible management of outdoor access based on a common understanding of the needs of access managers and users; and protecting the more fragile areas of the Park from pressures arising from outdoor access and recreation.

CONSULTATIONS

46. **Scottish Natural Heritage** has examined the proposal and state in the consultation response that there is no objection to the proposal because there is no likelihood of adverse impacts to the interests of the Cairngorms SAC.²² **SNH** note that the proposed development site lies partly within the boundary of the Cairngorms Special Protection Area and the Cairngorms Special Area of Conservation²³ and part of the site is also within the Glenmore Forest SSSI, including the south western section of the development site containing eleven proposed lodges, existing vehicle tracks and hard standings.
47. **SNH** advise in the response that the Cairngorms SAC is designated for a number of habitats and species which qualify for protection through the requirements of the EU Habitats directive. Qualifying features relevant to this application include Caledonian forest, juniper, otter and Atlantic salmon. It is noted that the development proposals include the enhancement of the Caledonian forest including juniper. The initial response from **SNH** noted that two of the lodges in the eastern area of the site (lodges 1 and 2) were proposed within the Cairngorms SAC and consequently **SNH** advised that due to their location there may be a significant effect on the qualifying interests of the site. It was advised in the event of lodges 1 and 2 being withdrawn from the proposal that this would completely remove the significant effect on the site's Natura interests. In response to the concerns raised, the applicants have chosen to omit the two lodges from the proposal. The most recent consultation response from **SNH** acknowledges this and confirms acceptance of it.
48. The response from **Scottish Natural Heritage** also made reference bats as a European Protected Species. Bats have been recorded feeding in the area and may roost in cavities of trees within the proposed development site. **SNH** consider that there will not be a loss of potential roosting sites as no large trees are planned to be removed.
49. The application has also been examined by **SEPA** with the initial response noting that it is proposed to connect the foul drainage for the development to the public sewer. **SEPA** welcomed the principle of connection to the public sewer, but initially objected to the proposal until it was confirmed that there was sufficient

²² SNH state at the outset of their initial response that the advice contained in the consultation response is limited to the implications for designated natural heritage features in accordance with the casework agreement between SNH and CNPA.

²³ The site lies outside the boundary of the River Spey Special Area of Conservation.

capacity available and that a connection to the waterwater treatment plant could be provided. Further to confirmation on this point a revised consultation response was received from **SEPA** in which it was noted that Forest Holidays are a key contributor to the costs of improving the waste water treatment plant. **SEPA** is satisfied on the basis of the information submitted that the foul drainage from the development can connect to the public sewer and the initial objection has therefore been removed. In addition, some concern originally expressed regarding surface water drainage, has also been addressed, with the most recent response from **SEPA** noting that the surface water run off will discharge to ground via natural infiltration and that unnecessary parking and roadways have been removed. On that basis, the proposal is considered acceptable in terms of water quality and **SEPA** also removes the objection to this aspect.

50. The **Area Roads and Community Works** division of Highland Council examined the proposal and did not wish to make any comment. Similarly the **archaeology section** of Highland Council also assessed the proposal and advised of no further comment.
51. Highland Council's **Forestry Officer** raised several queries in his initial response, as well as requesting various items of additional information, including an Arboricultural Implications Assessment. Following the receipt of the required information a further consultation response has been provided. Reference is made to the fact that the development of the lodges in the Pinewood area would necessitate the removal of thirty six trees, with the majority of those proposed for felling being birch. It is also noted that a large proportion of the trees that would be felled are category C trees which the Forestry Officer states are "suppressed or drawn and as such are not particularly suitable to be retained." On this basis, the level of tree felling proposed is considered acceptable, subject to a minor adjustment in the proposed location of the lodge on plot 3 in order to allow for the retention of a category A semi-mature Scots pine and a Category B mature Scots pine. Some recent minor alterations to the position of the proposed lodges in the larger area of the site has also met with the approval of the Forestry Officer with the consultation response noting that the footprints are now outwith the indicative crown spread of trees.
52. The Forestry Officer has raised a number of other issues, including

querying the means of construction of the lodges²⁴ and suggesting in the event that any work involves a crane, the operation should be overseen by a qualified arboriculturalist; suggesting that any footpaths within the Pinewoods area which pass through the proposed habitat restoration area of the woodland should be built with a 'no-dig construction technique' in order to prevent damage to the roots of adjacent trees; recommending that all service mains running through the wooded area to the north of lodge no. 12 be kept within the road in order to avoid any damage to tree roots; and a suggestion in the event that natural regeneration is not successful within five years in the Pinewoods area of the site, that there may be a necessity to carry out replacement planting of native pinewood species of local provenance. In conclusion, the response from the Forestry Officer acknowledges that the Arboricultural Implications Assessment demonstrates that the applicant has taken into account the significant trees on the site, including mature Scots pine, when deciding on the quantity and positioning of the lodges. He does not object to the application, subject to the introduction of measures to address the issues detailed above and subject to the inclusion of conditions in any grant of planning permission requiring the submission of an Arboricultural Method Statement detailing the means of protecting the retained trees on the site, requiring adequate site supervision for the arboricultural protection measures, and requiring a detailed landscaping plan and associated maintenance programme.

