

Issue 10	Area specific - An Camas Mòr	
Development plan reference:	14 An Camas Mòr	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>231 Albyn Housing Society Ltd 179 An Camas Mòr LLP 129 Aviemore and Vicinity Community Council 080 Badenoch and Strathspey Conservation Group 139 Buglife 227 EnviroPlan Consulting Ltd 242 HiTrans 158 John Poyner 191 Martin Ashdown & Susan Matthews 016 Mountaineering Council Of Scotland 044 North East Mountain Trust 195 Ramblers Scotland 226 Rothiemurchus Estate 087 Scottish Campaign for National Parks 051 Scottish Government 040 Scottish Natural Heritage 225 Springfield Properties PLC 061 The Cairngorms Campaign 196 Woodland Trust Scotland</p>		
Provision of the development plan to which the issue relates:	14 An Camas Mòr	
Planning authority's summary of the representation(s):		
<p><u>Justification for the development</u> Aviemore and Vicinity Community Council (129) - support this allocation</p> <p>Badenoch and Strathspey Conservation Group (080) - Object to this allocation for a number of reasons:</p> <ul style="list-style-type: none"> - use of spurious reasons to justify ACM including that it is to meet the Scottish Government's national housing requirements (these are being met already and do not necessitate a new town), that it will take the pressure off the countryside (ACM is itself prime countryside in a National Scenic Area), and that it will mean development in other areas will be unnecessary (the CNPA has committed in its Plan to housing in all communities). No convincing and irrefutable reason for building a new town in the CNP has ever been provided by the CNPA or anyone else. This appears to us to indicate that it is political considerations rather than reasons relating to housing need or real public interest that are propelling ACM forward. - The principles of development are unspecific, unmeasurable and are 		

not framed to make any specific requirement for the developers. When detailed applications are submitted to build out phases of ACM, the judgment as to whether the Principles have been met or not will be a matter of subjective opinion rather than objective fact.

- Para 14.5 – Object to the excessively optimistic opinion provided that appears to be speculation including the statement that it will be ‘internationally acclaimed’, that it will ‘set an outstanding example of what is possible in a NP’, that it will ‘reflect the special qualities of the NP’. Disagree that it is a ‘distinction’ to have the first new town in a NP, when an alternative viewpoint that we hold is that it is completely inappropriate to build a new town in such a sensitive location.

Buglife(139) – By continuing to support the principle of development at An Camas Mòr without being certain of the impact on protected species and habitats, especially freshwater pearl mussels, CNPA is failing to comply with National Parks (Scotland) Act which required natural and cultural heritage to take precedence over the other purposes.

John Poyner (158) - Object to inclusion of An Camas Mòr allocation. Believes large scale new development is not appropriate in the National Park.

Martin Ashdown and Susan Matthews (191) - The definition of sustainable; "Designating of, or characterised by a practice that sustains a given condition, as economic growth or a human population, without destroying or depleting natural resources." and/or "Involving the long term use of resources that do not damage the environment" should be used across the Park

Mountaineering Council of Scotland (016) - Object to An Camas Mòr development and request its deletion from the Plan. Feel such a scheme is unsuitable in a National Park and will have negative environmental impacts, especially biodiversity, climate change and landscape, on the site and wider area.

Ramblers Scotland (195) - Object to An Camas Mòr.

Scottish Campaign for National Parks (087) – The whole concept of An Camas Mòr serves a political imperative over several governments and is not based on sound resource management in the greater interests of the National Park environment.

The Cairngorms Campaign (061) – Object to inclusion of An Camas Mòr within the Plan. Believe that a new settlement is not compatible with National Park purposes.

Conflict with the aims of the Park

Buglife(139) – CNPA can not deliver its LDP or comply with National Park Act which requires conservation of natural and cultural heritage should take precedence over other purposes.

Martin Ashdown and Susan Matthews (191) - It conflicts with the first aim of the Park; there is no evidence to support the need for its development; it is not sustainable.

Scottish Campaign for National Parks (087) - Object to allocation

It is wholly inappropriate and illogical in the scheme of developments for the national park. There was an opportunity at the establishment of the National Park to re-think all the development proposals inherited from Highland Council.

We will not repeat all the detailed objections we had to the 'Principles of the Development' which were really a set of unachievable aspirations, but we will continue to monitor closely the information provided in respect of the various assessments that have to be lodged.

The Cairngorms Campaign (061) – Object to inclusion of An Camas Mòr within the Plan. Believe that a new settlement is not compatible with National Park purposes.

Delivering The National Park Partnership Plan

An Camas Mòr LLP (179) - Note no explicit link is made between this proposal and delivery of National Park Plan which would help to explain the strategic significance of the allocation.

Springfield Properties PLC (225) - Recognition should be given to the large body of work already undertaken to get An Camas Mòr to the current stage and to its current status as 'with PPP pending'.

Role of An Camas Mòr in the future

Rothiemurchus Estate (226) - Support para 14.2 but question if An Camas Mòr will remain a focus for development once completed.

Ability of the development to be sustainable

Badenoch and Strathspey Conservation Group (080) - Object to this allocation for a number of reasons:

Para 14.1 - Object to unsubstantiated comment that ACM will be a 'sustainable' community as there is no commitment that ensures it will be sustainable. The Principles do not specifically commit or require the development to meet any specified standard.

North East Mountain Trust (044) - The plan should clarify how it will ensure An Camas Mòr does not become a holiday village or second home enclave.

John Poyner (158) - Object to inclusion of An Camas Mòr allocation. Believes large scale new development is not appropriate in the National Park.

Martin Ashdown and Susan Matthews (191) - The definition of sustainable; "Designating of, or characterised by a practice that sustains a given condition, as economic growth or a human population, without destroying or depleting natural resources." and/or "Involving the long term use of resources that do not damage the environment" should be used across the Park

Apply the definitions of "sustainable" as "Designating of, or characterised by a practice that sustains a given condition, as economic growth or a human population, without destroying or depleting natural resources." and/or "Involving the long term use of resources that do not damage the environment" should be used across the Park

Delete An Camas Mòr from the plan

The Cairngorms Campaign (061) – Questions how such a proposal can be called ‘sustainable development’.

Question definition of sustainable development and how this could be used to justify a new community in the Park. Observe An Camas Mòr is currently fields and so justify new community on basis of community needs is disingenuous.

Question how the vision for the scheme can be delivered in practice and suggest that to ensure it does not become a holiday homes village or second home enclave occupancy conditions must be required. Suggest that if they are used here they should be also be used elsewhere in the Park. Suggest high costs of managing natural heritage impacts will increase house prices and so impact affordability and result in a lower standard of development to make the scheme to be deliverable. The resulting town will be over dominant relative to other communities in the Park. Suggest the development is not necessary.

