

Issue 14	Area Specific – Nethy Bridge and Carr-Bridge	
Development plan reference:	23 Carr-bridge 38 Nethy Bridge	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
206 Ann Robbie 080 Badenoch and Strathspey Conservation Group 169 Barry Edmondson 204 Bob Robbie 139 Buglife 241 Boy's Brigade (Monifieth) 149 Carr-bridge and Vicinity Community Council 099 Donny Black 240 David Dean 186 Elizabeth and Kieth Urqhart 207 Eric Foulds 212 Frank Anderson 020 George Knox 223 Gillian Campbell 213 James Bisset 038 Janet Trythall 058 Jeremy Money 210 John and Mary Clube 190 Jonny Pott	203 Louise and Simon Molyneux 211 Mr and Mrs McGeachie 185 Nethy Bridge and Vicinity Community Council 208 Oliver and Morag Sykes 202 Paul and Beryl Shackleton 205 Ray and Barbara Cranfield 201 Raymond Bainbridge 045 Robert Greenwood 013 Rodger Builders 062 Roy Turnbull 040 Scottish Natural Heritage 200 Susan Broyd 214 Terry Sayer 061 The Cairngorms Campaign 057 Tulloch Homes Group Ltd 134 Valery Dean 196 Woodland Trust Scotland	
Provision of the development plan to which the issue relates:	23 Carr-bridge 38 Nethy Bridge	
Planning authority's summary of the representation(s):		
<p>NETHY BRIDGE</p> <p><u>Sites H1 and H2</u></p> <p>Ann Robbie (206) Badenoch and Strathspey Conservation Group (080) Bob Robbie (204) Barry Edmondson (169) David Dean (240) Eric Foulds (207) Frank Anderson (212) James Bisset (213) Janet Trythall (038) Jeremy Money (058) John and Mary Clube (210) Jonny Pott (190) Louise and Simon Molyneux (203) Mr and Mrs McGeachie (211) Oliver and Morag Sykes (208) Paul and Beryl Shackleton (202) Ray and Barbara Cranfield (205) Robert Greenwood (045) Roy Turnbull (062) Susan Broyd (200) Terry Sayer (214) The Cairngorms Campaign (061) Valery Dean (134) and the Woodland Trust Scotland (196) object to housing allocations H1 and H2 at School Wood, Nethy Bridge for one or more of the following reasons:</p> <ul style="list-style-type: none"> • Loss of woodland / impact on ancient woodland / harm to neighbouring woodland 		

- Development contrary to SPP para 146 which states that ancient and semi-natural woodland is an important and irreplaceable national resource that should be protected and enhanced
- Reduction on amenity value of the remaining wood and reduce people's enjoyment
- Impact on amenity
- Impact on landscape and character of the village
- Impact on wildlife and habitats
- Loss of biodiversity
- Impact on soil
- impact on SAC
- Impact on Otters, Red Squirrels and Capercaillie.
- No need for development
- Allocation is excessive
- Conflict with 4 aims of the Park, and role of CNPA.
- The site is detached from the village, would require require road widening, and would cause housing sprawl.
- It is not sustainable development, does not support conservation and sustainability of local communities.
- New development should continue the organic nature in which the village has developed in the past
- There has already been recent expansion of the village, which is fuelled by in-migration and is unsustainable.
- No assessment of social benefits of the development has been conducted.
- Impact of additional traffic
- Adverse impact on tourism
- Use of small scale infill development preferable

Nethy Bridge and Vicinity Community Council (185) - Support H1 and H2 but request area allocated is reduced in size to match current planning application proposals.

Tulloch Homes Group Ltd (057) – Request site boundaries of H1 and H2 should be amended to reflect the sites currently subject of a planning application. The text should be amended to remove reference to capacity or should be replaced with a capacity of 58 dwellings.

Woodland Trust Scotland (196) – If development is to occur it must include sufficient buffering. Seek assurances that appropriate species surveys will be undertaken.

Additional/Alternative Housing Sites

Donny Black (099) - Request the addition of land for housing development at Lettoch Road, Nethy Bridge. The land could provide land for new development, provide choice, meet a recognised demand for private and social rented housing, provide an effective site which could be brought forward quickly, does not create access or traffic issues, is not visually intrusive, does not require restructuring of the site, does not have significant biodiversity, and it has opportunity to create landscape/tree buffer zones. It meets national policy. The site is preferred to the

existing allocations which remain undeveloped despite years of being identified in Plans, are under mature woodland, have generated much objection from the community.

George Knox (020) –Seeks the inclusion of alternative/additional land for housing development at Lurg Road to the south eastern of the village boundary of the village. The site has services, infrastructure, does not have high quality biodiversity, is supported by the community. Site could be used for housing, affordable housing, tourism, chalets, community development with a strong focus on affordable development.

Natural Heritage Issues

Badenoch and Strathspey Conservation Group (080) - Para 38.7 Object as all SPAs for capercaillie should be included here for reasons already provided previously.

Badenoch and Strathspey Conservation Group (080) - Para 38.8 Object to omission of wildcat from the list.

Roy Turnbull (062) Objects to the non-identification of all sites on the ancient woodland inventory on the settlement maps.

Roy Turnbull (062)- Para 38.6 - Concerned Allt Mor, a tributary of the Spey, is not referenced.

Scottish Natural Heritage (040) - Recommend national and international designated sites and SSSIs should be specifically named.

Scottish Natural Heritage (040) - Para 38.6 should identify SSSIs, NNRs, SACs and SPAs due to the complex nature of the multiple-designations. It is not necessary to refer to Cairngorms Loch Ramsar site here, but it should be noted that River Nethy is part of River Spey SAC. To accommodate Craigmore Wood SPA para 38.6 should reflect that designation are primarily to south and north of village, rather than south and west. Reference should also be made to Abernethy NNR.

Scottish Natural Heritage (040) - Para 38.7 - 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. As settlement boundary overlaps Cairngorms SAC in several places this should be added to the para and screened in for HRA. Also wording of para 38.7 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.

Scottish Natural Heritage (040) - Para 38.8 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.

Settlement Boundary

Badenoch and Strathspey Conservation Group (080) - Object to the settlement which is indefensible around H2.

Open Space

Badenoch and Strathspey Conservation Group (080) - Welcome the allocations of Open Space but object to any reduction in size. Object to non-inclusion of: the remainder of School Wood outwith H1 and H2; fields on both sides of the B970 going towards Boat west of the settlement boundary; land north of Balnagown Brae and close to the pedestrian access from Balnagowan Brae to Balnagown Wood area; and the area between the River Nethy and the gardens at the ...as open space.