53. The response from **Aviemore and Vicinity Community Council** indicates that there is no objection to the lodges on the Glenmore camp site. Concern has however been expressed about the reduction of camping facilities and caravan pitches.
54. **Rothiemurchus and Glenmore Community Association** was also consulted on the proposal and raised a number of points in their response. Concerns include the reduction in touring and camping pitches; concern that the balance between lodges and touring and camping sites is wrong and that there should be fewer lodges and the associated suggestion that the pinewood site should be left for tourers and campers; and also concern that the aims of the National Park "may be undermined as there may be an overprovision of lodges affecting other smaller and entirely private lodge and B&B operators in the locality." The

²⁴ The Forestry Officer has queried whether or not the buildings would be pre-fabricated, pointing out that in the event that this is the case, the panels are likely to be of a size that requires a crane to manoeuvre them into position.

Community Association response also referred to their committee feeling "sorry for the current upset seasonal residents who will be displaced."

55. The **Cairngorms Chamber of Commerce** were consulted on the proposal. No response has been received to date. In the event that a consultation response is received prior to the scheduled committee date, Members will be updated on it at the meeting.
56. The sustainable tourism officer responded from the CNPA's **Economic and Social Development Group** commenting that "there is much to welcome in this proposal," making reference in particular to the proposed infrastructure upgrades, as well as the proposals to improve the natural heritage value of the pinewoods area of the site. She considers that the development will widen the appeal of the site, would attract a greater range of visitors and would also allow greater access to the site by people with disabilities. It would also attract more visitors to the site and the area at traditionally quieter times of year, which is a key objective of the Cairngorms Sustainable Tourism Strategy.
57. Despite the overall positive view of the development proposal, some slight concern was expressed in the original response from the Sustainable Tourism Officer regarding the impact of the lodge development on the traditional campsite role. The response noted that campsites play a key role within the National Park in attracting lower-income visitors and that the proposed lodge development would reduce the amount of the site available to such visitors. It was also suggested in the original consultation response that the development is also likely to be in competition with the existing large supply of self catering accommodation available within the Aviemore area. Reference was made to STEAM figures for Badenoch and Strathspey in 2007 which show that tourist days in self catering accommodation vary from over 100,000 in July and August to under 30,000 in November and December. The sustainable tourism officer commented that this suggests significant spare capacity in existing developments at off-peak times and consequently concluded in the original consultation response that "the extent to which Forest Holidays development will attract new custom...rather than displacing activity from other providers is unknown."
58. **The latter points are ones which Members discussed in detail at the November determination meeting and as detailed earlier the applicants were consequently requested to provide more information on the economic impact etc. of the proposal. The**

additional information has since been examined by the CNPA's Sustainable Tourism Officer and an amended consultation response has been received. It is considered that the figures included within the Economic Impact Analysis are based on reasonable assumptions and represent an accurate picture of the likely economic impact of the development. The Sustainable Tourism Officer is in agreement with the case made by the applicants that the new business in the area is likely to outweigh the effects of any displacement from existing businesses. In addition the marketing strategy's emphasis on attracting new visitors to the area, as well as further developing links with other local businesses is also particularly welcomed.

59. The CNPA's **Heritage and Land Management Group** has considered the proposal in terms of ecology and landscape impact. Whilst there is no objection to the development a number of ecological issues were raised in the initial consultation response including the need to ensure that any soil imported to the site is derived from a source free of the risk of invasive, non native plant species, particularly as the control and prevention of such species has been identified as a priority in the Cairngorms National Park Plan; clarification was sought on the nature of restoration proposed in the Pinewoods area of the site; a red squirrel survey was also required; and it was suggested that the development should encourage biodiversity enhancement, through for example, the integration of bat roosting opportunities in the proposed new buildings. The additional information submitted in response to the issues raised has been considered by the CNPA's ecology advisor who has confirmed that matters raised have been satisfactorily addressed. It is recommended that each of the proposed new lodges incorporates purpose designed roosting opportunities for bats and that this is done in conjunction with advice from the Bat Conservation Trust, in order to ensure that they are installed in the most effective and sensitive manner. The ecology officer has discussed the subject of bat box provision with the Bat Conservation Trust and it has been advised that at least one bat box per lodge could be incorporated on the gable end. The Bat Conservation Trust also suggested that woodcrete boxes could be added to trees. Such boxes are likely to be used by all local species and generally tend to be occupied quicker and more frequently than wooded boxes.
60. The initial response from the CNPA's landscape officer also raised some issues which required further consideration by the applicants. Concern was expressed regarding the proposed location of lodges 1, 2, 3 and 6, as they were considered to

intrude too far into the woodland. It was suggested that units 1, 2 and 6 in particular should either be omitted entirely from the proposal or positioned in an alternative location, which would maintain the established pattern and reduce the intrusion into the woodland. Further landscaping details for the overall site were also required and it was suggested that there was a particular need for enhanced planting proposals amidst the lodges that are proposed in the western area of the site.

61. In an effort to address the issues raised by the CNPA's **Heritage and Land Management Group**, as well as concerns expressed by **SNH**, the applicants have now omitted lodge no's 1 and 2 which were originally proposed in the southern area of Pinewoods. Lodge no's 3 and 6 however remain part of the proposal, with the applicants stating that they "do not wish to relocate or omit lodge 3 or 6 on the basis that they are positioned to cause the least impact onto the SSSI and the surrounding trees." Also in response to the concerns raised by the Landscape Officer, a revised landscaping scheme has been submitted which is intended to "ensure compatibility with the surrounding forest." The landscape officer has since confirmed his acceptance of the removal of lodges 1 and 2 from the proposal and generally concurs with the comments of Highland Council's Forestry Officer in relation to the need for agreement on tree protection measures, arboricultural supervision, further detailed landscaping proposals etc..
62. The application has also been assessed by the CNPA's **Visitor Services and Recreation Group**, who focused in particular on access issues. It is noted in the report from the access officer that public access through the site already exists and is set to continue. Consequently it is considered that the proposed development would have little impact on outdoor access provision in the area. Reference is made to the proposal to create a 'corral' in order to assist in regenerating areas of the Pinewoods. The low fence which would be used to create the corral, as well as its proposed location is considered acceptable, as the site layout plan shows that it would not hinder access, which would continue to be taken through the site utilising existing paths.

REPRESENTATIONS

63. **A number of representations have** been received in respect of the proposed development. Stacy, Austin, Michael and Kendra Clark from Aberdeenshire have written to object to the building

of 40 holiday homes. The Clark family detail their history of holidaying at the site over the past ten years, several times each year. They consider that the proposal will "absolutely destroy the rustic beauty of the site." They describe the plans to upgrade the site as "conceivable but not necessary" and state that proposals to "build 40 homes on the site is just heartbreaking." Various concerns are expressed in relation to the proposed development of the lodges, including traffic concerns arising from an assumption that the lodges would "sleep more than the average family allowing for more and more cars"; concerns regarding the 'type of people' who may begin to come to the site; and also various concerns regarding children's safety.

64. H.K. Crowden of Glasgow has written stating that he visits the campsite on a regular basis with his touring caravan. The points raised in his letter of representation concern 'the statistics of the plan', 'the aim' and 'the most likely intended scenario.' On the subject of the statistics, he suggests that there are a number of inaccuracies. The author states that the site is operated by Forest Holidays and the Caravan and Camping Club, and he advises that the latter operates a rule of having 6 metres between units. On that basis he calculates that there are less pitches available than stated and he questions the plan indicating that only 38 camping pitches²⁵ would be lost in providing the lodges. The second point discussed in the letter of representation is 'the aim'. The author suggests that the aim of providing opportunities for families to enjoy a forest holiday and open space would not be achieved by building "2 and 3 bedroom luxury dwellings". It is also suggested that the units should be integrated across the site rather than in a designated separate area. The third subject detailed in the letter is 'the more likely intended scenario.' The author suggests that the proposal does not 'stack up commercially' and speculates that the renting of the lodges would not be viable and that they would be put on the market for private sale. Following such assumptions, the author then suggests that "the application is in truth therefore a planning application for a 40 house scheme development in a prime scenic area that simply would not be tolerated in this location other than via the guise of providing holiday rented accommodation."
65. Response from Forest Holidays LLP: The applicants have chosen to respond to some of the issues raised in the letter from H.K.

²⁵ The letter of representation was received prior to the submission of the most recent site layout plan indicating the pitch layout and demonstrating the accommodation of 206 pitches as well as the proposed 38 lodges on the site.

Crowden. The response from Forest Holidays LLP notes that the objector in referring to the existing site arrangement is working from "an indicative, stylised site layout" which is used to inform Forest Holiday customers and is not a scaled survey drawing of the site. Survey drawings and scaled site layout plans have been provided to the CNPA to demonstrate the proposed new layout. The applicants also clarify that the site is "only and solely operated by Forest Holidays" who propose to operate a '5 metre rule' rather than the '6 metre rule' which is apparently operated by the Caravan and Camping Club. In response to concerns raised regarding the commercial viability of the lodge development, the applicants state that the proposal does "stack up commercially" and reference is made to a number of other Forest Holiday operated sites on which lodges / cabins have been developed and which are operating viably. In response to the objectors concerns that the proposed lodges would be sold as permanent residential units, Forest Holidays clarify that the company is not a speculative developer and describe it as a "holiday company with long term visions and goals" which aims to become a market leader in the UK "for family holidays within stunning locations." To further reinforce their intentions to provide tourist accommodation rather than speculative housing as suggested by the objector, reference is made to the fact that Forest Holidays lease the site from their parent company, the Forestry Commission, with the lease precluding any sale of units.

66. The third letter of representation is from Catriona Mayes of Dundonald and the 4 aims of the National Park are quoted at the outset. Ms. Mayes states that she is a long term camper at Glenmore and does not believe that the proposal for cabins on the site would benefit the local economy, protect wildlife, be accessible to a large number of people or enhance the cultural heritage of the area. Concern is expressed at the proposed reduction in the area available for camping and it is suggested that the proposed redevelopment would necessitate a much closer and more formal arrangement than currently exists for pitches. Reference is made to anecdotal information on wildlife impacts at other sites where cabins have been developed. The author speculates about further development which she assumes may occur including loss of a shower and toilet block, the introduction of bars and clubs on such sites, and a change in the type of visitor to the site. Ms Mayes considers that the proposal for lodges would disadvantage hundreds of families per year and would cut down the publics' access to enjoyment and recreation in this area.

67. *Response from Forest Holidays LLP*: The applicants disagree with the suggestion that the lodges would not benefit the local economy. Forest Holidays are of the view that the proposal would provide tangible and realistic benefits to the local economy by spreading the visitor numbers to the site during the traditionally quieter months. It is also pointed out that the site would continue to provide up to 206 pitches in addition to the lodges. They have also put forward the view that in retreating from Pinewoods, they are encouraging and allowing the ecology to regenerate. Forest Holidays also state that they are not aware of plans to remove the shower and toilet block nor have they any plans to promote bars and clubs. They express their commitment to improving the site and maintaining their main body of visitors, who are those "who visit to enjoy the quiet family peaceful nature of the site."
68. **Derek Scrimger of Edinburgh states that he strongly objects to the proposal, noting that his family regularly camp at Glenmore. He finds the proposal to build lodges and maintain the same number of pitches to be unacceptable, as he "does not want the spacious feel of the site to be lost by some overdevelopment by a commercial operator." Mr. Scrimger queries where he is going to camp if the development goes ahead.**
69. **Jack Welch of Guildtown, Perth objects to the scale of the proposal, detailing his main points of concern as -**
- **A reduction in the available space for camping (tents and caravans), with the lodges proposed to be located in areas that are currently open and free draining;**
 - **Limited alternative touring facilities in this area of the park, and all extremely busy during summer holiday periods;**
 - **Denying foreign visitors the opportunity to 'turn up' at Glenmore and camp at short notice.**

Mr. Welch describes the lack of affordable alternative opportunities to stay in the National Park as being critical. Other points detailed in the letter of representation include reference to a reduction in the open areas of the campsite and a suggestion that this could potentially lead to camp site roads being used as play areas; reference to speculation that an existing toilet block will be turned into a 'Lodge Office'; concern that regular users of the campsite may not have had the opportunity to take part in the consultation process for this planning application; and also reference to increases in the cost of camping (pitch price per day quoted for 2006 and 2009). The author states at the conclusion of the letter that he is not against some lodges on the

site but suggests that the scale of changes proposed represents an overdevelopment of the facility.

70. In a letter received from Jenny Cooke of Inverness it is stated that the proposals will fundamentally alter the informal nature and ambience of the site "into a vast commercial and overdeveloped campsite." Ms. Cooke considers that the forest can absorb a number of holiday lodges, but she is unhappy with the proposed proliferation of buildings in the more open areas.
71. Two letters of representation have been received from Mrs. Johanna SW Fleming of Longniddry, East Lothian. Concern is expressed in the first letter about the development proposal which she considers will lead to a significant change in the character of the area and will result in a "large reduction in the number of pitches available for campers and caravanners." She also suggests that the presence of so many occupied chalets during the "off season" (wintertime) could interfere with what has been regarded as a recovery time for local flora and fauna.
72. In the second letter of representation received from Mrs. Fleming (with the letter being submitted post deferral of the determination of the application) a number of points were raised, which the author requested be addressed to the applicants. The queries relate primarily to the '6 metre rule' between caravan and camping units and the implications of changes to a '5 metre rule.'

APPRAISAL

73. There are a number of issues to take into account in determining whether or not the proposed development is appropriate. It is necessary to consider relevant planning policies from national level to **Highland Council's Structure Plan** and the **Badenoch and Strathspey Local Plan**, take into account the impact of the development on the aims of the Cairngorms National Park, examine siting and design issues, and also take into account the case advanced for the development on behalf of the applicants.
74. At national level, the proposal accords with advice contained in **SPP2 : Economic Development** in relation to development within national parks. Tourist accommodation in this area of Glenmore is accepted with the caravan and camping facility having been in existence for a considerable period of time. The improvement of facilities on the site, through both the refurbishment of pitches,

as well as the provision of a new form of tourist accommodation, is consistent with the existing land use and is also appropriate to the purposes and character of the National Park.

75. Paragraphs 33 - 42 of this report detail the **Structure Plan** and **Local Plan** policies applicable to the site. Each of the Plans include general policies which are supportive of the tourism industry and the Structure Plan in particular recognises that there has been a growth trend in recent years in the self catering tourist accommodation sector. The support expressed in the Plans for the general growth of the industry and the associated provision of new or improved facilities does not however automatically render all such developments acceptable. The **Structure Plan**, for example, requires developments of self catering tourist accommodation to be designed for minimal impact on services, road infrastructure and the environment and also requires all new development to minimise the impact on the nature conservation resource and enhance it wherever possible. The proposed development includes many measures which demonstrate compliance with the Structure Plan policy, including for example the units being designed to sit on pilings in order to minimise the disturbance to the ground beneath, the reorganisation of the overall site area to result in the removal of a large number of pitches from the environmentally sensitive Pinewoods area of the site and the creation of an opportunity for the regeneration of much of that area, as well as the removal of a significant amount of unnecessary hard standing and road infrastructure.
76. In terms of the **Badenoch and Strathspey Local Plan** (1997) tourism is recognised as continuing to make a vital contribution to the economy. However, as detailed in paragraph 25 the **Local Plan** also emphasises that development in this sector should be balanced with protecting the areas exceptional scenic and heritage resources. The **Local Plan** undoubtedly encourages the development of tourist accommodation and facilities at suitable sites within or immediately adjoining communities and in particular advocates giving priority to the expansion of existing facilities. The current proposal meets all of the criteria, being located within the settlement area of Glenmore, and also representing an expansion of the tourist facilities at the site. The refurbishment of pitches and the new lodges are all proposed on land which has a history of usage for caravan and camping purposes and the proposal is essentially for the refurbishment of pitches and the expansion of the tourist business through the introduction of a new form of accommodation provision on the site.

77. Reference has been made in letters of representation, as well as in the consultation responses from **Aviemore and Vicinity Community Council** and **Rothiemurchus and Glenmore Community Association** to concerns regarding the potential loss of pitches and also the development of a layout which would reduce the area of land available for pitches. As described earlier the site layout plans clearly demonstrate that a total of 206 pitches would be provided on the site following the proposed refurbishment works. This represents a reduction of just 12 pitches from the number currently provided on the site. The majority of current opportunities for camping and caravanning on the site would therefore remain although in a revised layout, which it is necessary to acknowledge would be confined to a smaller land area than in the current arrangement. I do not necessarily view this as a negative aspect of the proposal or one solely deriving from the applicants desire to also accommodate 38 holiday lodges on the site. It is more a symptom of the need for the site operators to utilise the land in a more efficient way.
78. A large number of the existing pitches are accommodated in an ad hoc manner on various pockets of land throughout the site. Within this type of layout caravan or camping guests are free to choose their own location, and there is the possibility at peak times that separation distances between such pitches may not be particularly well observed. **As discussed in earlier sections of this amended report some concern was expressed by Members when the proposal was initially considered regarding the potential loss of large areas of the site for this style of ad hoc camping, which is recognised as being a long established practise at the site and one which perhaps enhances the informal atmosphere of the facility. As demonstrated in figures 5 and 6 the applicants have reconsidered the proposed layout and have significantly increased the area available for the ad hoc pitching of tents.** Over the remainder of the site the proposed new pitch layout undeniably has a more uniform appearance, with a larger number of pitches being clearly demarcated. This is however a necessary measure in order to ensure that a significantly increased number of pitches can benefit from electric hook ups. It also provides greater opportunity for use of the formal pitches outwith the main summer holiday season when more adverse weather conditions may be experienced. **Taking into account the amendments to the proposed site plan I am of the view that the current layout strikes an acceptable balance.** An appropriate mix is achieved of clearly defined serviced pitches, appropriately arranged in groups and successfully avoiding a linear or regimented

appearance and interspersed with areas of landscaping at strategic points, in combination with the retention of a number of areas capable of accommodating the more traditional ad hoc pitch arrangement, primarily for use by visitors in tents, but also capable of being utilised by caravans and motorhomes.

79. Other concerns have also been raised in letters of representation, in which it is speculated that the lodges in particular may be sold individually and used as permanent dwelling houses. The response from Forest Holidays on this point has been detailed in paragraph 65 of this report, where it is confirmed that the lodges would be retained and operated by the company as holiday accommodation. Aside from the applicants confirmation on this point, it is also worth noting that the formal development description in this application specifically refers to the provision of 'holiday lodges' and it is on that basis that the proposal has been assessed. The lodges are proposed as an addition to the tourist accommodation options available on the existing caravan and camping site. The layout of the two areas in which the lodges are proposed differs considerably from the type of layout that would be required in the event that this was to be assessed as a standard residential development. With the exception of decks and patio areas associated with each of the lodges, all surrounding land is effectively communal. The site layout has not been designed to provide the proposed lodges with individually defined garden curtilages, or adhere to the minimum requirements for private open space provision that would generally be associated with residential dwellings for permanent occupation, nor does it provide for the minimum separation distances normally required between residential properties. Compliance with such standards is not considered appropriate in the context of this proposal for holiday lodges and any attempt to apply such standards would detract from the relaxed and less formal environment of the tourist facility, both in terms of physical layout and general ambience. The development of lodges on the site is acceptable in the context of their specifically proposed use as holiday accommodation for short term occupation and I am satisfied that conditions can be imposed to regulate and restrict the use of the lodges to the purpose applied for. This is an approach which is consistent with Highland Council **Structure Plan** policy regarding the provision of self catering tourist accommodation.
80. Details have been provided in earlier sections of this report on the various natural heritage designations affecting the site and the measures that are being put forward in this application to bring about an enhancement of the natural heritage value of

the site. While I note the comment in the consultation response from **Rothiemurchus and Glenmore Community Association** in which sympathy is expressed for 'seasonal residents' who may be displaced from the Pinewoods area of the site, the environmental benefits likely to result from the removal of pitch provision in this area cannot be ignored. The degradation of the natural environment of this area of the site has been recognised by both the site owners (the Forestry Commission), the applicants (Forest Holidays LLP) and indeed by various consultees including **Scottish Natural Heritage** and the CNPA's **Heritage and Land Management Group**. Much of the impact that is evident in the area at present is a result of the sustained use of this area over prolonged periods, by seasonal users, which generally involves long term parking of caravans and the associated spread of owners additional paraphenelia, including awnings, various forms of pitch enclosures, outdoor furniture, vehicles etc. throughout the wider pitch area.

81. The removal of pitches from the western side of the Pinewoods area, together with the removal of redundant road surfacing and car parking and the associated temporary corralling off of some of the land would be of significant assistance in the regeneration process. While achieving this benefit in the Pinewoods area, the availability of seasonal pitches would continue to be maintained at an alternative location within the overall caravan and camp site and regular seasonal users of the site would not therefore be displaced from Glenmore. The wider natural environment as well as the visual quality of the site outwith the Pinewoods area, would also be enhanced through the development proposals, which includes small groups of planting interspersed between the proposed lodges and also between various areas of pitches, as well as the undertaking of more extensive landscaping proposals, through the planting of large bands of trees and shrubs around the periphery of the open area of the site and also as islands within the interior. The landscaping approach detailed in the submission would offer the potential to form diverse, multi layered stands of trees, which would increase enclosure on the site, assist in enhancing the woodland experience for visitors to the site and would also have the benefit of minimising the impact of new structures on the site, particularly when viewed from distant, higher elevations. Other aspects to consider in the context of the impact of the development on the natural heritage of the area include the introduction of bat roosting opportunities which will assist in biodiversity enhancement, and also the fact that the squirrel survey recently undertaken has demonstrated that the

development would not disturb existing squirrel dreys in the Pinewoods area of the site.

82. Details have been provided in paragraph 11 regarding the various car parking options which have been considered in an effort to address the previously expressed concerns of Members regarding the visual and environmental impact of the car parking arrangement, as well as concerns regarding the traffic safety issues associated with the movement of vehicles around the site. In terms of the arrangements that have been considered for the Pinewoods area in particular, I am of the view that Option 1, which essentially represents the originally presented car parking proposals and involves utilising existing hard standing areas, is the most appropriate. I recognise that the dispersal of the car parking bays throughout Pinewoods would result in a level of regular vehicular movement in the area. However, I am satisfied that any perceived conflicts between pedestrian or vehicular traffic can be minimised by the associated proposals to impose a 5 mph speed limit and also to introduce a vehicular barrier at the entrance to Pinewoods, thereby ensuring that vehicles accessing the area are limited to those occupying the lodges and also any service or emergency vehicles which require access through Pinewoods. The use of the existing hard standing pitch areas to serve as new car parking bays would minimise physical disturbance in this area and this approach does not give rise to the detrimental effects likely to accrue from the car parking arrangements proposed in Options 2 or 3, which would result in the felling of trees in the Pinewoods area or the loss of a number of caravan and camping pitches on land to the north of Pinewoods.
83. Finally, the potential economic benefits of the proposal cannot be ignored. Supporting documentation from the applicants, as well as references in the consultation response from the CNPA's Sustainable Tourism Officer, allude to potential to encourage increased visitor numbers to the Glenmore site, particularly in traditionally quieter times of the year, through the provision of a range of accommodation options (including the lodges and improved pitches with enhanced facilities) where their use would be unaffected by adverse weather conditions. Increases in visitor numbers to the site would in turn also have positive benefits to the wider economy of the area. **As outlined in detail in earlier sections of this report the applicants commissioned the preparation of an Economic Impact Analysis in response to Members concerns regarding the potential economic impacts of the proposed development and in particular the potential for the development of the lodges to displace existing similar businesses**

in the area. The Economic Impact Analysis acknowledges that there will be a degree of displacement (4.9%). Some displacement is in my view inevitable in the development of similar type facilities to those already existing in an area. The question must therefore be, in the context of the fourth aim of the national park, which is to promote the sustainable economic and social development of the areas's communities, can the limited level of displacement predicted be considered acceptable? In answering this, it is also necessary to consider other economic aspects of the proposal including the predicted level of additional annual visitor expenditure which the development would generate in the area²⁶ and the associated employment opportunities likely to arise from the additional expenditure. In taking an overall view on the economic impact of the development proposal, I consider that the limited degree of displacement is acceptable and that the proposal can be considered to accord with the aspirations of promoting the economic and social development of the area.

IMPLICATIONS FOR THE AIMS OF THE NATIONAL PARK

Conserve and Enhance the Natural and Cultural Heritage of the Area

84. The proposed development includes the removal of several pitches (many of which have been used over long periods on a seasonal basis) from the western area of the site, close to the shores of Loch Morlich, where the land is subject to several natural heritage designations. In conjunction with the removal of the pitches and the limiting of vehicular access through part of the area, the Pinewoods area of the site would be allowed to regenerate, which would result in the enhancement of the natural heritage of the area.

Promote Sustainable Use of Natural Resources

85. Where possible it is proposed to utilise locally sourced products, including hard standing and other surfacing materials, as well as FSC timber. A variety of energy efficiency measures are also proposed to be incorporated into the development. The proposal can therefore be considered to assist in achieving this aim.

Promote Understanding and Enjoyment of the Area

²⁶ Approximately £1.6 million net of assumed displacement.

86. The proposed development would provide a variety of accommodation options for tourists wishing to holiday in the area. The proposals also continue to make provision for public access through the site to the beach area at Loch Morlich and other lands. In addition although outside the scope of this planning application Forest Holidays LLP have also committed to the employment of a ranger on the site to enhance visitors understanding and enjoyment of the area.

Promote Sustainable Economic and Social Development of the Area

87. The proposed development would provide increased and varied accommodation options for visitors to the area. The lodge accommodation in particular has the potential to encourage greater numbers of visitors to the area throughout the year, including during traditionally quieter periods. The use of the site by greater numbers of visitors throughout the year would be of economic benefit to the area, both in terms of potential employment creation and also through visitors utilising facilities and services in the area.

RECOMMENDATION

88. **That Members of the Committee support a recommendation to grant full planning permission for the refurbishment of the existing site and the siting of 38 additional holiday lodges at Glenmore Caravan and Camping site, Aviemore, subject to the following conditions : -**
1. The development to which this permission relates must be begun within five years from the date of this planning permission.
 2. The proposed lodges shall only be used as short term tourist accommodation in connection with the existing business at the site and shall be retained and operated as a single commercial entity. The lodges shall not be sold separately or be used by a tenant, lessee, owner or occupier as their only or principal dwellinghouse. No single period of occupation shall exceed two months unless otherwise agreed in writing by the Cairngorms National Park Authority acting as planning authority. Occupation shall be restricted to use by persons requiring to stay in the area for recreational purposes.

3. A maximum of 206 caravan and camping pitches shall be provided on the site.
4. Exact details and specifications of all proposed external finishing materials (including roofing materials) shall be submitted for the further approval of the Cairngorms National Park Authority acting as planning authority before any work commences on site.
5. Prior to the commencement of the development of the lodges elevation drawings shall be submitted for the written agreement of the Cairngorms National Park Authority acting as Planning Authority to show the incorporation of bat roosting opportunities in the proposed lodge design. A minimum of one bat box shall be incorporated into the design of each of the lodges.
6. Pedestrian access through the site shall remain unobstructed during the course of construction and following the completion of works.
7. Prior to the commencement of development an Arboricultural Method Statement which details the means of protecting the retained trees on the site, shall be submitted for the written agreement of the Cairngorms National Park Authority acting as Planning Authority, in conjunction with Highland Council's Forestry Section. The Statement should include details of tree removal and tree surgery required; removal and disposal of stumps; means of site construction access; the installation of protective fencing; installation of protective matting within the construction zone; means of installing and filling steel pilings with concrete; means of construction of the buildings; the confirmed location and means of excavation of all service runs, including mains; the confirmed location and means of construction of all footpaths; contractors car parking; phasing of construction works; all changes in ground levels; identification of space for cranes, scaffolding, plant and access for works; identification of the location of temporary construction site structures, including all offices, storage areas and also areas allocated for the mixing of concrete. All works shall subsequently be carried out in accordance with the agreed statement.
8. Prior to the commencement of development a scheme of supervision for the arboricultural protection measures and site working shall be submitted for the written agreement of the Cairngorms National Park Authority acting as Planning Authority, in conjunction with the Highland Council's Forestry section.

9. No trees shall be uprooted, lopped, topped, felled or damaged without the prior written consent of the Cairngorms National Park Authority, acting as Planning Authority, in conjunction with Highland Council's Forestry Section.
10. Prior to the commencement of development a comprehensive landscaping plan shall be submitted for the written agreement of the Cairngorms National Park Authority acting as Planning Authority, specifying the quantity, position, size, species and protection measures (tree shelters, stakes and ties) of all trees / shrubs to be planted. A maintenance programme shall also be submitted in conjunction with the landscaping plan.

The landscaping of all areas within each phase of the proposed development shall be carried out in accordance with the agreed plan and shall be completed within one year of the commencement of works within that phase. Any trees or shrubs that die or become seriously damaged or diseased within a period of five years from the time of planting shall be replaced with others of a similar size and species, suited to the climate of the area, within the next planting season.

11. The surface of any new pathways through the site shall be a permeable material in keeping with the woodland nature of the site, the details of which shall be submitted for the agreement of the Cairngorms National Park Authority acting as Planning Authority prior to their development.
12. Prior to the commencement of development a revised site layout plan shall be submitted for the written agreement of the Cairngorms National Park Authority acting as Planning Authority, to show the position of proposed lodge no. 3 in the Pinewoods area repositioned northwards in order to allow for the retention and protection of two Scots pine trees in the vicinity.
13. All service trenches within the Pinewoods area of the site shall be hand-dug and service installation shall be co-ordinated to ensure that all services are laid in the same trench.
14. All public services for the development, including electrical, cable television and telephone cables, shall be located underground throughout the site. All such work shall be carried out prior to road surfacing and junction boxes shall be provided by the developer.

Advice notes :

1. The scheme of site supervision required in condition no. 8 of this permission shall include the following details :
 - A. induction and personnel awareness of arboricultural matters;
 - B. identification of individual responsibilities and key personnel;
 - C. statement of delegated powers;
 - D. timing and methods of site visiting and record keeping, including updates;
 - E. procedures for dealing with variations and incidents.
2. The maintenance programme required in condition no. 10 of this permission shall include specifications for weed control; adjustment / replacement of shelters, stakes and ties; formative pruning; and the replacement of failures.
3. The trees to be retained and protected as a result of the repositioning of lodge no. 3, as required in condition no. 12 of this permission, are identified as trees no's 764 and 766 in the submitted Arboricultural Implications Assessment.
4. Consideration should be given to the provision of woodcrete bat boxes in trees around the site in order to create enhanced bat roosting opportunities.

Mary Grier
planning@cairngorms.co.uk

28 January 2009

The map on the first page of this report has been produced to aid in the statutory process of dealing with planning applications. The map is to help identify the site and its surroundings and to aid Planning Officers, Committee Members and the Public in the determination of the proposal. Maps shown in the Planning Committee Report can only be used for the purposes of the Planning Committee. Any other use risks infringing Crown Copyright and may lead to prosecution or civil proceedings. Maps produced within this Planning Committee Report can only be reproduced with the express permission of the Cairngorms National Park Authority and other Copyright holders. This permission must be granted in advance.