Woodland Trust Scotland (196) - Object to allocation because of the impact development will have on ancient woodland. If development is to occur it must include sufficient buffering. Object also since the settlement is not sustainable when compared to the Bruntland definition.

Relationship with Aviemore

EnviroPlan Consulting Ltd (227) - Concerned that the plan has not demonstrated any detail particularly in its relationship with Aviemore. The idea of creating a new settlement which will be cut off and separate from Aviemore is not a good one as the whole reason for An Camas Mòr is the presence of Aviemore. The plan must therefore be clear on how the two will integrate. This includes clear direction on the issue of th foot/cycle bridge over the Spey.

The standards of design

Albyn Housing Society (231) - Support the allocation. However the plan should recognise the additional costs associated with design and sustainability aspirations.

Badenoch and Strathspey Conservation Group (080) - Object to this allocation for a number of reasons: Unconvinced that it will be of a significantly higher standard than other developments taking place at the moment. In addition why are all new housing developments not meeting this higher standard.

The Cairngorms Campaign (061) – Suggest high costs of managing natural heritage impacts will increase house prices and so impact affordability and result in a lower standard of development to make the scheme to be deliverable. The resulting town will be over dominant relative to other communities in the Park. Suggest the development is not necessary.

Tone and clarity of language used

Badenoch and Strathspey Conservation Group (080) - Object to this allocation for a number of reasons: para 14.6 – object to the claims made when there is nothing for these claims to adhere to

Springfield Properties PLC (225) - Suggest reviewing text to make it more ‘plain

English'

Information provided within the Plan

An Camas Mòr LLP (179) - Support allocation of new community at An Camas Mòr but consider it would be useful to refer in the text of Section 4 to the detailed studies that have been undertaken to support the current planning application including HRA, advanced discussions in relation to section 75 agreement and further additional HRA and AA assessments, to give greater creditability and assurance around the continuation of this proposal from the adopted Local Plan into this emerging LDP.

Badenoch and Strathspey Conservation Group (080) - Object to this allocation for a number of reasons: we object to the emphasis on subjective opinion in the LDP (e.g. ACM will be 'vibrant') and we reiterate that such comments are inappropriate in a LDP.

There is no commitment to protect areas of particular sensitivity from built and recreational development, such as the wetlands, areas near badger setts, areas near the river, Ancient Woodland sites, lowland heath with areas rich in bearberry and petty whin, etc. The LDP should be building on natural heritage information that is already in the public domain.

EnviroPlan Consulting Ltd (227) - Object to lack of definition of the An Camas Mòr development.

Rothiemurchus Estate (226) - Requests para 14.15 is updated to reflect the conclusions of the Appropriate Assessment that was conducted for An Camas Mòr and that para 14.10 is updated to reflect the trunk authorities' view in response to the planning agreement in principle, that no contribution is required Request para 14.7 on the delivery of An Camas Mòr is updated to reflect the most recent information on housing demand for the development.

Springfield Properties PLC (225) - Supports the reps made on behalf of An Camas Mòr LLP and endorses the alterations being sought

Woodland Trust Scotland (196) - seek assurances that appropriate species surveys will be undertaken. Object also since the settlement is not sustainable when compared to the Bruntland definition.

Negative impacts of the proposal

Badenoch and Strathspey Conservation Group (080) - Object to this allocation for a number of reasons: No assessment or acknowledgement of the potentially negative impacts of ACM on existing settlements, including Aviemore

Buglife(139) – By continuing to support the principle of development at An Camas Mòr without being certain of the impact on protected species and habitats, especially freshwater pearl mussels, CNPA is failing to comply with National Parks (Scotland) Act which required natural and cultural heritage to take precedence over the other purposes.

Mountaineering Council of Scotland (016) - Object to An Camas Mòr development and request its deletion from the Plan. Feel such a scheme is unsuitable in a

National Park and will have negative environmental impacts, especially biodiversity, climate change and landscape, on the site and wider area.

Scottish Campaign for National Parks (087) – Object to allocation

It is wholly inappropriate and illogical in the scheme of developments for the national park. There was an opportunity at the establishment of the National Park to re-think all the development proposals inherited from Highland Council.

We will not repeat all the detailed objections we had to the 'Principles of the Development' which were really a set of unachievable aspirations, but we will continue to monitor closely the information provided in respect of the various assessments that have to be lodged.

The Cairngorms Campaign (061) – Objects to An Camas Mòr new settlement due to impact on NSA, Natura 2000 sites and protected species

Woodland Trust Scotland (196) - seek assurances that appropriate species surveys will be undertaken.

Impact on cultural heritage

Badenoch and Strathspey Conservation Group (080) - Object to this allocation for a number of reasons: Para 14.19 - Object to the lack of specific information on cultural heritage that would allow the public to assess whether they considered better protection should be afforded to the assets in the LDP

Scottish Government (051) - INFORMAL COMMENT

An Camas Mòr – the proposed new community will lie close to a scheduled monument. As such consideration of this monument's setting for the development itself and also for potential impacts from associated services should be included. Mitigation for potential direct impacts upon this monument should also be given due attention.

Impact on natural heritage

Badenoch and Strathspey Conservation Group (080) - Object to this allocation for a number of reasons:

- The whole boundary leaves unrestricted opportunity for development
- Para 14.14 - object to the incomplete nature of the list. All SPAs for capercaillie in Badenoch & Strathspey could be adversely affected through recreational disturbance, given the metapopulation. We note that obligations towards European interests extend beyond site boundaries.
- Para 14.15 - Object to list which is significantly incomplete. Object to the exclusion of species, including the following which are interests for neighbouring Natura sites and/or the site itself and/or European Protected Species (EPS): Freshwater Pearl Mussels - no reference is made to this globally threatened species. ACM should demonstrate that levels of potentially harmful substances will be within limits appropriate to juvenile FWPM, which are more sensitive than adults; Otters - should refer to mortality as well as disturbance; Other European Protected Species such as wildcat, all species of bats and great crested newt should be included. We understand that there are wildcat records in the recent past from the ACM site.
- Para 14.17 – Unrealistic to assume a new town is capable of conserving

and enhancing important biodiversity on the site, and reflects an apparent lack of sound ecological understanding. It would appear to be particularly so when not a single commitment to any natural heritage interest is being made on the map in the LDP. How are habitat networks going to be improved 'throughout the area within and surrounding it'? How is mitigation going to 'ensure a net enhancement of the natural heritage of the Park'? In an area of such high natural heritage quality already, genuinely enhancing this is a major challenge. However, reducing the natural heritage of the Park through human intervention, however unintentional, is a more likely outcome. There are many sensitive biodiversity interests where predictable outcomes would be degradation.

Buglife(139) – The Plan identifies a number of SPAs and SACs that may be affected by the proposal (para 14.14). The impact of the development on the five protected sites in the vicinity should be fully assessed before the site is allocated, and if it is not possible to develop this site alternatives will need to be considered. It is not possible to mitigate biodiversity impact (as suggested in para 14.7), such as the loss of ancient woodland, that would occur as part of the An Camas Mòr Development. DEFRA guidance suggested that if loss is unavoidable a bespoke compensation solution that recognises the value of the irreplaceable habitat is needed. The ratio for replacement woodland is around 30:1. A 2008 survey identified An Camas Mòr as an important location for spiders, damsel flies, flies, beetles, bugs, moths and butterflies. Development must ensure this biodiversity value is not lost and species movement is not impeded. The scale of the development of 1500 houses will be difficult to mitigate which calls into question the justification for such a development within a National Park.

Object to inclusion of An Camas Mòr allocation before it has been proved that there will be not impact on fresh water pearl mussels. This is the primary reason for designation of River Spey SAC. CNPA is failing in its duty to protect this site , without more detailed work on An Camas Mòr and consideration of alternatives

Scottish Natural Heritage (040) - Recommend that where national and international designated sites for each community should be named, and SSIs as well as European sites should be named where these overlap.

Para 14.13 appears incomplete in comparison to other settlements. Para 14.14 Wording is not accurate in relation to Habitats Regulations and need to make it clear Natura sites listed are those HRA has identified as likely to be of significantly affected by proposals in the Plan- they have been screened in and so require high level mitigation. Also need to reflect the importance of role of the five SPAs in Strathspey area and the non-designated woodland for connectivity with these SPAs in terms of Capercaillie and adopt a precautionary approach. When individual proposals are assess against Natural Heritage SG need to ensure account can be taken of all detailed ecological factors as well as information on household increase, travel distance etc. Para 14.15 Need to strengthen policy caveat to make it clear that if a planning authority is unable to conclude there would be no impact on the integrity of European site(s) the proposal would not be in accordance with the Plan. Mitigation proposed in draft HRA must be picked up in the Plan. Para 14.16 Reference should be made especially to this SAC as policy caveats should be a specific as possible. As Natural Heritage SG does not provide mitigation for this one-off case it is important this para is comprehensive.

Woodland Trust Scotland (196) - seek assurances that appropriate species surveys will be undertaken. Object also since the settlement is not sustainable when compared to the Bruntland definition.

Natura requirements

Badenoch and Strathspey Conservation Group (080) - Object to this allocation for a number of reasons: The allocation does not include any allocations for open space or recreation as there is a need to assess the impact of open space and recreation on Natura and other natural heritage interests (e.g. impacts on otters and badgers).

Settlement boundary

Badenoch and Strathspey Conservation Group (080) - Object to this allocation for a number of reasons: Object to the settlement boundary for multiple reasons, including that it goes too close to important areas for protected species like badgers, it includes too much important habitat, it goes too close to the Spey, there is insufficient buffer from Natura sites.

Phasing of development

Albyn Housing Society (231) - Text should set out how the first phase of development will contribute to a successful and balanced community.

Linkages and Connections

HiTrans (242) - Include in either para 14.24 or 14.25 of the need for new development at An Camas Mòr to take into account the priorities and recommendations identified in the HITRANS Aviemore Active Travel Audit

Scottish Natural Heritage (040) - Para 14.24 New foot/cycle way is not within site boundary and therefore may not be covered by protective provisions so mitigation text should be added to reflect River Spey SAC and potential impact on otters, freshwater species and water quality.

Evidence and other available information used to informing the preparation of the LDP

Rothiemurchus Estate (226) - In light of work undertaken to in support of the planning application for An Camas Mòr, request that the status of the site in the ecology survey, landscape information and risk of flooding should be changed from amber to green.

Request para 14.7 on the delivery of An Camas Mòr is updated to reflect the most recent information on housing demand for the development.

Object to para 14.21 on flood risk at An Camas Mòr as the flood risk assessment to support the An Cams Mor application concluded that no part of the site is at risk from flooding, but the loss of floodplain capacity means there may be implications elsewhere so a compensatory storage scheme is required.

Modifications sought by those submitting representations:

Justification for the development

Badenoch and Strathspey Conservation Group (080) – Remove allocation as it is not required to meet real housing need and is completely inappropriate in a National Park.

Buglife (139) – remove allocation

John Poyner (158) - Delete An Camas Mòr allocation

Martin Ashdown & Susan Matthews (191) - Delete An Camas Mòr from the plan
Apply the definitions of "sustainable" as "Designating of, or characterised by a practice that sustains a given condition, as economic growth or a human population, without destroying or depleting natural resources." and/or "Involving the long term use of resources that do not damage the environment" should be used across the Park

Mountaineering Council Of Scotland (016) - Delete An Camas Mòr allocation

Ramblers Scotland (195) - Delete An Camas Mòr

Scottish Campaign for National Parks (087) - Delete An Camas Mòr as an allocation.

The Cairngorms Campaign (061) - Remove An Camas Mòr allocation.

Conflict with the aims of the Park

Buglife (139) – remove allocation

Martin Ashdown & Susan Matthews (191) - Delete An Camas Mòr from the plan

Scottish Campaign for National Parks (087) - Delete An Camas Mòr as an allocation.

The Cairngorms Campaign (061) - Remove An Camas Mòr allocation. Ensure greater weight is given to the first purpose in policy and practice.

Delivering The National Park Partnership Plan

An Camas Mòr LLP (179) - Paragraph 14.2 should be amended as follows:

“The development of An Camas Mòr is specifically identified as a strategically important proposal in the Cairngorms National Park Partnership Plan (2012 – 2017), and as such forms a major part of the development strategy of this LDP as well as being a strategic part of the overall settlement hierarchy and settlement strategy for the Badenoch and Strathspey part of the Park. While it may take many years to be completed, it will then be a main settlement where larger scale development will be focussed. A number of detailed studies and assessments have already been undertaken, both of the allocation and of the planning application, and these all conclude that there will be no adverse effects on the integrity of any Natura site.”

Reason: To explain that the An Camas Mòr allocation is of strategic as well as local significance. Also to explain that the development allocation has already undergone significant and extensive environmental and development assessment that has all shown the proposed development to be compliant with planning policy and additional environmental considerations and legal requirements.

Springfield Properties PLC (225) – endorse modifications sought by An Camas

Mòr LLP (179)

Role of An Camas Mòr in the future

Rothiemurchus Estate (226) - Suggest 'then' should be deleted from para 14.2

Ability of the development to be sustainable

Badenoch and Strathspey Conservation Group (080) - include specific requirements for developments on how the development will proceed creating a sustainable community, based on objective fact rather than opinion and vague aspirations

John Poyner (158) - Delete An Camas Mòr allocation

Martin Ashdown & Susan Matthews (191) - Delete An Camas Mòr from the plan
Apply the definitions of "sustainable" as "Designating of, or characterised by a practice that sustains a given condition, as economic growth or a human population, without destroying or depleting natural resources." and/or "Involving the long term use of resources that do not damage the environment" should be used across the Park

North East Mountain Trust (044) – remove allocation

The Cairngorms Campaign (061) - Remove An Camas Mòr allocation.

Woodland Trust Scotland (196) – Remove allocation as it is not sustainable. Should it go ahead, include a buffer to protect ancient woodland.

Relationship with Aviemore

EnviroPlan Consulting Ltd (227) – provide additional clarity on what this development constitutes and how it will integrate with Aviemore including a foot/cycle bridge over the Spey.

The standards of design

Albyn Housing Society Ltd (231) – recognise the additional costs associated with design and sustainability aspirations within the plan.

Badenoch and Strathspey Conservation Group (080) – Include clarity on how it will be developed to a higher design standard than that taking place at present.

The Cairngorms Campaign (061) - Remove An Camas Mòr allocation.

Tone and clarity of language used

Badenoch and Strathspey Conservation Group (080) - include specific requirements for developments on how the development will proceed creating a sustainable community, based on objective fact rather than opinion and vague aspirations.

Springfield Properties PLC (225) - Suggest reviewing text to make it more 'plain english'

Information provided within the Plan

An Camas Mòr LLP (179) - it would be useful to refer in the text of Section 4 to the detailed studies that have been undertaken to support the current planning application including HRA, advanced discussions in relation to section 75 agreement and further additional HRA and AA assessments, to give greater creditability and assurance around the continuation of this proposal from the adopted Local Plan into this emerging LDP.

Badenoch and Strathspey Conservation Group (080) – Provide greater detail of areas for development and areas which are to be protected such as areas for open space, wetland areas, areas adjacent to the river, lowland heath, etc.

EnviroPlan Consulting Ltd (227) – provide additional clarity on what this development constitutes

Rothiemurchus Estate (226) - Change para 14.15 to read:

14.15 An Appropriate Assessment was carried out on the basis of the proposal, EIA and supporting papers and other information used for the CNPA determination of 11 June 2010: due to passage of time this must be updated in advance of issuing the Planning Permission in Principle. Any further applications which exceed the parameters previously provided may require to be subject to further assessment in terms of the Environmental Impact Assessment or Habitat Regulations: in particular consideration would have to be given to any changes which have the potential to impact upon the following:

- disturbance to otters
- pollution and siltation from construction sites
- requirement for SUDS
- disturbance to capercaillie
- pollution from wastewater

Change para 14.10 to read:

The determination of the Planning Permission in Principle in June 2010 was on the basis of a detailed transport assessment which examined the various access issues facing the site, including the need for a regular bus service, the impact of the development on the trunk road and local road network, the impact on the nearby rail network, and linking to Aviemore by an off road path and cycle route.

The terms of approval require a contribution to paths and the funding for a bridge on the foot/cycle path link to Aviemore via River Spey , the Provision of other foot/cycle paths, the Provision of distributor road before 201 residential units to satisfaction of Highland Council TEC Services including any off site works, upgrading of existing B970 Coylumbridge junction to satisfaction of Highland Council TEC Services including any off site works to serve up 200 residential units, a contribution to improvements to Grampian Road to the satisfaction of the Highland Council TEC Services and a Green Transport Plan with funding for infrastructure involved and provision of an accessible public bus service.

Add' Cairngorms National Park Authority will work with public sector partners, the community and developers to consolidate An Camas Mòr in the time period that delivers the outcomes of the Park Partnership Plan 2012-2017' at the end of the paragraph.

Springfield Properties PLC (225) – endorse modifications sought by An Camas Mòr LLP (179)

Woodland Trust Scotland (196) – Include text to require appropriate species surveys.

Negative impacts of the proposal

Badenoch and Strathspey Conservation Group (080) – Include clear assessment of the impact of development on existing settlements including Aviemore.

Buglife (139) – If it must remain para 14.3 needs to be expanded to specify how natural heritage will be protected and enhanced. The 2008 biodiversity survey identified 10 UKBAP species and a number of other rare species on the site, additional up to date surveys are required and appropriate mitigation will be needed. The level of impact of the proposal on SPAs and SACs should be assessed before the site is allocated.

Mountaineering Council Of Scotland (016) - Delete An Camas Mòr allocation

Scottish Campaign for National Parks (087) - Delete An Camas Mòr as an allocation.

The Cairngorms Campaign (061) - Remove An Camas Mòr allocation.

Woodland Trust Scotland (196) – Include text to require appropriate species surveys.

Impact on cultural heritage

Badenoch and Strathspey Conservation Group (080) – Include specific information on cultural heritage to allow a proper assessment be completed.

Scottish Government (051) – Informal comment suggests additional information be included to highlight the presence of a scheduled monument.

Impact on natural heritage

Badenoch and Strathspey Conservation Group (080) – Remove allocation as it is not required to meet real housing need and is completely inappropriate in a National Park.

Should it go ahead:

- Include natural heritage designation site information which is comprehensive, including all SPAs for capercaillie in Badenoch & Strathspey.
- Include all relevant species in 14.15 including Freshwater Pearl Mussels, impact on mortality of species as well as disturbance, and include other protected species including wildcat, all species of bats and great crested newt
- Clarity how para 14.17 will be achieved

Buglife (139) – If it must remain para 14.3 needs to be expanded to specify how natural heritage will be protected and enhanced. The 2008 biodiversity survey

identified 10 UKBAP species and a number of other rare species on the site, additional up to date surveys are required and appropriate mitigation will be needed. The level of impact of the proposal on SPAs and SACs should be assessed before the site is allocated.

Scottish Natural Heritage (040) - Name SACs, SPAs, Ramsar sites, NNRs and SSSIs within the relevant community section of the plan and ensure consistency in whether SSSIs are named or not when they are also European sites.

Add additional bullet points to para 14.13 (An Camas Mòr) saying “within and to the south of the are areas of woodland in the registered Ancient Woodland Inventory, the whole areas falls within the National Scenic Area, along the western boundary is the River Spey Special Area of Conservation, land to the south and west is designated as a Site of Special Scientific Interest (River Spey SSSI, Craigellachie SSSI, Kinveachy Forest SSSI and North Rothiemurchas Pinewood SSSI), Special Protection Area (Cairngorms SPA and Kinveachy Forest SPA) and/or Special Area of Conservation (Cairngorms SAC, River Spey SAC, Kinveachy Forest SAC), west of the A9 is Craigellachie National Nature Reserve”.

Amend para 14.14 to say “In addition, development on land allocated in the Plan has potential to have significant effect, directly or indirectly, on a number of European designated sites, alone or in combination”.

Refer to Anagach Woods SPA and Craigmore Woods SPA in para 4.14

Amend text of para 4.15 to read “...to carry out Appropriate Assessment in order that they can be confident that your development will not have an adverse effect on the site integrity in view of the conservation objectives, either alone or in combination with other plans or projects. If the planning authority is unable to reach this conclusion, your proposal will be judged not to be in accordance with this plan and planning permission will not be granted. Specifically your proposal must address...”

Refer specifically to SAC in para 14.16

Recognise Craigellachie which is both a SSSI and NNR in the Plan

Woodland Trust Scotland (196) – Include text to require appropriate species surveys.

Natura requirements

Badenoch and Strathspey Conservation Group (080) – Include clarity on how the development will proceed in a way which protects Natura and other natural heritage interests.

Settlement boundary

Badenoch and Strathspey Conservation Group (080) – Amend the boundary to ensure proper protection to all relevant species, habitats, the river Spey and Natura sites

Phasing of development

Albyn Housing Society Ltd (231) –include text to clarify how the first phase will contribute to a successful and balanced community.

Linkages and Connections

HiTrans (242) - Include in either para 14.24 or 14.25 of the need for new

development at Camas Mor to take into account the priorities and recommendations identified in the HITRANS Aviemore Active Travel Audit

Scottish Natural Heritage (040) - Add mitigation text about River Spey SAC to para 14.24

Evidence and other available information used to informing the preparation of the LDP

Rothiemurchus Estate (226) - Update the ecology survey, landscape information and risk of flooding to green to reflect latest position in relation to the An Camas Mòr development.

Change para 14.21 to read 'A flood risk assessment has shown that the development site including the new access road is free from flood risk but that parts of the new access road has the potential to affect flooding elsewhere; detailed plan must demonstrate how the proposal; will not increase flood risk elsewhere.'

Summary of responses (including reasons) by planning authority:

Justification for the development

Badenoch and Strathspey Conservation Group (080); Buglife(139); John Poyner (158); Martin Ashdown and Susan Matthews (191); Mountaineering Council of Scotland (016); Ramblers Scotland (195); The Cairngorms Campaign (061); Scottish Campaign for National Parks (087) – Regarding the overarching justification for the identification and allocation of An Camas Mòr, Scottish Government Planning Circular 1/09 requires Local Development Plans to focus on their specific main proposals for the period up to year 10 from adoption and provide a broad indication of the scale and location of growth up to year 20. This is reinforced in paragraph 73 of Scottish Planning Policy 2010 which requires local development plans to maintain a minimum of 5 years ongoing effective land supply at all times and also provide an indication of the possible scale and location of housing land up to year 20. The need for a 5 year ongoing effective land supply is reinforced in Scottish Government PAN 2/2010: Affordable Housing and Housing Land Audits.

The site has a long history, beginning with a working party established in 1990 to consider a report for a new village with An Camas Mòr one of the possible locations. The consultative draft Badenoch and Strathspey Local Plan published in 1991 suggested a number of locations, and the final draft of this plan, published in 1992 made provisions for An Camas Mòr specifically.

The Public Local Inquiry into objections to the Local Plan was held in 1994. The Reporter recognised the constraints to long term growth of Aviemore and accepted the need for a new community at An Camas Mòr after 2005. This is the position in the Badenoch & Strathspey Local Plan adopted in 1997 and taken forward in the Highland Structure Plan 2001.

The Badenoch and Strathspey Local Plan (1997) (SDXxx) includes a specific section on new communities in which it is stated that the socio-economic factors at the heart of the district could justify a major development at Cambusmore as part of the overall settlement policy. The Local Plan advises that it should be contained as a free standing village initially, with housing, community and employment opportunities. It also refers to a road bridge over

the River Spey providing an option for long term expansion of Aviemore. Section 6.1.6 of the plan (SDXxx page xxx) deals specifically with Cambusmore stating that Section 6.1.6 of the Local Plan is specifically about Cambusmore and states that “the Council will support the development of a new community at Cambusmore, subject to a formal environmental assessment demonstrating that it would not give rise to unacceptable impacts.”

The Highland Structure Plan (2001) (SDXXX) recognises the proposed new settlement stating “in Badenoch and Strathspey housing land supply beyond five years can only be maintained if infrastructure investment has been made to bring forward the Cambusmore site at Aviemore.”

This support was taken forward into the CNP Local Plan (SDXxx) adopted in 2010 which included an indicative boundary for the site. Whilst not providing effective land as part of the housing land supply, the continued support for the scheme was reflective of the need to provide long term continuity for such a complex and large scale development which, it was recognised, would require the life of more than one local plan to come to fruition. The Local Plan also embedded the development principles for the development into the Plan (Appendix 4 page xxx). This allowed preparatory work to proceed which helped inform the application for planning in principle considered by CNPA planning committee in 2013 (SDXxxx).

Strategic support is provided through the National Park Partnership Plan 2012-2017 (SDXX) approved by Scottish Ministers in 2012 where there is specific recognition of An Camas Mòr as a sustainable location for future growth (page xxx).

The CNPA remains committed to the site as a key solution to the provision of long term growth in Badenoch and Strathspey. Its slow progress through the planning process has now reached a point where it is accepted that it can begin to make an effective contribution to the housing land supply for the plan period, as well as for the longer term. Whilst it is recognised that progress will require significant phasing, it will progressively act in a way to relieve development pressure from Aviemore. Without it the CNPA would be required to find land elsewhere in the Strath to meet the identified housing need, and in considering this as a realistic option, the CNPA remain convinced that, whilst the original socio-economic justifications for the identification of the site dating from the 1990's, this part of the Strath remains, and will continue to remain a focus for development pressure, and a long term solution is imperative.

Conflict with the aims of the Park

Buglife(139); Martin Ashdown and Susan Matthews (191); The Cairngorms Campaign (061); Scottish Campaign for National Parks (087) - Regarding conflict with the aims of the Park, and the appropriateness of the development within the National Park, it is considered appropriate to consider this under each of the 4 aims of the Park set out by the National Parks (Scotland) 2000 Act (SDXXX)

1. Conserve and Enhance the Natural and Cultural Heritage of the Area - This is

a unique development of a character and scale that cannot avoid having an impact on the natural and cultural heritage of the area. This has been recognised as a serious issue and through detailed work to inform current and previous planning applications, and information provided as part of this clarifies that measures are available to mitigate this over time allowing the development to proceed in a way which meets this aim (SDXxx planning reports from 2010 and 2013). There is recognition within this work that there will be adverse impacts for periods of time, but that in the long term there is an opportunity for An Camas Mòr to make a positive contribution to the character of the National Park in much the same way as, for example, Ballater or Grantown on Spey.

In addition there is an opportunity to make a positive contribution under this aim by way of the impact the development will have, reducing the pressure on other settlements in Badenoch and Strathspey, and to contribute positively to conserving and enhancing the natural and cultural heritage and character of those settlements.

2. Promote Sustainable Use of Natural Resources – the development will be based on the principles of sustainability at a number of levels, as set out in the text. There will be a need for good transport links with a focus that discourages the use of the car (para 14.25); development will be required to demonstrate innovation in design and sustainable construction and living (page 54 Objectives); it will offer opportunities to maximise existing and new technology in regard to climate change and maximise solar gain in its design (para 14.6); it will maximise use of locally sourced materials (para 14.8); it will show how higher density is compatible with the landscape context (para 14.8); it will create opportunities for renewable energy use and water conservation (para 14.6). The development also allows for sharing of facilities/services with Aviemore (para 14.2). It is therefore considered that if the development is taken forward in line with the text, it will meet this aim.
3. Promote Understanding and Enjoyment of the Special Qualities - Development within this setting with a focus on actively discouraging use of the private car will promote enjoyment and understanding for the community itself. If the development makes a positive contribution to the built environment, the landscape within which it sits and embraces/promotes biodiversity it can do so for the wider community and those enjoying the Park. The proposals for walking/cycling, the network of paths, and opportunities to link with a proposed community park and bridge across the River Spey contribute to this aim. If the proposal is developed in line with this text, it is considered to meet this aim.
4. Promote Sustainable Economic and Social Development - The development has potential to make a significant contribution to this aim by demonstrating in practice how the housing, employment and leisure needs of a community can be delivered in an integrated way that is based on how people would like to live their life and reflect the values of the National Park. If the proposal is developed in line with the design guidance set out it will meet this aim.

Section 9 (1) of the National Parks (Scotland) Act 2000 (SDXXX) requires the authority to ensure that the National Park aims are collectively achieved in relation

to the National Park in a co-ordinated way. Section 9 (6) states that if it appears to the authority that there is a conflict between the first aim and other National Park aims, the authority must give greater weight to the first aim. It is only when there is a conflict that this occurs. The CNPA, having assessed the impact of the proposal on each of the aims do not consider there to be any conflict. No greater weight should therefore be given to the first aim, and any change to the text or emphasis would be in conflict with the Act. The CNPA does not therefore consider the proposal to be at odds with the aims, and neither does it consider that any greater weight should be given to the first aim of the National Park in this particular circumstance where there is no conflict.

Delivering The National Park Partnership Plan

An Camas Mòr LLP (179); Springfield Properties PLC (225) - Regarding the role the development serves in the delivery of the National Park Partnership Plan, the Cairngorms National Park Partnership Plan 2012-2017 was approved by Stewart Stevenson Minister for the Environment and Climate Change in June 2012 and adopted by CNPA in July 2012. This provides the strategic context for planning decisions in the Park.

The National Park Partnership Plan 2012-2017:

- Sets out the vision and overarching strategy for managing the Park;
- Provides focus and priorities at a time of limited financial resources;
- Provides a strategic context for the Local Development Plan;
- Shows how the four aims of the National Park can be achieved together, benefiting people and place

This is the context for the content of the Plan, including the long-term outcomes and the specific policies within it. It has been informed by a Strategic Environmental Assessment, Habitats Regulations Appraisal and an Equalities Impact Assessment.

Long-term Outcome 1 is *“A sustainable economy supporting thriving businesses and communities.”*

Policy 1.1 f) seeks to contribute to growing the economy of the Park and helping to deliver this outcome by *“provision of a housing land supply that meets identified need and demand, supports migration of young people and workers to the Park, and maintains vibrant communities.”*

Policy 1.2 a) seeks to enable sustainable patterns of settlement growth, infrastructure and communications by *“consolidating the role of the existing main settlements....., as well as the new community at An Camas Mòr , as the most sustainable places for future growth and the focus of housing land supply while maintaining the integrity of designated sites.”*

Policy 1.3 supports development of a low carbon economy through, inter alia, c) *“supporting businesses and communities to use less energy, reduce emissions, generate low impact renewable energy and plan for climate change”* and d) *“promoting high standards of sustainable design and efficient use of energy and materials in construction.”*

The Plan therefore specifically recognises An Camas Mòr as a sustainable location for future growth. Text within the LDP from para 1.13 onwards clarifies that it is the role of the LDP to act as a tool to deliver the National Park

Partnership Plan. The CNPA do not consider there to be an explicit need to repeat this throughout the LDP and do not therefore support any change in this regard.

Rothiemurchus Estate (226) – regarding the role of An Camas Mòr in the future, it is the intention of the CNPA, in line with the Plan that the development will remain a focus for growth and investment for the long term. As one of the largest settlements in the National Park it will become a strategic settlement within the settlement hierarchy, and it is therefore considered appropriate that over time, it acts in this role as would other strategic settlements, providing a focus for growth. The CNPA would not support any dilution of this or any change in the role it plays within the settlement strategy, and considers any change to this to be undermining to the role of the development.

Ability of the development to be sustainable

Badenoch and Strathspey Conservation Group (080); John Poyner (158); Martin Ashdown and Susan Matthews (191); North East Mountain Trust (044); The Cairngorms Campaign (061); Woodland Trust Scotland (196) - Regarding the sustainability of the development, if it is accepted that there is a need for the development, the plan then goes on, in detail, to clarify the way in which it should be taken forward. There is a clear focus on sustainability and in works to take the scheme forward sustainable design has remained at the heart of the design. This is reflected in the confirmation that An Camas Mòr had been identified by Scottish government as one of 11 projects under the Scottish Government Scottish Sustainable Communities Initiative (SSCI). The plan sets out in detail a number of design principles to ensure works are carried out in a way which creates an exemplar of sustainable development and building design. Further definition is also provided in the glossary, splitting sustainable, sustainable communities and sustainable development into separate definitions.

The CNPA does not agree that the development of the site is not sustainable. The CNPA considers that the development is founded on the principles of sustainability, and has provided detailed guidance to ensure that all development ensures this is achieved. The CNPA does not therefore support any change or removal of text or the allocation in full from the Plan.

Issues raised regarding occupancy also link with the sustainability of the development as a whole. The CNPA has considerable sympathy with the issue of second and holiday homes. While this is not something which can be controlled by legal mechanisms, it is the view of the CNPA that much can be done to control this through careful design. Whilst the Plan does not go into detail on this matter, it does require any proposal to set out how it will address this issue. Para 14.26 is clear that An Camas Mòr will “be a real community, not a holiday village or second home enclave and will provide the range of facilities commensurate with that status.” The masterplan for the development will set out how this will be achieved, and future applications will then be taken forward in accordance with the masterplan.

The CNPA does not consider the use of occupancy conditions to be effective. It has set out in evidence to support the preparation of the Local Development Plan its thinking behind the use of residency criteria, (SDXxxx) and remains of this

view.

The CNPA does not therefore support any change to the text or general approach to further deal with this issue.

Relationship with Aviemore

EnviroPlan Consulting Ltd (227) – regarding the relationship with Aviemore, the text within the plan makes it clear that there is a close relationship with Aviemore. Para 14.1 states “The settlement of An Camas Mòr will be a new sustainable community. With links to the Aviemore community”. Para 14.24 goes on to set out clearly the relationship with Aviemore. This paragraph sets out the fundamental need for a bridge across the River Spey to ensure that the two communities are true partners. The CNPA is therefore of the view that the text provides sufficient clarity on the need to form a robust link with Aviemore, and that there is a fundamental need for a bridge. The CNPA do not agree that the text in any way suggests the two settlements should work independent of each other but that they should be close partners. The CNPA does not therefore support any further change to the text to expand on this point.

The standards of design

Albyn Housing Society (231); Badenoch and Strathspey Conservation Group (080); The Cairngorms Campaign (061) – regarding the issue of design, the CNPA is committed to raising the standards of design across the Park. The objection highlights the costs associated with this. Whilst the CNPA has sympathy with this issue, it does not consider inclusion of this within the policy dealing with design, or associated with text for individual settlements or allocations is appropriate as this may be seen as a dilution of the core commitment. The CNPA will consider the issue of costs and quality of design in detailed applications for development and does not therefore support any change to the text of the plan as requested.

The cost and relative affordability of the development is also linked to the costs of provision. Many considerations must be taken into account, not least the need to address matters of natural and cultural heritage, provision of infrastructure, the need of high quality design and the provision of public realm on a large scale. The objector (080) considers this will result in lower standards of design. The CNPA is committed to the highest standards of design and it is for this reason that the CNPA has been working on this project for a considerable length of time, to ensure that the economics of development meet with the standards of development required. The CNPA do not therefore consider there to be a need to further amend the text to expand on this issue.

Tone and clarity of language used

Badenoch and Strathspey Conservation Group (080); Springfield Properties PLC (225) – regarding the tone of language used, the CNPA is setting out within the plan its proposals for future development. The CNPA therefore considers it appropriate to use aspirational language which seeks to set the standard of any development at the highest level. Whilst the objector may consider this to create opportunity for subjective decision making, it is the view of the CNPA that such subjectivity, matched with clear and directional text will help to ensure the highest standards of design. The CNPA considers the wording to be sufficiently clear to

provide the reader with all the necessary direction to allow development proposals to be worked up. The CNPA supports the need for clarity in the text, but considers there to be a number of technical issues associated with this development which require detailed text. The CNPA does not therefore support any dilution or rewording in regard to this issue.

Information provided within the Plan

An Camas Mòr LLP (179); Badenoch and Strathspey Conservation Group (080); EnviroPlan Consulting Ltd (227); Rothiemurchus Estate (226); Springfield Properties PLC (225); Woodland Trust Scotland (196) – regarding information which is in the public domain regarding survey information and assessments of the impact of the proposal, and works undertaken to inform the current planning application, the CNPA accept that these exist, but consider it inappropriate to include specific reference within the LDP to these. The plan establishes the new settlement as a significant proposal for the long term, and as such considers there to be a need to ensure appropriate and up to date survey information at each stage of the process. Para 14.15 sets out the information which must be supplied and the CNPA will review the information submitted at each stage. Depending on the time taken to reach each stage additional or updated information may be required. The CNPA do not therefore support the inclusion of text which may imply that works and surveys undertaken to day would in any way remove the need for appropriate information at future stages.

The CNPA does not support any change to the text which reflects work done to inform an applicant of the decision which has yet to be issued. The CNPA recognises that much information has been gathered as part of the work on the current and previous planning applications. However, without the issue of permission, nor any commencement on site, the CNPA wishes to retain text within the plan which provides a clear policy background to any future decisions. It does not consider it appropriate to include text which relates to current work which, in the event of a change in circumstances, may require to be revisited in the future. Regarding the level of detail provided, the CNPA accepts that the plan provides a level of detail which must be supported by further information and a detailed masterplan. Rather than imbed this within the Plan, the CNPA is working with the development promoter to secure a masterplan which will be the subject of planning consent. This will then inform future phases and discrete planning applications. The requirement for this masterplan is clearly set out in para 14.9 onwards. The masterplan once granted will then form the basis of any future development. This masterplan will set out the areas within the boundary where development will occur, areas which will be protected from development which may have particular natural heritage sensitivities, areas for informal recreation, areas for open space, buffer areas to protect woodland, particular species etc. This is clarified in para 14.8. The CNPA has also set out within the An Camas Mòr section of the Plan the design principles to be followed by any development. The CNPA does not therefore consider it necessary or appropriate to include a further level of detail.

Negative impacts of the proposal

Badenoch and Strathspey Conservation Group (080); Buglife(139); Mountaineering Council of Scotland (016); The Cairngorms Campaign (061); Scottish Campaign for National Parks (087); Woodland Trust Scotland (196) –

regarding the issue of the overarching negative impacts of the development, the proposal has been fully assessed within the associated Strategic Environmental Assessment (SDXxx) and Habitat Regulations Appraisal (SDXXX) which accompany the Plan. These have been carried out using methodology which considers the direct and cumulative impact. This includes the impact on neighbouring sites and areas such as Aviemore. The CNPA does not therefore agree that there has been no assessment of the overarching impact. This impact will continue to be assessed with future updates to both assessment and appraisal required prior to the adoption of the Plan. The Authority do not consider there to be any need to carry out further assessment at this stage.

In particular reference to the impact of the development on natural heritage, para 14.13 onwards sets out the requirements for any development proposal. Further to this additional information is provided in supplementary guidance (SDXxx) regarding this issue. The policy in the proposed Local Development Plan dealing with natural heritage will also require to be complied with.

Impact on cultural heritage

Badenoch and Strathspey Conservation Group (080); Scottish Government (051) – regarding cultural heritage and the presence of a scheduled monument close to the site, the Authority accept this and suggest that text be amended in para 14.19 to clarify this point. The CNPA therefore suggests an amendment to the first sentence to read “..... there are assets around the site which may be impacted upon by the development including a scheduled monument. Any proposal, including the provision of associated services, must therefore consider the impact on cultural heritage assets including this scheduled monument, considering disturbance above and below ground, and any impact made both to individual resources and in a cumulative manner. Mitigation for potential direct impacts upon assets including the scheduled monument should also be given due attention.”

Impact on natural heritage

Badenoch and Strathspey Conservation Group (080); Buglife(139); Scottish Natural Heritage (040); Woodland Trust Scotland (196) – regarding the impact on the environment, biodiversity, landscape, woodland and climate change, and in particular paras 14.13- 14.17, the CNPA accepts that the information in 14.13 and relating to formal natural heritage designations is incomplete when compared to other comparable sections of the plan. The CNPA therefore accepts that an amendment to the text would provide additional clarity and supports a change in line with that suggested by (040) to read after the existing text:

“• within and to the south of the site are areas of woodland registered in the Ancient Woodland Inventory

- the whole area falls within a National Scenic Area
- along the western boundary is the River Spey Special Area of Conservation
- land to the south and west is designated as a Site of Special Scientific Interest (River Spey SSSI, Craigellachie SSSI, Kinveachy Forest SSSI and North Rothiemurchus Pinewood SSSI), Special Protection Area (Cairngorms SPA and Kinveachy Forest SPA) and/or Special Area of Conservation (Cairngorms SAC, River Spey SAC, Kinveachy Forest SAC)
- west of the A9 is Craigellachie National Nature Reserve”

Regarding para 14.14 the CNPA accepts that the list is inaccurate and incomplete and does not adequately link with the Habitats Regulations Appraisal carried out in support of the Plan. The CNPA would therefore support and amendment to this para in line with the modification sought by (040) to read:

14.14 “In addition, development on land allocated in the Plan has potential to have a significant effect, directly or indirectly, on a number of European designated sites, alone or in combination:”

The list provided should also be expanded to include

- Anagach Woods SPA
- Craigmore Wood SPA”

The CNPA also acknowledges that HRA may also need to be updated to reflect this latest information.

Regarding para 14.15 the CNPA accepts the merit of expanding the text to strengthen the position regarding European sites and would therefore support an amendment to the text in line with the modification sought by (040) to read “..... to carry out an Appropriate Assessment in order that they can be confident that your development will not have an adverse effect on the site integrity in view of the conservation objectives, either alone or in combination with other plans or projects. If the planning authority is unable to reach this conclusion, your proposal will not be judged to be in accordance with this plan. Specifically your proposal must address”. The CNPA considers this amendment to address the issues of compliance with the relevant legislation and does not therefore support any future change to the text to specifically list juvenile fresh water pearl mussels, wildcat, bats and great crested newts. The CNPA considers the impact on these to be fully addressed through the remainder of the paragraphs relating to natural heritage.

This paragraph clarifies the need for extensive survey information and the CNPA is confident that, with the changes above, the text provides sufficient clarity to ensure proper information is gathered to inform any decisions taken.

Regarding para 14.16 the CNPA accepts that the inclusion of text to refer to Cairngorms Special Area of Conservation would help improve clarity and would support an amendment to the paragraph in line with that sought by (040) to read “In addition, for the Cairngorms SAC, a Compensatory Woodland Planting Plan (CWPP) should be submitted as part of the information for the Appropriate Assessment. This should indicate the habitat(s) where it is proposed that compensatory woodland planting will occur and the new habitat(s) to be established. The CWPP should demonstrate that there will be no adverse effect on the integrity of the Cairngorms SAC through habitat loss. Scarcer qualifying habitats should be avoided within the planting plan, including blanket bog, dwarf-shrub heaths and wet heath”

Regarding para 14.17, the CNPA remains of the view that the text sets out an aspirational goal for development. Any applicant will then be required to demonstrate how they will achieve this aspiration. It is generally accepted that certain impacts can be mitigated, whilst others cannot and the way in which these are dealt with needs to be different and tailored accordingly. The text clarifies this stating “where mitigation is not possible within the site boundary”. Further information is also provided in supplementary guidance regarding Natural

Heritage which deals with mitigation and compensation. The CNPA therefore do not consider there to be a need for further amendment to the text regarding this point.

Natura requirements

Badenoch and Strathspey Conservation Group (080) – regarding obligations to carry out appraisals of the impact of development on Natura sites, the plan as a whole has been the subject of an overarching appraisal and appropriate assessment. At further detailed stages of the process, when applications are submitted, further appraisals and assessments may be necessary and the need for this is set out in para 14.15. The CNPA is confident that the correct procedure has been followed in this regard and does not therefore support any further change to text to deal further with this issue.

Settlement boundary

Badenoch and Strathspey Conservation Group (080) – the issue raised here is the same point as that raised in regard to Natura requirements, and the impact of development on natural heritage. The CNPA do not consider there to be a need to amend the settlement boundary as it remains confident that the appropriate level of protection has been built into the plan to deal with protected species and habitats.

Phasing of development

Albyn Housing Society (231) – regarding the contribution of the first phase of development to the creation of a successful and balanced community, para 14.9 of the plan states that “the development will be based on a detailed masterplan. Within this, the requirements to create a sustainable community including a mix of housing and economic development opportunities, community facilities and other forms of development will be detailed”. The CNPA consider this text to be clear in its intention to ensure that all development associated with An Camas Mòr contributes to the creation of a sustainable community. The CNPA do not therefore support any change to the text to highlight the contributions made to that overall aim by different phases of the development.

Linkages and Connections

HiTrans (242) – regarding the inclusion of text to highlight the need to take into account the Aviemore Active Travel Audit, the CNPA accept that such additional text would provide clarity to the reader, and support the inclusion of additional text at the end of para 14.25 stating “Account should be taken of the priorities and recommendations set out in the HITRANS Aviemore Active Travel Audit”.

Scottish Natural Heritage (040) – regarding the issue of the foot/cycle bridge across the Spey, the CNPA accept the point made highlighting the fact that this will occur outwith the settlement boundary. As such, the CNPA would support the addition of text to explain the issue of mitigation to reflect the River Spey's designation as a Special Area of Conservation. The CNPA would therefore support an additional sentence to para 14.25 in line with the modification sought, to read: “Development of recreational and leisure facilities on land either side of the river, and of a link bridge across the river to Aviemore, has potential to have a significant effect on the River Spey SAC through disturbance to otters, disturbance to freshwater species movement and impact on water quality. To

accord with this plan, detailed proposals for these developments must demonstrate that there would be no adverse effect on the integrity of the River Spey SAC, alone or in combination with other plans or projects”

Evidence and other available information used to informing the preparation of the LDP

Rothiemurchus Estate (226) – regarding the status of the site within the supporting evidence published to support the Plan, the CNPA accept that much work has been undertaken since the publication of this work, but do not agree that this evidence should be amended. The evidence provided information to help inform the development of the Plan and its allocations. This evidence is related to a particular point in time, and the CNPA do not therefore consider it necessary to make further changes to the evidence at this stage in plan preparation.

Regarding information on flooding, the CNPA accepts that additional information has been gathered and that the suggested wording included by the objector as a sought modification provides additional and more up to date clarity on this issue. The CNPA support such a change to para 14.21 to read: ‘A flood risk assessment has shown that the development site including the new access road is free from flood risk but that parts of the new access road has the potential to affect flooding elsewhere; detailed plan must demonstrate hoe the proposal; will not increase flood risk elsewhere.’

Reporter’s conclusions:

Reporter’s recommendations: