

# PAPER I:

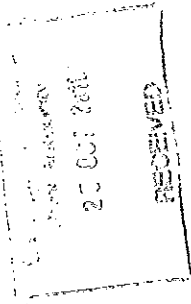
**(Boat of Garten Housing Application)**

## APPENDIX G

Developers Response  
To SNH Objection

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Your Ref: 08/272/CP  
20 October 2011

Dear Andrew

**Town and Country Planning (Scotland) Act 1997: 08/272/CP – Reconsultation:**  
**Planning Application for Erection of 72 Houses; Formation of 5 House Plots; Provision of Primary School Site; Associated Amenity Ground, Roads and Footways at Land 200m West of Football Field, Craigie Avenue, Boat of Garten, for Davall Developments**

We are in receipt of a copy of SNH's letter addressed to the CNPA of 11<sup>th</sup> October 2011 setting out its response to the "Further Information Report" submitted by the applicant via email on 24<sup>th</sup> September 2011.

We are also in receipt of CNPA's note of 14<sup>th</sup> October 2011 detailing further responses by Mr Allan Bestick, The Boat of Garten & Vicinity Community Council, the Badenoch & Strathspey Conservation Group, Mr Adam Gordon, Ms Dawn Smith, Mr Roy Turnbull, Mr Colin Ormston, Mr Tim Ransom, R.S.P.B and the S.C.N.P.

Regarding SNH's letter of 11<sup>th</sup> October 2011, we are surprised and disappointed to note that SNH objects to "the proposal as currently submitted", because the development is likely to have disturbance to Capercaillie using the adjacent woodland". This conclusion has been reached after analysis of "six scenarios by which this proposal, risks increasing disturbance to capercaillie. These are listed in Annex 1, along with our assessment of the extent to which the mitigation proposals will effectively address these risks".

The letter continues "where the mitigation proposals involve access management measures, our assessment is informed by your (CNPA's) advice, as the local access authority under the terms of the Land Reform (Scotland) Act 2003, on whether the proposals will successfully influence recreational behaviour".

The basis for the objection is clearly advice that SNH has received from access officers of the CPNVA.

We know from the SNH report what the access officers' conclusions were, but do not know the basis on which they reached those conclusions. We have not had any proper opportunity to respond.

Neither the CPNVA nor SNH have indicated that planning permission cannot be granted for housing on this site. SNH's previous appropriate assessment for the development plan process indicated that impact on capercaillie could be suitably mitigated. We note that the RSPB also does not have concerns about the development of the site in view of the mitigation proposals.

We would ask you for a full explanation of the access officers' position and an opportunity to respond. It may be that these matters can best be dealt with by a meeting between Andrew Tait, SNH, the access officers and the applicants. We have set out an initial response in annex 1, and do not see that any of the issues raised is insuperable. The application was deferred to see if appropriate mitigation could be achieved. It would be unreasonable for the Council not to give the applicants a proper opportunity to demonstrate that it can be.

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We remind you of our entitlement to respond in view of our right to a fair hearing under Article 6 of the European Convention on Human Rights.

### Conclusion and Discussion

Following our detailed point by point response to the SNH/CNPA Planning Consultation response, we turn to the generality of the situation from the applicants' point of view.

This is perhaps best summarised by SNH's email, (Debbie Green) of 12<sup>th</sup> October 2011 explaining SNH's position on the matter (see below).

"Allan, Allan, Sandy, Andy, Alison  
Please find attached our advice to CNPA on this proposal. I'm afraid we were unable to withdraw our objection, because we remain concerned about the likelihood of increased disturbance to capercaillie arising from the development, particularly in the short to medium term whilst vegetation screening and barriers become effective. Where the mitigation proposals involve access management measures, our assessment is informed by advice from CNPA, in their role as local access authority, on the extent to which the measures would successfully influence recreational behaviour. We think the suite of proposals could result in benefits to capercaillie in the long term, but our assessment is that the risks of increased disturbance in the short to medium term are significant and do not allow the Natura tests to be met."

We have worked closely with CNPA and the developers on this proposal over the last 10 months and we do understand the time and expense many parties have incurred in getting to this stage. We're very happy to participate in any further discussions.

If you have any questions or would like to discuss our advice to CNPA, please do get in touch, although please note that after today I am on leave until next Wednesday 19<sup>th</sup> October. Anne is also on leave during this period.

Regards"

This correspondence is reproduced here as it places a slightly different complexion on the matter than that in the formal SNH response. Taken with our response to Annex 1 "Key potential scenarios that could arise from this proposed development that risk increasing disturbance to capercaillie", we consider that the situation can be further distilled as follows.

- There is evidence that SNH objects to the proposal as such, only when advised by the CNPA as access authority.
- SNH states that "we think the suite of proposals could result in benefits to capercaillie in the long term" but identifies risks of disturbance in the short to medium term.
- We are of the view that concerns regarding short-medium term mitigation can be addressed in an efficient manner, through negotiation, to the long term benefit of capercaillie and the residents of Boat of Garten.
- We welcome R.S.P.B.'s response that R.S.P.B. does not object to the proposals.

No positive suggestions are made by the access officers as to potential solutions to the problems they raise. This is disappointing, especially since SNH is relying on their judgement in matters of access behaviour. No suggestion has been made that mitigation is not possible. Therefore we would appreciate the opportunity to discuss and agree mitigation measures. We are hopeful of being able to do so, especially since the access officers' negative response set out in the SNH letter contrasts sharply with the helpful and constructive attitude shown at the meetings between SNH, CNPA and the Applicant's Ecologist during the formulation of the final mitigation report.

We cannot reconcile this stance with the CNPA's continued promotion of the core path network, which as you are aware skirts capercaillie habitat, and the CNPA stance taken at the L.P.I in response to objections to this sites' allocation. (A copy is enclosed for clarity - Appendix 1).

Yours sincerely,



Allan D Remie  
For Bracewell Stirling Consulting

Annex 1: Key potential scenarios that could arise from this proposed development that risk increasing disturbance to capercaillie.

<p><b>Risk</b> Temporary disturbance from construction activity</p>	<p><b>Assessment taking into account proposed mitigation</b> This would be a short term effect in an area close to existing sources of disturbance, with relatively low current usage by capercaillie. The report proposes to limit construction activity to the development site, to retain a screen of trees around the site and to construct a 2m high solid fence around the development site prior to construction starting. Conclusion: risk addressed effectively; no significant disturbance to capercaillie.</p>
<p><b>Applicant's Response:</b> Agreed that there is no significant disturbance to capercaillie from construction activity.</p>	
<p><b>Risk</b> Disturbance from the housing site once occupied</p>	<p><b>Assessment taking into account proposed mitigation</b> This would be a permanent effect, in an area close to existing sources of disturbance, with relatively low current usage by capercaillie. The report proposes to retain and thicken a screen of trees and shrubs around the site; and to construct a 2m high solid fence around the development site in addition to, and outside of, individual garden fences. Conclusion: risk addressed effectively; no significant disturbance to capercaillie.</p>
<p><b>Applicant's Response:</b> Agreed that there is no significant disturbance to capercaillie from the housing site once occupied.</p>	
<p><b>Risk</b> Disturbance arising from increased recreational use of Boat of Garten woods A proliferation of informal 'desire line' paths in the woods around the development</p>	<p><b>Assessment taking into account proposed mitigation</b> This would increase disturbance to capercaillie and reduce the available area of lower disturbance in between paths. The report proposes a double fence around the development which will be monitored and maintained in perpetuity; retaining and thickening a screen of trees and shrubs outside the outer fence; and designing the site layout so that the only access from the site to the woods will be via the new link directly onto the adjacent core path, which links to the existing path network in the woods. Advice from CNPA as access authority; these proposals are likely to stop all access from and through the development into the woods and will result in access being directed eastwards to path 2. Conclusion: risk addressed effectively; no significant disturbance to capercaillie.</p>
<p><b>Applicant's Response:</b> Agreed that there is no significant disturbance to capercaillie due to a proliferation of informal 'desire line' paths in the woods around the development.</p>	

<p><b>Risk</b></p> <p>Significantly increased use of some currently lightly used paths in the NW sector of the wood that are close to the development site. Also consequential increased use of some relatively lightly used paths in the SW sector, as a result of the potential for circular routes.</p>	<p><b>Assessment taking into account proposed mitigation</b></p> <p>This could significantly increase disturbance to capercaillie in some areas where there is currently relatively little recreational disturbance. The report proposes designing the site layout so that the only access from the site to the woods will be via the new link directly onto the adjacent core path to the east, and to try to 'close' two infrequently used paths in the lightly used NW sector of the wood (paths 7 &amp; 8) by scarifying their surfaces to allow natural regeneration, and by publicising and explaining this course of action to the community.</p> <p>Advice from CNPA as access authority: Given the relatively low use of path 8, it is likely that scarifying the path surface with some blocking material will result in low to no use of this path. Unless there is clear community support for all the management measures proposed there must be significant doubt that access will be prevented along the line of path 7.</p> <p>Conclusion: risk not addressed effectively; cannot conclude no significant disturbance to capercaillie.</p>
<p><b>Applicant's Response:</b></p> <p>Noted that SNH has not expressed concern and that CNPA cites "clear community support" for management measures to be effective. We refer you to the Community Council's response to the proposals dated 8<sup>th</sup> October 2011 which states "The Community Council welcomes the recommendation at para 11.5.2 to set up a Steering Committee to include community representation. In our view community engagement is not something which ends if planning consent is granted. The implementation and monitoring of mitigation measures are long-term issues which would require community engagement and Steering Group involvement over a period of years" and further "at the most recent Community Council open meeting on 3<sup>rd</sup> October 2011, members took the view that the public meeting of the 29<sup>th</sup> June gave a positive steer to the draft mitigation proposals and that detailed proposals would be best discussed with all stakeholders after the Housing Application has been determined".</p> <p>It is clear from the foregoing that there is already community support for the mitigation which will strengthen through consultation with the proposed Steering Group.</p> <p>With regard to "increased use of some currently lightly used paths in the NW sector of the wood that are close to the development site" we cannot reconcile this concern with the conclusion noted for the previous risk "Proliferation of informal desire line paths in the woods around the development" is that there is "no significant disturbance to Capercaillie".</p> <p>Plainly we reject CNPA's reservations and request they be removed.</p>	

<p><b>Risk</b></p> <p>Increased off-path use by people in areas used by Capercaillie, eg for wildlife watching, taking a short cut, picking berries and mushrooms.</p>	<p><b>Assessment taking into account proposed mitigation</b></p> <p>This could increase disturbance to capercaillie. The report proposes a suite of education and awareness raising initiatives for existing and new residents, and visitors, involving signage, written advice, meetings and peer pressure; scarification and enrichment planting alongside tracks close to areas used by capercaillie and vulnerable to off-path access to reduce the potential for people to leave paths and increase the screening effect in the longer term, once vegetation has thickened.</p> <p>The scarification and planting is likely to take several years to become effective, and it may require careful management to create an effective physical and visual barrier, given the low density of some existing trackside, regeneration in the woods. It is not likely to be effective in the short or medium term.</p> <p>Advice from CNPA as access authority. The modification of new residents' behaviour is likely to work but only if existing recreational behaviour changes significantly. Changing existing behaviour requires a significant majority of people to understand and then buy in to new values. It remains unclear as to whether behaviour will change amongst existing users as a result of these proposals.</p> <p>Conclusion: risk not addressed effectively; cannot conclude no significant disturbance to capercaillie.</p>
<p><b>Applicant's Response:</b></p> <p>Regarding the SNH comment concerning the time taken for scarification and planting to become effective, it should be noted that it is likely to be 3 or 4 years from the appointment of the proposed 'mitigation steering group' formed to manage and monitor the mitigation before any houses are occupied. This would give some time for planting to become established. In the short to medium term, this could be re-inforced by using inperforate fencing or similar 'instant' screening. This was discussed at length at meetings attended by CNPA, SNH and the applicants' ecologist. It is disappointing that a more constructive comment is not offered. This issue could be covered by a Planning condition.</p> <p>Regarding CNPA's comments we note the 'statement' "the modification of new residents' behaviour is likely to work but only if existing recreational behaviour changes significantly.....it remains unclear as to whether behaviour will change amongst existing users as a result of these proposals".</p> <p>It is clear that CNPA staff did not attend the applicants' presentation to the Community Council where this issue was discussed and reported in the local Community Council response. It has to be pointed out that those in attendance were exclusively "existing users" and responded positively to the concept of behavioural change.</p> <p>We do not agree with CNPA response and request that it be modified, particularly in the light of the CNPA statement that "The modification of new residents' behaviour is likely to work".</p>	

**APPENDIX 1  
CNPA Response to Objections from the Badenoch & Strathspey Conservation Group and Roy Turnbull**

<b>Date:</b>	
<b>Issue:</b>	Boat of Garten – Allocation of Housing Site BG/HI
<b>Objector(s):</b>	Badenoch and Strathspey Conservation Group      400(i)(m) Roy Turnbull      390q
<b>Reporter</b>	Mrs Jill Moody
<b>Procedure</b>	Informal Hearing

**1.0 Overview**

**1.1** This statement sets out the CNPA's response to objections from the Badenoch and Strathspey Conservation Group and Roy Turnbull. The objections maintain that the allocation of proposed housing site BG/HI for around 70 houses is excessive, conflicts with the aims of the National Park, and is contrary to the EU Habitats Directive. There is evidence that there are recreational disturbance impacts on capercaillie in woodland areas where there are paths. This statement recommends that BG/HI remains as an allocated and effective housing site in the CNP Local Plan.

**2.0 Provision of the Local Plan**

**2.1** The CNP Local Plan (Deposit) July 2007 (CD6.11) identified BG/HI for residential development of around 70 houses. It was stated that the allocation should provide housing land for Boat of Garten's needs for the lifetime of the Local Plan. The design of the development should retain as much of the existing woodland of the site as possible. The 1<sup>st</sup> Modifications May 2008 (CD6.12) retained the allocation but amended the supporting text to include phasing of 50 houses in the period of 2006-2011, with additional capacity for 20 houses for future need in the period 2011-2016. Also added was reference to mitigation for important natural heritage interests, access management and the design of any development ensuring access to the adjacent Community Site BG/GI. The 2<sup>nd</sup> Modifications October 2008 (CD6.13) maintains this position.

**2.2 Related policies are:**

- Tables 2-4 Housing Land Requirement and Supply
- Policy 22 Housing Development within Settlement Boundaries (Incl. Background and Justification)
- Policy 1 Development in the Cairngorms National Park
- Policy 6 Biodiversity
- Policy 7 Landscape
- Policy 18 Design Standards for Development

**3.0 Summary of Objection**

- Objects to the allocation of BG/HI on grounds of excessive scale, that it will increase recreational disturbance to capercaillie in the woodland, and that it conflicts with all 4 aims of the Park (400(i)(m)).
- Objects to the allocation of BG/HI because it is contrary to the first aim of the Park and the EU Habitats Directive (390q).

<p><b>Risk</b> Increases in the number of dogs ranging off paths in areas used by capercaillie.</p>	<p><b>Assessment taking into account proposed mitigation</b> This could lead to increased disturbance to capercaillie, and mortality. The report proposes a suite of education and awareness raising initiatives for existing and new residents, and visitors, involving signage, written advice, meetings and peer pressure; scarification and enrichment planting alongside tracks close to areas used by capercaillie and vulnerable to off-path access to reduce the potential for people to leave paths and increase the screening effect in the longer term, once vegetation has thickened; establishing an off lead dog play area within the woods close to the village and the new development, in an area not currently used by capercaillie.</p> <p>The scarification and planting is likely to take several years to become effective, and it may require careful management to create an effective physical and visual barrier, given the low density of some existing trackside regeneration in the woods. It is not likely to be effective in the short or medium term.</p> <p>Advice from CNPA as access authority: The off lead dog play area will cater for some use but the existing evidence from survey points to the frequency of dogs off lead being higher the further they are away from the village. The dog area will not address existing demand for longer distance off lead walking which is likely to continue, and no alternative routes are identified to meet this demand. There are no proposals put forward for the short term other than general advice about staying on tracks and keeping dogs on leads. Changing existing behaviour requires a significant majority of people to understand and then buy in to new values. It remains unclear as to whether behaviour will change amongst existing users as a result of these proposals.</p> <p>Conclusion: risk not addressed effectively; cannot conclude no significant disturbance to capercaillie.</p>
<p><b>Applicant's Response:</b> Regarding SNH's comments concerning the timescale for scarification and planting to become effective we refer to our response to the previous issue. It is a relatively simple matter to agree a series of short-medium term measures designed to be effective until the long-term measures, which SNH has commented on – "we think the suite of proposals could result in benefits to capercaillie in the long term". Regarding CNPA's comments, these are generally a repeat of concerns about behavioural change amongst existing users.</p> <p>The applicant's consultations to the Community Council were attended exclusively by "existing users" and the feedback was generally positive in terms of affecting behaviour patterns of dog users.</p> <p>We also refer you to the research report "People and Dogs in the Outdoors" – commissioned by the CNPA dated 31<sup>st</sup> March 2011. The report effectively addresses the concerns raised by CNPA regarding behavioural change and demonstrates and advises on best practice to achieve this. We particularly refer you to Section 7 of the report "Influencing behaviour in practice". It is disappointing that the CNPA has chosen to ignore this report in its deliberations.</p> <p>We request the CNPA response is modified.</p>	

#### 4.0 Summary of CNPA's Response

4.1 The site contributes to the housing land supply set out in proposed modifications to Tables 3 and 4 (CD7.28) of the Local Plan, and has been assessed through the site selection criteria set out in Topic Paper 4 (CD7.24). Boat of Garten is identified as an intermediate settlement in the CNP Local Plan. As part of the overall strategy for allocating housing land at existing settlements, Boat of Garten is considered to have the capacity to accommodate the provision of land for housing growth to meet the social and economic needs of the local area. This site forms part of a larger development land allocation in the extant adopted Badenoch and Strathspey Local Plan 1997 (CD6.6). The site does not carry any natural heritage designation. However, the supporting text in the Boat of Garten settlement proposals (Page 76) recognises that there are important natural heritage interests relating to the site and the surrounding area and that appropriate mitigation and access management is required with any development proposal. This falls in line with the recommendations of Scottish Natural Heritage's Natura Appraisal of the site. Development proposals for the site will be considered against the terms of other policies in the CNP Local Plan.

#### 5.0 CNPA Commendation to Reporter

5.1 It is commended to the Reporter that no further modification to the allocation and provision of housing land at BG/Hi in the CNP Local Plan, is required.

#### 6.0 Assessment and Conclusions

6.1 **400(m) Objects** – to the allocation of BG/Hi on grounds of excessive scale, that it will increase recreational disturbance to capercaillie in the woodland, and that it conflicts with all 4 aims of the Park.

6.2 **Response:** The CNP Local Plan, in line with SPP3 (CD2.4), and the objectives of the CNP Park Plan (CD7.1) is required to deliver effective housing land for the Local Plan period on the basis of the housing needs established for the area (see proposed modified background text to Housing policies CD7.28). This is further clarified through Topic Paper 3 Approach to Housing Land Supply and Affordable Housing (CD7.23). The development strategy, as defined in Housing Policy 22 (Page 45) and explained at paragraph 5.52, seeks to allow for new housing development within the settlements of the National Park. The allocation of housing site BG/Hi at Boat of Garten for around 70 houses has been made in this context. The objector has not expanded on why these allocations are considered to conflict with the aims of the Park. However, the provision of this site for residential development will contribute to the housing land supply and is in line with the objectives for Sustainable Communities and Housing in the CNP Park Plan. As such, it will help to promote the sustainable economic and social development of the Boat of Garten community (4<sup>th</sup> aim).

6.3 The site does not carry any natural heritage designations but it is accepted that the site and immediate area does carry some natural heritage interest. In particular, woodland areas to the south and south west of the site (but outwith the boundaries BG/Hi) are known to carry populations of capercaillie (European Protected Species) and the area acts a "stepping stone" by facilitating capercaillie movements between the Kirveachy, Craigmors and Abermethy Special Protection Areas (SPAs). A previous outline application to Highland Council (02/00230/OUTBS), in 2002, for the development of housing, commercial, and business areas, on the larger area of land allocated for such uses in the Badenoch and Strathspey Local Plan 1997, extending to the south, but including the subject site, was the subject of an appeal against non-determination in 2006. The appeal was dismissed on 21 June 2006 (PPA/270/380). The primary reason given for the dismissal was the likely impacts of potential increased recreational disturbance on the capercaillie populations in the woodland. BG/Hi is significantly reduced in size from that allocated in the Badenoch and Strathspey

Local Plan and does not extend significantly into the woodland. Scottish Natural Heritage (SNH) have carried out a Natura Appraisal for the site (CD7.18). It concludes that potential disturbance to the capercaillie population can be reduced to an acceptable level through mitigation measures, including an access management plan and tree retention at the time of any planning application. The Modified CNP Local Plan encompasses these requirements and planning mechanisms such as a S75 Legal Agreement can be used to secure these mitigation measures. Other natural heritage interests can be addressed at the time of a planning application. Indeed a current planning application with requirements for access management, tree retention and associated ecological survey work is under consideration by the CNPA – 08/272/CP. On this basis, it is submitted that the allocation does not conflict with the 1<sup>st</sup> aim of the Park.

6.4 Sensitive development, in line with the other policies of the CNP Local Plan and the Sustainable Design Guide will ensure compliance with the 2<sup>nd</sup> and 3<sup>rd</sup> aims of the Park.

6.5 **390g Objects** to the allocation of BG/Hi because it is contrary to the first aim of the Park and the EU Habitats Directive.

6.6 **Response:** The CNP Local Plan, in line with SPP3 (CD2.4), and the objectives of the CNP Park Plan (CD7.1) is required to deliver effective housing land for the Local Plan period on the basis of the housing needs established for the area (see paras 5.22 to 5.34 of the CNP Local Plan). This is further clarified through Topic Paper 3 Approach to Housing Land Supply and Affordable Housing (CD7.23). The development strategy, as defined in Housing Policy 22 (Page 45) and explained at paragraph 5.52, seeks to allow for new housing development within the settlements of the National Park. The allocation of housing site BG/Hi at Boat of Garten for around 70 houses has been made in this context.

6.7 As stated above, the site does not carry any natural heritage designations but it is accepted that the site and immediate area does carry some natural heritage interest. In particular, woodland areas to the south and south west of the site (but outwith the boundaries BG/Hi) are known to carry populations of capercaillie (European Protected Species). A previous outline application to Highland Council, in 2002, for the development of housing, commercial, and business areas, on the larger area of land allocated for such uses in the Badenoch and Strathspey Local Plan 1997, extending to the south, but including the subject site, was the subject of an appeal against non-determination in 2006. The appeal was dismissed on 21 June 2006 (PPA/270/380). The primary reason given for the dismissal was the likely impacts of potential increased recreational disturbance on the capercaillie populations in the woodland. BG/Hi is significantly reduced in size from that allocated in the Badenoch and Strathspey Local Plan and does not extend significantly into the woodland. Scottish Natural Heritage (SNH) have carried out a Natura Appraisal for the site (CD7.18). It concludes that potential disturbance to the capercaillie population can be reduced to an acceptable level through mitigation measures, including an access management plan and tree retention at the time of any planning application. The Modified CNP Local Plan encompasses these requirements. Other natural heritage interests can be addressed at the time of a planning application. Indeed a current planning application with requirements for access management, tree retention and associated ecological survey work is under consideration by the CNPA – 08/272/CP. On this basis, it is submitted that the allocation does not run contrary to the 1<sup>st</sup> aim of the Park nor the EU Habitats Directive.

#### 7.0 Strategic Issues

7.1 The Cairngorms National Park Plan 2007 (CD7.1) sets out a number of strategic objectives. Of relevance to this case, are those relating to Conserving and Enhancing the Park (5.1) – Landscape, Built and Historic Environment, and Biodiversity; and Living and Working in the Park (5.2) – Sustainable Communities and Housing.

**8.0 National Planning Policy/Guidance**

8.1 SPP3 Planning for Homes 2008 (CD2.4) requires planning for housing to be based on the housing need and demand assessment process. Information derived from this process should form the basis of the local housing strategy and the land allocation for housing in the development plan. NPPG14 Natural Heritage (CD3.2) advises that while conservation of the natural heritage will be a key objective in any National Park, due weight must also be given to the social and economic interests of local communities.

**9.0 Other Material Considerations**

9.1 The National Parks (Scotland) Act 2000 sets out the aims of the National Park (CD1.3).

**10.0 List of Documents (Including Core Documents)**

- CD1.3 National Parks (Scotland) Act 2000
- CD2.4 SPP3 Planning for Housing 2008
- CD6.6 Baderoch and Strathpey Local Plan 1997.
- CD6.11 Deposit Local Plan
- CD6.12 Deposit Local Plan 1<sup>st</sup> Modifications
- CD6.13 Deposit Local Plan 2<sup>nd</sup> Modifications
- CD7.1 Cairngorms National Park Plan 2007
- CD7.18 Appropriate Assessment Boat of Garten Wood
- CD7.23 Topic Paper 3 Approach to Housing Land Supply and Affordable Housing
- CD7.24 Topic Paper 4 Background information regarding allocate sites
- CD7.28 Proposed Post Inquiry Modifications proposed by Officers through Inquiry Statements
- 02/00230/OUTBS
- PPA/270/380
- 09/272/CP

**11.0 Cairngorms National Park Witnesses for Hearing**

- Neil Stewart - Planning Officer
- Matthew Hawkins - Senior Heritage Officer
- Justine Prigmore - Local Biodiversity Action Plan Officer
- Adam Streeter-Smith - Outdoor Access Officer