Barry Edmondson (169) - Requests removal of the open space designation from small piece of land to the south of Nethy Bridge which is currently fenced into two plots (map provided). There is a desire to bring these plots into the curtilages of the neighbouring houses 'Dell Cottage' and 'Taigh Fuinidh'.

Map

Roy Turnbull (062)- The key to the map as it is inadequate.

CARR-BRIDGE

Sites H1 and H2

Badenoch and Strathspey Conservation Group (080) Boy's Brigade (Monifieth) (241) and Gillian Campbell (223) Elisabeth and Keith Urquhart (186) and The Cairngorms Campaign (061) object to sites H1 and H2 for one or more of the following reasons:

- Conflict with all four aims of the Park
- The scale of development is too large for the size of the village and is out of proportion to the present housing stock, in a village which has little by way of facilities.
- The development would not be sympathetic
- Impact on character and appearance of the village
- Would not "protect those parts of the village that are important to its character and setting".
- Undermine the objective that "development contributes to a clear definition between settlement and countryside"
- The proposals are not matched with employment provision and would promote long distance travel to work and
- Impact on tourism, which depends on the amenity value of woodland, the presence of species including wildcat and capercaillie
- Would reduce quality of experience and enjoyment for the public through impacts on landscapes, habitats, wildlife and paths,
- Would not "enhance ... The local economy" due to negative impacts on tourism interests; the size and siting of the allocations are not "done in a

way which raises ... design quality”, they demonstrate poor design; and these developments would make Carr Road less pedestrian and cycle-friendly rather than more so, due to substantially increased traffic.

- Fails to “facilitate appropriate economic growth which supports a thriving community” as they undermine key tourism assets
- Development is incompatible with community aspirations set out in 23.1-23.3
- Would be unsustainable in terms of destroying, threatening and reducing irreplaceable assets (e.g. Capercaillie, wildcat, AWI woodland, long-established and little-improved meadows) and providing for housing on a scale that is unsustainable.
- Harm to sensitive woodland setting of the village
- Impact on woodland, grassland, biodiversity and wildlife. Development would destroy flower-, fungi- and invertebrate-rich meadows and native Scots pine-dominated woodland, both of which are habitats that are special qualities of the CNP and reduce natural and cultural heritage rather than conserve and enhance them. There is noteworthy biodiversity in the field because of the way it is grazed during the summer.
- Would not comply with the guidance set out in 23.5 to consolidate the settlement; would not “ensure the quality of surrounding woodland, and sensitive valuable habitats is not compromised”; would destroy woodland and sensitive valuable habitat and would compromise the remaining woodland, including at a distance from the village, through impacts on important wildlife such as capercaillie and wildcat.
- Would not “ensure” that new housing “helps the community remain sustainable” as the allocations will entail a majority of open market and non-affordable housing that could be sold as second homes and retirement homes
- Would not promote sustainable use of natural resources, but would destroy them
- Includes land that has never previously been allocated for housing and which is outwith the present settlement boundary in the Local Plan without any justification. The site boundary of the allocation which follows the current live application suggests the allocation has been drawn as a result of developer driven pressure. Object to this apparent planning application-specific nature of allocations.
- The road has no pavement, is very narrow and dangerous if many more cars are introduced.
- Access issues
- The need is for affordable housing, not another 72 non-affordable units, there are too many holiday/ second homes already
- There are existing redevelopment sites in the village which could provide affordable development
- Part of the site is used by the Boys Brigade which brings considerable income to the village and education to children from urban places

Tulloch Homes Group Ltd (057) – Request the boundary of the housing allocations should be amended to match the sites being promoted under the current planning application. The text should be amended to remove any information on the capacity of H2. Replace with 24 units, or amend reference to

include that the two sites, combined, have a capacity of 96.

Buglife (139) - Observe sites are home to UK red-listed narrow-headed ant which in on UK BAP priority species and included on the Scottish Biodiversity Action Plan list. It is important development does not negatively impact on this population.

Carr-bridge and Vicinity Community Council (149) - Support the proposals map. Should the current application be refused, the boundary of the settlement should be amended to remove the land allocated at H1 and H2.

Raymond Bainbridge (201) - Requests if the proposals proceeds conditions should be used to provide an access path to the village bypassing Carr Road. The grey area on the proposals map should be removed. New development should be limited to 96 as there is no further demand, will be damaging to the village, and there is inadequate infrastructure.

Specific H2 comments

Badenoch and Strathspey Conservation Group (080) raise specific concerns in relation to H2 as it includes land currently protected from development shown as ENV (in Local Plan) without justification and allocates land adjacent to bog woodland (a priority habitat) and to Ancient Woodland Inventory woodland, both of which would be adversely impacted on by development close by for example through drainage alterations, water quality deterioration, trampling and other recreational impacts and encroachment of introduced species from gardens.

Alternative or Additional Site for Housing

Rodger Builders (013) - Object to non-inclusion of site at Baddengorm, Carr-bridge in the LDP. They reiterate comments made at previous stages of the Plan which promote the site for mixed residential and tourism development. Seeks inclusion of site within the Plan to meet need for new tourism development, jobs and housing. Suggest the site is a sustainable location relative to the village and its existing facilities, would not harm the ecology woodland setting of the village. Requests extension of village boundary along A938 from house by golf course to Lilac Cottage. Requests inclusion of residential allocation H3 of 6-8 plots for development which would add to the mix of new housing available locally. Requests allocation of land to north of suggested revised settlement boundary and including the access as site T2 for tourism development. The housing site is needed to pump prime the infrastructure required to deliver the tourism development.

Site ED1

Badenoch and Strathspey Conservation Group (080) - Object to north easterly boundary as it encroaches beyond the current station yard area into woodland.

Woodland Trust Scotland (196) - Object to ED1 because of the 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.

Site T1

Woodland Trust Scotland (196) object to T1 because of the 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.

Alternative or Additional Site for Tourism

Rodger Builders (013) - Object to non-inclusion of site at Baddengorm, Carrbridge in the LDP. They reiterate comments made at previous stages of the Plan which promote the site for mixed residential and tourism development. Seeks inclusion of site within the Plan to meet need for new tourism development, jobs and housing. Suggest the site is a sustainable location relative to the village and its existing facilities, would not harm the ecology woodland setting of the village. Requests extension of village boundary along A938 from house by golf course to Lilac Cottage. Requests inclusion of residential allocation H3 of 6-8 plots for development which would add to the mix of new housing available locally. Requests allocation of land to north of suggested revised settlement boundary and including the access as site T2 for tourism development. The housing site is needed to pump prime the infrastructure required to deliver the tourism development.

Open Space

Badenoch and Strathspey Conservation Group (080) - Object to the removal of several areas of ENV land allocated in the current Local Plan without justification. These include land near the river, bowling green and golf course areas, all of which continue to be worthy of protection against development

Natural Heritage Issues

Scottish Natural Heritage (040) - Recommend national and international designated sites, and SSIs should be specifically named.

Scottish Natural Heritage (040) - Para 23.6 should make specific reference to River Dulnain SAC to bring it in line with other chapters of the Plan.

Scottish Natural Heritage (040) Para 23.7 Needs 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 assessed 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 23.7- 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 significantly affected by proposals in the Plan- they have been screened in and so require high level mitigation.

Scottish Natural Heritage (040) – Para 23.8 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.

Scottish Natural Heritage (040) - Mitigation proposed in draft HRA must be picked

up in the Plan.

Badenoch and Strathspey Conservation Group (080) - Para 23.7 – Object as all SPAs in Badenoch & Strathspey for capercaillie could be impacted on and therefore should be included here, not only Kinveachy Forest. Capercaillie are regarded as existing as a metapopulation and need to be managed in a way that is appropriate to this.

Badenoch and Strathspey Conservation Group (080) - Para 23.8 Object because Wildcat should be included in the list of interests potentially impacted on.

Buglife (139) - Observe sites are home to UK red-listed narrow-headed ant which in on UK BAP priority species and included on the Scottish Biodiversity Action Plan list. It is important development does not negatively impact on this population.

Settlement Boundary

Badenoch and Strathspey Conservation Group (080) - Object as it has been modified from the boundary in the adopted local plan to follow a live application; it is indefensible in many places e.g. Around H1 and H2; it excludes a large area of important ground that is green ENV in the present CNPLP; it excludes the important economic site of the sawmill, which is included within the SB in the CNPLP with no explanation given as to why this should be excluded.

Rodger Builders (013) - Requests extension of village boundary along A938 from house by golf course to Lilac Cottage. Requests inclusion of residential allocation H3 of 6-8 plots for development which would add to the mix of new housing available locally. Requests allocation of land to north of suggested revised settlement boundary and including the access as site T2 for tourism development. The housing site is needed to pump prime the infrastructure required to deliver the tourism development.

Existing Permissions

Badenoch and Strathspey Conservation Group (080) object to the grey 'Existing permissions – for information only' – as only a small part of this area has ever been permissioned for built development. Most of the grey area is allocated in the present LP as green ENV land that is protected from development. No justification is provided as to why land should be considered worthy of protection from development in one LP and then considered unworthy of it in the next.

Modifications sought by those submitting representations:

NETHY BRIDGE

Sites H1 and H2: Ann Robbie (206) Badenoch and Strathspey Conservation Group (080) Bob Robbie (204) David Dean (240) Eric Foulds (207) Frank Anderson (212) James Bisset (213) Janet Trythall (038) Jeremy Money (058) John and Mary Clube (210) Jonny Pott (190) Louise and Simon Molyneux (203) Mr and Mrs McGeachie (211) Oliver and Morag Sykes (208) Paul and Beryl Shackleton (202) Ray and Barbara Cranfield (205) Robert Greenwood (045) Roy Turnbull (062) Susan Broyd (200) Terry Sayer (214) The Cairngorms Campaign

(061) Valery Dean (134) request deletion of H1 and H2 allocations. Nethy Bridge and Vicinity CC (185) request the size of allocations at H1 and H2 are reduced to match current proposals. Badenoch and Strathspey Conservation Group (080) request a review of the settlement boundary to ensure it is defensible particularly at H2.

Additional Housing Sites: Donny Black (099) seeks inclusion of additional land for housing at Lettoch Road. George Knox (020) seeks inclusion of land suggested within settlement boundary and allocate for housing/tourism development.

Natural Heritage Issues: Scottish Natural Heritage (040) request SACs, SPAs, Ramsar sites, NNRs and SSSIs are named and that there is in naming SSSIs when they are also European sites. SNH (040) Seek amendment to second bullet point of para 38.6 to say 'the River Nethy, Duack Burn and Allt Mor and their bank areas are designated as a Special Area of Conservation (part of River Spey SAC), and an amendment to the third bullet point to say 'In addition, land to the south and north of the village is designated as Special Area of Conservation (Cairngorms SAC and River Spey SAC), Special Protection Area (Abernethy Forest SPA and Craigmore Wood SPA), Site of Special Scientific Interest (Abernethy Forest SSSI and River Spey SSSI) and National Nature Reserve (Abernethy NNR).

SNH (040) seek the addition of Abernethy Forest SPA, Cairngorms SPA and Kinveachy Forest SPA as bullet points to para 38.7 and a reference to Cairngorms SAC. SNH (040) seek an amendment to 38.7 so it says "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".

Badenoch and Strathspey Conservation Group (080) request para 38.7 includes all SPAs for capercaillie and para 38.8 includes reference to wildcats.

Roy Turnbull (062) requests that all sites identified on the ancient woodland inventory are identified on the settlement maps, and requests a reference to the river tributary Allt Mor in para 38.6.

Badenoch and Strathspey Conservation Group (080) seek the inclusion of all the SPAs in Badenoch & Strathspey for capercaillie in para 23.7 and the addition of Wildcat to the list of interests potentially impacted in para 23.8.

Settlement Boundary: Badenoch and Strathspey Conservation Group (080) request the boundary is redrawn at Site H2,

Open Space: Badenoch and Strathspey Conservation Group (080) request the remainder of School Wood outwith H1 and H2; fields on both sides of the B970 going towards Boat west of the settlement boundary; land north of Balnagown Brae and close to the pedestrian access from Balnagowan Brae to Balnagown Wood area; and the area between the River Nethy and the gardens is included as Open Space. Barry Edmondson (169) seeks removal of open space designation land in Nethy Bridge and allow it to be within the curtilages of the neighbouring properties (map provided).

Map: Roy Turnbull (062) requests the map key is improved.

CARR-BRIDGE

Housing Sites H1 and H2: Boy's Brigade (Monifieth) (241) Badenoch and Strathspey Conservation Group (080) Elisabeth and Keith Urquhart (186) Gillian Campbell (223) and The Cairngorms Campaign (061) seek the deletion of sites H1 and H2.

Tulloch Homes Group Ltd (057) seek amendments of the boundary of the housing allocations to match the sites being promoted under the current planning application. In particular they request the text should be amended to either to remove any information on the capacity of H2, replace it with 24 units, or to amend the reference amended to include that the two sites, combined, have a capacity of 96.

Raymond Bainbridge (201) seeks removal of any further allocations from the proposals map. If the development is to proceed he seeks the inclusion of a requirement for access path to the village.

Alternative or Additional Site for Housing: Rodger Builders (013) seek an allocation of land to north of village for 6-8 plots of housing.

Site ED1: Badenoch and Strathspey Conservation Group (080) seek an amendment to the boundary on the north easterly section to exclude the area of woodland.

Site T1: Woodland Trust Scotland (196) seek the removal of the T1 from the Plan

Alternative or Additional Site for Tourism: Rodger Builders (013) seek an allocation of land to the north of the village for tourism development.

Open Space: Badenoch and Strathspey Conservation Group (080) request the retention, or re-introduction of all areas of open space included in the current adopted Local Plan.

Natural Heritage Issues: Scottish Natural Heritage (040) request SACs, SPAs, Ramsar sites, NNRs and SSSIs are named within the relevant community section of the plan and that there is consistency in naming SSSIs when they are also European sites.

SNH (040) request specific reference is made to the River Dulnain SAC in para 23.6 through the additional of a new bullet point saying 'The River Dulnain and its bank are also designated as a Special Area of Conservation (part of River Spey SAC).

SNH (040) request Abernethy Forest SPA, Anagach Woods SPA, Cairngorms SPA and Craigmore Wood SPA are added as bullet points to para 23.7. SNH (040) seek amendment to the text of para 23.8 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...”

Buglife (139) stress the importance of ensuring any development at Carr-Bridge does not negatively impact on the narrow headed ant population.

Settlement Boundary: Although Carr-bridge and Vicinity Community Council (149) support the allocations they request a change settlement boundary if the current application is refused.

Badenoch and Strathspey Conservation Group (080) request a review of the settlement boundary to ensure it is defensible and the inclusion of the sawmill within it. Rodger Builders (013) seek an extension of the village boundary along A938 from house by golf course to Lilac Cottage.

Rodger Builders (013) seek an allocation of land to north of village for 6-8 plots of housing.

Existing Permissions: Badenoch and Strathspey Conservation Group (080) request amendments to show only the land where permission will result in development on the ground.

Summary of responses (including reasons) by planning authority:

NETHY BRIDGE (Proposed LDP pages 172- 177)

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 and Policy 1.2 of the CNPPP (SDXX page 42) sets out how sustainable patterns of settlement growth, infrastructure and communications will be achieved, including focusing new growth on the existing main settlements whilst also allowing for additional flexibility around a wider range of settlements. This settlement hierarchy is illustrated by a diagram on page 43 of the CNPPP (SDXX) and identifies Nethy Bridge as one of the 'Other Settlements with sites for development'.

Sites H1 and H2

Ann Robbie (206) Badenoch and Strathspey Conservation Group (080) Bob Robbie (204) Barry Edmondson (169) David Dean (240) Eric Foulds (207) Frank Anderson (212) James Bisset (213) Janet Trythall (038) Jeremy Money (058) John and Mary Clube (210) Jonny Pott (190) Louise and Simon Molyneux (203) Mr and Mrs McGeachie (211) Oliver and Morag Sykes (208) Paul and Beryl Shackleton (202) Ray and Barbara Cranfield (205) Robert Greenwood (045) Roy Turnbull (062) Susan Broyd (200) Terry Sayer (214) The Cairngorms Campaign (061) Valery Dean (134) and the Woodland Trust Scotland (196) - These sites were allocated in the adopted Local Plan (SDXX page 125) albeit with slightly different boundaries as site NB/H2 for housing, some land adjacent to the more southerly site was also allocated for employment, as site with a small element of employment as NB/ED1. It is important to provide certainty to developers and communities, and to this end the continuation of this allocation is important. A review of demand for economic land across the National Park (SDXX) showed little demand for formal site allocations, and this resulted in a change to the employment allocation which is included in the proposed Local Development Plan allocated for housing H2.

Outline planning permission was granted for development of this site by The Highland Council in 2002 (SDXX planning permission ref). An application for approval of Reserved Matters ref 09/052/CP (SDXX) dated 13 February 2009 was refused by the CNPA on 17 January 2011 but granted on appeal (Planning Appeal Reference PPA-001-2005 SDXX).

The committee report on the application 09/052/CP (SDXX) provides more detailed background on the site history of this site explaining in paragraphs 15 that "an application seeking outline planning permission for the erection of 40 dwellings and business units was submitted to Highland Council in February 2002 (Highland Council planning ref. no. 02/45/OUTBS refers). The application was on three fragmented pockets of land, identical to the site boundaries identified in this current planning application. Highland Council Members resolved in September 2002 to grant outline planning permission, subject to any necessary clearance by the Scottish Executive and upon conclusion of a Section 75 Legal Agreement to cover matters including provision of affordable plots for self build purposes, and the undertaking of certain off site works. The Section 75 agreement required that the ten serviced dwelling house plots be conveyed to the Council or a registered social landlord at the rate of a minimum of one affordable plot for each set of three plots (which are not affordable plots). An obligation was also included that the acquiring body shall "insert in the Disposition in favour of any plot purchaser a Right of Pre-Emption, which shall be in favour of a

Designated Rural Housing Body.” The Section 75 agreement also included that provision would be made for waste water treatment to serve 10 houses in the first phase of the development.”

As para 16 of the committee report on 09/052/CP (SDXX) explains “the Highland Council resolution to grant planning permission was taken prior to the establishment of the National Park, although matters such as the Section 75 agreement were only concluded in 2006, thereby enabling the issuing of the decision notice at that time”.

The site therefore already has extant outline permission. A revised application 2013/0119 has now been received and called in by the CNPA and this new application is awaiting determination.

In addition to the detailed guidance provided in the Nethy Bridge section of the proposed Local Development Plan (pages 172 to 177), any proposal will be assessed against all relevant policies in the Plan including the Natural Heritage Policy (page 26-30) which considers how development impacts on wildlife and habitats, including woodland.

Text within the section of the Plan on Nethy Bridge (SDXx page 175) goes on to detail the requirement to “retain enough woodland to allow for movement of species between areas of woodland to the sides of the site, and retain the woodland setting of this part of the village”.

For these reasons the CNPA do not agree that the development of this is contrary to SPP para 146 in relation to ancient and semi-natural woodland.

Any reserved matters application must also explain how the development will impact any impact on amenity, the landscape and character of the village and how these impacts will be addressed. Policies in the proposed Local Development Plan address these issues, particularly those on Sustainable Design (SDXx pages 23-25), Natural Heritage (SDXx pages 26- 30) and Landscape (SDXx page 31-33). These policies require that the amenity value of the remaining woodland is retained.

The current or any future application will be assessed against the relevant policies of the adopted plan at that time. In the event that this plan is adopted prior to the determination of the application, it will be required to satisfactorily demonstrate that development will not have any adverse impact on the SAC, biodiversity, soil, otters, red squirrels and Capercaillie and the ancient woodland and assessed against the relevant policies dealing with those topics.

Regarding the need for and scale of development, the CNPA continues to believe that some development at Nethy Bridge is essential to help maintain the prosperity of the community and the scale of development is appropriate. The Housing Need and Demand Assessment carried out by the housing authority (SDXx evidence report) recognises a need and demand created by population growth and in-migration. The evidence produced to support the Main Issues Report (SDXx) acknowledges the National Park benefits from a younger population than might otherwise be expected for a remote area of rural Scotland

for a large part due to the result of in-migration. The CNPA believes sufficient information has already been provided to support the need to allocate land for housing in the Park. The way in which this is distributed follows the settlement strategy set out in the National Park Partnership Plan (SDXX). Therefore the CNPA remains committed to the provision of housing in Nethy Bridge and the appropriateness of these allocations.

Regarding the aims of the Park, the CNPA continues to believe that this site represents sustainable development, and will help support the sustainability of this community. For reasons set out above, CNPA remains confident that development can be achieved in a way which does not undermine the special qualities of the site, and the village. CNPA does not therefore accept that this development will be in conflict with the aims of the Park.

Regarding the location of the proposed site, the Proposed Plan (page 175) recognises that these two housing sites will create an extension to the village. It will also be for the detailed application to demonstrate how any impact of additional traffic will be managed and mitigated and if any road widening is required. There are already policies in the Proposed Plan that address this issue (SDXx page xx). The Design policy in the Proposed Plan will ensure that the scheme is well-designed and thus minimise any appearance of sprawl.

Regarding the assessment of social benefit, there is no requirement to conduct such an assessment. However, the proposed Local Development Plan has taken the expressed views of the Community into account. As para 38.2 acknowledges the “community are concerned about the unsympathetic developments scale and design”. In response to these concerns para 38.4 of the proposed Local Development Plan clearly sets out that “development should meet the needs of the community” and that this “should be undertaken in a way that compliments the sensitive woodland setting of the village”.

Regarding the impact on tourism, the CNPA is aware of the importance of tourism in the village. Para 38.1 acknowledges “Nethy Bridge has been a holiday destination since Victorian times” its growth and development reflects this history. Text goes on to recognise (SDXx para 38.4) that new development should enhance the character and appearance of the village as a tourism centre. Text goes on, within the village objectives (SDXx page 172) to require the need for new development to “facilitate appropriate economic growth which supports a thriving community”. The CNPA does not therefore agree that new development will have an adverse impact on tourism in the village.

Regarding the use of small scale, infill development, CNPA has considered the use of other sites, and the use of infill development, and has reviewed options for other parcels of land during the preparation of the Main Issues Report (SDXx evidence report). The CNPA is keen to ensure that the level of development in the village matches the demand while protecting its character and appearance. CNPA cannot ignore the fact that the site H1 and H2 has an extant permission. Whilst it could take a change of view and identify other land for infill development, this could be at the risk of both or many sites coming forward for development. Rather, the CNPA is confident that development on the site with permission can be achieved in a way which meets the aspirations of the village while protecting

its special qualities.

Nethy Bridge and Vicinity Community Council (185); Tulloch Homes Group Ltd (057) - The CNPA would not object to the request from Nethy Bridge and Vicinity Community Council (185) and Tulloch Homes Group Ltd (057) to amend the site boundary to reflect the current planning application proposals. The CNPA do not however support the sought change to the indicative capacity of the site as set out in the text. The figure given is founded on work carried out by The Highland Council in establishing and monitoring the effective housing land supply. It also has fed into the housing land supply tables (SDXx). Any amendment to the capacity would also require the site to be reassessed through the SEA and HRA process. Whilst this work will be required post examination, the CNPA do not support any change to reflect the change sought by the objector.

Woodland Trust Scotland (196) - 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.

Additional Housing Sites

Donny Black (090) – The CNPA does not believe the alternative housing site suggested is needed in addition to, or offer a better alternative to the current allocations. The sites put forward by the objector were assessed at the time of the Main Issues Report. SDXx Evidence report page 55). The site was found to be at risk of flooding, and has issues associated with landscape impact of any development. The CNPA therefore discounted this site, and remain of the view that this site is not a suitable one for inclusion in the proposed Local Development Plan.

George Knox (020) - The CNPA does not believe the alternative housing site suggested is needed in addition to, or offer a better alternative to the current allocations. The sites put forward by the objector were assessed at the time of the Main Issues Report. SDXx Evidence report page 14). The site was found to have issues associated with landscape impact of any development. SEPA also provided subsequent information to indicate this site might be at risk from flooding. The CNPA therefore discounted this site, and remain of the view that this site is not a suitable one for inclusion in the proposed Local Development Plan.

Natural Heritage Issues

Scottish Natural Heritage (040); Badenoch and Strathspey Conservation Group (080) - The CNPA would not object to Scottish Natural Heritage (040) request that SACs, SPAs, Ramsar sites, NNRs and SSSIs are named within the relevant community section of the plan and agree there is a need for consistency in naming SSSIs when they are also European sites. These changes would also address the request of Badenoch and Strathspey Conservation Group (080) that para 38.7 includes reference to all the SPAs relevant for Capercaillie. Therefore the CNPA would not object to Scottish Natural Heritage's (040) request to add Anagach Woods SPA, Cairngorms SPA, Craigmore Wood SPA and Kinveachy Forest SPA or Cairngorms SAC as bullet points to para 38.7. The CNPA would

suggest the new list of designated sites is listed alphabetically for consistency throughout the plan. This would mean the amended list would read “Anagach Woods SPA, Abernethy Forest SPA, Cairngorms SAC, Craigmore Wood SPA, Kinveachy Forest SPA, River Spey SAC”.

Scottish Natural Heritage (040) - The CNPA would also not object to SNH’s (040) proposed amendments to the third bullet point of para 38.6 so that it says “In addition, land to the south and north of the village is designated as Special Area of Conservation (Cairngorms SAC and River Spey SAC), Special Protection Area (Abernethy Forest SPA and Craigmore Wood SPA), Site of Special Scientific Interest (Abernethy Forest SSSI and River Spey SSSI) and National Nature Reserve (Abernethy NNR).”

The CNPA would not object to SNH’s (040) suggestion to amend para 38.7 Amend 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” as this would aid clarity.

The CNPA would not object to SNH’s (040) suggestion to amend para 38.8 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 aid clarity and provide additional information for applicants and communities.

Scottish Natural Heritage (040); Roy Turnbull (062) - The CNPA would not object to SNH’s (040) proposed amendments to second bullet point of para 38.6 so it says “the River Nethy, Duack Burn and Allt Mor and their bank areas are designated as a Special Area of Conservation (part of River Spey SAC)”. This would also address the request from Roy Turnbull (062) for a reference to Allt Mor in para 38.6.

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

Roy Turnbull (062) - The CNPA would not support Roy Turnbull’s (062) request for all sites identified on the ancient woodland inventory to be included on the settlement maps. As clarified elsewhere, CNPA do not agree that third party data should be included on maps within the Local Development Plan. The information contained within such maps and datasets is outwith the control of the CNPA and could be altered at any time. CNPA is however committed to providing all relevant information in an appropriate form and will put this and other third party information on its web site following adoption of the Local Development Plan. Those interested in the process will then be able to see the national, international and other designations together.

Badenoch and Strathspey Conservation Group (080) - Although the CNPA recognises the important of wildcats, the species is not listed as a qualifying interest for Natura sites. It would therefore be inaccurate to add a reference to

wildcats to paragraph 38.8 as requested by Badenoch and Strathspey Conservation Group (080) as information on wildcats is not necessary to enable a planning authority to carry out an Appropriate Assessment.

Settlement Boundary

Badenoch and Strathspey Conservation Group (080) - The CNPA does not agree with Badenoch and Strathspey Conservation Group (080) that the settlement boundary of H2 is not defensible. CNPA have, above, set out that this site has an extant permission. When this is implemented the development will be set within a woodland setting which creates a backdrop to the site which will be defensible and creates a clear boundary between the development and the woodland. CNPA would not therefore support any change to this, other than, as conceded above, should the Reporter find that an amendment to the boundary to reflect the live planning application has merit.

Open Space

Badenoch and Strathspey Conservation Group (080) - The CNPA does not support the request from Badenoch and Strathspey Conservation Group (080) to include the remainder of School Wood outwith H1 and H2, the fields on both sides of the B970 going towards Boat, west of the settlement boundary, land north of Balnagowan Brae and close to the pedestrian access from Balnagowan Brae to Balnagowan Wood area or the area between the River Nethy and the gardens should be allocated as Open Space. CNPA consider the best way to protect land from development is to exclude it from the settlement boundary. As para 13.7 of the proposed LDP clarifies, "The plans also identify settlement boundaries, outwith which it is expected that proposals will require justification for their selected location. Where no locational need exists, development on the periphery of settlements will be resisted. "CNPA would not support a change to this approach.

Barry Edmondson (169) - The CNPA support the request from Barry Edmondson (169) to remove the open space designation from land adjacent to Dell Cottage and Taigh Fuinidh. In looking at this land again, the land in question does not function as open space, and is simply part of the fabric of the village. The objector does not seek the land be allocated as anything else, and the CNPA would support the land remaining within the settlement boundary. Any proposal for development would then be considered on its merits.

Map

Roy Turnbull (062) - The CNPA does not believe any changes to the map key are needed. It's location at the end of the Plan is to enable any particular map and the key to be looked at simultaneously. The CNPA will review the format of the Plan prior to adoption to ensure it is easy to read and the key and maps can be read together.

CARR-BRIDGE (Proposed LDP pages 102- 107)

It is perhaps first important to note that the consultation on the Proposed Local Development Plan April- July 2013 and the consultation on an application for planning permission 2013/0120/DET occurred at the same time and there was a period of overlap between the two consultations. This did create some confusion

and planning staff involved in policy development and development management attended a public drop-in meeting in Carr-Bridge on Friday 28th June 2013 to help explain the different processes underway. This may explain why many of the comments received in response to the proposed LDP explicitly refer to the current planning application and are on occasion inter-dependant.

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 CNPPP (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 and Policy 1.2 of the CNPPP (SDXX page 42) sets out how sustainable patterns of settlement growth, infrastructure and communications will be achieved, including focusing new growth on the existing main settlements whilst also allowing for additional flexibility around a wider range of settlements. This settlement hierarchy is illustrated by a diagram on page 43 of the CNPPP (SDXX) that identifies Carr-Bridge as one of the 'Other Settlements with sites for development'.

Housing Sites H1 and H2

The adopted Local Plan (SDXX page 113) allocates a large site to the south east corner of Carr-bridge for development. Three parts of the area are identified specifically as C/H1 for housing. As the adopted Local Plan explains (SDXX page 112) "The site has outline permission for up to 117 dwellings". This application was allowed on appeal by the then

Scottish Executive (see <http://www.dpea.scotland.gov.uk/Documents/qJ5935/J48298.PDF> SDXX). The appeal was against The Highland Council's decision to refuse to grant permission for the development, and this decision pre-dates the establishment of the Cairngorms National Park.

The appeal decision (SDXX) was issued on 1 Feb 2005. The site is also currently

subject to a live application reference 05/495/CP (SDXX) which was presented to CNPA planning committee in 2007 with a recommendation of approval (SDXX <http://cairngorms.co.uk/park-authority/about-us/meeting-papers/committee-papers/?meetingID=344&typeID=2>). However, this decision was deferred pending additional surveys and this pending application serves to keep the appeal approval for outline consent live.

The boundary of the outline permission in the adopted Local Plan (SDXX) includes an extensive amount of land and included the land shown in the adopted Plan as H1 and also the land between the different parts of H1 which is shown in the adopted Local Plan as C/ENV. This illustration intended to show that although the existing outline permission covered a wide area, housing could only be built on part of the site as the outline consent required a large amount of the existing woodland and open space to be retained.

The remainder of the site was shown in the adopted Local Plan as C/Env the supporting text to which explains (SDXX page 112) “a number of open spaces and land, which contribute to the setting of Carr-Bridge, are identified and will be protected from development”. This was intended to help explain the extent of the extant outline permission without indicating incorrectly that the whole of this land would be developed as housing.

In preparing the proposed Local Development Plan the confusion created by the annotation of the settlement map was identified as a concern, and a different approach taken. The extant permission is now shown as grey, site with existing permission. In addition, two smaller parcels of land are identified as housing allocations. These reflect work carried out in recent years to assess what parts of the larger site might be suitable for development.

Housing sites H1 and H2 are therefore allocated in the adopted Plan (SDXX page 125) albeit with slightly different boundaries, and the principle of development has been established through the outline permission. It is important to provide certainty to developers and communities and to this end the continuation of this allocation is important. The changes to how the site is presented in the proposed Local Development Plan are intended to reflect the update situation with regards the site, and reflect the more detailed information resulting from work undertaken to support the planning application.

The CNPA has now received and called in a new detailed application 2013/0120/DET which is still pending. This application seeks to split the open market housing onto land broadly similar to Site H1 in the proposed LDP and provide affordable housing on land broadly similar to Site H2 in the proposed LDP.

Badenoch and Strathspey Conservation Group (080) Boy's Brigade (Monifieth) (241) Buglife (139); Gillian Campbell (223) Elisabeth and Keith Urquhart (186); Raymond Bainbridge (201); The Cairngorms Campaign (061) – Regarding the aims of the Park, CNPA does not agree that the allocation will be in conflict with the aims of the National Park or the role of CNPA. The continued growth of main settlements is in line with the NPPP and the identification of land for housing meets the established and demonstrated need for both open market and affordable

homes. CNPA has set The CNPA continues to believe that some development at Carr-Bridge is essential to help maintain the prosperity, including the current facilities, of the community and the scale of development is appropriate. CNPA continues to believe that this site represents sustainable development, and will help support the sustainability of this community. For reasons set out below, CNPA remains confident that development can be achieved in a way which does not undermine the special qualities of the site, and the village. CNPA does not therefore accept that this development will be in conflict with the aims of the Park.

Regarding the scale and design of development, the housing land supply and settlement strategy in the proposed Local Development Plan is supported by the National Park Partnership Plan (SDXx page 43) and the evidence produced to support the Main Issues Report (SDXx). The CNPA believes this continues to be the correct approach and remains committed to the allocation of land in all Main settlements in support of their sustainable communities. The identification of land to meet the housing land requirement is a requirement of a planning authority and the sites in Carr-bridge contribute to this.

The text of the proposed plan also sets out criteria which must be met in any detailed proposal in terms of design and impact on the village. This requires that any detailed proposal to the development is well designed and in sympathy with the village. Development must meet the settlement objectives set out on page 102, follow the general design guide, also page 23.5, and meet the standards set in the Sustainable design policy.

Regarding the impact on tourism and the economy, the CNPA is aware of the importance of tourism in the village. Para 23.1 begins by recognising the role Carr-bridge has as a tourism village. Para 23.4 goes on to acknowledge “Carr-bridge is a popular and active community which forms a focus for local people and tourists to the area.” The text goes on to recognise (SDXx objectives) that new development should “facilitate appropriate economic growth which supports a thriving community” and “protect those parts of the village that are important to its character and setting”. The CNPA does not therefore agree that new development will have an adverse impact on tourism in the village.

Regarding access to employment, the Proposed Plan includes an allocation of employment land at ED1 which as the Proposed Plan (SDXx page 105) explains offers an opportunity for investment. The Proposed Plan also protected site ED2 which “makes an important contribution to the local economy, and the tourism allocation T1 Seeks to support the existing Landmark Forest Adventure Park which also offers some employment opportunities for people. The Proposed Plan therefore does seek to provide housing in places where there are opportunities for employment locally, and Carr-Bridge is reasonably well served in this regard.

The CNPA believes that this development is compatible with community aspirations. As paras 23.1-23.3 set out the community benefits from a number of facilities and has strong identity, however support for the younger generation is needed and improvements to facilities and infrastructure are also required. The allocations of housing, employment and tourism in the village should help contribute to these objectives.

The Proposed Plan already requires careful consideration of the woodland setting of the development and this is specifically mentioned in Housing Proposals for H1 and H2 (page 104). In addition detailed guidance is provided in the Carr-Bridge specific part of the Proposed Plan (pages 172 to 177) regarding general design, community objectives, natural heritage, landscape, and cultural heritage, any proposal will be assessed against all relevant policies in the Plan including the Natural Heritage Policy (Proposed 26-30) which considers any development impact on wildlife and habitats, including woodland. These policies will also ensure that the development does contribute to a clear definition between settlement and countryside.

Regarding detailed comments regarding the design of any proposal, any reserved matters application must explain how the development will impact any impact on amenity, woodland, the landscape and character of the village and how these impacts will be addressed. Policies in the proposed Local Development Plan address these issues, particularly those on Sustainable Design (SDXx pages 23-25), Natural Heritage (SDXx pages 26- 30) and Landscape (SDXx page 31-33). These policies require that the amenity value of the remaining woodland is retained.

The current or any future application will be assessed against the relevant policies of the adopted plan at that time. In the event that this plan is adopted prior to the determination of the application, it will be required to satisfactorily demonstrate that development will not have any adverse impact of the development on the, biodiversity, soil, red squirrels meadows and grassland, biodiversity, including flower and fungi and wildlife including the Capercaillie, wildcat and invertebrates, UK BAP priority species including narrow headed ant, ancient woodland, and use of resources and assessed against the relevant policies dealing with those topics. In addition access and transport issues must be assessed against the policies of the Plan, and Para 23.16 (SDXX proposed LDP page 104) requires developer contributions to connect the site to the path network.

As has been explained above the site boundary for the existing permission has been continued forward from the adopted Local Plan. Although the boundaries for the housing elements of H1 and H2 do differ slightly from how they were shown in the adopted Local Plan. This reflects additional work and information gathered as part of the planning applications. The extent of the housing allocation within the area has outline permission has actually been reduced. The fact that the site boundary follows the current live application is in response to this application, but this must be seen against the long standing and extant outline permission. There allocation of these sites would not prevent applications for the redevelopment of existing sites in the village which could provide for affordable housing coming forward. Any such applications would be considered on their merit.

Although the CNPA recognises the concern in the community around second and holiday homes, the planning system is quite limited in what it can achieve to resolve this issue. However, CNPA are committed to promoting developments for the benefit of local people and will continue to use design in ways which reduce the likelihood of new homes becoming second and holiday homes. In addition, CNPA will continue to use conditions and agreements with developers to release new development onto the market to favour local people. It is also important to

note that second and holiday homes do play a role in supporting the economy, particularly the tourism economy, and retirement homes provide accommodation for year round residents.

Regarding the impact any development has on the use of the existing site by the Boys Brigade, whilst the CNPA can understand the concern raised, this is not a matter which would prevent future development, and CNPA will be happy to work with the Boys Brigade to find an appropriate solution.

Tulloch Homes Group (057) - The CNPA remains committed to the housing allocation at Carr-bridge but would not object to the request from Tulloch Homes Group Ltd (057) that the boundary of the housing allocations should be amended to match the sites being promoted under the current application (SDXX ref). The CNPA do not however support the sought change to the indicative capacity of the site as set out in the text. The figure given is founded on work carried out by The Highland Council in establishing and monitoring the effective housing land supply. It also has fed into the housing land supply tables (SDXx). Any amendment to the capacity would also require the site to be reassessed through the SEA and HRA process. Whilst this is work will be required post examination, the CNPA do not support any change to reflect the change sought by the objector.

Specific H2 comments

Badenoch and Strathspey Conservation Group (080) – the justification for the change of annotation on the settlement maps is provided above. The CNPA remain convinced that development on this site can occur in a way which protects its special qualities, and considers the policies of the Plan, the supporting and detailed text associated with Carr-bridge and the supplementary guidance which supports the Plan to provide sufficient clarity and protection to achieve this.

Alternative or Additional Site for Housing

Rodger Builders (013) - The CNPA does not believe the alternative or additional site suggested is acceptable. The site put forward by the objector was assessed at the time of the Main Issues Report. SDXx Evidence report page 71). The site was found to have issues associated with landscape impact of any development. SEPA also provided subsequent information to indicate this site might be at risk from flooding. The CNPA therefore discounted this site, and remain of the view that this site is not a suitable one for inclusion in the proposed Local Development Plan

Site ED1

Badenoch and Strathspey Conservation Group (080); Woodland Trust Scotland (196) – This is site is currently in use as employment land and the proposal seeks to encourage further investment in this location. The current site boundary reflects the use on the ground and therefore the CNPA would not support an amendment to the boundary on the site.

Site T1

Woodland Trust Scotland (196) – the site T1 is an existing successful tourism development, Landmark Adventure Park. Its identification as an allocation in the settlement maps is in recognition of the role it plays and offers support to possible expansion of the development within the site. Any such development would be

required to carry out and submit the necessary surveys in line with the Natural Heritage policy and associated supplementary guidance (SDXx page xx). CNPA do not therefore support any change to the plan in this regard.

Alternative or Additional Site for Tourism

Rodger Builders (013) - The CNPA does not believe the alternative or additional site suggested is acceptable. The site put forward by the objector was assessed at the time of the Main Issues Report. (SDXx Evidence report page 71). The site was found to have issues associated with landscape impact of any development. SEPA also provided subsequent information to indicate this site might be at risk from flooding. The CNPA therefore discounted this site, and remain of the view that this site is not a suitable one for inclusion in the proposed Local Development Plan.

Open Space

Badenoch and Strathspey Conservation Group (080) - The CNPA does not support the request from Badenoch and Strathspey Conservation Group (080) to retain all, or re-introduce areas of open space included in the current adopted Local Plan. The previous approach of identifying land outside settlement boundaries was found to be confusing. CNPA have now used a methodology of identifying only land within settlement boundaries and showing them on the appropriate settlement map. Land outside the settlement boundary would be protected by the general policies of the plan and proposals for development would be assessed against those. As para 13.7 of the proposed LDP clarifies, "The plans also identifies settlement boundaries, outwith which it is expected that proposals will require justification for their selected location. Where no locational need exists, development on the periphery of settlements will be resisted." CNPA would not support a change to this approach.

Natural Heritage Issues

Scottish Natural Heritage (040) - The CNPA would not object to Scottish Natural Heritage's (040) request for a specific reference is made to the River Dulnain SAC by adding a new bullet point to the end of para 23.6 saying 'The River Dulnain and its bank are also designated as a Special Area of Conservation (part of River Spey SAC).

The CNPA would not also object to SNH's (040) suggestion to amend para 23.7 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" as this would aid clarity.

The CNPA would not object to SNH's (040) suggestion to amend para 23.8 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.

Badenoch and Strathspey Conservation Group (080); Scottish Natural Heritage

(040) - The CNPA would not object to Scottish Natural Heritage (040) request that SACs, SPAs, Ramsar sites, NNRs and SSSIs are named within the relevant community section of the plan and agree there is a need for consistency in naming SSSIs when they are also European sites. Therefore the CNPA would not object to Scottish Natural Heritage's (040) request to add Abernethy Forest SPA, Anagach Woods SPA, Cairngorms SPA, and Craigmore Wood SPA as bullet points to para 23.7. The CNPA would suggest the new list designated sites is this listed alphabetically for consistency throughout the plan. This would mean the amended list would read "Anagach Woods SPA, Abernethy Forest SPA, Cairngorms SAC, Craigmore Wood SPA, Kinveachy Forest SPA, River Spey SAC" as this would aid clarity.

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

Badenoch and Strathspey Conservation Group (080) - Although the CNPA recognises the important of wildcats, the species is not listed as a qualifying interest for Natura sites. It would therefore be inaccurate to add a reference to wildcats to paragraph 23.8 as requested by Badenoch and Strathspey Conservation Group (080) as information on wildcats is not necessary to enable a planning authority to carry out an Appropriate Assessment.

Buglife (139) - The CNPA agrees with Buglife (139) that the narrow headed ant population is an important consideration in any application but this issue is already covered by the policies on biodiversity. The CNPA would be happy to add additional information on this issue into the Natural Heritage Section of the Supplementary Guidance which accompanies the Plan.

Settlement Boundary

Badenoch and Strathspey Conservation Group (080); Carr-bridge and Vicinity Community Council (149) - The support from Carr-bridge and Vicinity Community Council (149) for the H1 and H2 allocations is welcomed. However as detailed above (see response to Site H1 and H2) in the event that the current planning application is refused, the longstanding outline permission remains. The CNPA therefore do not support the request to change the settlement boundary to exclude this site. The CNPA does not agree with Badenoch and Strathspey Conservation Group (080) that the settlement boundary is not defensible. CNPA have, above, set out that this site has an extant permission. When this permission is implemented, the development will be set within a woodland setting which creates a backdrop to the site which will be defensible and creates a clear boundary between the development and the woodland. CNPA would not therefore support any change to this.

Regarding the role of the sawmill, the CNPA is aware of the recent closure of the sawmill and the impact this will have on the community but believes that the best way to seek an alternative use for the site would be through actively working with partners to develop a bespoke application. The CNPA would not wish to tie the future use of the sawmill down to a particular use in the LDP as this may limit the exploration of opportunities for future use.

Existing Permissions

Badenoch and Strathspey Conservation Group (080) - For the reasons detailed above (see response to Site H1 and H2) CNPA does not agree with Badenoch and Strathspey Conservation Group (080) request to amend the settlement map to show only the land where permission will result in development on the ground. The settlement maps as currently drafted shows the extent of sites with permission and follow the 'red line' boundary. The CNPA believes this is the most appropriate way to indicate the planning history and current position in relation to sites with extant permission. To include only part of a site which has permission would be misleading and could result in confusion

Reporter's conclusions:

Reporter's recommendations: