

<b>Issue 11</b>	<b>Area specific – Aviemore and Vicinity</b>	
<b>Development plan reference:</b>	16 Aviemore 29 Glenmore 33 Inverdrue and Coylumbridge	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>231 Albyn Housing Society Ltd  129 Aviemore and Vicinity Community Council  080 Badenoch and Strathspey Conservation Group  184 Colin Gair  227 EnviroPlan Consulting Ltd  060 Forest Holidays LLP  242 HiTrans  173 Ian Forrester  075 MacDonald Aviemore Highland Resort Ltd  044 North East Mountain Trust  035 Reidhaven Estate  226 Rothiemurchus Estate  040 Scottish Natural Heritage  063 SEPA  061 The Cairngorms Campaign  057 Tulloch Homes Group Ltd  196 Woodland Trust Scotland</p>		
<b>Provision of the development plan to which the issue relates:</b>	16 Aviemore 29 Glenmore 33 Inverdrue and Coylumbridge	
<b>Planning authority's summary of the representation(s):</b>		
<p>AVIEMORE</p> <p><u>Site ED1</u>  Badenoch and Strathspey Conservation Group (080) - Object to inclusion of undeveloped parts of this site. Capacity exists in the current industrial estate. The north extremity should be left undeveloped and placed outwith the settlement boundary. It was and potentially could be again, a valuable flower meadow habitat with some grassland fungi as well as scattered birch and other trees. It also provides a buffer between the industrial estate and exceptional countryside to the north. This should be valued as an amenity for all to enjoy and benefit from.</p> <p>Woodland Trust Scotland (196) - Concerned about the impact of the future expansion of the industrial estate on the ancient semi-natural woodland adjacent to the site.</p> <p><u>Site ED2</u>  Badenoch and Strathspey Conservation Group (080) - Object to inclusion of undeveloped parts of this site. Capacity exists in the current industrial estate. That part to the south should be left undeveloped. It provides valuable habitat, is used</p>		

for informal paths and has considerable amenity value, recently increased with the building of the new school.

#### Site ED3

Colin Gair (184) - Objects to any further development at Site ED3 in Aviemore as current development (Hydrason) are un-neighbourly and cause noise and vibration problems.

#### Additional Land for Employment Use

MacDonald Aviemore Highland Resort Ltd (075) - Welcome the inclusion of sites with existing permission on the community maps, and confirms that the line on the proposals corresponds with their planning permission 08/241/CP. However, as part of the permission a Masterplan for the resort was approved they consider that as well as recognising the existing permission the maps should also identify the area subject to the approved Masterplan as an allocation for economic development and mixed uses.

#### Additional Land for Tourism and Recreation Use

Enviroplan Consulting (227) - Consider allocating brownfield site at vacant industrial property at Dalfaber Road as tourism to reflect the need to encourage redevelopment of this brown field site.

Enviroplan Consulting (227) - Text should be amended to encourage improved recreation and leisure facilities in the area currently allocated as a buffer adjacent to the Spey. This area should be allocated as joint use recreation and tourism.

#### Additional Land for Community Use

Aviemore and Vicinity Community Council (129) - The land at Dalfaber Drive between the Bowling Green and Main Railway Line should be designated for community use, reflecting community aspirations for the site. Land encompassed by the old primary school should be marked as 'community' use. AVIEMORE AND VICINITY COMMUNITY COUNCIL would like to see the old playing field area of the site retained for 'community use'.

#### Additional Protection of Open Space

Aviemore and Vicinity Community Council (129) - While accepting the master plan for the Aviemore Centre, land at Strathspey Lawns and Gardens should be protected as open space and text at page 67 amended to 'must be retained as open space'.

#### Additional Land for Open Space

Badenoch and Strathspey Conservation Group (080) - Additional land at the Achantoul Burn area within the boundary, land east and north of the railway line, land beside the Milton Burn, land at the west area of the former horses field between Milton Wood and Scandinavian village, land close to the A9 north of Milton Wood, land south of the grey land at Dalfaber, land opposite The Bridge Inn to the Spey boundary (involving moving the settlement boundary) should be included as open space.

#### Natural Heritage Issues

Scottish Natural Heritage (040) - Para 16.5 Craigellachie NNR provides an important setting for Aviemore which should be recognised in the Plan.

Scottish Natural Heritage (040) - Para 16.6 Craigellachie is both a SSSI and a NNR.

Scottish Natural Heritage (040) - Para 16.7 Wording is not accurate in relation to Habitats Regulations and that the Plan needs to make it clear that the Natura sites listed are those HRA has identified as likely to be significantly affected by proposals in the Plan and so they have been screened in and thus require high level mitigation. Need to reflect the importance of role of the five SPAs in Strathsey area and the non-designated woodland for connectivity with these SPAs in terms of Capercallie 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.

Scottish Natural Heritage (040) - Para 16.8 There is a 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. They highlight that the mitigation proposed in draft HRA must be picked up in the Plan.

#### Settlement Boundary

Aviemore and Vicinity Community Council (129) Generally content with the settlement boundary however the boundary adjacent to Dalfaber Road should be extended to the south to allow for one more house (reflecting recent grant of planning permission)

Tulloch Homes Group (057) - Object to the settlement boundary which does not include Highburnside. Object to the lack of justification that no further development at Highburnside will be considered appropriate.

Ian Forrester (173) - Request development boundary of Aviemore is extended to the South of Spey cottage (map provided) back to the position it was it Highland Council Plan. The site was previously a garden and orchard, and so is brownfield. This change would enable a current extant planning permission to be substituted with a new permission which would enable to site to be developed in a more appropriate way

Badenoch and Strathspey Conservation Group (080) - Support line which does not extend west of the A9 but object to the boundary at ED1 which should exclude land to the north currently undeveloped, and the boundary should be also be moved to enable land opposite The Bridge Inn to the Spey boundary to be allocated as Open Space.

#### Explanatory Text

Enviroplan Consulting (227) - Object to apparent intention to diminish the role of Aviemore and replace it with An Camas Mòr, a direction which is supported by no clear justification. Object to the lack of clarity on how Aviemore and An Camas Mòr will integrate. The plan should be more explicit in the direction given, in particular how the two will interact across open space along the River Spey and associated bridge.

Aviemore and Vicinity Community Council (129) - Roads and Transport - There is no mention of the A9 dualling. This is a major development which should have a strategy to deal with the effects of changes to the road structure.

Badenoch and Strathspey Conservation Group (080) - Para 16.1 - Object to claim that Aviemore is 'the economic driver for the NP' as it is only one of a number. Also object to unsubstantiated statement that Aviemore has become a focus for conservation activity as a substantial amount of destruction of particularly high quality habitat has taken place in Aviemore and surrounds in recent years which will be exacerbated by recent permissions.

HiTrans (242) - Include in para 16.17 of the need for new development in the Aviemore area to take into account the priorities and recommendations identified in the HITRANS Aviemore Active Travel Audit.

MacDonald Aviemore Highland Resort Ltd (075) - Support Aviemore as a main settlement and recognition of its various roles including the investment opportunity at Macdonald Highland Resort. Suggest including reference to the importance of working with all stakeholders, including Macdonald Highland Resort to deliver in infrastructure referred to.

#### Existing Permissions

Reidhaven Estate (035) North Dalfaber - The use of the grey shading "Existing permissions - for information only" implies that the site could disappear if the permission lapses. The maps should be altered to provide more explicit detail. Use of hatching to show that it is an allocation and also has permission should be used as an alternative.

MacDonald Aviemore Highland Resort Ltd (075) - Support recognition of existing permission. However it is unclear why the key marks this site as 'for information only'. Consider the site should not only be marked as an existing permission, but also that it should be an allocation for economic development and mixed use.

#### Map

Aviemore and Vicinity Community Council (129) – Observe the base map is out of date.

Aviemore and Vicinity Community Council (129) - The approved planning permission for a 50 bed nursing home at Allt Mòr, Aviemore, ref 08/443/CP and 2012/0353/DET should be shown on the Plan.

#### GLENMORE

##### Site T1

Scottish Natural Heritage (040) - Site T1 includes land within the Cairngorms SPA/SAC and is therefore likely to have significant effect in terms of HRA. However, subject to satisfactory HRA tourism-related development could occur. A specific caveat is necessary at T1 and T2 to give protection to European sites as they are not covered by 'new housing allocation style' text as they are based on existing uses.

SEPA (063) – Include wording saying “Several small watercourses and drains run through the site. A FRA will be required to support any development proposals.”

#### Site T2

Scottish Natural Heritage (040) - Site T2 includes land within the Cairngorms SPA/SAC and is therefore likely to have significant effect in terms of HRA. However, subject to satisfactory HRA tourism-related development could occur. A specific caveat is necessary at T1 and T2 to give protection to European sites as they are not covered by ‘new housing allocation style’ text as they are based on existing uses.

#### Support for Tourism

Forest Holidays LLP (060) - There is a need for explicit support for increasing the provision and broadening the range of tourist accommodation and visitor facilities. Development should not be constrained by designations. Development should be measured against the impact on sensitive designations and appropriate mitigation considered.

#### Additional Open Space

Aviemore and Vicinity Community Council (129) - Open space is a key attraction but by not defining that open space on the map, it is left open to windfall development.

Scottish Natural Heritage (040) - Suggest area south of road which is regenerating woodland is identified as open space.

#### Natural Heritage Issues

Badenoch and Strathspey Conservation Group (080) Para 29.5 - Object that no guidance is provided in the LDP as to what should be included in the Habitats Regulation Appraisal and no list of European sites that are potentially affected is provided. Query whether ‘Habitats Regulation Appraisal’ should be ‘Appropriate Assessment’.

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.

Scottish Natural Heritage (040) Para 29.5 - Should identify SSSIs, NNRs, SACs and SPAs due to the complex nature of the multiple-designations. As Glenmore settlement boundary indicates a general policy direction for development it should be subject to HRA and mitigation applied, rather than being screened out of the assessment because no allocations are included. Recommend a specific policy caveat is added if the boundary is retained and that this should be added at the end of the Proposals chapter.

Scottish Natural Heritage (040) Para 29.6- A stronger policy caveat is needed to remove any possible ‘tensions’ between the settlement chapters and the Natura protective policy elsewhere in the Plan.

#### Settlement Boundary

Scottish Natural Heritage (040) - The settlement boundary should be extended to include the Open Space to the north and west as far as Site T1 (south of road).

Aviemore and Vicinity Community Council (129) - Object to the settlement boundary as there is no justifiable reason to identify it as a settlement. The boundary is not defensible. The boundary is too big. There is no plan to develop the area. The boundary creates 'white land' which would promote more development to the detriment of Glenmore. The boundary suggests space for development to the east of the main road which cannot be justified. The line along to Glenmore Lodge would lead to creep. The settlement boundary on the east should be the main road. There is no good planning reason to include Glenmore Lodge in the settlement. The boundary should come from behind the Forestry Houses down to the main road, between the Forestry Houses and the Sewage Works, and join up with the boundary on the south side at the bridge over the river. The river should be used as the southern boundary. There is no need to include the 'Hayfield' in the settlement.

Badenoch and Strathspey Conservation Group (080) - Object to the settlement boundary which includes substantial areas of national and European designated land, over which there should be a strong presumption against development. The SB is not drawn tightly around developed or allocated land and includes large amounts of undeveloped land. It is in parts indefensible. It gives an impression of a development-driven initiative, especially given the inconsistency that Laggan, a far larger community than Glenmore, has no map provided in the LDP. The extensive area within the SB yet absence of any development allocations provides developers with large expanses of white ground over which there is a certain anticipation of development because the white areas are within the settlement boundary.

The Cairngorms Campaign (061) - Objects to extensions of settlement boundary to south and west of Glenmore and into the SAC, as it is not justified.

#### Cairngorm Mountain

North East Mountain Trust (044) - The Plan should clarify the reasons for not allowing open access to Cairngorm Mountain and how these reasons will be respected.

#### INVERDRUIE and COLYUMBRIDGE

#### Additional Site for Housing

Albyn Housing Society Ltd (231) – Include land with lapsed consent at Dellmhor.

#### Site T1

Scottish Natural Heritage (040) - A specific caveat is necessary for T1 to give protection to European sites as they are not covered by 'new housing allocation style' text as they are based on existing uses.

SEPA (063) - Need to explain that part of the site is within SEPA's indicative 1:200 year flood risk area. A FRA may be required to accompany any further development proposals, particularly where an increase in footprint or vulnerability is proposed.

Woodland Trust Scotland (196) - Object to site due to impact development will have on ancient woodland. If development is to occur it must include sufficient buffering. Also seek assurances that appropriate species surveys will be undertaken.

Rothiemurchus Estate (226) – The site boundary should include the whole of the Caravan and Camping Park and grounds of Lairig Ghru Cottage (derelict) up to the boundary with the SSSI.

#### Natural Heritage Issues

Scottish Natural Heritage (040) - Suggest the national and international designations within each community should be named and consistency is needed in whether SSSIs are named or not when they are also European sites.

Scottish Natural Heritage (040) Para 33.4 - Both SSSIs should be named for clarity.

Scottish Natural Heritage (040) Para 33.5 - A stronger policy caveat is needed to remove any possible 'tensions' between the settlement chapters and the Natura protective policy elsewhere in the Plan.

#### Settlement Boundary

Aviemore and Vicinity Community Council (129) - Support settlement boundary Inverdrue and support settlement boundary for Coylumbridge but consider the whole of the caravan/camp site should be included.

Rothiemurchus Estate (226) - Amend the settlement boundary to include the whole of the Caravan and Camping Park and grounds of Lairig Ghru Cottage (derelict) up to the boundary with the SSSI.

Badenoch and Strathspey Conservation Group (080) Support the settlement boundary as currently drafted and would object to any changes.

#### **Modifications sought by those submitting representations:**

##### AVIEMORE

Site ED1: Badenoch and Strathspey Conservation Group (080) seek redrawing of site boundary to exclude undeveloped parts of this site. Woodland Trust Scotland (196) seek assurances that development would not have a negative impact on the neighbouring ancient woodland.

Site ED2: Badenoch and Strathspey Conservation Group (080) seek redrawing of site boundary to exclude undeveloped parts of this site.

Site ED3: Colin Gair (183) seeks removal of ED3 allocation, unless current building is to be demolished and rebuilt.

Additional Employment Site: MacDonald Aviemore Highland Resort Ltd (075)

seek the inclusion of the site with permission as an allocation for economic development and mixed use.

Additional Land for Tourism and Recreation Use: Enviroplan Consulting (227) request the allocation of the brownfield site at vacant industrial property at Dalfaber Road for tourism uses and seek a joint use allocation for recreation and tourism on land currently allocated as a buffer adjacent to the Spey and amendments to the text to encourage improved recreation and leisure facilities in this area.

Additional Land for Community Use: Aviemore and Vicinity Community Council (129) seek the allocation of land at Dalfaber Drive between the Bowling Green and Main Railway Line and the land encompassing the old primary school and the old playing fields for community use.

Additional Protection of Open Space: Aviemore and Vicinity Community Council (129) seek increased protection for Strathspey Lawns and Gardens by an amendment to the text to say they 'must be retained as open space'.

Additional Land for Open Space: Badenoch and Strathspey Conservation Group (080) seek the allocation of land at the Achantoul Burn area within the boundary, land east and north of the railway line, land beside the Milton Burn, land at the west area of the former horses field between Milton Wood and Scandinavian village, land close to the A9 north of Milton Wood, land south of the grey land at Dalfaber, land opposite The Bridge Inn to the Spey boundary (involving moving the settlement boundary) as open space.

Natural Heritage Issues: Scottish Natural Heritage (040) Recommend national and international designated sites and SSSIs should be named. Scottish Natural Heritage (040) seek a reference to Anagach Woods SPA and Craigmore Wood SPA to para 16.7 (Aviemore). Scottish Natural Heritage (040) seek amendment to para 16.7 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". Scottish Natural Heritage (040) seek amendment to para 16.8 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...".

Settlement Boundary: Aviemore and Vicinity Community Council (129) seek amendments to the settlement boundary at Dalfaber Road to reflect the recent planning permission. Ian Forrester (173) Seeks an extension to the development boundary of Aviemore is extended to the South of Spey cottage (map provided). Tulloch Homes Group (057) seek amendment to the settlement boundary to include Highburnside and land with extant permission. Ian Forrester (173) - Request development boundary of Aviemore is extended to the South of Spey cottage (map provided) back to the position it was it Highland Council Plan. Badenoch and Strathspey Conservation Group (080) seek amendments to the



settlement boundary to at ED1 to exclude the land that is currently undeveloped and an amendment to enable land opposite The Bridge Inn to the Spey boundary to be allocated as Open Space.

Explanatory Text: Aviemore and Vicinity Community Council (129) seek inclusion of a reference to A9 dualling and the development of a strategy to deal with its effects. MacDonald Aviemore Highland Resort Ltd (075) seek recognition within the Plan of the importance of working with all stakeholders, including MacDonald Highland Resort, to deliver the infrastructure required to ensure that development opportunities at the Resort and within Aviemore are realised. Enviroplan Consulting (227) – seek clarification on how Aviemore and An Camas Mòr will integrate and a more explicit direction on how the two will interact across open space along the River Spey and associated bridge. Badenoch and Strathspey Conservation Group (080) seek clarification that Aviemore is only of the economic drivers in the National Park, in para 16.1 and seek justification for the statement that Aviemore has become a focus for conservation activity. HiTrans (242) seek inclusion of the need for new development in the Aviemore area to take into account the priorities and recommendations identified in the HITRANS Aviemore Active Travel Audit in para 16.17.

Existing Permissions: Reidhaven Estate (035) seek changes to the map to provide more explicit detail in relation to the grey shading showing “Existing permissions - for information only”. They suggest using hatching to show that the allocation also has permission, as an alternative. MacDonald Aviemore Highland Resort Ltd (075) – Request their site should be marked not only as an existing permission, but as an allocation for economic development and mixed use.

Map: Aviemore and Vicinity Community Council (129) request an updated base map is used. Aviemore and Vicinity Community Council (129) seek inclusion of the approved 50 bed nursing home at Allt Mòr, Aviemore on the proposals map. Reidhaven Estate (035) seek alterations to the maps to use hatching over allocations to indicate those with permission.

## GLENMORE

Site T1: SEPA (063) seek inclusion of additional wording saying “Several small watercourses and drains run through the site. A FRA will be required to support any development proposals.” Scottish Natural Heritage (040) seek a specific caveat to give protection to European sites as they are not covered by ‘new housing allocation style’ text as they are based on existing uses.

Site T2: Scottish Natural Heritage (040) seek a specific caveat to give protection to European sites as they are not covered by ‘new housing allocation style’ text as they are based on existing uses.

Support for Tourism: Forest Holidays LLP (060) seek inclusion of more support for tourist accommodation and visitor facilities.

Additional Open Space: Aviemore and Vicinity Community Council (129) request key areas of open space are identified on the proposals map. Scottish Natural Heritage (040) request that the regenerating woodland to the south of road which

is identified as open space.

Natural Heritage Issues: Scottish Natural Heritage (040) seek amendment to third bullet point of para 29.5 to read 'Adjacent to the area is Glenmore National Nature Reserve and amend 4th bullet point to read 'The area contains and is surrounded by land designated as Special Area of Conservation (Cairngorms SAC and River Spey SAC) Special Protection Area (Cairngorms SPA, Abernethy Forest SPA and Cairngorms Massif SPA) and Site of Special Scientific Interest (Glenmore Forest SSSI)'. '

Scottish Natural Heritage (040) also seek additional wording at the end of para 29.6 saying "Developments will not be in accordance with this plan if the Planning Authority is unable to ascertain that the proposal will not adversely affect the integrity of a European designated site, either alone or in combination with other projects and plans."

Scottish Natural Heritage (040) seek the insertion of a further policy caveat after the paragraphs on Housing and Economy on page 133 along the lines of 'Irrespective of being within the settlement boundary, any proposals located in the Cairngorm SAC/SPA which would have an adverse effect on their site integrity will not be in accordance with the plan, and will not be granted planning permission.'

Scottish Natural Heritage (040) also seek to amend settlement the map to extend Open Space north and west as far as Site T1 (south of road).

Forest Holidays LLP (060) seek clarification that on designated sites the impact of development on designated sites should be considered along with mitigation, rather than it being an absolute constraint.

Settlement Boundary: Scottish Natural Heritage (040) also seek an amendment to the settlement boundary so that it includes the Open Space north and west as far as Site T1 (south of road).

Aviemore and Vicinity Community Council (129) request Glenmore is left as a rural housing group. If it is to be identified as a settlement change the boundary to one which is defensible and compact to restrict unnecessary development.

Badenoch and Strathspey Conservation Group (080) request the SB drawn tightly around the developed and allocated land.

The Cairngorms Campaign (061) request the settlement boundary is defined more tightly around small settlement to east of the road.

Cairngorm Mountain: North East Mountain Trust (044) seek clarification of the reasons for not allowing open access to Cairngorm Mountain and an explanation of how these reasons will be respected.

INVERDRUIE and COLYUMBRIDGE

Additional Site for Housing: Albyn Housing Society Ltd (231) seek inclusion (assumed to mean allocation) of include the land with lapsed consent at Dellmhor.

Site T1: Scottish Natural Heritage (040) Seek amendment to last sentence of T1 so it reads 'where appropriate, enhancement opportunities will be supported, subject to a satisfactory outcome of the Habitats Regulations Appraisal.

SEPA (063) seek inclusion of the wording for Coylumbridge saying "Part of the site is within SEPA's indicative 1:200 year flood risk area. A FRA may be required to accompany any further development proposals, particularly where an increase in footprint or vulnerability is proposed".

Woodland Trust Scotland (196) seek the deletion of Site T1. If development is to occur it must include sufficient buffering and appropriate species surveys must be undertaken.

Rothiemurchus (226) seek an amendment of the boundary of Site T1 to include the whole of the Caravan and Camping Park and grounds of Lairig Ghru Cottage (derelict) up to the boundary with the SSSI.

Natural Heritage Issues: Scottish Natural Heritage (040) - Recommend that national and international designated sites and SSSIs should be named. Scottish Natural Heritage (040) seek amendment to fourth bullet of para 33.4 so it reads 'Lands to the south and west are also identified as Sites of Special Scientific Interest (North Rothiemurchus Pinewood SSSI and River Spey SSSI). Scottish Natural Heritage (040) seek a stronger policy caveat in para 33.5.

Settlement Boundary: Aviemore and Vicinity Community Council (129) seek inclusion of the whole caravan/camp site in settlement boundary. Rothiemurchus Estate (226) seek amendments to the community area boundary to encompass the south section of the Caravan and Camping Park and the adjacent grounds of Lairig Ghru Cottage (derelict) up to the boundary with the SSSI. Badenoch and Strathspey Conservation Group (080) would object to any changes to the settlement boundary as currently drafted.

**Summary of responses (including reasons) by planning authority:**

AVIEMORE

The CNPA's long term vision for the National Park is set out in the Cairngorms National Park Partnership Plan (CNPPP) which was approved by Scottish Government on 30 May 2012 (SDXX). Page 13 of the CNPPP sets out the long term vision for the Cairngorms National Park as "An outstanding National Park, enjoyed and valued by everyone, where nature and people thrive together". The CNPPP (SDXX page 14) goes on to explain that the vision of "success in being a sustainable economy supporting thriving businesses and communities" would include a growing and diversified economy, more jobs and a wider range of employment opportunities, thriving and sustainable communities, a growing workforce, people working in the Park finding it easier to access housing that meets their needs, safe route to travel and sustainable new development with good design. All of these outcomes will help to deliver the vision for the National Park.

The relationship between the CNPPP and the Local Development Plan is set out on page 40 of the CNPP (SDXX) which states “The Local Development Plan and planning services will support the delivery of this long term outcome by providing: sufficient land for housing to meet identified need and demand, including inward migration of workers; the necessary land and support for business development and diversification; site for future development that support attractive, vibrant communities and that minimise the need to use energy; clear guidance on where, when and how the best development will be supported.”

The CNPA is therefore keen to support the sustainable development of all of its communities. Policy 1.1 of the CNPPP (SDXX page 41) sets out how a sustainable economy of the National Park will be supported which includes “increased provision for business land where there is an identified need and demand; and to support the use of land for small business, particularly within settlements”. Chapter 4 of the proposed Local Development Plan (SDXX, page 20) explains in para 4.1 that “Sustainable Growth in the economy of the Park is at the heart of supporting our communities, helping them become and remain vibrant and attractive places for people to live and work”. As para 4.2 and 4.3 of the proposed Local Development Plan explain delivering successful economic growth for the future “is not just about identifying sites for new development” but also “assisting existing businesses and creating a flexible framework that allows the best economic development to thrive and prosper”. As para 4.5 explains the policy not only seeks to promote economic growth which meets the needs of communities but also to promote the National Park as a place to invest.

Policy 1.2 of the CNPPP (SDXX page 42) sets out how sustainable patterns of settlement growth, infrastructure and communications will be achieved, including consolidating the role of the existing main settlements including Aviemore as they are “the most sustainable places for future growth and the focus for housing land supply while maintaining the integrity of designated sites”. This settlement hierarchy is illustrated by a diagram on page 43 of the CNPPP (SDXX) identifying Aviemore as a ‘Main Settlement’.

As paras 16.1, 16.2, 16.3 and 16.4 of the proposed Plan (SDXX) explain Aviemore is the largest settlement in the Park and experiences significant pressure for growth. The community is keen to see a number of key projects come to fruition and have a desire to improve employment opportunities.

#### Site ED1

Badenoch and Strathspey Conservation Group (080) - The site ED1 is identified for employment uses in the current adopted Local Plan (SDXX page 87). CNPA consider it important to provide certainty to developers and communities, and to this end the continuation of this allocation is important. As the proposed Local Development Plan (SDXX, page 66) explains the purpose of the ED1 allocation is to include an additional area of 0.5 HA of employment land to the north of the current employment estate in order to “allow for further expansion when the current site reaches capacity”. This allocation therefore supports businesses by allowing for the capacity that already exists within the current industrial estate to be utilised and to allocate a small amount of additional land. It is a natural and inconspicuous extension to the existing industrial estate and is not considered to have any detrimental impact on visual amenity, natural and cultural heritage or

landscape of the area. An assessment of its qualities has found it to comprise poor grassland and scrub. Whilst CNPA recognises that the site boundary abuts open land it does not consider this to be sufficient justification to remove it or part of it from the plan. The CNPA would therefore not support the removal of the most northerly land from the allocation, as to do so would undermine the purpose of this particular allocation.

Woodland Trust (196) – regarding the impact of development on woodland, overarching policies in the plan will ensure appropriate species surveys and appropriate design and layout, are considered as part of any development. The potential role of including a buffer within the scheme would be developed on a case by case basis and be informed by the latest information from species surveys etc. to support a planning application. CNPA do not therefore consider there to be need for a further change.

#### Site ED2

Badenoch and Strathspey Conservation Group (080) - The site ED2 is also identified for employment uses in the current adopted Local Plan (SDXX page 87). CNPA consider it important to provide certainty to developers and communities, and to this end the continuation of this allocation is important. The purpose of the ED2 allocation as stated in the proposed Local Development Plan (SDXx p66) is to “allow for further expansion when the current site reaches capacity”. The site provides “flexibility to grow” and “will support future expansion options within Aviemore and allow for adequate choice in site identification”, therefore excluding currently undeveloped parts of this site from the allocation would undermine the purpose of the allocation. It is a natural extension to the existing industrial estate and its identification provides development opportunity within the settlement while preventing the further expansion of Aviemore into open countryside and helps consolidate the existing urban form.

There are also policies in the Plan which would enable any concerns raised about the impact of development on path access habitats, biodiversity to be considered and adequately addressed during the planning application process.

CNPA do not therefore support any amendment or change to this allocation.

#### Site ED3

Colin Gair (184) - The site ED3 is also identified for employment uses in the current adopted Local Plan (SDXX page 87). As above, CNPA consider it important to provide certainty to developers and communities, and to this end the continuation of this allocation is important. The inclusion of site ED3 in the proposed Local Development Plan (SDXX page 66) enables “small opportunities for economic growth to compliment the existing Myrtlefield Industrial Estate”. This would enable suitable infilling and additional development of employment land in an appropriate location, again providing choice in the range and type of sites available for economic development. The site is in the heart of Aviemore and its continued use for economic growth supports the community in a way which consolidates the existing urban form. The CNPA notes the concerns raised about the noise and vibration of the current use, but there are other mechanisms to address this issue that fall outside the planning system, including environmental health and licensing. CNPA do not therefore support any amendment to this

allocation.

#### Additional Employment Site

MacDonald Aviemore Highland Resort Ltd (075) - The fact that MacDonald Aviemore Highland Resort Ltd have secured permission for development (SDXx plan perm ref) is recognised in the Plan as the site is shown as an existing permission. CNPA has used this annotation to identify key sites with extant permission. The site remains within the settlement boundary, and the text within the plan (SDXx page 66 Investment opportunities) continues support for this site. Should permission lapse the CNPA would review the suitability of the site to support economic development and may, in the event of any change of circumstances, seek to amend the boundary or extent of the site. As such, the CNPA do not support the identification of the site boundary of the extant permission as an allocation at this time.

#### Additional Land for Tourism and Recreation Use

Enviroplan Consulting (227) – regarding the allocation of open space as tourism, or a split in this allocation between the two uses, CNPA has considered the request. However the area identified in the proposed Local Development Plan falls almost entirely within the SEPA 1 in 200 year flood risk area (see SEPA's interactive flood map

[http://www.sepa.org.uk/flooding/flood\\_extent\\_maps/view\\_the\\_map.aspx](http://www.sepa.org.uk/flooding/flood_extent_maps/view_the_map.aspx))

As a result CNPA are not minded to allocate it for any form of development and have identified it as open space to ensure that it is protected. Retaining it within the settlement boundary does however indicate the important role this area serves in providing open space to local residents.

Regarding the use of ED2 for tourism use, as has been explained above Aviemore is the largest settlement in the Park and experiences significant pressure for growth. The community is keen to improve employment opportunities and therefore the continuation of the allocations at Dalfaber Industrial Estate ED1 and ED2 provides certainty to developers and communities. The CNPA therefore does not support the view that parts of these sites should be allocated for tourism uses. To do so would undermine the intention of the Plan to provide for a choice of employment land sites in Aviemore reflecting its role as a main settlement in the CNPPP (SDXX page 42). Although the CNPA recognises the current economic climate and the current vacancies of some of the units, the Plan must take a longer term view, and so removing the potential of employment uses in this location would be premature.

This would not prevent an application for tourism uses coming forward and being considered on its merits to reflect the need to encourage redevelopment of this brown field site, the amount of jobs generated by any such proposal would be an important key material consideration in assessing any such application. Text within the Plan, (SDXx page 67 Mixed Uses) would support this. CNPA do not therefore support any change to the plan regarding this.

#### Additional Land for Community Use

Aviemore and Vicinity Community Council (129) - The CNPA would support the allocation of land at Dalfaber Drive between the Bowling Green and Main Railway Line for community use if this reflects community wishes. Likewise the CNPA

would support the allocation of land encompassing the old primary school should be marked as 'community' use, as this would help secure the community uses for the old playing field area of the site retained for 'community use' (SDxx layout map). The CNPA would suggest that to facilitate this, additional wording be added to page 66 to read "Site C1: Land at Dalfaber Drive between the Bowling Green and Main Railway Line provides an important community resource and will be protected for community use" and "C2: Land at the former school playing fields should be protected from inappropriate development. The land adjacent to the old primary school is therefore allocated for community use."

#### Additional Protection of Open Space

Aviemore and Vicinity Community Council (129) - The CNPA agree that the area of land known as Strathspey Lawns is an important area of open space in the heart of Aviemore. Text has already been included to offer this area protection from development. The site is however within a larger site which is covered by a masterplan (SDxx). This wider site has seen many changes and the need to retain flexibility is considered important. As such, CNPA do not agree that the wording should be strengthened and remain of the view that the wording as suggested is sufficient to meet the needs of both the site operator and the community.

#### Additional Land for Open Space

Badenoch and Strathspey Conservation Group (080) - The CNPA do not agree with Badenoch and Strathspey Conservation Group (080) that additional land at the Achantoul Burn, land east and north of the railway line, land beside the Milton Burn, land at the west area of the former horses field between Milton Wood and Scandinavian village, land close to the A9 north of Milton Wood, land south of the grey land at Dalfaber, land opposite The Bridge Inn to the Spey boundary (involving moving the settlement boundary) should be included as open space. The objector seeks the identification of all areas of open ground on the periphery of the existing built form as open space. However, it is the opinion of CNPA that in some cases these do not serve as open space for the public. In some cases, they form natural and inconspicuous sites which form an integral part of the settlement and in others are the subject of extant permission. CNPA remains of the view that the areas of open space identified do act as such and are important to the overall setting of Aviemore. CNPA does not support additions to this.

#### Natural Heritage Issues

Scottish Natural Heritage (040) - The CNPA agree with Scottish Natural Heritage (040) suggestion that national and international designated sites including SSSIs should be named and specific mention of European sites could be included in the bullets as this would aid clarity.

The CNPA agree with Scottish Natural Heritage's observation that Craigellachie NNR provides an important setting for Aviemore which should be recognised in the Plan, and would not object to the suggestion to add "and proximity to the National Nature Reserve at Craigellachie NNR" to the end of the fourth bullet point in para 16.5 to address this point.

The CNPA agrees with Scottish Natural Heritage (040) that the fact that Craigellachie is both a SSSI and a NNR should be reflected in the plan, and

would not object to their suggestion that “and SSSI” should be added after National Nature Reserve in para 16.6.

The CNPA would not object to references to Anagach Woods SPA and Craigmore Wood SPA being added as additional bullet to para 16.7, as this would aid clarity. The CNPA would also not object to Scottish Natural Heritage’s (040) proposed amendment to para 16.7 so it reads “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” as this would aid clarity. The CNPA also acknowledges that HRA may also need to be updated to reflect this latest information.

The CNPA would not object to Scottish Natural Heritage’s (040) proposed amendment to para 16.8 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...” as this would clarify and provide additional information for applicants and communities.

#### Settlement Boundary

Aviemore and Vicinity Community Council (129); Ian Forrester (173) - The CNPA would not object to Ian Forrester’s (173) request that the development boundary of Aviemore is extended to the South of Spey cottage as his application (SDxx planning consent) has now been granted permission. Such a change therefore reflects a factual update of changes on the ground resulting from the granting of planning permission. CNPA believes this should be addressed as a non-notifiable modification.

Badenoch and Strathspey Conservation Group (080); Tulloch Homes Group (057) – While CNPA accept that the housing at Highburnside functions as part of Aviemore for simple proximity reasons, the site relates poorly to the established form of Aviemore in that it breaches the A9 which provides an obvious, strong and well established western boundary. The development which exists is extremely prominent especially to views from the elevated A9 carriageway. Its exclusion from the settlement creates a strong signal that no further development will be permitted west of the A9. In the event that it was included CNPA is concerned that development here would be seen as a favourable precedent leading to pressure for more development here and elsewhere west of the A9, and would generally undermine the use of settlement boundaries as a means of containing urban development. This issue was considered at the Inquiry into outstanding objections to the now adopted Local Plan (SDXx reporters report page 199) and CNPA are content that the agreements against inclusion of this area within the settlement boundary remain the same. The support of Badenoch and Strathspey Conservation Group (080) for this approach is welcomed.

Badenoch and Strathspey Conservation Group (080) - The CNPA do not support the contention that the settlement boundary should be moved to cut across ED1 to exclude the currently undeveloped land to the north, for the reasons set out in the



response to site ED1 above.

The CNPA do not support the suggestion of moving of the boundary should be also be moved to enable land opposite The Bridge Inn to the Spey boundary to be allocated as Open Space for the reasons set out above (see Additional Land for Open Space).

#### Explanatory Text

Enviroplan Consulting (227) - The CNPA's support for the development at An Camas Mòr is highlighted as both an NPPP (SDXX page XX) and Structure Plan (SDXX) commitment and is informed by many factors, including the important requirement to meet the housing needs of Badenoch and Strathspey. There is no intention to replace Aviemore with An Camas Mòr or to diminish the role of Aviemore in any way. Its intention is that An Camas Mor will help to take the pressure off Aviemore rather the replace it. The CNPA do not believe the Plan needs to be more explicit on how An Camas Mor and Aviemore link. Para 14.1 on An Camas Mor (proposed Local Development Plan SDXX page 54) and the objection for Aviemore (proposed Local Development Plan SDXX page 63) already makes the links between the two places explicit and CNPA believe that to tie this down any more may in fact serve to frustrate the possible options and opportunities presented by the development.

The issue of how the two will interact across open space along the River Spey and associated bridge is clarified in text associated with An Camas Mor (SDXx page 57 para 14.24). No further change is considered necessary.

Aviemore and Vicinity Community Council (129) - The CNPA recognise the importance of the A9 dualling for the communities and visitors to the National Park. It is a major development and there may be a need for a co-ordinated response to maximise the opportunities that this could present. CNPA has an established team of staff working on this. CNPA do not however agree that there is a need to embed this within the Plan itself. The project is not a proposal and remains a fluid piece of work, with the exact line of work still under discussion with the government. The CNPA can see the benefit in highlighting the need for close partnership working on this key project within the Action Programme supporting the Local Development Plan. An amended Action Programme forms one of the supporting documents under considerable by this examination.

Badenoch and Strathspey Conservation Group (080) – Para 16.1 links directly to work carried out by the local community to create a vision for Aviemore. (SDXx community visions). The text has taken the land use parts of this and used it to direct the land use planning approach to the settlement. The CNPA stands by the statement in para 16.1 (page 63) that Aviemore is 'the economic driver for the National Park'. It is the largest settlement in the Park and plays a key role within Badenoch and Strathspey. The settlement hierarchy acknowledges other settlements large and small also play important roles and functions. The CNPA also stands by the statement that Aviemore has become a focus for conservation activity, with many specialists and experts using Aviemore as a base to carry out scientific research in the wider area. The CNPA would not therefore support Badenoch and Strathspey Conservation Group (080) request for changes to these paragraphs.

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 16.17 stating “Account should be taken of the priorities and recommendations set out in the HITRANS Aviemore Active Travel Audit”.

MacDonald Aviemore Highland Resort Ltd (075) - The support from MacDonald Aviemore Highland Resort Ltd (075) for the identification of Aviemore as a main settlement and recognition of its various roles including the investment opportunity at Macdonald Highland Resort is welcomed. Although the CNPA agrees that working with all stakeholders, including Macdonald Highland Resort to deliver in infrastructure referred to in the Plan is important it would not support an additional reference on this point being added to the Plan because working with partners is a key element of delivering the whole Plan, and there is no need or benefit to be gained in specifically flagging up this, or any other particular partner, in relation to this particular or any other site.

#### Existing Permissions

MacDonald Aviemore Highland Resort Ltd (075); Reidhaven Estate (035) - The CNPA do not agree with Reidhaven Estate (035) that changes to the map are needed to provide more explicit detail in relation to the grey shading showing “Existing permissions - for information only”. CNPA have used this annotation throughout the Plan to identify key sites with extant permission. The site remains within the settlement boundary and text within the plan (SDXx page 66 Investment opportunities) continues support for this site. Should permission lapse the CNPA would review the suitability of the site and may, in the event of any change of circumstances, seek to amend the boundary or extent of the site. As such, the CNPA do not support any change to this approach.

For the reasons listed above (see Additional Employment Site) the CNPA would not support MacDonald Aviemore Highland Resort Ltd (075) request that their site should be marked not only as an existing permission, but as an allocation for economic development and mixed use. As above, the site remains within the settlement boundary and text within the plan (SDXx page 66 Investment opportunities) continues support for this site. Should permission lapse the CNPA would review the suitability of the site to support economic development and may, in the event of any change of circumstances, seek to amend the boundary or extent of the site. As such, the CNPA do not support the identification of the site boundary of the extent permission as an allocation at this time.

#### Map

Aviemore and Vicinity Community Council (129) - The base map for the proposed Plan uses third party data provided by Ordnance Survey. CNPA will ensure it uses the most up to date data set when preparing the maps for the adopted plan.

The CNPA would not object to the inclusion of the approved 50 bed nursing home at Allt Mòr, Aviemore on the proposals map identified as a site with existing permission (SD amended map)

GLENMORE (Proposed LDP pages 131-135)

#### Site T1

Scottish Natural Heritage (040) - The CNPA would not object to Scottish Natural Heritage's (040) suggestion to include a specific caveat at the end of T1 saying "where appropriate, enhancement opportunities will be supported, subject to a satisfactory outcome of the Habitat Regulation Appraisal" as this will give the required protection to European sites where the allocations are based on existing uses.

SEPA (063) - The CNPA would also not object to the inclusion of additional wording at the end of T1 as suggested by SEPA (063) saying "Several small watercourses and drains run through the site. A FRA will be required to support any development proposals." This wording would be added after the additional wording suggested by Scottish Natural Heritage above.

These changes would aid clarity and provide more information for applicants and communities.

#### Site T2

Scottish Natural Heritage (040) - The CNPA would not object to Scottish Natural Heritage's (040) suggestion to include a specific caveat at the end of T2 saying "where appropriate, enhancement opportunities will be supported, subject to a satisfactory outcome of the Habitat Regulation Appraisal" as this will give the required protection to European sites where the allocations are based on existing uses. This change would aid clarity and provide more information for applicants and communities.

#### Support for Tourism

Forest Holidays LLP (060) - The CNPA believes the section on Glenmore already offers sufficient support for tourist accommodation and visitor facilities. One of the key objectives for all development in Glenmore (SDXx proposed LDP page 131 Objectives) is "to enhance the outstanding visitor experience in Glenmore and its surroundings, supporting the strategic role Glenmore plays in the tourism economy of the National Park". Para 29.3 (SDXx proposed LDP page 131) explains that development "should meet the needs of the community" and that this "includes development which enhances the visitor experience and compliments the role of Glenmore as a focus for visitors".

The CNPA do not agree with the suggestion from Forest Holidays LLP (060) that development should not be constrained. Any development must recognise the importance of designations and plan for any development proposal accordingly. The CNPA has accepted (see Site T1 And T2 above) the suggestion from Scottish Natural Heritage (040) that additional wording be included stressing the importance of the HRA, a tool that measures development against the impact on sensitive designations and considers if and what mitigation may be appropriate.

The issue of tourism development is also covered by other policies in the Plan, in particular the tourism and leisure development section of the Supporting Economic Growth policy (proposed Local Development Plan SDXx page 21). The CNPA therefore does not believe any additional wording on this matter is needed.

#### Additional Open Space

Aviemore and Vicinity Community Council (129); Scottish Natural Heritage (040) - CNPA has reviewed land identified as open space within Glenmore. The area is characterised by areas of open space including the beach, the Hay Field and areas around the campsite. However, CNPA does not agree that these should be all separately identified. Some are protected by virtue of their special qualities and international designations. Windfall development would have to meet the objectives for Glenmore (SDXx page 131) and the general design guidance. CNPA does not therefore agree that areas not identified as open space would be the subject of inappropriate windfall development. CNPA does not therefore support any further change to the settlement map for Glenmore.

#### Natural Heritage Issues

Badenoch and Strathspey Conservation Group (080); Scottish Natural Heritage (040) - The CNPA would not object to Scottish Natural Heritage's (040) request to amend the third bullet point of para 29.5 to read 'Adjacent to the area is Glenmore National Nature Reserve' and amend 4th bullet point to read 'The area contains and is surrounded by land designated as Special Area of Conservation (Cairngorms SAC and River Spey SAC) Special Protection Area (Cairngorms SPA, Abernethy Forest SPA and Cairngorms Massif SPA) and Site of Special Scientific Interest (Glenmore Forest SSSI)'.

The CNPA would not object to Scottish Natural Heritage's (040) request to add further policy caveat after the paragraphs on Housing saying 'Irrespective of being within the settlement boundary, any proposals located in the Cairngorm SAC/SPA which would have an adverse effect on their site integrity will not be in accordance with the plan, and will not be granted planning permission.' This wording would add clarity, for clarity and consistency the CNPA believe this should be included after both the Housing and Economy text.

The CNPA would also not object to Scottish Natural Heritage's (040) request to add further policy caveat after the paragraphs on Economy saying 'Irrespective of being within the settlement boundary, any proposals located in the Cairngorm SAC/SPA which would have an adverse effect on their site integrity will not be in accordance with the plan, and will not be granted planning permission.' This wording would add clarity, for clarity and consistency the CNPA believe this should be included after both the Housing and Economy text.

The CNPA would also not object to Scottish Natural Heritage's suggestion of adding additional wording to the end of para 29.6 saying "Developments will not be in accordance with this plan if the Planning Authority is unable to ascertain that the proposal will not adversely affect the integrity of a European designated site, either alone or in combination with other projects and plans" as this would aid clarity.

#### Settlement Boundary

Scottish Natural Heritage (040) - The CNPA do not agree with the suggested amendments to the settlement map to extend Open Space north and west as far as Site T1 (south of road), By keeping this land outside of the settlement boundary it is already protected from development. The boundary has been drawn in a way which creates defensible boundaries, and as above (see Aviemore settlement boundary) the addition of land within the settlement

boundary may result in pressure for more development, and would generally undermine the use of settlement boundaries as a means of containing urban development.

Aviemore and Vicinity Community Council (129); Badenoch and Strathspey Conservation Group (080); The Cairngorm Campaign (061) - The CNPA do not support the view of the Community Council that Glenmore should be left as a rural housing group. Glenmore was identified in the Main Issues Report as an area under particular pressure (SDXx Issue 3). As a result of the consultation process and subsequent discussions on how best to deal with this pressure, CNPA took the view that a clear framework for proposals was the most appropriate solution. The proposed LDP sets this out (SDXx page 131) and developers can, as a result, consider how their development fits with the settlement objectives. CNPA does not agree that leaving Glenmore as a rural housing group (SDXx Policy Chapter 3 Housing Development) would provide this level of detail.

There is no implication that all land within the settlement boundary would be appropriate for development as suggested by the objector. All proposals would be considered against the settlement objectives and general design guidance and inappropriate development will not gain permission. CNPA does not therefore agree that the boundary should be substantially amended to exclude areas which clearly contribute to the overall character of Glenmore.

#### Cairngorm Mountain

North East Mountain Trust (044) - The issues raised in relation to open access at Cairngorm Mountain relate to conditions relating to an existing planning consent. (SDXx ref number) The CNPA recognise the importance of the economic and recreational role played by Cairngorms Mountain and the challenges of visitor management in this area but believes the appropriate way to deal with any issues on this matter is through continued dialogue with the owner, operators, land managers and users of Cairngorm Mountain and as such reference to this specific issue in the Local Development Plan is not felt appropriate.

#### INVERDRUIE and COLYUMBRIDGE

#### Additional Site for Housing

Albyn Housing Association (231) -

The CNPA do not agree that it is necessary to allocate the site referred to (SDxx planning perm ref) which had secured consent for housing at Dellmhor, but which has now lapsed. This site was granted permission as an exception site to the adopted Local Plan at that time. Any new proposal for development would be considered under the appropriate policies of the adopted Local Development Plan.

#### Site T1

Scottish Natural Heritage (040) - The CNPA would not object to Scottish Natural Heritage's (040) suggestion to include a specific caveat at the end of T1 saying "where appropriate, enhancement opportunities will be supported, subject to a satisfactory outcome of the Habitat Regulation Appraisal" as this will give the required protection to European sites where the allocations are based on existing uses. This additional wording would aid clarity and provides additional information

for applicants and communities.

SEPA (063) – The CNPA would not object to the suggested inclusion of additional wording to para 33.11 to clarify “Part of these areas are within SEPA’s indicative 1:200 year flood risk area. A FRA may be required to accompany any further development proposals, particularly where an increase in footprint or vulnerability is proposed”. This additional wording would aid clarity and provides additional information for applicants and communities.

Woodland Trust Scotland (196) - Site T1 is an existing camping and caravan site. The purpose of the allocation, as set out on page 152 of the proposed Local Development Plan (SDXX) is to protect this facility from any adverse development. The CNPA remains committed to the allocation of Site T1. Other policies in the plan will already ensure appropriate species surveys and appropriate design and layout, are considered as part of any development. The potential role of including a buffer within the scheme would be developed on a case by case basis and be informed by the latest information from species surveys etc. to support a planning application.

Rothiemurchus Estate (226) - The CNPA would also not object to the request from Rothiemurchus Estate to extend the boundary of T1 to include the whole of the caravan and camping site as this would more accurately reflect the situation on the ground. (SDxx map to clarify amendment)

#### Natural Heritage Issues

Scottish Natural Heritage (040) - The CNPA agrees that national and international designated sites and SSSIs should be named and so the CNPA would not object to amending 33.4 as suggested by Scottish Natural Heritage (040) so it reads “Lands to the south and west are also identified as Sites of Special Scientific Interest (North Rothiemurchus Pinewood SSSI and River Spey SSSI)” as this will aid clarity and provide more information for applicants and communities.

Scottish Natural Heritage (040) – The CNPA agrees that additional text is required in para 33.5 to clarify the position regarding Natura. CNPA would therefore suggest the addition of an extra para 33.6 to read : “You must supply as part of your planning application, all necessary information to allow the planning authority 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 or qualifying features. Specifically your proposal must address the mitigation measures (as set out in supplementary guidance on Natural Heritage) required to address potential impacts on:

- Water abstraction
- Disturbance to otters
- Pollution and siltation from construction sites
- Requirement for SUDS
- Pollution from wastewater”

#### Settlement Boundary

Aviemore and Vicinity Community Council (129); Rothiemurchus Estate (226) - As

explained above (see site T1) the purpose of identifying the caravan and camp site as allocation T1 is to enable additional development within the site that would support and sustain this important facility. The CNPA therefore support the observation that the whole caravan/camp site in Coylumbridge should be included within the settlement boundary. (SDxx map to clarify amendment)

Correction of Numbering Error

The numeral for the chapter heading on page 150, for Inverdrue and Coylumbridge is incorrectly shown as 32, when it should be 33. The CNPA would seek to correct this as a non-notifiable modification.

**Reporter's conclusions:**

**Reporter's recommendations:**