Cairngorms National Park

Main Issues Response Report

February 2012



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INTRODUCTION

- 1.1 This report provides a summary of responses to Cairngorms National Park Authority's (CNPA) consultation on the Main Issues Report. It follows the format set out in The Town and Country Planning (Development Planning)(Scotland) Regulation 2008.
- 1.2 The Main Issues Report is the primary way of consulting on the Cairngorms National Park Local Development Plan. The Local Development Plan will set out the policies, proposals and guidance which will be used to inform decisions about future development in the National Park.
- 1.3 The first formal stage in preparing a Local Development Plan is to prepare a Main Issues Report. Its role is to stimulate debate on the issues and options for future development in the Park. It will inform the Local Development Plan and forms part of the statutory process surrounding development planning.
- 1.4 The Cairngorms National Park Local Development Plan will replace the Cairngorms National Park Local Plan 2010 and that part of the Perth & Kinross Council Highland Area Local Plan 2000 that falls within the National Park boundary.
- 1.5 The Main Issues Report is structured around seven key issues:
 - 1 Special qualities of the Park
 - 2 Resources/reducing our consumption
 - 3 Supporting our communities
 - 4 Housing/affordable housing
 - 5 Spatial strategy
 - 6 Support for rural areas
 - 7 Connectivity and communications
- 1.6 For each of the issues identified, the report sets out a number of options, and indicates the preferred option of the CNPA. The report seeks views on the seven key issues and options, and any other issues respondents wish to raise, structured around 28 questions.
- 1.7 The public consultation period for the main Issues Report ran from 19 September to 9 December 2011, concurrently with a consultation on the CNPA's draft Park Plan.
- 1.8 Respondents chose to respond to one or both consultations. In some cases, we found that responses to one of the consultations raised issues covered by the other consultation. We have tried to ensure that these comments are reflected in the appropriate report. Overall, there were a total of 113 responses to the Main Issues Report consultation.
- 1.9 This report provides a summary of these responses identifying agreement with a particular option, and any modifications being sought.



Issue 1: Special Qualities of the Park

How can we protect the special qualities of the Park and provide clarity on where development should and should not go?

Options	Implications
Option 1 – the current approach	
Protect the special qualities from inappropriate development through a policy-based approach.	 Clarifies what is expected from all developments. Deals with the whole Park in an even way. Allows for ad hoc development in a flexible way. Does not highlight or promote particular sites. May not provide adequate confidence for developers, communities, or those thinking about the National Park and its future.
Option 2 – the preferred approach	
Protect the special qualities through a policy based approach. Provide additional spatial guidance to conserve and enhance designated nature conservation sites, habitat connectivity, wildness and landscape character.	 Maintains clear expectations for all developments. Provides greater help in identifying some of the special qualities and their sensitivities to development. Protects designated sites through a clear spatial approach. Restrictions in sensitive areas may restrict specific appropriate ad hoc development.
Question 1	

Question 1

- Do you agree with the preferred option?
- If no, do you support the alternative option?
- If no, do you wish to put forward another option that helps us protect the special qualities of the Park for the future?



Reference	Respondent's Name
13	Rodger Builders
14	William Grant
16	The Mountaineering Council of Scotland
18	The Scottish Wildlife Trust
21	Roger Tozer
23	The Clouds Partnership
24	Gordon Bulloch
28	Alvie & Dalraddy Estates
33	Boat of Garten and Vicinity Community Council
34	Strathdee Properties Limited
40	Scottish Natural Heritage
44	North East Mountain Trust
46	Blair Atholl and Struan Community Council
47	RSPB Scotland
49	Scottish Land and Estates
50	Glenprosen Estate
52	
54	
57	Tulloch Homes Group Limited
58	
60	Forest Holidays LLP
61	The Cairngorm Campaign and The Scottish Wild Land Group
62	Roy Turnbull
63	SEPA (Scottish Environment Protection Agency)
67	Forest Enterprise Scotland
69	sportscotland
72	Helen Geddes
74	Tactran
75	MacDonald Aviemore Highland Resort Limited
78	Scotia Homes Limited
79	Mar Estate
80	Badenoch and Strathspey Conservation Group
84	Grantown-on-Spey and Vicinity Community Council
86 97	Aberdeenshire Council
87 00	Scottish Campaign for National Parks
96 07	Strathspey Railway Company & Trust
97 104	Keith Miller
104	Phillip J Swan
108	Sheila Potter
111	Angus Council



Representation ref:	13
Body or person submitting a	Rodger Builders
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	14
Body or person submitting a	William Grant
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	16
Body or person submitting a	The Mountaineering Council of Scotland
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	18
Body or person submitting a	The Scottish Wildlife Trust
representation:	
Provision of the Development Plan to which the issue relates:	We believe that inappropriately designed developments have a significant, detrimental impact on Scotland's bio-diversity and on people's quality of life. The planning system should not only act as a guardian for such bio-diversity, it should actively promote conservation, enhancement, restoration and expansion of it. It should also be a strategic and spatially based process which identifies
	and protects bio-diversity.
Modification sought by those submitting	
representation:	

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	23
Body or person submitting a	The Clouds Partnership
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	



Modification sought by those submitting representation:	The spatial guidance must be in a useable format, particularly for those without internet access and, if map base, should be at a scale which allows for detailed interpretation
	for small scale projects. We would also recommend taking in to account the Reporters Recommendations on the Aberdeenshire LDP, particularly in relation to mapping of designation.

Representation ref:	24
Body or person submitting a	Gordon Bulloch
representation:	
Provision of the Development Plan to	There is not enough information in this
which the issue relates:	paragraph to make an informed judgment as to how the preferred option will be implemented. The map provided in the MIR identifies various landscape categories, but does not give any indication on how these landscape categories will be used to guide development to appropriate sites. Whether this approach will work will depend
	on the detailed maps and the associated guidance.
Modification sought by those submitting representation:	

Representation ref:	28
Body or person submitting a	Alvie & Dalraddy Estates
representation:	
Provision of the Development Plan to	We question whether option 2 has any or
which the issue relates:	many advantages over option 1. Strict
	interpretation of plans and strategies can
	unreasonably restrict economic
	development.
Modification sought by those submitting	Proposals should be considered on their own
representation:	merits. Plans and strategies should be
	treated as flexible guidelines.

Representation ref:	33
Body or person submitting a	Boat of Garten and Vicinity Community
representation:	Council
Provision of the Development Plan to which the issue relates:	There is a need to protect 'special qualities' and ensure 'sustainable communities'. This balance needs to be clearer in the final document.
	'Spatial guidance' – it is not clear what this means other than housing development sites.
Modification sought by those submitting representation:	



Representation ref:	34
Body or person submitting a	Strathdee Properties Limited
representation:	
Provision of the Development Plan to which the issue relates:	The preferred approach is through a policy based approach with additional map-based spatial guidance on designated conservation sites, habitat connectivity, wildness and landscape character.
	Generally a combination of policy and map- based land use planning is accepted as a better approach than simply one or the other.
	Zoning an area as protected could have serious implications on how settlements might be able to embrace the aims of the Park to create sustainable and more socially and economically diverse communities.
Modification sought by those submitting representation:	Where the special qualities are not protected under statute then careful consideration should be given to their impact on delivering the visions for each settlement.
	The balance between the people who live, work and visit the Park should allow for some development.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	Other key areas for spatial identification as
representation:	well as those identified on Map 1b we
	suggest include –
	 green networks/habitat connectivity linked to the maintenance of an
	integrated habitat network which will
	form part of the national ecological
	network
	carbon rich soils
	geodiversity

Representation ref:	44
Body or person submitting a	North East Mountain Trust
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	46
Body or person submitting a	Blair Atholl and Struan Community
representation:	Council



Provision of the Development Plan to which the issue relates:	We support the preferred option (option 2).
Modification sought by those submitting	There must always be a mechanism to allow
representation:	specific appropriate ad hoc development
	which is contrary to the spatial guidance.

Representation ref:	47
Body or person submitting a	RSPB Scotland
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	We suggest an additional sentence, as
representation:	follows:
	"A biodiversity policy will also recognise the
	need to protect and enhance important
	wildlife found outside specified areas."

Representation ref:	49
Body or person submitting a	Scottish Land and Estates
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	However it is important that guidance
representation:	produced should be seen as just that – 'a
	guide' and not seen as a further planning
	control and mechanism which restrict
	innovative ideas or economic development.

Representation ref:	50
Body or person submitting a	Glenprosen Estate
representation:	
Provision of the Development Plan to	Recognising that the land management
which the issue relates:	sector, including shooting and stalking, plays
	a major role in conserving and enhancing the
	Park's special qualities, a balanced approach
	is essential.
Modification sought by those submitting	The estate would prefer an approach that not
representation:	only balances the need to conserve and
	enhance the special qualities, and protects
	them from inappropriate development, but
	which also proactively supports and
	encourages developments that help achieve
	the strategic objectives of the DNPP, rather
	than on an overly restrictive basis.

Representation ref:	52
Body or person submitting a	
representation:	
Provision of the Development Plan to	We do not support either option.
which the issue relates:	
Modification sought by those submitting	A third option is necessary which is much
representation:	more closely linked to the Park's key aims
	and ensures that the development does not
	further damage the character and culture of
	the Park.

Representation ref:	54
Body or person submitting a	
representation:	
Provision of the Development Plan to	We do not support either option.
which the issue relates:	
Modification sought by those submitting	A third option is necessary which is much
representation:	more closely linked to the Park's key aims
	and ensures that the development does not
	further damage the character and culture of
	the Park.

Representation ref:	57
Body or person submitting a	Tulloch Homes Group Limited
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	58
Body or person submitting a	
representation:	
Provision of the Development Plan to	We do not support either option.
which the issue relates:	
Modification sought by those submitting	A third option is necessary which is much
representation:	more closely linked to the Park's key aims
	and ensures that the development does not
	further damage the character and culture of
	the Park.

Representation ref:	60
Body or person submitting a representation:	Forest Holidays LLP
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 2) as long as beneficial economic development is not unnecessarily constrained in designated sites.
Modification sought by those submitting representation:	



Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We do not support the either option.
which the issue relates:	
Modification sought by those submitting	The entire section is unacceptable, and
representation:	should be rewritten, based on the special
	qualities of the NPP 2007.

Representation ref:	62
Body or person submitting a	Roy Turnbull
representation:	
Provision of the Development Plan to	I do not support either option. The
which the issue relates:	description of the special qualities of the
	Park is inadequate.
Modification sought by those submitting	
representation:	

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environmental Protection
representation:	Agency)
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	67
Body or person submitting a	Forest Enterprise Scotland
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	69
Body or person submitting a	sportscotland
representation:	
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 2) subject to the comments below.
Modification sought by those submitting representation:	We consider that the text in the MIR should be clear that guiding development to the appropriate site does not necessarily mean that development will not be allowed on the sites identified in Map 1b.



Representation ref:	72
Body or person submitting a	Helen Geddes
representation:	
Provision of the Development Plan to	We should protect special habitats and
which the issue relates:	species from the adverse impacts of
	development.
Modification sought by those submitting	CNPA should provide clear and unequivocal
representation:	guidance to protect the first aim of the CNP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	75
Body or person submitting a	MacDonald Aviemore Highland Resort
representation:	Limited
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	78
Body or person submitting a	Scotia Homes Limited
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	79
Body or person submitting a	Mar Estate
representation:	
Provision of the Development Plan to	In general a combination of policy and map-
which the issue relates:	based use planning is a better approach than
	simply one or the other.
Modification sought by those submitting	Where special qualities are not protected
representation:	under statute then careful consideration
	should be made of their impact on delivering
	the visions for each of the settlements.



Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We do not support either option.
which the issue relates:	
Modification sought by those submitting	The entire section on special qualities should
representation:	be re-written based on the special qualities
	section of the National Park Plan 2007.

Representation ref:	84
Body or person submitting a	Grantown-on-Spey and Vicinity
representation:	Community Council
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	86
Body or person submitting a	Aberdeenshire Council
representation:	
Provision of the Development Plan to which the issue relates:	The preferred approach uses the proposals map as a constraints map and does not reflect that boundaries of these areas may change in the life of the Plan and may result in the need for early modification, resulting in re-examination.
Modification sought by those submitting representation:	A more flexible approach would be to use supplementary guidance (or planning advice) to define the policy boundaries.

Representation ref:	87
Body or person submitting a	Scottish Campaign for National Parks
representation:	
Provision of the Development Plan to	We do not support either option.
which the issue relates:	
Modification sought by those submitting	There needs to be a principled approach to
representation:	development, asking the questions: is the
	scale appropriate; does it meet the desired
	cultural heritage values; is it distinctive
	enough to mark it out as being in tune with
	local vernacular styles?

Representation ref:	96
Body or person submitting a	Strathspey Railway Company and Trust
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	97
Body or person submitting a	Keith Miller
representation:	
Provision of the Development Plan to which the issue relates:	There should be a stronger option that gives greater protection to plants, animals, habitats, wilderness, and landscapes etc. significantly greater protection.
Modification sought by those submitting representation:	Go beyond purely designated nature conservation sites;
	Add spatial guidance which is sufficiently clear and robust to conserve and enhance.

Representation ref:	104
Body or person submitting a	Phillip J Swan
representation:	
Provision of the Development Plan to	I support option 1 - the current approach.
which the issue relates:	
Modification sought by those submitting	Reference in the MIR to emissions
representation:	reductions should be taken out, as this is not
	the same issue as climate change.

Representation ref:	108
Body or person submitting a	Sheila Potter
representation:	
Provision of the Development Plan to	We should preserve the rural ambiance;
which the issue relates:	prevent creeping urbanisation; and, preserve
	rare species.
Modification sought by those submitting	We should use brown field sites including the
representation:	renovation of old farm buildings and protect
	all virgin and agricultural land from
	development.

Representation ref:	111
Body or person submitting a	Angus Council
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	



Issue 2: Resources

How do we plan for the sustainable use of the existing resources and respond to the effects of climate change such as water, energy, waste, carbon?

Options	Implications
Option 1 – the current approach	
Protect those resources which are important to the National Park through a policy based approach, and set out options for appropriate development opportunities.	 Clarifies what is expected from all developments. Deals with the whole Park in an even way. Allows for ad hoc development in a flexible way. Does not highlight or promote particular sites. May not provide adequate confidence for developers, communities, or those thinking about the National Park and its future.
Option 2	
Provide an 'areas of search' analysis to direct developers to specific opportunities by providing spatial information looking at particular resources (water, energy sources, agricultural land, waste, forestry, etc).	 Gives positive direction to developers. May be difficult to identify opportunities for all forms of development. Risk of implying that the areas of opportunity have unconstrained options for development and may have conflict with other policy directions.
Option 3 – the preferred approach	
Combine a policy based approach with clear spatial guidance identifying sensitivities and opportunities, building on the existing Sustainable Design Guide.	 Clearly shows the resources we are concerned about and their constraints on development. Explains what must be considered when looking at development affecting each resource. Provides clear information on sensitivities that should be considered and where greater opportunities lie.
Question 2	

- Do you agree with the preferred option?
- If no, do you support an alternative option?
- If no, do you wish to put forward another option that helps us reduce our consumption and conserve the finite resources in the Park?



Reference	Respondent's Name
2	Baron Von Haldenwang
14	William Grant
16	The Mountaineering Council of Scotland
21	Roger Tozer
23	The Clouds Partnership
24	Gordon Bulloch
28	Alvie & Dalraddy Estates
33	Boat of Garten and Vicinity Community Council
40	Scottish Natural Heritage
43	The Highland Council
44	North East Mountain Trust
46	Blair Atholl and Struan Community Council
47	RSPB Scotland
49	Scottish Land and Estates
50	Glenprosen Estate
51	Scottish Government Directorate for the Built Environment, Historic Scotland
	and Transport Scotland
52	
54	
58	
61	The Cairngorm Campaign and The Scottish Wild Land Group
63	SEPA (Scottish Environment Protection Agency)
69	sportscotland
70	The Crown Estate
71	Dunachton Estate
74	Tactran
78	Scotia Homes Limited
79	Mar Estate
80	Badenoch and Strathspey Conservation Group
84	Grantown-on-Spey and Vicinity Community Council
85	Forestry Commission Scotland
86	Aberdeenshire Council
87	Scottish Campaign for National Parks
101	Invermark Estate
104	P Swan
108	Sheila Potter
111	Angus Council
114	Laggan Community Association



Representation ref:	2
Body or person submitting a	Baron Von Haldenwang
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Houses should no longer be built on arable
representation:	land, as food supply is an important future
	concern.

Representation ref:	14
Body or person submitting a	William Grant
representation:	
Provision of the Development Plan to	We agree that clear guidance on directing
which the issue relates:	development away from sensitive locations
	should be the preferred approach.
Modification sought by those submitting	Our plotted sites of Drumuillie should qualify
representation:	as a preferred location due to its non-
	sensitivity from an environmental
	perspective. All care will be taken to comply
	with sustainable Design Guidelines and as
	indicated, the site can be easily serviced.

Representation ref:	16
Body or person submitting a	The Mountaineering Council of Scotland
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
	Spatial mapping provides greater clarity of
	the location of important features.
Modification sought by those submitting	
representation:	

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	23
Body or person submitting a representation:	The Clouds Partnership
Provision of the Development Plan to which the issue relates:	We support option 2 and do not agree with the implication that this approach implies that the areas of opportunity have unconstrained options.
	An "area of search" rules out areas not appropriate for development. This helps developers search for areas which are deemed able to absorb development.
	It is for the planning system to provide



	certainty and to state where development will and will not take place.
Modification sought by those submitting representation:	It may be appropriate in the case of the Zero Waste Plan for the CNP (utilising the
representation.	proximity principal) to discuss with neighbouring authorities the locations of energy and waste facilities which may be needed within the Park.

Representation ref:	24
Body or person submitting a	Gordon Bulloch
representation:	
Provision of the Development Plan to	I support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting representation:	The preferred approach, however, needs to include management of population and also management of the number of residences which are used only as second homes (holiday homes) and which remain empty for large parts of the year.

Representation ref:	28
Body or person submitting a	Alvie & Dalraddy Estates
representation:	
Provision of the Development Plan to which the issue relates:	Some resources, like wind, water, trees and grass are renewable and can be exploited sustainably.
Modification sought by those submitting representation:	Too restrictive an approach to approving proposed developments will stifle economic growth.

Representation ref:	33
Body or person submitting a	Boat of Garten and Vicinity Community
representation:	Council
Provision of the Development Plan to	We support the move towards a low carbon
which the issue relates:	economy.
Modification sought by those submitting	Focussing on key settlements is only
representation:	appropriate if balanced with the needs of all
	settlements.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	This section of the Plan should also consider
representation:	minerals, peat, forestry and woodlands.
	Linking policy to an ecosystems approach
	would assist in recognising the multiple
	benefits from the Parks' resources, e.g.
	woodlands and peatlands as carbon stores,
	and flood plain areas for water management.



Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to which the issue relates:	There is likely to be an opportunity to tie in with the use of the Council's Highland Heat Map.
Modification sought by those submitting representation:	

Representation ref:	44
Body or person submitting a	North East Mountain Trust
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	46
Body or person submitting a	Blair Atholl and Struan Community
representation:	Council
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	47
Body or person submitting a	RSPB Scotland
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	We feel that extra detail regarding
representation:	sustainable flood management is required, in
	particular a target committing the Park to
	involvement in the Flood Risk Management
	Planning process.

Representation ref:	49
Body or person submitting a	Scottish Land and Estates
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	Renewable developments will have to be
representation:	proportionate and sensitive to the sites
	surrounding them.

Representation ref:	50
Body or person submitting a representation:	Glenprosen Estate
Provision of the Development Plan to	There is a need to ensure specific guidance
which the issue relates:	and spatial policies are in place to support
	appropriate renewable energy projects in
	and around the Park. A strong stance must
	be taken to protect the Park's special
	qualities and local economies against



	inappropriately designed and sited developments such as wind farms.
Modification sought by those submitting	Use of the SNH Guidance Notice is
representation:	important in terms of context for framing
	appropriate policies and guidance on siting
	wind farms.

Representation ref:	51
Body or person submitting a	Scottish Government Directorate for the
representation:	Built Environment, Historic Scotland and Transport Scotland
Provision of the Development Plan to which the issue relates:	We welcome the reference to the Scottish government's Zero Waste Plan and the requirement to view and manage waste as a resource.
Modification sought by those submitting representation:	We would like to see greater recognition given to the Climate Change (Scotland) Act 2009. It is essential that the Plan complies with Section 72 of the Climate Change (Scotland) Act 2009 and you will wish to take account of the requirement for the development plans to include policies requiring all new buildings to avoid a specified and rising proportion of greenhouse gas emissions.

Representation ref:	52
Body or person submitting a representation:	
Provision of the Development Plan to which the issue relates:	The Park has to acknowledge major growth in housing and creating a demand for it is diametrically opposed to the sustainability aims of the Park. Communities within the Park are already very dependent on commuting to larger settlements for employment and are, by their nature, in areas where extreme winters and a lack of employment are the norm. Promoting growth in these areas – other than to meet specifically local housing need - is creating growth in CO2 emissions and reveals a grave lack of 'joined up thinking' in the way the Authority attempts to reconcile its various aims.
Modification sought by those submitting representation:	

Representation ref:	54
Body or person submitting a	
representation:	
Provision of the Development Plan to	The Park has to acknowledge major growth
which the issue relates:	in housing and creating a demand for it is
	diametrically opposed to the sustainability
	aims of the Park. Communities within the



	Park are already very dependent on commuting to larger settlements for employment and are, by their nature, in areas where extreme winters and a lack of employment are the norm. Promoting growth in these areas – other than to meet specifically local housing need - is creating growth in CO2 emissions and reveals a grave lack of 'joined up thinking' in the way the Authority attempts to reconcile its various aims.
Modification sought by those submitting representation:	

	50
Representation ref:	58
Body or person submitting a	
representation:	
Provision of the Development Plan to which the issue relates:	The Park has to acknowledge major growth in housing and creating a demand for it is diametrically opposed to the sustainability aims of the Park. Communities within the Park are already very dependent on commuting to larger settlements for employment and are, by their nature, in areas where extreme winters and a lack of employment are the norm. Promoting growth in these areas – other than to meet specifically local housing need - is creating growth in CO2 emissions and reveals a grave lack of 'joined up thinking' in the way the Authority attempts to reconcile its various aims.
Modification sought by those submitting representation:	

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We do not support option 2. We can see
which the issue relates:	little merit in engaging with this question as
	we believe it is inconsistent with other
	policies proposed in the Plan.
Modification sought by those submitting	
representation:	

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	This approach seems to be confined to
representation:	protecting resources and areas from
	development rather than positively identifying
	appropriate areas for development.



Representation ref:	69
Body or person submitting a	sportscotland
representation:	
Provision of the Development Plan to	We strongly agree with the need
which the issue relates:	to protect the Park's special qualities but it is
	important that this is achieved through a
	balanced and evidence based approach.
Modification sought by those submitting	sportscotland considers that a discrete OAS
representation:	policy is merited.

Representation ref:	70
Body or person submitting a representation:	The Crown Estate
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 3).
Modification sought by those submitting representation:	We believe the Main Issues Report does not go far enough to encourage renewable energy development within the Park. It is difficult to comment in detail on the proposed policy direction for resources and reducing consumption as the MIR is very broad and does not contain any details of key policies. As such, we would request that an interim consultation is carried out by CNPA prior to the publication of the Proposed Plan to allow interested parties to comment on more detailed proposals for rural areas before they are set out in the Proposed Plan.

Representation ref:	71
Body or person submitting a	Dunachton Estate
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	78
Body or person submitting a	Scotia Homes Limited
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	It should be considered that incorporation if
representation:	such guidance within the SDG should be
	subject to further public consultation prior to
	the publication of the proposed LDP.

Representation ref:	79
Body or person submitting a	Mar Estate
representation:	
Provision of the Development Plan to	We do not support any of the options.
which the issue relates:	
Modification sought by those submitting	There should be a balanced approach
representation:	between people and the environment to
	allow for growth that allows the economy to
	thrive

Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We do not support option 2. We can see
which the issue relates:	little merit in engaging with this question as we believe it is inconsistent with other
	policies proposed in the Plan.
Modification sought by those submitting	
representation:	

Representation ref:	84
Body or person submitting a	Grantown-on-Spey and Vicinity
representation:	Community Council
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	85
Body or person submitting a representation:	Forestry Commission Scotland
Provision of the Development Plan to which the issue relates:	
Modification sought by those submitting representation:	It would be useful if stronger reference could be made to the Scottish Government's Woodland Removal policy with regards to any proposed development.



Representation ref:	86
Body or person submitting a representation:	Aberdeenshire Council
Provision of the Development Plan to which the issue relates:	We are unconvinced that the preferred approach will address fundamental issues of resource use within the Park area.
Modification sought by those submitting representation:	We suggest that greater thought is given to how the carbon footprint of the Park can be reduced through planning policies and proposals.
	Key strategic tourism resources should be protected from alternative development forms.

Representation ref:	87
Body or person submitting a representation:	Scottish Campaign for National Parks
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 3). We note that the text acknowledges that the present consumption regime within the Park's communities is unsustainable. The current rate of building flies in the face of the preferred option.
Modification sought by those submitting representation:	

Representation ref:	101
Body or person submitting a	Invermark Estate
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We believe that a policy framework in
representation:	connection with renewable technology and
	particularly hydro technology should be
	created that: recognises the wide range of
	technologies available; does not preclude the
	delivery of large scale hydro ventures; and,
	applies policy through a criteria based
	approach to a site specific basis.

Representation ref:	104
Body or person submitting a	P Swan
representation:	
Provision of the Development Plan to	Issue 2 needs more structure. It is poorly laid
which the issue relates:	out and leaves the reader confused.
Modification sought by those submitting	The language is too "visionary" and needs to
representation:	be more down to earth.



Representation ref:	108
Body or person submitting a	Sheila Potter
representation:	
Provision of the Development Plan to	Biodiversity should be preserved and there
which the issue relates:	should be an increase in food production.
	Water resources and flood plains should also
	be preserved.
Modification sought by those submitting representation:	

Representation ref:	111
Body or person submitting a	Angus Council
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	114
Body or person submitting a	Laggan Community Association
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	One and a half storey development should
representation:	be redefined and not be a prerequisite of
	planning permission.



Issue 3: Supporting Our Communities

How and where can we make sure communities have what they need – jobs, tourism options, facilities etc?

Options	Implications
Option 1 – the current approach	
Highlight the general opportunities for economic development that fit in key settlements, and also support our rural communities.	 Maximum flexibility. Does not address the needs of different communities. Provides some direction to large investment sites.
Option 2 – the preferred approach	
Highlight the different communities in the Park and support appropriate opportunities for economic development, services and facilities within them.	 Promotes/highlights the different communities across the Park. Opportunities for investment can be focused on Communities. Provides some structure for the needs of communities and for the assessment of development proposals.
Question 3	

- Do you agree with the preferred option?
- If no, do you support the alternative option?
- If no, do you wish to put forward another option that helps us identify what communities need to secure prosperity for the future?



Reference	Respondent's Name
21	Roger Tozer
23	The Clouds Partnership
24	Gordon Bulloch
25	Michael Franklin
28	Alvie and Dalraddy Estates
33	Boat of Garten and Vicinity Community Council
40	Scottish Natural Heritage
43	The Highland Council
44	North East Mountain Trust
46	Blair Atholl and Struan Community Council
47	RSPB Scotland
49	Scottish Land and Estates
50	Glenprosen Estate
51	Scottish Government Directorate for the Built Environment, Historic Scotland
	and Transport Scotland
52	
54	
58	
60	Forest Holidays LLP
67	Forest Enterprise Scotland
69	sportscotland
70	The Crown Estate
71	Dunachton Estate
74	Tactran
75	MacDonald Aviemore Highland Resort Limited
78	Scotia Homes Limited
79	Mar Estate
84	Grantown-on-Spey and Vicinity Community Council Aberdeenshire Council
86 87	
90	Scottish Campaign for National Parks Victor Jordan
90	Ballater Royal Deeside Limited
96	Strathspey Railway Company and Trust
107	Bryan Wright
107	Sheila Potter
111	Angus Council
114	Laggan Community Association
117	



Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	Only businesses that service recreation and
representation:	the needs of the community should be
	encouraged.

Representation ref:	23
Body or person submitting a	The Clouds Partnership
representation:	
Provision of the Development Plan to	We support option 1 - the current approach.
which the issue relates:	
Modification sought by those submitting representation:	Whilst this may be appropriate for larger scale proposals in the major settlements, provision should also be made for ad-hoc economic development proposals in the more remote areas, where a local requirement can be demonstrated.

Representation ref:	24
Body or person submitting a	Gordon Bulloch
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
	The map showing key employment sites and
	areas of visitor pressure is interesting, but it
	is not clear how this will be used to help
	focus new development on areas with
	greatest capacity for new growth.
Modification sought by those submitting	There should be a policy for managing
representation:	second homes within the Park.

Representation ref:	25
Body or person submitting a	Michael Franklin
representation:	
Provision of the Development Plan to	The Aberdeenshire Rural Partnerships
which the issue relates:	Federation (ARPF) is a loosely knit body comprising Rural Partnerships which either support community groups or carry out their own projects. The Partnerships work with Aberdeenshire Council. Such a body in the National Park would allow for the exchange of experiences and knowledge between partnerships. Due to geography, electronic information sharing would benefit such a body.
Modification sought by those submitting representation:	Include support for rural partnerships.



Representation ref:	28
Body or person submitting a	Alvie and Dalraddy Estates
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Development/Investment may occur outside
representation:	existing communities. There should be a presumption in favour of developments that provide long term employment and can meet the needs of local communities.
	Each proposal should be considered on its merits, irrespective of guidance and or current visitor pressure.

Representation ref:	33
Body or person submitting a	Boat of Garten and Vicinity Community
representation:	Council
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	This community seeks the continued support
representation:	of the CNPA in achieving completion of the
	Station Square Heritage Project.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	44
Body or person submitting a	North East Mountain Trust
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	It will be important to make sure that this
representation:	spatial guidance is focused on protecting the
	core areas of the Park rather than simply
	giving carte blanche to any development in
	the periphery.



Representation ref:	46
Body or person submitting a	Blair Atholl and Struan Community
representation:	Council
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	47
Body or person submitting a	RSPB Scotland
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	49
Body or person submitting a	Scottish Land and Estates
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	50
Body or person submitting a	Glenprosen Estate
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	It is essential that the policy direction has
representation:	sufficient flexibility to ensure multi-faceted
	land management units and estates to adapt
	and respond to changing economic
	circumstances in order to sustain rural
	economies, businesses and communities.

Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 2).
Modification sought by those submitting representation:	As you work towards the proposed Plan you will need to identify where the opportunities for economic development are and support these through the Plan.

Representation ref:	52
Body or person submitting a	
representation:	
Provision of the Development Plan to	I do not support either option 1 or 2.
which the issue relates:	

Modification sought by those submitting representation:	The Park needs to look at all its aims and produce a coherent new option for Issue 2 which recognises the need to support communities in reducing dependence on carbon while recognising that promoting growth in these settlements (except in
	response to local - and not national need) is in no way sustainable.

Representation ref:	54
Body or person submitting a representation:	
Provision of the Development Plan to which the issue relates:	I do not support either option 1 or 2.
Modification sought by those submitting representation:	The Park needs to look at all its aims and produce a coherent new option for Issue 2 which recognises the need to support communities in reducing dependence on carbon while recognising that promoting growth in these settlements (except in response to local - and not national need) is in no way sustainable.

Representation ref:	58
Body or person submitting a representation:	
Provision of the Development Plan to which the issue relates:	I do not support either option 1 or 2.
Modification sought by those submitting representation:	The Park needs to look at all its aims and produce a coherent new option for Issue 2 which recognises the need to support communities in reducing dependence on carbon while recognising that promoting growth in these settlements (except in response to local - and not national need) is in no way sustainable.

Representation ref:	60
Body or person submitting a	Forest Holidays LLP
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	There is a lack of information within the MIR
representation:	on the National Park Authority's framework
	for development within the recognised areas
	of greatest visitor pressure.

Representation ref:	67
Body or person submitting a	Forest Enterprise Scotland
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	69
Body or person submitting a representation:	sportscotland
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 2).
Modification sought by those submitting representation:	We consider it important to also look at how existing facilities and resources within settlements can be protected. This would include the protection of open spaces. Sport Scotland has a statutory role in the protection of playing fields. The production of a playing field strategy is recommended.

Representation ref:	70
Body or person submitting a representation:	The Crown Estate
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 2).
Modification sought by those submitting representation:	It is difficult to comment in detail on the proposed policy direction for economic development and reducing consumption as the MIR is very broad and does not contain any details of key policies. As such, we would request that an interim consultation is carried out by CNPA prior to the publication of the Proposed Plan to allow interested parties to comment on more detailed proposals for rural areas before they are set out in the Proposed Plan.

Representation ref:	71
Body or person submitting a	Dunachton Estate
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	75
Body or person submitting a	MacDonald Aviemore Highland Resort
representation:	Limited
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	This must sit below a wider Park strategy on
representation:	economic growth. There needs to be a policy
	on Tourism.



Representation ref:	78
Body or person submitting a	Scotia Homes Limited
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	79
Body or person submitting a	Mar Estate
representation:	
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 2) if opportunities for development to support economic development and services, and the allocations or policies, are flexible enough to allow for such development to achieve planning consent. Overzealous zoning of protected areas around existing settlements will make this difficult at the very least and in many cases impossible. Past local plans has simply allocated the existing business/ employment areas for economic development.
Modification sought by those submitting representation:	To support appropriate new or expanding business ventures new economic development allocations are required. We don't agree that new developments should be located in areas with the greatest visitor pressure. The LDP should be taking a new look at how the Park has developed and how it might develop in the future for the benefit of all of its constituent communities.

Representation ref:	84
Body or person submitting a	Grantown-on-Spey and Vicinity
representation:	Community Council
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	Greater support for voluntary groups is
representation:	needed.

Representation ref:	86
Body or person submitting a representation:	Aberdeenshire Council
Provision of the Development Plan to which the issue relates:	We are concerned that the needs of dispersed rural communities are not met by the proposals and the significant contribution that might be made from new housing on appropriate sites within country areas to meeting both need and demand is not recognised.
Modification sought by those submitting representation:	

Representation ref:	87
Body or person submitting a	Scottish Campaign for National Parks
representation:	
Provision of the Development Plan to which the issue relates:	Option 2 allows communities to differentiate themselves by growing at their own pace, which is close to the National Park values of organic growth, but it sits uneasily with the NPA's large housing allocations.
Modification sought by those submitting representation:	

Representation ref:	90
Body or person submitting a	Victor Jordan
representation:	
Provision of the Development Plan to	I support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	Emphasis should be on seeking projects of
representation:	economic development compatible with the
	first aim of the National Park, recognising the
	value of small enterprises, self employment,
	etc, encouraging existing industries, such as
	farming, tourism and outdoor pursuits.

Representation ref:	93
Body or person submitting a	Ballater Royal Deeside Limited
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	96
Body or person submitting a	Strathspey Railway Company and Trust
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	108
Body or person submitting a	Sheila Potter
representation:	
Provision of the Development Plan to	The opportunity for education and research
which the issue relates:	should be recognised.
Modification sought by those submitting	
representation:	

Representation ref:	107
Body or person submitting a	Bryan Wright
representation:	
Provision of the Development Plan to	I support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	111
Body or person submitting a	Angus Council
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	114
Body or person submitting a	Laggan Community Association
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Importance placed on retention of all
representation:	amenities i.e. shop, school, doctors.
	Need for help for small business.



Issue 4: Affordable Housing

How and where can we meet the housing need in our communities – open market, affordable local needs?

Options	Implications
Option 1 – the current approach Limit new housing development to provide only that identified as required in the housing assessments. This will take into account those sites with permission, focus new Development opportunities on sites which are allocated in the existing adopted Local Plans. On those sites we would require a proportion of between 25-40 per cent affordable units.	 Shows sites that have planning permission already. Gives continuity to the allocation of sites in existing plans which are yet to gain permission. There will be little new development other than that which has permission already limiting the amount of affordable development.
Option 2	
Focus all new development on the provision of affordable housing by only identifying sites for 100 per cent affordable housing (bearing in mind the existing consents).	 Shows sites that have planning permission already. Focuses new development solely on the provision of much needed affordable development. Relies on all new development finding appropriate funding streams to ensure projects are economically viable. With limited land identified there will be little new development other than that which has permission already, limiting the amount of affordable development.
Option 3 – the preferred approach	
Support the needs of communities by ensuring all main and other settlements have some options for future development. Focus new housing on those sites already in adopted Local Plans. On these sites require a benchmark of 25 per cent affordable development (again, bearing in mind existing consents).	 Shows sites that have planning permission already. Gives continuity to the allocation of sites in existing plans which are yet to gain permission. Gives additional flexibility to make sure all communities have options for new development. Ensures a reasonable number of affordable units within all new developments.



Question 4

- Do you agree with the preferred option? •
- If no, do you support the alternative option? ٠
- If no, do you wish to put forward another option that helps us identify what ٠ communities need to secure prosperity for the future?

Reference	Respondent's Name
7	John Burrows
13	Rodger Builders
14	William Grant
15	Robin and Freda Gibson
17	William Houston
19	William Yuile
21	Roger Tozer
23	The Clouds Partnership
24	Gordon Bulloch
26	Walkinghighlands
27	Frank Johnstone
28	Alvie and Dalraddy Estates
30	Jane Palmer
31	Ballater and Crathie Community Council
32	Christopher Roberts
33	Boat of Garten and Vicinity Community Council
34	Strathdee Properties Limited
38	Jane Trythall
40	Scottish Natural Heritage
41	Robert Moss
42	Jane O' Donnovan
43	The Highland Council
44	North East Mountain Trust
45	Robert Greenwood
46	Blair Atholl and Struan Community Council
47	RSPB Scotland
49	Scottish Land and Estates
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
52	
54	
55	Katherine Carington-Smith
56	Dinnet and Kinford Estate
57	Tulloch Homes Limited
58	
61	The Cairngorm Campaign and The Scottish Wild Land Group
62	Roy Turnbull
64	The Muckrach Estate
65	Ballater Housing Partnership
70	The Crown Estate
71	Dunachton Estate
72	Helen Geddes



74	Tactran
76	Jane Smith
77	Invercauld Estate
78	Scotia Homes Limited
79	Mar Estate
80	Badenoch and Strathspey Conservation Group
81	Alison Day
82	A M Walker
83	Allan Bantick
84	Grantown-on-Spey and Vicinity Community Council
87	Scottish Campaign for National Parks
89	Laura Cannicott
90	Victor Jordan
93	Ballater Royal Deeside Limited
95	Susan Matthews
97	Keith Miller
98	Moira Richards
104	Phillip J Swan
107	Bryan Wright
108	Sheila Potter
110	Perth and Kinross Council
111	Angus Council
112	Christopher Carter
114	Laggan Community Association



Representation ref:	7
Body or person submitting a representation:	John Burrows
Provision of the Development Plan to which the issue relates:	The priority should be on developing affordable housing to meet the needs of local residents. The present plans will mean that local people will not be able to afford to buy any of the new housing, especially in light of the fact that many locals have only part time jobs.
Modification sought by those submitting representation:	There should be a focus on developments in brown field sites.

Representation ref:	13
Body or person submitting a	Rodger Builders
representation:	
Provision of the Development Plan to	We partly support the preferred option
which the issue relates:	(option 3) to support the needs of the
	communities, provided there is sufficient
	flexibility to encourage a range of product to
	be established, including affordable self-build
	for example.
Modification sought by those submitting	Include sufficient flexibility to encourage a
representation:	range of product to be established, including
	affordable self-build for example.

Representation ref:	14
Body or person submitting a	William Grant
representation:	
Provision of the Development Plan to	We partly support the preferred option
which the issue relates:	(option 3) to support the needs of the
	communities, provided there is sufficient
	flexibility to encourage a range of product to
	be established, including affordable self-build
	for example.
Modification sought by those submitting	Include sufficient flexibility to encourage a
representation:	range of product to be established, including
	affordable self-build for example.

Representation ref:	15
Body or person submitting a	Robin and Freda Gibson
representation:	
Provision of the Development Plan to	We generally support the preferred option
which the issue relates:	(option 3). However, we note that in Blair Atholl, the main sights identified for housing are at risk of flooding and are therefore unsuitable. I welcome the proposal to include a benchmark of 25% for the proportion of affordable housing in new development.
Modification sought by those submitting	It is important to identify sufficient land in
representation:	Blair Atholl area to allow for expected
	housing needs for several years.
	The affordable element need not be included



on the same site as the other housing, but
should be within the same settlement.

Representation ref:	17
Body or person submitting a representation:	William Houston
Provision of the Development Plan to which the issue relates:	I support option 2 because market demand in Ballater is not for open market housing, but for affordable housing.
Modification sought by those submitting representation:	The CNPA should be looking at alternatives for development such as the old school, which sits empty.

Representation ref:	19
Body or person submitting a	William Yuile
representation:	
Provision of the Development Plan to	I do not support the preferred option (option
which the issue relates:	3 for Ballater). I support a variation of option
	2.
Modification sought by those submitting	The alternative scheme I would support
representation:	would is to focus on affordable housing only
	through identifying and allocating brown field
	and infill locations for building small number
	of affordable homes inside the existing
	village boundaries and identifying existing
	properties suitable for conversion.

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support option 3.
which the issue relates:	
Modification sought by those submitting	However, there should be an increase in the
representation:	percentage of affordable housing to between
	25-50%.

Representation ref:	23
Body or person submitting a	The Clouds Partnership
representation:	
Provision of the Development Plan to	Whilst we generally support the preferred
which the issue relates:	approach (option 3) we do not feel that the
	approach advocated, relying on those sites
	already in the Adopted Local Plans would be
	in compliance with the new National
	Government Guidance in PAN 2/2010, which
	changes the definition of "effectiveness" to
	be applied to Housing Land Audits and in
	identifying the five year supply in local plans.
	Providing continuity of land allocations to
	sites in existing Local Plans which have not
	been subject to a Planning Application within
	the previous five year period artificially
	constrains the land supply by continuing



	sites which have no realistic prospect of delivering housing numbers within the Plan period.
Modification sought by those submitting representation:	An alternative approach to consider could be along the lines of the following:
	"support the needs of communities by ensuring all main and other settlements have some options for future development. Review existing housing sites in Adopted Local Plans and assess their "effectiveness" against recently issued government guidance. Remove land allocations from non-effective land, or amend their phasing and allocate new effective sites for delivery in the short term. On these sites require a benchmark of 25% affordable housing unless a greater percentage is justified through the Housing Ned and Demand assessment."

Representation ref:	24
Body or person submitting a	Gordon Bulloch
representation:	
Provision of the Development Plan to which the issue relates:	There are some flaws in the preferred approach. Focusing new housing on those sites already in adopted Local Plans limits options and ability to react to changing circumstances.
	It is unclear what is meant by a 'benchmark' of 25% affordable.
Modification sought by those submitting representation:	The new Development Plan process should be used to question the allocations in the adopted Local Plan and look to see if other more appropriate sites should be included.

Representation ref:	26
Body or person submitting a representation:	Walkhighlands
Provision of the Development Plan to which the issue relates:	We do not support the preferred approach to housing development (option 3).
	Tourism is mainstay of the economy and of employment in the National Park and is dependent on the special qualities of the area. Visitors to the Park come here because the landscape and wildlife provide them with an experience that differs from their everyday life - and key to this is a sense of the more limited scale of the human elements compared to the natural environment found here. These special qualities would be greatly damaged by taking



	option 3.
	Housing developments already planned are excessive and in the long run will harm the tourist economy.
Modification sought by those submitting	With the Scottish Government
representation:	recommending use is not made of Section
	75 residency restrictions in planning
	applications, the only feasible option which
	would not damage the local economy (and
	the special qualities of the Park on which it
	depends) is to increase the percentage of
	affordable housing in developments, not
	decrease it as is suggested. This would be a
	move from option 1 towards option 2.

Representation ref:	27
Body or person submitting a	Frank Johnstone
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	28
Body or person submitting a	Alvie and Dalraddy Estates
representation:	
Provision of the Development Plan to which the issue relates:	The planning authority is exacerbating the housing problem with an assumption against housing in the countryside.
	By insisting on 25% of developments to be affordable homes, this pushes up the prices of the open market houses and makes the gap between affordable and market homes even wider.
Modification sought by those submitting representation:	The planning authority should not identify the location of housing developments, it should be more flexible in accepting locations chosen by the landowner to meet identified local needs.
	Taxation should be used to encourage supply of affordable housing. Presumption against developing in the countryside is hampering supply of affordable home. Holiday homes are forcing up prices.
	More effort should be put in to getting houses in to the rental market.



Representation ref:	30
Body or person submitting a	Jane Palmer
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	The housing should be affordable because of
representation:	the predominantly low income jobs in the
	part as indicated in the report.

Representation ref:	31
Body or person submitting a	Ballater and Crathie Community Council
representation:	
Provision of the Development Plan to which the issue relates:	We would support a variant on option 2.
	Option 2 focuses all new development on the provision of affordable housing by only identifying sites for 100% affordable housing and is a more appropriate approach to dealing with Ballater's affordable housing needs.
Modification sought by those submitting representation:	The uncertainty as to the number of affordable housing required necessitates a flexible approach.
	There is no need for open market housing at this time.
	Our investigations show that there is capacity within the existing settlement boundary for around 160 affordable homes, which would be adequate for the foreseeable future. The stock of affordable housing in Ballater could be sustainable over the long term if it remained affordable in perpetuity. Our preference would be for rented affordable housing in order to prevent "leakage" into the private sector.
	 Our own proposal for provision of affordable housing comprises: Focus on affordable housing only, Abandon BL/H1 as a development site Identify and allocate brown field and infill locations for building small numbers of affordable homes inside
	 the village boundary Identify existing properties potentially suitable for conversion to affordable housing



Representation ref:	32
Body or person submitting a	Christopher Roberts
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	33
Body or person submitting a representation:	Boat of Garten and Vicinity Community Council
Provision of the Development Plan to which the issue relates:	We strongly support the need for all communities to have some options for future development. Boat of Garten currently has no allocation for affordable housing.
Modification sought by those submitting representation:	The village must be made a special case for urgent housing development. We suggest the benchmark for affordable housing in any development should remain at 25-40%. Maintaining this option will encourage developers to consider the particular needs of an individual community, rather than trying to keep to the minimum. CNPA should support an increase in Council Housing and community led housing developments, as a means of providing social housing.

Representation ref:	34
Body or person submitting a representation:	Strathdee Properties Limited
Provision of the Development Plan to which the issue relates:	The preferred approach is more realistic as it allows for mainstream development in settlements and requires a proportion of these to be affordable.
	The housing information available to CNPA (from the Housing Needs and Demand Assessment) does not seem to offer a realistic view of housing need and is most likely an under-estimate.
	If a significant proportion of housing is sold as holiday homes this removes them from the housing supply available to local people.
Modification sought by those submitting representation:	We can see some issues in particular locations, such as Cromdale, where existing allocations have consents and agreed levels of affordable housing. Only future allocations can provide the right housing to meet local needs.

Consideration does have to be given to the impact that affordable housing can have on the viability of some developments and a flexible approach should be taken to assessing developments on a case by case basis.
It may be worth expanding the preferred option to allocate completely new housing sites over and above existing consents and Local Plan allocations to deliver affordable housing.

Representation ref:	38
Body or person submitting a	Janet Trythall
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	We have no comments on the options.
which the issue relates:	
Modification sought by those submitting	The location of affordable housing ideally
representation:	should not be considered in isolation from other key requirements such as affordable transport, employment opportunities and services. This more integrated assessment may give more scope for options and the working-up of proposals in a more holistic way.

Representation ref:	41
Body or person submitting a	Robert Moss
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	Action should be taken to prevent second
representation:	homes in or near the Park and to ensure that
	only affordable homes for people who
	genuinely work in the Park are built.



Representation ref:	42
Body or person submitting a	Jane O'Donnovan
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	All new build houses should have a
representation:	residency criteria creating a more
	sustainable stable population. Retirees need
	not be excluded from this criteria as this
	group are apt to create more jobs locally.

Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	44
Body or person submitting a	North East Mountain Trust
representation:	
Provision of the Development Plan to	We support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	45
Body or person submitting a	Robert Greenwood
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	Option 2 should be restricted to those with a
representation:	work/family connection to the area.

Representation ref:	46
Body or person submitting a	Blair Atholl and Struan Community
representation:	Council
Provision of the Development Plan to which the issue relates:	We generally support the preferred option (option 3).
Modification sought by those submitting representation:	In Blair Atholl, the main sites identified for housing in the current Local Plan are unsuitable in their current condition due to flooding risk.



Representation ref:	47
Body or person submitting a	RSPB Scotland
representation:	
Provision of the Development Plan to which the issue relates:	We disagree with all 3 options. We support the principle of a high percentage of housing being affordable housing.
Modification sought by those submitting representation:	Developments should be based on housing assessments and should be able to be accommodated without adverse impact on the special qualities of the Park.

Representation ref:	49
Body or person submitting a	Scottish Land and Estates
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	51
Body or person submitting a	Scottish Government Directorate for the
representation:	Built Environment, Historic Scotland and
	Transport Scotland
Provision of the Development Plan to	We are concerned that the MIR does not
which the issue relates:	give sufficient encouragement to flexibility and innovation in meeting the demand for both market and affordable housing, and are not at present persuaded that the indicative housing land allocations will provide for a generous supply of housing during the lifetime of the Plan. Furthermore, the figures presented in the MIR are unclear as to whether they are for need or for demand.
Modification sought by those submitting representation:	We expect the proposed Plan to allocate a generous supply of housing. We would work with you to ensure that the Plan makes sufficient provision for a range of sites to provide choice and flexibility across the Park area.

Representation ref:	52
Body or person submitting a	
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	House building within the Park should be
representation:	subject to a residency requirement, which
	would restrict the building of holiday homes.

Representation ref:	54
Body or person submitting a	
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	

Modification sought by those submitting	House building within the Park should be
representation:	subject to a residency requirement, which
	would restrict the building of holiday homes.

Representation ref:	55
Body or person submitting a	Katherine Carington-Smith
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	There should be a requirement for any
representation:	further house building to be primarily for
	those with strong local roots or those who
	need to move into the area for work
	purposes.

Representation ref:	56
Body or person submitting a	Dinnet and Kinford Estate
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	57
Body or person submitting a	Tulloch Homes Limited
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	There does not seem to be a clear
representation:	justification for the application of a
	requirement for 25% affordable development
	in all settlements - particularly where the MIR
	acknowledges that existing sites will more
	than meet the need for affordable housing.
	Since the MIR highlights that some of the
	need is not for housing that is considered
	affordable – the imposition of a 25%
	requirement seems excessive.

Representation ref:	58
Body or person submitting a	
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	House building within the Park should be
representation:	subject to a residency requirement, which
	would restrict the building of holiday homes.

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We support option 2.
which the issue relates:	
Modification sought by those submitting	The LDP should adopt a residency criteria,

representation:	whereby all new-build housing is reserved for
	those with a National Park connection.

Representation ref:	62
Body or person submitting a representation:	Roy Turnbull
Provision of the Development Plan to which the issue relates:	I do not support options 1 and 3, both of which would continue the unsustainable and damaging provision of large quantities of open market housing within the National Park.
Modification sought by those submitting representation:	

Representation ref:	64
Body or person submitting a representation:	The Muckrach Estate
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 3).
Modification sought by those submitting representation:	We believe that existing Local Plan allocations should only be brought forward to the Local Development Plan where they are shown to be effective.
	Housing policy in the forthcoming LDP should reflect the role of small scale housing development (1-5 units) in delivering local housing need and providing a mix of options for the local housing market.

Representation ref:	65
Body or person submitting a	Ballater Housing Partnership
representation:	
Provision of the Development Plan to	We do not support the preferred option
which the issue relates:	(option 3).
Modification sought by those submitting	We would support the direct identification of
representation:	land for affordable housing.

Representation ref:	70
Body or person submitting a representation:	The Crown Estate
Provision of the Development Plan to which the issue relates:	The title of this Issue as "Affordable Housing" is partly ambiguous and misleading. The Issue seems to relate to the housing spatial strategy for the Park, not just affordable housing. As such, some of the text within the options is unclear and ambiguous as to whether it relates to open market housing or affordable housing.
	We agree with the statement in Paragraph 8.2 recognising housing as a remaining important issue across the Park. With regard to the policy approach for affordable housing



	and the Device and the St
	within the Park, we support the recognition that affordable housing policy should be amended in line with the national benchmark instead of sitting above this level.
Modification sought by those submitting representation:	We would encourage a flexible affordable housing policy which accounts for the varying situation with housing development across the Park. In addition, we would seek to include a flexibility of approach to the delivery of different tenures of affordable housing, recognising that the traditional social landlord provision may not be viable in all circumstances. Policy should positively encourage housing development in all rural areas, in line with Scottish Planning Policy, and be flexible enough that the affordable element of a housing scheme does not render the development unviable. Delivery of development, and in particular housing for residents and workers within the Park is key in this economic climate.
	In terms of open market housing, it is important that policy does not restrict the deliverability of development. Focussing new housing on sites already adopted in Local Plans may restrict development which is viable in the Plan period. Additionally, there has been insufficient choice of development sites for settlements in Local Plan allocations, and carrying these forward without identifying further sites for potential development may stranglehold development in settlements where there is only one proposed development site. It is difficult to comment in detail on the proposed policy direction for affordable housing as the MIR is very broad and does not contain any details of key policies. As such, we would request that an interim consultation is carried out by CNPA prior to the publication of the Proposed Plan to allow interested parties to comment on more detailed proposals for affordable housing before they are set out in the Proposed Plan.

Representation ref:	71
Body or person submitting a	Dunachton Estate
representation:	
Provision of the Development Plan to	Some of the text within the options is unclear
which the issue relates:	and ambiguous as to whether it relates to
	open market housing or affordable housing.
Modification sought by those submitting	We would encourage a flexible affordable
representation:	housing policy which accounts for the



varying situation with housing development across the Park.
It is difficult to comment in detail on the proposed policy direction for affordable housing as the MIR is very broad and does not contain any details of key policies. As such, we would request that an interim consultation is carried out by CNPA prior to the publication of the Proposed Plan to allow interested parties to comment on more
detailed proposals for affordable housing
before they are set out in the Proposed Plan.

	72
Body or person submitting a	Helen Geddes
representation:	
Provision of the Development Plan to	Only houses required to provide a bank of
which the issue relates:	social housing stock should be built.
Modification sought by those submitting	Residential development should be small in
representation:	scale or limited to infill clusters of 1-4
	houses, and restricted to 'social' rather than
	'affordable' housing.

	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	76
Body or person submitting a	Jane Smith
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	77
Body or person submitting a	Invercauld Estate
representation:	
Provision of the Development Plan to	The preferred option states that sites in the
which the issue relates:	Local Plan should be required to provide a
	benchmark figure of 25% affordable housing.
Modification sought by those submitting	We consider that the affordable housing
representation:	policy should provide flexibility, and local
	circumstances and site specific issues
	should be taken in to consideration.



Representation ref:	78
Body or person submitting a	Scotia Homes Limited
representation:	
Provision of the Development Plan to	We support the preferred option (option 3)
which the issue relates:	subject to modification below.
Modification sought by those submitting representation:	We support this approach but consider that the Policy in the proposed LDP provides for further flexibility and the last sentence is replaced with wording similar to "A benchmark of 25% affordable housing will be sought as a target on sites, subject to a settlement based justification for such provision. The CNPA will work in partnership with the private sector to secure affordable housing, where this is viable, and will consider innovative and new models for its delivery. The provision of level entry housing or first time buyers housing as part of a mixed use sustainable development will be supported."

Representation ref:	79
Body or person submitting a representation:	Mar Estate
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 3).
	However, we see issues with particular locations, for example in Braemar it has been shown that the types of affordable housing being offered are not necessarily meeting local needs. This represents a core flaw in the in this option in specific locations, i.e. historic allocations/consents can't deal with future affordable housing requirements. This is something that only future allocations and respective planning applications can achieve.
Modification sought by those submitting representation:	The preferred option could be expanded to allocate completely new housing sites over and above existing consents and Local Plan allocations, therefore meeting housing needs in a more flexible manner.

Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We support option 2.
which the issue relates:	
Modification sought by those submitting representation:	We firmly believe that only the adoption of residency criteria, whereby all new-build housing is reserved for those with a national Park connection will enable the CNPA to remain within the bounds of the four aims of the Park.



Representation ref:	81
Body or person submitting a	Alison Day
representation:	
Provision of the Development Plan to	I partly support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	82
Body or person submitting a	A M Walker
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	There should be a number of small
representation:	developments of around 15-20 houses.

Representation ref:	83
Body or person submitting a	Allan Bantick
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	84
Body or person submitting a	Grantown-on-Spey and Vicinity
representation:	Community Council
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	Only zone land with a low wildlife/landscape
representation:	value.

Representation ref:	87
Body or person submitting a	Scottish Campaign for National Parks
representation:	
Provision of the Development Plan to which the issue relates:	We believe that the vast majority of new housing should address the need for affordable homes.
Modification sought by those submitting representation:	

Representation ref:	89
Body or person submitting a representation:	Laura Cannicott
Provision of the Development Plan to which the issue relates:	I support the proposal for small housing developments within the community for locals living and working in the Park area.
Modification sought by those submitting representation:	



Representation ref:	90
Body or person submitting a representation:	Victor Jordan
Provision of the Development Plan to which the issue relates:	I partly support option 2.
Modification sought by those submitting representation:	Sites should be allocated specifically for wholly or mainly affordable housing according to local need. This would mean that land would not be developed unless and until a social landlord or other body had the funds to buy the land for affordable housing and subsequently build the houses.

Representation ref:	93
Body or person submitting a	Ballater Royal Deeside Limited
representation:	
Provision of the Development Plan to	We support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	95
Body or person submitting a	Susan Matthews
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	97
Body or person submitting a	Keith Miller
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	98
Body or person submitting a	Moira Richards
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	104
Body or person submitting a	Phillip J Swan
representation:	
Provision of the Development Plan to	I would support a variant on option 2.
which the issue relates:	
Modification sought by those submitting	A more innovative approach to the funding of
representation:	affordable housing is needed.



Representation ref:	107
Body or person submitting a	Bryan Wright
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	108
Body or person submitting a	Sheila Potter
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Do not tack on urban suburbs to rural
representation:	villages. If possible use brownfield sites
	including abandoned farm buildings. Do not
	build on wild or agricultural land.

Representation ref:	110
Body or person submitting a	Perth and Kinross Council
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	111
Body or person submitting a	Angus Council
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	112
Body or person submitting a representation:	Christopher Carter
Provision of the Development Plan to which the issue relates:	It is illogical that a settlement must have 70- 80 houses built, in order to get the 20 affordable houses it actually needs. This arrangement is completely inappropriate in a National Park.
Modification sought by those submitting representation:	In the National Park, in particular, there should be a policy which ensures that, whilst a very small number of market value houses might be permitted, affordable housing should only be let or sold either to existing residents of the Park (with priority to local residents) or to people who are moving into the Park because they have work within it.



Representation ref:	114
Body or person submitting a	Laggan Community Association
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	No planning condition should inhibit the
representation:	building of houses for local families.
	No areas should be zoned for housing
	developments.



Issue 5: Spatial Strategy

How and where should development happen in the National Park?	
Options	Implications
Option 1 – the preferred approach	
Clarify the settlement hierarchy so communities are clear what they are likely to see in the future. This would include land for housing and economic investment. Clarify what is anticipated in rural communities outwith identified settlements.	 Focuses development on areas most suitable to accommodate it. Gives a sustainable approach to the development of housing and economic development. Shows sites that have planning permission already. Provides for ad hoc development outside the settlement hierarchy to meet local need. Maintains the status quo – follows the spatial strategy set out in the adopted Local Plan. Does not raise unrealistic expectations on alternatives which are not deliverable.
Question 5	

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us set out a reasonable spatial strategy for the future?



Reference	Respondent's Name
13	Rodger Builders
14	William Grant
16	Mountaineering Council of Scotland
21	Roger Tozer
23	The Clouds Partnership
24	Gordon Bulloch
28	Alvie and Dalraddy Estates
31	Ballater and Crathie Community Council
34	Strathdee Properties Limited
40	Scottish Natural Heritage
43	The Highland Council
44	North East Mountain Trust
46	Blair Atholl and Struan Community Council
47	RSPB Scotland
49	Scottish Land and Estates
52	
54	
57	Tulloch Homes Group Limited
58	
60	Forest Holidays LLP
61	The Cairngorm Campaign and The Scottish Wild Land Group
63	SEPA (Scottish Environment Protection Agency
67	Forest Enterprise Scotland
74	Tactran
75	MacDonald Aviemore Highland Resort Limited
78	Scotia Homes Limited
79	Mar Estate
80	Badenoch and Strathspey Conservation Group
84	Grantown-on-Spey and Vicinity Community Council
87	Scottish Campaign for National Parks
90	Victor Jordan
96	Strathspey Railway Company and Trust
104	P Swan
111	Angus Council
114	Laggan Community Association



Representation ref:	13
Body or person submitting a	Rodger Builders
representation:	
Provision of the Development Plan to which the issue relates:	We agree with the generality of the spatial strategy which focuses development in settlements such Carr-Bridge.
Modification sought by those submitting representation:	

Representation ref:	14
Body or person submitting a	William Grant
representation:	
Provision of the Development Plan to	We agree with the generality of the spatial
which the issue relates:	strategy which focuses development in
	settlements such as Boat of Garten, near
	Drumuillie. Moreover, we support the
	suggested action to "Clarify what is
	anticipated in rural communities outwith
	identified settlements."
Modification sought by those submitting	Whilst we consider Site A complies with
representation:	current Adopted Local Plan Policy 21, a
	more flexible approach is required to enable
	Site B and, in this context, we support this
	review and recognise the potential for
	additional "ad hoc development outside the
	settlement hierarchy to meet local need".
	This presumably would operate on a site-by-
	site basis, and be determined on the specific
	circumstances pertaining to the relationship
	between sites and existing
	groupings/hamlets, such as Drumuillie.
	We therefore recommend that existing Policy
	21 be altered or replaced to create sufficient
	flexibility to achieve the aims of Issue 5,
	option 1.

Representation ref:	16
Body or person submitting a	Mountaineering Council of Scotland
representation:	
Provision of the Development Plan to	We support the preferred option but with the
which the issue relates:	exception of An Camas Mor.
Modification sought by those submitting	An alternative should be found to the
representation:	development at An Camas Mor.

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	23
Body or person submitting a	The Clouds Partnership
representation:	
Provision of the Development Plan to	Whilst we would broadly support the
which the issue relates:	preferred option we were disappointed to
	note that there is no reasonable alternative
	to this put forward for consideration.
Modification sought by those submitting	We also support the identification of sites
representation:	covering a 20 year period (in three phases 1-
	5 years, 6-11 years and 12-20 years),
	however, object to the sites identified.

Representation ref:	24
Body or person submitting a	Gordon Bulloch
representation:	
Provision of the Development Plan to	The preferred option on spatial strategy is in
which the issue relates:	the main the appropriate way forward.
Modification sought by those submitting	The opportunity should be taken within the
representation:	Development Plan process to properly
	review sites allocated for housing rather than
	simply justifying the existing allocations.

Representation ref:	28
Body or person submitting a	Alvie & Dalmaddy Estates
representation:	
Provision of the Development Plan to	We do not agree with the preferred option.
which the issue relates:	
	We welcome the development of a proposed new settlement at An Camas Mòr, to take pressure off further development of our existing settlements. However, we question whether there is sufficient demand from those seeking work within the immediate locality.
	Presumption against building houses in the countryside is destroying the character of existing settlements by increasing their size. Developers don't build houses which are affordable to local people.
Modification sought by those submitting representation:	Build small collections of houses in the countryside which use local water and sewerage systems and which require no new roads.
	There needs to be a greater emphasis on housing residents closer to their place of work and reopening railway stations for local commuting traffic.



Representation ref:	31
Body or person submitting a	Ballater and Crathie Community Council
representation:	
Provision of the Development Plan to	We do not support the preferred option. We
which the issue relates:	do not agree that Ballater should be a
	strategic settlement where significant growth
	could be focused.
Modification sought by those submitting	Ballater should not be a strategic settlement.
representation:	, , , , , , , , , , , , , , , , , , ,

Representation ref:	34
Body or person submitting a representation:	Strathdee Properties Limited
Provision of the Development Plan to which the issue relates:	We generally support the preferred option.
Modification sought by those submitting representation:	The role and hierarchy of each settlement should be clearly identified in the spatial strategy and this should be followed by appropriate development allocations. In the case where sites with existing consents have not been developed for a number of years, consideration should be given to the allocation of additional sites being promoted by willing developers that can be developed though a realistic approach.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	We support the preferred option to continue
which the issue relates:	with the approach of the current Local Plan.
Modification sought by those submitting	
representation:	

Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	44
Body or person submitting a	North East Mountain Trust
representation:	
Provision of the Development Plan to	We generally support the preferred option.
which the issue relates:	
Modification sought by those submitting	There should be no presumption that more
representation:	development is all that matters.



Representation ref:	46
Body or person submitting a	Blair Atholl and Struan Community
representation:	Council
Provision of the Development Plan to	We support the proposed option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	47
Body or person submitting a	RSPB Scotland
representation:	
Provision of the Development Plan to	We see no realistic alternative to the one
which the issue relates:	option proposed.
Modification sought by those submitting	Clarify the settlement hierarchy so
representation:	communities are clear what development
	they are likely to see in the future and where
	it will be located.

Representation ref:	49
Body or person submitting a	Scottish Land and Estates
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	52
Body or person submitting a	
representation:	
Provision of the Development Plan to	I do not agree there are no realistic
which the issue relates:	alternatives to the option proposed.
Modification sought by those submitting	An innovative approach to land use should
representation:	be adopted.

Representation ref:	54
Body or person submitting a	
representation:	
Provision of the Development Plan to	I do not agree there are no realistic
which the issue relates:	alternatives to the option proposed.
Modification sought by those submitting	An innovative approach to land use should
representation:	be adopted.

Representation ref:	58
Body or person submitting a	
representation:	
Provision of the Development Plan to	I do not agree there are no realistic
which the issue relates:	alternatives to the option proposed.
Modification sought by those submitting	An innovative approach to land use should
representation:	be adopted.



Representation ref:	57
Body or person submitting a	Tulloch Homes Group Limited
representation:	
Provision of the Development Plan to	This spatial strategy is the one best able to
which the issue relates:	absorb the bulk of future development need
	and is therefore the most appropriate
	approach to take towards development.
Modification sought by those submitting	It is submitted that the Authority include
representation:	within their calculations (in terms of housing
	projections), which at present are based on
	housing consents already obtained, those
	applications which to date have not yet
	received consent.

Representation ref:	60
Body or person submitting a	Forest Holidays LLP
representation:	
Provision of the Development Plan to	We support the preferred approach.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We do not support the preferred approach.
which the issue relates:	We accept the need for a settlement
	hierarchy and that very nearly all
	development should occur within settlement
	boundaries.
Modification sought by those submitting	Option 1 should include a provision for
representation:	making the settlement boundaries
	permanent.

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	We note that there is no indication within the
representation:	MIR of any additional allocations for essential infrastructure such as new water treatment works, the A9 dualling, fire stations nursing homes, schools, cemeteries etc. We strongly recommend that all types of development should be identified in the LDP maps wherever possible after thorough site analysis.



Representation ref:	67
Body or person submitting a	Forest Enterprise Scotland
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	75
Body or person submitting a	MacDonald Aviemore Highland Resort
representation:	Limited
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting representation:	More emphasis should be placed on supporting existing business and ongoing investment in these businesses.
	MIR maps for the identified settlements do not show settlement boundaries. T his is an important omission as settlement boundaries will determine what policy zonings apply to certain sites.

Representation ref:	78
Body or person submitting a	Scotia Homes Limited
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	79
Body or person submitting a	Mar Estate
representation:	
Provision of the Development Plan to	We generally support the preferred option.
which the issue relates:	
Modification sought by those submitting	The Plan focuses very much on the Western
representation:	side of the Park. The Eastern area of the
	Park requires a specific strategy to improve
	its attractiveness as a location to live, work
	and visit.



Representation ref:	80
Body or person submitting a	Badenoch & Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	Settlement boundaries should be
representation:	permanently established

Representation ref:	84
Body or person submitting a	Grantown-on-Spey and Vicinity
representation:	Community Council
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	87
Body or person submitting a	Scottish Campaign for National Parks
representation:	
Provision of the Development Plan to	We do not agree that there are no realistic
which the issue relates:	alternatives to the preferred option.
Modification sought by those submitting	An Camas Mòr should not be a development
representation:	site and the settlement strategy should be
	adjusted to reflect this.

Representation ref:	90
Body or person submitting a	Victor Jordan
representation:	
Provision of the Development Plan to	I do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	96
Body or person submitting a	Strathspey Railway Company and Trust
representation:	
Provision of the Development Plan to which the issue relates:	The railway should be used to contribute to tourist and economic development in Grantown, Aviemore, and Boat of Garten directly, as well as indirectly in Nethy Bridge and Tomintoul.
Modification sought by those submitting representation:	Recognise the role of the railway in the contribution to tourist and economic development in these towns.



Representation ref:	104
Body or person submitting a	P Swan
representation:	
Provision of the Development Plan to	I do not support the preferred option. I do not
which the issue relates:	agree with Ballater as a strategic settlement
	where significant growth could be focused.
Modification sought by those submitting	Ballater should not be a strategic settlement.
representation:	

Representation ref:	111
Body or person submitting a	Angus Council
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	114
Body or person submitting a	Laggan Community Association
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	No zoning at all.
representation:	
	The placement of houses already present
	should be maintained i.e. dispersed
	settlements.



Issue 5 Spatial Strategy: An Camas Mòr

What are the options for growth in An Camas Mòr?

Preferred Option

- Use the land with an existing permission (pending completion of legal agreement) to provide opportunities for housing and economic growth.
- Use the Development Principles to guide a masterplan for the whole settlement.

Question 6

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the long-term growth demands in An Cams Mòr for the next 20 years?

Reference	Respondent's Name
16	The Mountaineering Council of Scotland
18	Scottish Wildlife Trust
21	Roger Tozer
23	The Clouds Partnership
28	Alvie and Dalraddy Estates
40	Scottish Natural Heritage
44	North East Mountain Trust
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
52	
54	
58	
61	The Cairngorm Campaign and The Scottish Wild Land Group
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
80	Badenoch and Strathspey Conservation Group
87	Scottish Campaign for National Parks
89	Laura Cannicott
95	Susan Matthews
97	Keith Miller



Representation ref:	16
Body or person submitting a	The Mountaineering Council of Scotland
representation:	
Provision of the Development Plan to	We do not support the preferred option. We
which the issue relates:	support the organic growth of existing
	settlements rather than new villages/towns.
	We do not consider An Camas Mòr as a
	necessary or desirable approach to
	addressing the housing need in the Park. It
	will have a negative impact on the landscape
	of the area.
Modification sought by those submitting	An Camas Mor should be removed from the
representation:	settlement hierarchy. The necessary
	housing allocation should be found through
	developing the existing settlements.

Representation ref:	18
Body or person submitting a	Scottish Wildlife Trust
representation:	
Provision of the Development Plan to	We do not support the preferred option. We
which the issue relates:	believe the development is in the wrong
	location, given the significant loss of
	heathland habitat that will occur and the
	impact on species present including Scottish
	wildcat and black grouse.
Modification sought by those submitting	If the development does go ahead, it is
representation:	essential that there are sustainable transport
	connections to Aviemore town centre across
	the river. A 'green bridge' should be a
	requirement of the development proposal.

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	What is meant by 'creating a
which the issue relates:	demographically balanced resident
	population'?
Modification sought by those submitting	This statement needs to be amended unless
representation:	there is a legal method of creating such a
	balanced population.

Representation ref:	23
Body or person submitting a	The Clouds Partnership
representation:	
Provision of the Development Plan to	We object to the proposed continuation of An
which the issue relates:	Camas Mor to the new LDP in light of court
	proceedings. We are disappointed that the
	NPA have not suggested any reasonable
	alternatives. This could impact on the
	provision of a five year effective land supply.
	We question the description of the
	development as "mixed use/sustainable
	community," as the plans show no element
	of anything which could be described in



	these terms. We also question, firstly, the figure of 1500 dwellings, when it appears from analysis of the plans that the expectations is that over
	2000 will be built over a 20 year period, and, secondly, whether it is possible to deliver the numbers of houses in current market conditions.
Modification sought by those submitting representation:	We suggest that the land at Kinakyle discussed by the Reporters at the recent Local Plan Examination is a suitable option for the purposes of a mixed development of the size envisaged for An Camas Mòr. A build and planning timetable estimate is provided.

Representation ref:	28
Body or person submitting a representation:	Alvie & Dalraddy Estates
Provision of the Development Plan to which the issue relates:	We welcome the development of a proposed new settlement to take the pressure off further development of our existing settlements. Building a new settlement is an acceptable solution to the increased demand for speculative housing caused by the promotion of the Park as a desirable place to live.
	We question whether there is sufficient demand from those seeking work within the immediate locality.
Modification sought by those submitting representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	We note the proposed allocation.
which the issue relates:	
Modification sought by those submitting	Natural heritage issues should be taken
representation:	forward through the master-planning for this
	area, including Habitats Regulations
	Appraisal.
	The LDP should include any pedestrian/cycle
	link bridge to Aviemore, which should be
	assessed as part of the HRA.
	There is a need for a good network of
	suitable paths to be built into the
	development as this area isn't well covered
	by the current core paths plan. Good local
	path networks could also be beneficial to



	avoid increases in people walking dogs and disturbing Capercaillie in the nearby Cairngorms and Abernethy Forest SPAs.
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Representation ref:	44
Body or person submitting a	North East Mountain Trust
representation:	
Provision of the Development Plan to which the issue relates:	An Camas Mòr is fundamentally wrong in concept. The Park does not need a large- scale new town in such a prominent and central location. This might be appropriate for the development of an area of lesser conservation importance outside the Park and with already good transport connections (to limit further traffic). Development of the existing centres, to improve services and Park-friendly "ambience", is one thing; building a whole new urban area within the Park is another. If more emphasis was placed on needed affordable housing and less on full-price housing wanted only as "positional goods" by the relatively wealthy and economically inactive, there would no need for An Camas Mòr.
Modification sought by those submitting representation:	

Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
Provision of the Development Plan to which the issue relates:	
Modification sought by those submitting representation:	Any development should take in to consideration proximity to monument known as Rothiemurchus.

Representation ref:	52
Body or person submitting a	
representation:	
Provision of the Development Plan to	I do not support the preferred option. The
which the issue relates:	proposed development at An Camas Mor is
	unsustainable.
Modification sought by those submitting	Remove An Camas Mor as a development
representation:	site.



Representation ref:	54
Body or person submitting a	
representation:	
Provision of the Development Plan to	I do not support the preferred option. The
which the issue relates:	proposed development at An Camas Mor is
	unsustainable.
Modification sought by those submitting	Remove An Camas Mor as a development
representation:	site.

Representation ref:	58
Body or person submitting a	
representation:	
Provision of the Development Plan to	I do not support the preferred option. The
which the issue relates:	proposed development at An Camas Mor is unsustainable.
Modification sought by those submitting representation:	Remove An Camas Mor as a development site.

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We do not support the preferred option. We
which the issue relates:	object to all housing allocations with An
	Camas Mor because of its conflict with all
	four aims of the National Park.
Modification sought by those submitting	Remove An Camas Mor as a development
representation:	site.

Representation ref:	63
Body or person submitting a representation:	SEPA (Scottish Environment Protection Agency)
Provision of the Development Plan to which the issue relates:	We support the preferred option.
Modification sought by those submitting representation:	We are disappointed to note that no mention of the potential flood risk constraint to this preferred option has been included in the Background Evidence Report 4, section 3. It should be noted that we have assessed site 058d as Red in terms of flood risk and are likely to object in principle to any planning application for housing on this site as the majority of the site is within the 1 in 200 fluvial flood extent of the River Druie.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	Remove An Camas Mor as a development
representation:	site.
Representation ref:	87
Body or person submitting a	Scottish Campaign for National Parks
representation:	
Provision of the Development Plan to	We do not support the preferred option. The
which the issue relates:	proposed development at An Camas Mor is
	a flawed concept.
Modification sought by those submitting	Remove An Camas Mor as a development
representation:	site.

Representation ref:	89
Body or person submitting a	Laura Cannicott
representation:	
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	Remove An Camas Mor as a development
representation:	site.

Representation ref:	95
Body or person submitting a	Susan Matthews
representation:	
Provision of the Development Plan to	I do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	I would support development of a masterplan
representation:	that clearly shows what this development
	would look like, and how, in detail, it supports
	the outcomes in the Park Plan.

Representation ref:	97
Body or person submitting a	Keith Miller
representation:	
Provision of the Development Plan to	I do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	This development should be abandoned, or
representation:	should only proceed with 100% affordable
	housing.



Issue 5 Spatial Strategy: Aviemore

What are the options for growth in Aviemore?

Preferred Option

- Use the land with an existing permission to provide opportunities for housing.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.
- Identify no additional land.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Aviemore?

Reference	Respondent's Name
21	Roger Tozer
23	The Clouds Partnership
40	Scottish Natural Heritage
43	The Highland Council
57	Tulloch Homes Limited
61	The Cairngorm Campaign and The Scottish Wild Land Group
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
75	MacDonald Aviemore Highland Resort Limited
80	Badenoch and Strathspey Conservation Group



Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	23
Body or person submitting a	The Clouds Partnership
representation:	
Provision of the Development Plan to which the issue relates:	We object to the proposed spatial strategy for Aviemore. We find it disappointing that there are no reasonable alternatives put forward for the growth of Aviemore.
	The preferred option of continuing land with existing planning permission and identified in the current Local Plan whilst identifying no new land, to provide opportunities for economic growth, does not comply with the government guidance set out in PAN2/2010. In particular that part relating to Housing Land Audits and "effectiveness" of the housing land supply.
	Sites should not be persisted with which have achieved nothing except secure planning consent.
Modification sought by those submitting representation:	We feel that an alternative (as set out above) should have been considered in the SEA and put forward as an option for growth of Aviemore to the south to receive peoples' views, especially with the court proceedings over An Camas Mor potentially impacting on the delivery of housing in the area.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We note that the proposed new Tesco site is
representation:	not identified. The site is adjacent to the
	Aviemore Burn, which flows into the River
	Spey SAC, and therefore any residual effects
	should be included as part of the in-
	combination assessment within the Habitats
	Regulations Appraisal of the Plan.



Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	57
Body or person submitting a	Tulloch Homes Group Limited
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	The Plan of the site boundaries is inaccurate.
representation:	This should be amended.

Representation ref:	61
Body or person submitting a representation:	The Cairngorm Campaign and The Scottish Wild Land Group
Provision of the Development Plan to which the issue relates:	We do not support the preferred option.
Modification sought by those submitting representation:	We consider the MIR provides for too much housing and development at the expense of valuable countryside.

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with the allocations are highlighted in the
·	LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	75
Body or person submitting a	MacDonald Aviemore Highland Resort
representation:	Limited
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We do not support the preferred option. We
which the issue relates:	do not consider that the CNP LDP provides
	the right amount of growth in Aviemore. We
	consider it provides for far too much housing
	and built development at the expense of
	valuable countryside.
Modification sought by those submitting	In a "Park for all" the CNPA should be
representation:	prioritising the retention of areas which are
	wild and natural within communities like
	Aviemore, so that people can experience
	relatively natural, unspoilt areas, getting
	away from it all and quiet solitude close to
	their homes, so that this experience is not
	only for those who can get to the more
	remote parts of the Park.



Issue 5 Spatial Strategy: Ballater

What are the options for growth in Ballater?

Preferred Option

- Use the land identified in the current Local Plan to provide opportunities for housing and economic growth.
- Identify no additional land.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Ballater?

Reference	Respondent's Name
5	Susan John
11	C. Moffat
12	Ann Moffat
17	William Houston
19	William Yuille
21	Roger Tozer
31	Ballater and Crathie Community Council
39	Gillian Sinclair
40	Scottish Natural Heritage
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
63	SEPA (Scottish Environment Protection Agency)
65	Ballater Housing Partnership
74	Tactran
77	Invercauld Estate
78	Scotia Homes Limited
81	Alison Day
86	Aberdeenshire Council
90	Victor Jordan
92	Jane Angus
93	Ballater Royal Deeside Limited
94	Mrs Harvey
95	Susan Matthews
102	Invercauld Estate
104	Phillip Swan
107	Bryan Wright
108	Sheila Potter
109	R J Searle
113	Neil R Williams

Representation ref:	5
Body or person submitting a	Susan John
representation:	
Provision of the Development Plan to	New housing proposed near Monaltrie Park
which the issue relates:	will alter the view up the fields and the Dee
	valley.
Modification sought by those submitting	A new venue for the highland games should
representation:	be considered (either down the valley or at
	the field just past Invermuick, on the south
	bank of the Dee), which is a natural arena.

Representation ref:	11
Body or person submitting a	C Moffat
representation:	
Provision of the Development Plan to which the issue relates:	People in Ballater are dependent on the tourist industry, which means there are many low paid jobs, requiring people to often take on several jobs. How are people to afford housing?
	The removal of arable soil associated with proposed developments in Ballater will have far reaching negative consequences.
Modification sought by those submitting representation:	

Representation ref:	12
Body or person submitting a representation:	Ann Moffat
Provision of the Development Plan to which the issue relates:	There are not enough jobs in Ballater to support the kind of new housing developments proposed. Nor is there sufficient infrastructure, for e.g. schools, to accommodate such development.
Modification sought by those submitting representation:	

Representation ref:	17
Body or person submitting a	William Houston
representation:	
Provision of the Development Plan to	Market demand in Ballater is for affordable
which the issue relates:	housing. There should be an explanation of
	why Ballater is considered a strategic
	settlement.
Modification sought by those submitting	
representation:	



Representation ref:	19
Body or person submitting a	William Yuile
representation:	
Provision of the Development Plan to	I do not support the preferred option for
which the issue relates:	Ballater. Abandon entirely the development
	of BL/H1 which is unnecessary and likely to
	lead to the destruction of the established
	village ethos and culture.
Modification sought by those submitting	The alternative scheme I would support is to
representation:	focus on affordable housing only through
	identifying and allocating brown field and infill
	locations for building small numbers of
	affordable homes inside the existing village
	boundaries and identify existing properties
	for conversion.

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	31
Body or person submitting a	Ballater and Crathie Community Council
representation:	
Provision of the Development Plan to	Local opinion is opposed to significant
which the issue relates:	growth in Ballater, e.g. by the development of BL/H1 (Monaltrie Park)
	 Housing development beyond Monaltrie Park will lead to alienation of its residents from the existing community. Monaltrie Park must not become landlocked by housing development but allowed to expand as needed to accommodate additional recreation facilities, especially for young people, Climate change may result in the reclassification of the farm land at BL/H1 from class 3.2 to class 3.1 at which level of quality there is a presumption against development
Modification sought by those submitting	New housing, if it were justified in numbers
representation:	beyond the capacity of the other sites we
	have identified for affordable housing, would be better located in side and close to the
	entrance to Monaltrie Park and be
	progressively "topped up" over the very long
	term by further development if Ballater
	decides that it wants to expand physically.
	Monaltrie Park's north eastern boundary
	could be "elastic" moving out as needed to

accommodate new recreational facilities.
The only thing that would need to move in an
expansion scenario is the south western
boundary of Monaltrie Park and maybe some
of the recreation facilities.

Representation ref:	39
Body or person submitting a representation:	Gillian Sinclair
Provision of the Development Plan to which the issue relates:	We don't think that the land allocated in the current Local Plan will provide opportunities for housing or meet the demand for housing need in the short term and therefore it would be appropriate to identify other land to meet the need.
	We are aware that H1 has been on the cards for a long time and by all indications will still be a long time before anything starts. There is a need now to meet a local demand which H1 doesn't.
Modification sought by those submitting representation:	Provide land which meets the local need.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting representation:	The Habitats Regulations Appraisal of the Plan should assess implications of development of this site on the River Dee SAC in terms of water supply and waste water discharge. This assessment should include an in-combination appraisal, both with other proposals in this Plan and with other proposals in the Aberdeenshire & Aberdeen City LDP/SDP.

Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
Provision of the Development Plan to which the issue relates:	Land allocations may affect the setting of category B and C(S) listed buildings at Ballater. CNP should ensure any development coming forward in these locations is considered in line with its listed buildings policy.
Modification sought by those submitting representation:	



Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.

Representation ref:	65
Body or person submitting a	Ballater Housing Partnership
representation:	
Provision of the Development Plan to which the issue relates:	We do not support the preferred option. The option does not meet the local housing need. Discussions with Scotia have shown that site H1 will not have houses on it for a number of years. The site size limits smaller building firms from participating. Economic development could be stimulated by supporting smaller sites with a drive effort to provide affordable housing.
Modification sought by those submitting representation:	

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	77
Body or person submitting a	Invercauld Estate
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	78
Body or person submitting a	Scotia Homes Limited
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	81
Body or person submitting a	Alison Day
representation:	
Provision of the Development Plan to	I do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	Land identified as suitable for development
representation:	should be removed from this classification.

Representation ref:	86
Body or person submitting a	Aberdeenshire Council
representation:	
Provision of the Development Plan to which the issue relates:	We are concerned that the focus in the preferred on one development site in Ballater may not allow choice or any insurance against the site not coming forward.
Modification sought by those submitting representation:	A second site should be identified as a potential substitute. Additional employment land allocations must be included to provide continuity of employment land provision in the settlement.

Representation ref:	90
Body or person submitting a	Victor Jordan
representation:	
Provision of the Development Plan to	I do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	The Development Plan should be used to
representation:	concentrate on providing housing to meet the
	needs of the community and in accordance
	with a long term sustainable settlement
	strategy for Ballater and its surrounding
	areas. The main need is affordable housing
	for rent.

Representation ref:	92
Body or person submitting a	Jane Angus
representation:	
Provision of the Development Plan to	I do not support the preferred approach.
which the issue relates:	
Modification sought by those submitting	The area marked for housing must be
representation:	marked as the car/bus Park, including that
	for Monaltrie Park and the games,
	commercial, retail, with the possibility of flats
	above, possibly a hotel and provision made
	for at least one block of flats.



Representation ref:	93
Body or person submitting a	Ballater Royal Deeside Limited
representation:	
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	The land to the northeast of Ballater should
representation:	be used for recreation, leisure and
	environmental facilities, plus some affordable
	housing.

Representation ref:	94
Body or person submitting a	Mrs Harvey
representation:	
Provision of the Development Plan to	I do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	There should be more affordable housing
representation:	especially for older people and some support
	for young people.

Representation ref:	95
Body or person submitting a	Susan Matthews
representation:	
Provision of the Development Plan to	I do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	First attention should be given to 'infill sites'
representation:	in the existing settlement for affordable
	housing for local people.

Representation ref:	102
Body or person submitting a	Invercauld Estate
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	The site at 004 (Culsh Farm, Ballater) should
representation:	be included for tourism development.

Representation ref:	104
Body or person submitting a	Phillip Swan
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	There should be no provision for market
representation:	housing in Ballater.
	There should be a focus on affordable
	housing only. Site BL/H1 should be
	abandoned as a development site. Brown
	field and infill locations should be identified
	and allocated for small numbers of affordable
	homes inside the village. Existing properties
	should be identified for affordable housing.



Representation ref:	107	
Body or person submitting a	Bryan Wright	
representation:		
Provision of the Development Plan to		
which the issue relates:		
Modification sought by those submitting	Further open market housing is not required.	
representation:	Site to NE should be used for recreation and	
	affordable housing.	

Representation ref:	108	
Body or person submitting a	Sheila Potter	
representation:		
Provision of the Development Plan to	I support the preferred option.	
which the issue relates:		
Modification sought by those submitting	There is a need to protect views from Tullich	
representation:	Bridge over the village to Lochnagar.	

Representation ref:	109
Body or person submitting a	R J Searle
representation:	
Provision of the Development Plan to	It is difficult to quarrel with any of these
which the issue relates:	options, though this is a wish list without any
	indication of how all these worthy aims are to
	be achieved.
Modification sought by those submitting	
representation:	

Representation ref:	113
Body or person submitting a	Neil R Williams
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	The farmland on the outskirts of Ballater
representation:	called Glascorrie should be zoned for
	development.



Issue 5 Spatial Strategy: Grantown-on-Spey

What are the options for growth in Grantown-on-Spey?

Preferred Option

- Use the land identified in the current Local Plan to provide opportunities for housing and economic growth.
- Identify no additional land.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Grantown-on-Spey?

Reference	Respondent's Name
21	Roger Tozer
24	Gordon Bulloch
35	Reidhaven Estate
40	Scottish Natural Heritage
43	The Highland Council
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
61	The Cairngorm Campaign and the Scottish Wild Land Group
63	SEPA (Scottish Environment Protection Agency)
73	Lorna O'Connell
74	Tactran
80	Badenoch and Strathspey Conservation Group
84	Grantown-on-Spey and Vicinity Community Council



Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	24
Body or person submitting a	Gordon Bulloch
representation:	
Provision of the Development Plan to	I do not support the preferred option.
which the issue relates:	
Modification sought by those submitting representation:	Include some of the infill sites with planning permission or for which planning applications may be developed. These sites strategically could be best developed for affordable housing or at least housing suitable for first time buyers.

Representation ref:	35	
Body or person submitting a	Reidhaven Estate	
representation:		
Provision of the Development Plan to	Allocating only one site in the village is	
which the issue relates:	inadequate.	
Modification sought by those submitting	It is recommended that other sites are	
representation:	allocated for medium term use and to allow	
	flexibility – in particular in those areas put	
	forward by the Estate in May 2012.	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We are aware that the Strathspey Railway is
representation:	aiming to extend the railway line to
	Grantown-on-Spey, and we would query if
	one or more of the proposed sites for a
	railway station should be included in the
	proposed allocations.

Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We feel there may be challenges to
which the issue relates:	delivering housing with the preferred option,
	given the extent of the need for affordable
	housing, the lack of affordable housing
	development in the last ten year and the
	difficulties experienced (by the Council) in
	land and site issues in Grantown.
Modification sought by those submitting	There is a need for more options for housing
representation:	land to be identified (ideally encompassing a



	nt owners) and for the tlement boundary to be this.
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Representation ref:	51
Body or person submitting a	Scottish Government Directorate for the
representation:	Built Environment, Historic Scotland and
	Transport Scotland
Provision of the Development Plan to	The effect of Achnaganolin Industrial Estate
which the issue relates:	needs to be understood to establish the
	effect on the strategic transport network.
Modification sought by those submitting	
representation:	

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to which the issue relates:	We do not support the preferred option - except in so far as it identifies no additional development land.
Modification sought by those submitting representation:	

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.

Representation ref:	73
Body or person submitting a	Lorna O'Connell
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	An area of land allocated for economic
representation:	development should be removed and not
	identified for any particular purpose.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	80
Body or person submitting a	Badenoch and Strathspey and
representation:	Conservation Group
Provision of the Development Plan to which the issue relates:	We do not support the preferred option except in so far as it identifies no additional
	development land.
Modification sought by those submitting representation:	

Representation ref:	84
Body or person submitting a	Grantown-on-Spey and Vicinity
representation:	Community Council
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	Zone the field south east of Dulicit Bridge
representation:	and former track-bed, for Strathspey railway
	extension and station complex.



Issue 5 Spatial Strategy: Kingussie

What are the options for growth in Kingussie?

Preferred Option

- Use the land with existing permission to provide opportunities for housing.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.
- Identify no additional land.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Kingussie?

Reference	Respondent's Name
21	Roger Tozer
28	Alvie and Dalraddy Estates
40	Scottish Natural Heritage
43	The Highland Council
53	Davall Developments Limited
61	The Cairngorm Campaign and Scottish Wild Land Group
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
80	Badenoch and Strathspey Conservation Group
105	Kingussie and Vicinity Community Council



Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I do not support the preferred option. The
which the issue relates:	provision of 300 houses will not protect
	physical appearance and atmosphere of
	village.
Modification sought by those submitting	Allow growth that accords with the
representation:	community's vision

Representation ref:	28
Body or person submitting a	Alvie & Dalraddy Estates
representation:	
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	We would prefer to see organic growth by
representation:	the development of individual house sites.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	If there are any residual effects, the site
representation:	should be included as part of the in-
	combination assessment of the likelihood of
	significant effects of the Plan as part of the
	Habitats Regulations Appraisal.

Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	53
Body or person submitting a	Davall Developments Limited
representation:	
Provision of the Development Plan to	The Main Issues Report identifies the
which the issue relates:	approved St Vincent's site. In this regard we ask you to treat the other sites mentioned in the same manner.
Modification sought by those submitting representation:	We therefore request that the Park Authority at least includes the following areas, also outlined in red on the attached copy of Map 10, as specific allocations: - (a) Ardbroilach Road, for 4 houses. (b) North of West Terrace/North West of Ardvonie Road also for 4 houses; vehicular and pedestrian access from Ardvonie Road /Middle Terrace.



In addition, we also request that the
Settlement Development Area boundary be
drafted to continue allow for smaller scale
infill development opportunities such as at
the west end of West Terrace.

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and Scottish
representation:	Wild Land Group
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We do not support the preferred option. The
which the issue relates:	LDP does not provide for the right amount of
	growth, but provides for an excessive
	amount of growth.
Modification sought by those submitting	
representation:	

Representation ref:	105
Body or person submitting a	Kingussie and Vicinity Community
representation:	Council
Provision of the Development Plan to which the issue relates:	We do not believe that the general infrastructure of Kingussie is viable in the event of an expansion of the population. Medical, social and educational facilities are undersized and under resourced as it is. Current land zoned for residential development may result in inappropriate development.



Kingussie should be included in the Flexipass network for rail services.
Mammal and ecological surveys should be undertaken to prevent unsuitable development.
A proportion of new housing should comprise housing suitable for elderly people and be accessible to younger people.
Land adjacent to the museum site should be zoned for economic development.
The ancient birch forest contains many rare as well as unique in the UK species of fungi. It is the last piece of ancient birch forest in Kinguissie and it should be zoned as "Environmental."



Issue 5 Spatial Strategy: Newtonmore

What are the options for growth in Newtonmore?

Option 1 - Preferred Option

- Use the land with existing permission to provide opportunities for housing in the short-term.
- Use the land identified in the current Local Plan to provide opportunities for housing in the long-term.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.
- Identify no new land.

Option 2 – Alternative Option

- Use the land with existing permission to provide opportunities for housing in the short and medium-term.
- Use only part of the land identified in the current Local Plan to provide opportunities in the long-term.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.
- Identify no new land.

- Do you agree with the preferred option?
- If no, do you support the alternative option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Newtonmore?

Reference	Respondent's Name
21	Roger Tozer
40	Scottish Natural Heritage
43	The Highland Council
47	RSPB Scotland
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
57	Tulloch Homes Group Limited
61	The Cairngorm Campaign and The Scottish Wild Land Group
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
80	Badenoch and Strathspey Conservation Group



Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Sites should be included (unless no residual
representation:	effects) alone and in combination as part of
	the Habitats Regulations Appraisal.

Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We support the preferred option (option 1).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	47
Body or person submitting a	RSPB Scotland
representation:	
Provision of the Development Plan to which the issue relates:	We do not support either option. We do not think that this is a suitable location for a housing development. Additionally, this allocation is on a floodplain which Scottish Planning Policy advises against save in specific circumstances.
Modification sought by those submitting representation:	

Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
Provision of the Development Plan to which the issue relates:	The extent of the proposed development is unclear. An appraisal of the proposed development should be carried out to clarify this point.
Modification sought by those submitting representation:	



Representation ref:	57
Body or person submitting a	Tulloch Homes Group Limited
representation:	
Provision of the Development Plan to	We support the preferred option (option 1).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We support option 2. We consider the
which the issue relates:	alternative option is preferable to the
	preferred option because it promotes a
	smaller scale of development.
Modification sought by those submitting	
representation:	

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option (option 1).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We do not support either option as we
which the issue relates:	consider both options provide an excessive
	scale of housing.
Modification sought by those submitting	We consider the alternative option is
representation:	preferable to the preferred option because it
	promotes a smaller scale of development.



What are the options for growth in Blair Atholl?

Option 1 - Preferred Option

- Include the site to the south-east of the village to provide opportunities for housing.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.

Option 2 – Alternative Option

- Retain the sites included in the current Local Plan to provide opportunities for housing.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.
- Identify no new land.

- Do you agree with the preferred option?
- If no, do you support the alternative option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Blair Atholl?

Reference	Respondent's Name
2	Baron Von Haldenwang
3	Joan Dawber
4	Geoffrey Campbell
6	Hamish Maxwell
8	Rosemary Christie
10	Gordon and Lin Muirhead
15	Robin and Freda Gibson
21	Roger Tozer
40	Scottish Natural Heritage
46	Blair Atholl and Struan Community Council
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
59	Lude Estate
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
88	Donald and Rita Isles
100	Atholl Estate
110	Perth and Kinross Council



Representation ref:	2
Body or person submitting a	Baron Von Haldenwang
representation:	
Provision of the Development Plan to	The proposed development will simply bring
which the issue relates:	commuters to the village, as there is no work.
	With regard to the suggested housing site to the south east of the village, there should be no house building on arable land at all.
	The existing infrastructure is inadequate to support the proposed development to the south east of the village (especially in terms of the roads and sewerage systems).
Modification sought by those submitting	A proper infrastructure needs to be built in
representation:	the village.

Representation ref:	3
Body or person submitting a	Joan Dawber
representation:	
Provision of the Development Plan to	We are opposed to residential development
which the issue relates:	on the proposed site in Bridge of Tilt.
Modification sought by those submitting	There is plenty of land suitable namely from
representation:	the Atholl Arms Hotel towards the House of
	Bruar. That area would have easy access to
	the A9 both north and south.

Representation ref:	4
Body or person submitting a	Geoffrey Campbell
representation:	
Provision of the Development Plan to	I do not support the proposal to build houses
which the issue relates:	on the southeast site at Bridge of Tilt due to environmental reasons as the field is subject to flooding. It is also too close to the Scottish Water Sewage area and a proper and safe access and egress is questionable. There is also an air take off and landing strip nearby.
Modification sought by those submitting representation:	I would suggest that you look at developing the area to the north of Blair Atholl in the direction of Bruar which is better suited transport wise to join the new A9 either to the north or south.



Representation ref:	6
Body or person submitting a	Hamish Maxwell
representation:	
Provision of the Development Plan to	I do not support housing development on the
which the issue relates:	site proposed to the south east of the village.
	The land is too low lying causing
	drainage/sewerage problems, the visual
	impact on the approach from the south would
	be completely at odds with the existing
	housing, the approach roads to this site are
	wholly inappropriate as they are narrow and
	have no footways and blind entrances. This
	site would also have the effect of stretching
	the village into a ribbon development.
Modification sought by those submitting	I suggest that any housing development in
representation:	Blair Atholl be to the north side of the main
	road, opposite the petrol station and Bridge
	of Tilt Hotel. It has excellent mains services
	running along that road, easy entry/exit onto
	a straight road with no vision issues, and the
	opportunity to broaden the existing village
	community, rather than stretching it out.
	With foresight, this area could be made
	central to the community.

Representation ref:	8
Body or person submitting a representation:	Rosemary Christie
Provision of the Development Plan to which the issue relates:	I do not support housing development at the Bridge of Tilt end of the village because the infrastructure is totally inadequate. Apart from the proximity of the sewage farm and railway, poor drainage/porosity of the land the access road is inadequate and will not support further development. Housing development proposed at the
	entrance of the village would have a visually adverse effect to those entering from the direction of Pitlochry.
Modification sought by those submitting representation:	I would support the suggestion of Lude Drive/Old Bridge of Tilt, on the road to Bruar, or any other suitable piece of land along that road. Any development should be sympathetic to the rest of the village, especially as it is now in the National Park.



Representation ref:	10
Body or person submitting a representation:	Gordon and Lin Muirhead
Provision of the Development Plan to which the issue relates:	In our view the siting of houses on the south east site at Bridge of Tilt is wrong. It is in a low lying field which is prone to flooding, is next to the railway and next to the sewerage works. The village at this point has a natural boundary in the large bank which sweeps from the road all the way to the river – building on the flats there would be highly visible from the road and spoil the entrance to the village which is, in effect, the southern eastern entrance to the National Park.
Modification sought by those submitting representation:	The area to the north of the main road running through Bridge of Tilt would be ideal especially the land to the west of the track to Kilmaveonaig Church. The infrastructure is all in place for this site, easy access to the main road, to power, mains water, not in front of any existing houses and will not overpower the look of the village.

Representation ref:	15
	Robin and Freda Gibson
Body or person submitting a	NUDITI ATTU FTEUA GIDSUT
representation:	
Provision of the Development Plan to which the issue relates:	We disagree with the proposal to include the site to the south- east of the village to provide opportunities with housing. This would fundamentally alter the entrance to the village from the south. This is particularly important as Blair Atholl will be the first impression many visitors have of the Park.
	We also have concerns about the suitability of this field for housing. The field does not drain well and is close to the local sewage works. Access to the site is unsuitable for any significant increase in traffic as the approach roads are narrow with no pavements and blind entrances. There is little scope for widening the roads.
	The Main Issues Report shows only a requirement for 14 affordable homes.
	We agree with the proposal to use the land identified in the current Local Plan to provide opportunities for economic growth.
Modification sought by those submitting representation:	We recognise that the sites shown in the current Local Plan are unsuitable for housing because of the flood risk. We would suggest that before ruling them out altogether an assessment is made of the likely cost and

effects of floor protection measures so that one or both of these sites could become suitable for development.
We believe there is a requirement to identify suitable land in the village for further development over time, both for affordable and market housing.
As an alternative, Site 019c should be considered. It appears to be better drained and is close to village facilities.
We believe there is a requirement to identify suitable land in the village for further development over time, both for open market and affordable housing.

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to which the issue relates:	Option 1 raises landscape issues. it is adjacent to the SSSI.
	Option 2 would raise far more issues in terms of the Habitats Regulations Appraisal of the Plan. Option 1 raises issues for the Park Authority to consider and mitigate (it is adjacent to Blair Atholl SSSI).
Modification sought by those submitting representation:	

Representation ref:	46
Body or person submitting a	Blair Atholl and Struan Community
representation:	Council
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	We have serious concerns about the
	proposal to include the site to the south-east
	of the village to provide opportunities for
	housing.
Modification sought by those submitting	We recognise that the sites shown in the
representation:	current Local Plan are unsuitable for housing
	because of the flood risk. However, we
	would suggest that, before ruling them out
	altogether, an assessment is made of the
	likely cost and effects of flood protection



	measures so that one or both of these sites could become suitable for development.
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Representation ref:	51
Body or person submitting a	Scottish Government Directorate for the
representation:	Built Environment, Historic Scotland and
	Transport Scotland
Provision of the Development Plan to	We support the preferred option (option 1).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	59
Body or person submitting a	Lude Estate
representation:	
Provision of the Development Plan to	We support the preferred option (option 1).
which the issue relates:	
Modification sought by those submitting	The Estate propose a number of alternative
representation:	sites, which they own, for development
	outside Blair Atholl, all of which have been
	promoted for development in the past.

	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
-	LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option (option 1).
which the issue relates:	
Modification sought by those submitting	
representation:	

	88
Body or person submitting a	Donald and Rita Isles
representation:	
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	As an alternative to the site proposed and
representation:	the current sites, we would suggest that Site
	019c stretching down the Glen Tilt Road
	from Old Bridge of Tilt to Bridge of Tilt should
	be considered. This site would appear to be
	better drained and is just as close to most
	village facilities as the site to the south-east.
	It would require a pavement and perhaps
	widening of the Glen Tilt road, but there



	appears to be adequate land available for this.
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Representation ref:	100
Body or person submitting a	Atholl Estate
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting representation:	An additional site 005a (land at Struan, nr. Calvine) should be included for residential use in the Plan.
	The site analysis at the site at 005b, (land to the North of Blair Castle Caravan Park, Blair Atholl) should be revisited and amended to Green/Amber, and the site included for tourism development.
	The site at 005c (land at Old Nursery, Old Blair, Blair Atholl) should be included for residential development, and the site analysis revised to Green/ Amber.
	The site at 005d (land at Black Island, Blair Atholl) should be included for tourism development.
	The LDP should make provision for the growth of the additional commercial use at site at 005e (goods yard, Blair Atholl).
	We support option 2 in relation to a portion of the site at 005f/0054 (land at Garryside, Blair Atholl H26) which should be included for residential development subject to appropriate flood mitigation measures.
	A site at Middlebridge, Old Bridge of Tilt should be included for residential development.
	A site at Auldclune should be included for residential development.

Representation ref:	110
Body or person submitting a representation:	Perth and Kinross Council
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 1).
Modification sought by those submitting representation:	CNPA should seek advice from network rail on whether the site (business land identified) is required for its current purpose or whether there will be opportunity to allow other business land or mixed use on the site.



We would propose that either the site designated for employment/business land could also allow opportunities for tourism development, or an alternative site is sought.
Blair Atholl has a conservation area which needs to be indicated within the proposed Plan and relevant policy provision made in terms of the protection and enhancement of this designation.



Issue 5 Spatial Strategy: Boat of Garten

What are the options for growth in Boat of Garten?

Option 1 - Preferred Option

- Include the sites identified to provide options for short and medium-term development of housing.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.

Option 2 – Alternative Option

- Include only some of the sites identified for short-term development of housing.
- Add longer-term phasing on the remainder of site to provide for a more incremental level of housing growth.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.

- Do you agree with the preferred option?
- If no, do you support the alternative option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Boat of Garten?

	Respondent's Name
14	William Grant
18 🛛	Scottish Wildlife Trust
21	Roger Tozer
27	Frank Johnstone
29 I	Elizabeth Johnstone
33 I	Boat of Garten and Vicinity Community Council
37 3	Seafield Estate
36 (Ogilvie Grant Estate
40 S	Scottish Natural Heritage
43 -	The Highland Council
4 7	RSPB Scotland
	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
61 ⁻	The Cairngorm Campaign and The Scottish Wild Land Group
63 5	SEPA (Scottish Environment Protection Agency)
74 ⁻	Tactran
80 E	Badenoch and Strathspey Conservation Group
89 I	Laura Cannicott



Representation ref:	14
Body or person submitting a	William Grant
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	An additional site at Drumullie should be
representation:	included for residential development.

Representation ref:	18
Body or person submitting a representation:	Scottish Wildlife Trust
Provision of the Development Plan to which the issue relates:	We do not agree with the L-Shaped site in the Boat of Garten Woods as a location for development. This site should be used only as a last resort. Capercaillie are regularly seen in these woods. All the proposed development sites in Boat of Garten would have to be considered in terms of the potential impact on the Capercaillie population in the nearby Abernethy Forest SPA. Such a development would be contrary to the first aim of the National Park, and the Nature Conservation (Scotland) Act 2000.
Modification sought by those submitting representation:	

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option (option 1).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	27
Body or person submitting a	Frank Johnstone
representation:	
Provision of the Development Plan to	I do not support either option.
which the issue relates:	
Modification sought by those submitting	The need is for affordable housing.
representation:	

Representation ref:	29
Body or person submitting a	Elizabeth Johnstone
representation:	
Provision of the Development Plan to	I do not support either option, as the sites
which the issue relates:	are unclear.
Modification sought by those submitting	Very important to prioritise 'Affordable
representation:	Housing'. Not to promote urban sprawl but
	to think carefully about where small pockets
	of publicly funded housing could be situated.



I appreciate that this may be a slow process but better to proceed slowly and ensure some housing that really meets the needs of
local people who require it without undue
damage to the environment of the village.

Representation ref:	33
Body or person submitting a representation:	Boat of Garten and Vicinity Community Council
Provision of the Development Plan to which the issue relates:	As a result of considerable community pressure on the CNPA, Boat of Garten residents welcome the establishment of the Housing Working Group to take forward the need for affordable housing for the village. Work on securing housing development in Boat of Garten is underway with the Housing Working Group encompassing all stakeholders.
Modification sought by those submitting representation:	 Options for growth in Boat of Garten The old village hall Woodland at the north of the village (The Davall Housing Development application) Moore land (ref 0121) was suggested as an alternative site for housing. It should be screened to maintain a rural aspect. The site to the rear of Birch Grove (ref 012n) is a possible site for development. Though drainage issues would need to be addressed. Completion of Craigie Avenue (ref 012p). This site for approximately 6 houses makes sense and does not adversely impact on the woodland. South of Deshar road (012h) – although this is seen as a site of last resort. Adjacent to the football pitch (012o) The school site adjacent to the community hall should be marked for a replacement school.
	Achieving mitigation in terms of the Capercaillie population is important.



Representation ref:	36
Body or person submitting a representation:	Ogilvie Grant Estate
Provision of the Development Plan to which the issue relates:	
Modification sought by those submitting representation:	The omission of the site off Deishar Road which was the subject of the planning application by Davall Developments cannot be supported. This site should be included as a suitable site for housing to support the community.
	The development of this site would allow mitigation measures to be agreed between the landowner and SNH and the Park with potential to reduce any existing disturbance of caper by recreational users of the nearby woodland.
	This site comes closest to being deliverable with a willing owner, a developer in place and considerable support from the community and others. It should therefore be allocated for an agreed number of houses.

Representation ref:	37
Body or person submitting a	Seafield Estate
representation:	
Provision of the Development Plan to which the issue relates:	The Seafield Estate in principle supports the allocation of the site it owns as shown, south of Strathspey Park. The site has a long standing allocation and is one that the owner supports.
Modification sought by those submitting representation:	We consider that it should be capable of accommodating more housing than the 5 units proposed in the Park's report to the Boat of Garten Working Group in March 2011.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	The potential allocations for housing could all
which the issue relates:	have an impact on Capercaillie (i.e. through recreational use of the Boat of Garten Wood by people living in the new development). We advise that there is likely a significant effect on Capercaillie in Abernethy, Kinveachy Forest, Cairngorms and
	Craigmore Wood SPAs.
Modification sought by those submitting	Assess the impact on SPAs.
representation:	



Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We feel that there may be challenges to
which the issue relates:	delivering housing with the preferred option.
	Given our experience of trying to deliver
	affordable housing in the village we are
	aware that the identified sites have
	significant constraints on their development.
Modification sought by those submitting	There is a need for additional sites to be
representation:	identified if the current constraints on
	development prove insurmountable. A mix of
	sites from different landowners should be
	supported.

Representation ref:	47
Body or person submitting a	RSPB Scotland
representation:	
Provision of the Development Plan to	Any or all of the proposed allocations could
which the issue relates:	have knock on effects through disturbance
	upon Capercaillie.
Modification sought by those submitting	There needs to be an appraisal at this stage
representation:	of the likely number of houses at each of
	those locations and the level and nature of
	mitigation needed to ensure compatibility
	with national and European legislation.

Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and
	Transport Scotland
Provision of the Development Plan to	The eastern A95 junction may have to be
which the issue relates:	upgraded to support this development.
Modification sought by those submitting	The eastern A95 junction may have to be
representation:	upgraded to support this development.
	Further transport appraisal work will be
	required to identify the need for further work.

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We do not support either option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	80
Body or person submitting a	Badeonch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We do not support the preferred option or the
which the issue relates:	alternative option.
Modification sought by those submitting	
representation:	

Representation ref:	89
Body or person submitting a	Laura Cannicott
representation:	
Provision of the Development Plan to	We support the proposals for small housing
which the issue relates:	developments of between 4 and 5 units within the community.
Modification sought by those submitting representation:	



Issue 5 Spatial Strategy: Braemar

What are the options for growth in Braemar?

Option 1 - Preferred Option

- Use land with existing permissions to provide for the housing needs in the short-term.
- Include the sites identified to provide options for medium and long-term development of housing.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.

Option 2 – Alternative Option

- Use land with existing permissions to provide for the housing needs of the village.
- Identify no additional land for housing.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.
- Identify no new land.

- Do you agree with the preferred option?
- If no, do you support the alternative option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Braemar?

Reference	Respondent's Name
21	Roger Tozer
40	Scottish Natural Heritage
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
77	Invercauld Estate
79	Mar Estate



Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting representation:	The proposed longer term site to the SW of the village should be assessed as part of the Habitats Regulations Appraisal of the Plan. The potential issue here would be if it was proposed to abstract water from the site to supply the houses. The site contains subalpine flushes, springhead, rill and flush (both SSSI) and hardwater springs depositing lime, base rich fens and high altitude plant communities associated with areas of water seepage. There are already a number of water supplies sourced from the site and if it was proposed to use springs to supply water to any new development it might be an issue for these interests. The water supply for this site should therefore be clarified – if instead it would be from the River Dee this too would need assessing (alone and in combination) as part of the HRA for the River Dee SAC (see comment under Ballater). This proposed site on the boundary of Morrone also includes the car park for the National Nature Reserve. We would wish to see some kind of parking provision retained for the site, and this should be included within the development factors and developer requirements for this area, should it be taken forward.



Representation ref:	51
Body or person submitting a	Scottish Government Directorate for the
representation:	Built Environment, Historic Scotland and
	Transport Scotland
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Site H2 has the potential to impact on setting
representation:	of "A" listed Braemar Castle. New
	development will have to be considered in
	line with Council policies for conservation
	areas and listed buildings.

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	77
Body or person submitting a	Invercauld Estate
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We support the use of the masterplan being
representation:	prepared to inform the Local Development
	Plan.

Representation ref:	79
Body or person submitting a representation:	Mar Estate
•	
Provision of the Development Plan to	The preferred approach does not address
which the issue relates:	the lack of commercial space available in the
	town.
Modification sought by those submitting	Some of the elements of the Braemar
representation:	Strategic Options Study should be included now with the option for future development being recognised now.
	The medium term allocation of housing should be brought forward in to the first 5 year period.



Issue 5 Spatial Strategy: Bruar and Pitagowan

What are the options for growth in Bruar and Pitagowan?

Preferred Option

- Use the land identified in the current Local Plan to provide opportunities for economic growth.
- Identify no additional land.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Bruar and Pitagowan?

Reference	Respondent's Name
15	Robin and Freda Gibson
21	Roger Tozer
40	Scottish Natural Heritage
46	Blair Atholl and Struan Community Council
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
103	House of Bruar Limited
110	Perth and Kinross Council



Representation ref:	15
Body or person submitting a	Robin and Freda Gibson
representation:	
Provision of the Development Plan to	The land shown shaded on the map is
which the issue relates:	currently completely occupied by House of
	Bruar for car parking – which is very well
	used. There seems to be little opportunity to
	use this land for economic growth unless
	alternative land is identified for car parking.
Modification sought by those submitting	Either further land should be identified for
representation:	parking so that the existing car park can be
	developed for other used, or an alternative
	site should be identified for economic
	growth. As the main source of economic
	growth is likely to be House of Bruar, it
	would make sense to develop the
	commercial activity adjacent to the existing
	buildings.

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	This proposed site (brought forward from the
representation:	existing Local Plan) should be included
	within the assessment (alone and in
	combination) of proposals in the Plan on the
	River Tay SAC as part of the Habitats
	Regulations Appraisal.

Representation ref:	46
Body or person submitting a	Blair Atholl and Struan Community
representation:	Council
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
	The land identified in the current Plan and
	shown shaded on the map in the Main
	Issues Report is currently completed
	occupied by House of Bruar for the purpose
	of car parking. There therefore seems to be
	little opportunity to use this land for economic
	growth unless alternative land is identified for
	car parking.
Modification sought by those submitting	We suggest that either further land should be
representation:	identified for parking so that the existing car



park can be developed for other uses, or that an alternative site should be identified for economic growth. As the main source of economic growth is likely to be House of Bruar, it would make sense to develop the commercial activity adjacent to the existing
buildings.

Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
Provision of the Development Plan to which the issue relates:	There have been discussions in the past regarding this potential industrial development. Although it would be expected that the existing junction could accommodate such an improvement, it is important that dialogue continues on this matter.
Modification sought by those submitting representation:	

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	103
Body or person submitting a	House of Bruar Limited
representation:	
Provision of the Development Plan to	We do not support the proposed option.
which the issue relates:	
Modification sought by those submitting	Additional land should be included at Site 53
representation:	(House of Bruar – 07) for economic
	development.



Representation ref:	110
Body or person submitting a	Perth and Kinross Council
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We would recommend expanding the
representation:	existing industrial, business and tourist
	designation at the House of Bruar site to
	include the whole site for such uses.



Issue 5 Spatial Strategy: Carr-Bridge

What are the options for growth in Carr-Bridge?

Preferred Option

- Use land with existing permissions to provide for the housing needs in the future.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Carr-Bridge?

Reference	Respondent's Name
13	Rodger Builders
21	Roger Tozer
40	Scottish Natural Heritage
43	The Highland Council
57	Tulloch Homes Group Limited
61	The Cairngorm Campaign and The Scottish Wild Land Group
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
80	Badenoch and Strathspey Conservation Group



Representation ref:	13
Body or person submitting a	Rodger Builders
representation:	
Provision of the Development Plan to	We generally agree that the strategic sites
which the issue relates:	identified in the Adopted Local Plan and
	essentially confirmed in the Main Issues
	Report should remain the major focus for
	residential and employment uses.
Modification sought by those submitting	We do not agree that these sites represent
representation:	the entire option and that a limited allowance
	should be made for some additional houses
	along the A938, opposite the existing ribbon
	development from the golf course to Lilac
	Cottage.
	The consolidation of Carr-Bridge would be
	achieved and a minor boundary adjustment
	required, as indicated in sections 2 and 3.
	In addition, there is a need for additional
	tourism accommodation and the site at
	Baddengorm Woods should be allocated for
	additional new tourism accommodation

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	The proposed sites (either with
representation:	unimplemented planning permission – unless
	these have no residual effects – or carried
	forward from the existing Local Plan) should
	be included within the assessment (alone
	and in combination) of proposals in the Plan
	on the River Spey SAC as part of the
	Habitats Regulations Appraisal.



Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We have concerns that the identified site
which the issue relates:	may not be deliverable given the on-going
	constraints and challenges to development in
	the village.
Modification sought by those submitting	Additional sites for development should be
representation:	identified.

Representation ref:	57
Body or person submitting a	Tulloch Homes Group Limited
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	It is noted that none of the settlements in the
representation:	MIR has an identified settlement boundary.
	At Carr-Bridge the settlement envelope
	should be drawn around the south eastern
	boundaries of our site (see planning consent
	reference PPA/270/312).

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Issue 5 Spatial Strategy: Cromdale

What are the options for growth in Cromdale?

Option 1 - Preferred Option

- Use land with existing permission to provide for the housing needs in the short-term.
- Include one additional site to provide options for medium and long-term development of housing.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.

Option 2 – Alternative Option

- Use the land with existing permission to provide opportunities for housing in the short and medium-term.
- Use only part of the land identified in the current Local Plan to provide opportunities in the long-term.
- Use the land identified in the current Local Plan to provide opportunities for economic growth.

- Do you agree with the preferred option?
- If no, do you support the alternative option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Cromdale?

Reference	Respondent's Name
21	Roger Tozer
34	Strathdee Properties Limited
40	Scottish Natural Heritage
43	The Highland Council
51	Scottish Government Directorate for the Built Environment, Historic Scotland
	and Transport Scotland
61	The Cairngorm Campaign and The Scottish Wild Land Group
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
80	Badenoch and Strathspey Conservation Group



Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option (option 1).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	34
Body or person submitting a representation:	Strathdee Properties Limited
Provision of the Development Plan to which the issue relates:	The principle of housing development at H1 and H2 is supported, as is reference to Cromdale as a "fragile community which needs housing for young and old people and business opportunities."
Modification sought by those submitting representation:	It would be beneficial to alter the phasing of the allocations so that the current "H2" site could be allocated first to allow an access to be taken directly from Kirk Road. The current "H1" site could then become the second phase site to the rear of development fronting Kirk Road. We would also suggest that the first phase site should be increased to allow more housing to be delivered in the first phase of the LDP to make up for the absence of completion of the "H" site.
	We believe that there is scope for a housing allocation in the area of Balmenach. The land identified (site ref 029b) north of Balmenach Distillery contains flexibility regarding the exact siting of development and this could be determined through a planning application. The scale of an eight house development is not out of character with the existing cluster of housing. The proposed site makes use of brownfield land to accommodate future development.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	The possible sites for the medium and long
representation:	term should be included within the
	assessment (alone and in combination) of
	proposals in the Plan on the River Spey SAC
	as part of the Habitats Regulations
	Appraisal. The short term site – with planning
	permission – should be included in the in-
	combination assessment unless this would
	have no residual effects.



Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We agree with the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
Provision of the Development Plan to which the issue relates:	The scale of development will not impact on the strategic transport network provided access for the large developments in the village are taken from Kirk Road and any appropriate improvements with the junction with the A95 are made.
Modification sought by those submitting representation:	

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	We object to the two medium and long term
representation:	housing allocations which represent an
	excessive scale of development and a loss
	of lowland agricultural land. Such habitat in
	the CNP can support important biodiversity.

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We object to the 2 medium and long term
representation:	housing allocations which represent an
	excessive scale of development and a loss
	of lowland agricultural land. Such habitat in
	the CNP can support important biodiversity.



Issue 5 Spatial Strategy: Dalwhinnie

What are the options for growth in Dalwhinnie?

Preferred Option

- Use the land identified in the current Local Plan to provide opportunities for economic growth.
- Identify no additional land.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Dalwhinnie?

Reference	Respondent's Name
21	Roger Tozer
40	Scottish Natural Heritage
43	The Highland Council
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
63	SEPA (Scottish Environment Protection Agency)
74	Tactran



Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	These sites (either with unimplemented
representation:	planning permission – unless these have no residual effects – or carried forward from the existing Local Plan) should be included within the assessment (alone and in combination) of proposals in the Plan on the River Spey SAC as part of the Habitats Regulations Appraisal.

Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
Provision of the Development Plan to which the issue relates:	The scale of development proposed will not impact on the strategic transport network provided no new accesses are taken from the trunk road.
Modification sought by those submitting representation:	

Representation ref:	63
Body or person submitting a representation:	SEPA (Scottish Environment Protection Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.



Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Issue 5 Spatial Strategy: Dinnet

What are the options for growth in Dinnet?

Preferred Option

- Include the sites identified to provide options for short and medium-term development of housing.
- Use the land identified to provide opportunities for economic growth.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Dinnet?

Reference	Respondent's Name
17	W Houston
21	Roger Tozer
40	Scottish Natural Heritage
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
56	Dinnet and Kinford Estate
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
86	Aberdeenshire Council



Representation ref:	17
Body or person submitting a representation:	W Houston
Provision of the Development Plan to which the issue relates:	Dinnet is in a more strategic location (than Ballater) as the first settlement on entering the Park from the east.
Modification sought by those submitting representation:	If the CNPA had any strategic development plans Dinnet is where is should look.

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting representation:	The proposed housing sites, at their closest, lie within 50m of the River Dee SAC, notified for Otter, Atlantic Salmon and Freshwater Pearl Mussel. Otters are also European Protected Species (EPS). As part of the Habitats Regulations Appraisal of the Plan, any development here must therefore ensure that there will be no loss of habitat or disturbance to Otter or adverse effect upon the Atlantic Salmon and Freshwater Pearl Mussel through impacts upon water quality, both alone and in combination with other plans or projects. This proposed employment site is for the conversion of the steading to commercial/retail. The north-west corner of this site appears to lie within the
	Muir of Dinnet SSSI. Without more detailed information regarding what is proposed for this area, we cannot advise if this is likely to affect the special interest of the SSSI. For example while formation of hard infrastructure such as new buildings or car parking may affect the special interest, open space associated with the setting of any steading conversion with appropriate management may not. Our preference would be that the boundary of this area is amended to exclude the SSSI area. Otherwise more information will be required



to demonstrate how any advorse offects on
to demonstrate how any adverse effects on the SSSI will be avoided.
The site also lies close to the Clarack Loch which forms part of the River Dee SAC. Otters have been recorded from the area. Otters are both a feature of the SAC and a European Protected Species. We advise that any development would therefore require an otter survey particularly for holts or resting places and if necessary appropriate mitigation.
The site should be included within the Habitats Regulations Appraisal of the Plan in terms of the River Dee SAC, both alone and in combination with other plans or projects. The site also lies close to an entry point to the Muir of Dinnet National Nature Reserve (NNR). It is possible that any development at Clarack would become a significant entry point to the reserve. However we are promoting the Burn O' Vat area as the main gateway to the NNR. Should this site be taken forward into the Proposed Plan, it would be important that a developer requirement should be included to ensure close working with SNH in order to manage the potential increase in people accessing the reserve from Clarack, and to ensure that relevant information on the reserve is made available to visitors. We have previously provided advice to you and the owners on development of visitor facilities in this area. We therefore advise that as a part of the development requirements here a visitor management Plan should be drawn up preferably to accompany any planning application.
Re the formation of a Chalet/Caravan Site, the habitat survey on page 374 of the appendix to the evidence describes the site as mature even-aged pine plantation over a typical ground layer of heath and mosses. The birch component increases to the north. The northern part of the proposed site is very close to the area to the south of Clarack Loch which is within the River Dee SAC notified for Otter, Atlantic Salmon and Freshwater Pearl Mussel. Otters are also European Protected Species (EPS). Should this proposal be taken forward into the Proposed Plan, we therefore advise that:



 the northern boundary is amended if necessary to exclude the SAC; any development would require an otter survey particularly for holts or resting places and if necessary appropriate mitigation; any development must ensure that there will be no adverse effect upon Atlantic Salmon and Freshwater Pearl Mussel through impacts upon water quality. The site should be included within the Habitats Regulations Appraisal of the Plan in terms of the River Dee SAC, both alone and in combination with other plans or projects Red squirrels have been recorded in the area. Red squirrels and their dreys are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). We therefore advise that any development should require a red squirrel survey to accompany a planning application, since this may affect how or whether the development can take place.
As a development of this type is likely to result in an increase in visitor numbers which could potentially affect the species of the SAC and the nearby Muir of Dinnet SSSI, we also advise that as a part of the development requirements a visitor management plan is drawn up preferably to accompany any planning application.

Representation ref:	51
Body or person submitting a	Scottish Government Directorate for the
representation:	Built Environment, Historic Scotland and
	Transport Scotland
Provision of the Development Plan to	The scale of development will not impact on
which the issue relates:	the strategic transport network.
Modification sought by those submitting	There are several proposed allocations
representation:	which may affect the setting of category B
	and C(S) listed buildings in Dinnet. The
	National Park Authority should ensure that
	any development coming forward in these
	locations is considered in line with its listed
	building policy.



Representation ref:	56
Body or person submitting a representation:	Dinnet and Kinford Estate
Provision of the Development Plan to which the issue relates:	The estate welcomes the zoning of the Clarack development which will become an important gateway attraction to the National Park.
Modification sought by those submitting representation:	The allocation of housing land in Dinnet does not reflect role that the village plays in the settlement hierarchy nor does it reflect the sustainable location of the village as a potential focus for development in the A93 corridor. There should be a review of the basis of the calculation of housing land within the Aberdeenshire section of the Park more housing land should be allocated in Dinnet in acknowledgement of its sustainable location.

Representation ref:	63
Body or person submitting a representation:	SEPA (Scottish Environment Protection Agency)
Provision of the Development Plan to which the issue relates:	
Modification sought by those submitting representation:	Relevant flood risk constraints associated with allocations should be highlighted in LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	86
Body or person submitting a	Aberdeenshire Council
representation:	
Provision of the Development Plan to	We are concerned at the scale of the land
which the issue relates:	allocations made in Dinnet and whether
	these are appropriate.
Modification sought by those submitting	
representation:	



Issue 5 Spatial Strategy: Dulnain Bridge

What are the options for growth in Dulnain Bridge?

Preferred Option

- Use the land with existing permission to provide opportunities for housing in the short-term.
- Use the land identified in the current Local Plan to provide opportunities for housing in the short, medium and long-term.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Dulnain Bridge?

Reference	Respondent's Name
21	Roger Tozer
40	Scottish Natural Heritage
43	The Highland Council
61	The Cairngorm Campaign and The Scottish Wild Land Group
74	Tactran
80	Badenoch and Strathspey Conservation Group



Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	These proposed sites (either with
representation:	unimplemented planning permission – unless
	this has no residual effect – or carried
	forward from the existing Local Plan) should
	be included within the assessment (alone
	and in combination) of proposals in the Plan
	on the River Spey SAC as part of the
	Habitats Regulations Appraisal.

Representation ref:	43
Body or person submitting a	The Highland Council
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We do not support the preferred option. The
which the issue relates:	housing allocations are excessive in scale.
Modification sought by those submitting	
representation:	



Issue 5 Spatial Strategy: Killiecrankie

What are the options for growth in Killiecrankie?

Preferred Option

- Use the land identified in the current Local Plan to provide opportunities for housing and economic growth.
- Identify no additional land.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Killiecrankie?

Reference	Respondent's Name
21	Roger Tozer
40	Scottish Natural Heritage
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
110	Perth and Kinross Council

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	These proposed sites (carried forward from
representation:	the existing Local Plan 2000) should be
	included within the assessment (alone and in
	combination) of proposals in the Plan on the
	River Tay SAC as part of the Habitats
	Regulations Appraisal.

Representation ref:	51
Body or person submitting a	Scottish Government Directorate for the
representation:	Built Environment, Historic Scotland and
	Transport Scotland
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Consideration should be given to the impact
representation:	on the Killicrankie Battlefield and the need
	for appropriate mitigation.

Representation ref:	63
Body or person submitting a representation:	SEPA (Scottish Environment Protection Agency)
Provision of the Development Plan to which the issue relates:	
Modification sought by those submitting representation:	Relevant flood risk constraints associated with allocations should be highlighted in LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	110
Body or person submitting a	Perth and Kinross Council
representation:	
Provision of the Development Plan to	An application for 2 dwellings on the rail
which the issue relates:	freight site has been allowed on appeal.
	Network rail has sold the site and made a



	statement that it foresees no likelihood of railway need for the site.
	Further investigation is recommended to assess whether the rail freight use should in fact be retained as proposed in the preferred option.
Modification sought by those submitting representation:	



Issue 5 Spatial Strategy: Kincraig

What are the options for growth in Kincraig?

Preferred Option

- Use the land identified in the current Local Plan to provide opportunities for housing and economic growth.
- Identify no additional land.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Kincraig?

Reference	Respondent's Name
21	Roger Tozer
28	Alvie and Dalraddy Estates
40	Scottish Natural Heritage
61	The Cairngorm Campaign and The Scottish Wild Land Group
63	SEPA (Scottish Environment Protection Agency)
71	Dunachton Estate
74	Tactran
80	Badenoch and Strathspey Conservation Group



Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	28
Body or person submitting a	Alvie & Dalraddy Estates
representation:	
Provision of the Development Plan to	We welcome the retention of the area around
which the issue relates:	Baldow Smithy.
Modification sought by those submitting representation:	We object to the proposed use of the arable field for development, as arable fields in this area are in such short supply.
	There should be an emphasis on small, single house developments, to be occupied by those working in the area. Large scale developments could destroy the character of the countryside.
	There is a much more suitable area adjoining Alvie Primary School which is currently a conifer plantation.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	These proposed sites (carried forward from
representation:	the existing Local Plan) should be included
	within the assessment (alone and in
	combination) of proposals in the Plan on the
	River Spey SAC as part of the Habitats
	Regulations Appraisal.

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We do not support the preferred approach.
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.

Representation ref:	71
Body or person submitting a	Dunachton Estate
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Include sites for short and long term growth
representation:	of the village.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Issue 5 Spatial Strategy: Nethy Bridge

What are the options for growth in Nethy Bridge?

Preferred Option

- Use land with existing permissions to provide for the housing and economic needs in the future.
- Identify no additional land.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Nethy Bridge?

Reference	Respondent's Name
9	David Carrott
20	George Knox
21	Roger Tozer
22	Goldcrest (Highland) Limited
35	Reidhaven Estate
40	Scottish Natural Heritage
43	The Highland Council
57	Tulloch Homes Limited
61	The Cairngorm Campaign and The Scottish Wild Land Group
62	Roy Turnbull
63	SEPA (Scottish Environment Protection Agency)
74	Tactran
80	Badenoch and Strathspey Conservation Group
99	Donny Black



Representation ref:	9
Body or person submitting a representation:	David Carrott
Provision of the Development Plan to which the issue relates:	The centre of Nethy Bridge is unique. Unsympathetic development of the roads/ footpaths/ road signage etc to urban highways standards will destroy this environment. This has already been eroded by the Birchfield Court and adjacent development using standard highways treatment of concrete kerbs and straight lines of tarmac footpaths. A new approach needs to be taken to preserve this heritage. The present restrictions at the main bridge serve to calm the traffic without additional
	measures.
Modification sought by those submitting representation:	A new approach needs to be taken to preserve this heritage.

Representation ref:	20
Body or person submitting a	George Knox
representation:	
Provision of the Development Plan to which the issue relates:	We are very interested in discussing 100% affordable housing which will benefit the village.
Modification sought by those submitting representation:	

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	22
Body or person submitting a	Goldcrest (Highland) Limited
representation:	
Provision of the Development Plan to	Additional (affordable) residential
which the issue relates:	development at Nethy Bridge is both logical
	and desirable. In the short term it is
	deliverable; it has a good road frontage; and,
	drainage infrastructure is already in place.
Modification sought by those submitting	We believe that development in the short
representation:	term should commence on the southern
	portion of the site, to the north of Lynstock
	Crescent/Lurg Road. There is also potential
	for low destiny development in the future in
	the sites' woodland.



Representation ref:	35
Body or person submitting a	Reidhaven Estate
representation:	
Provision of the Development Plan to	Two sites have been allocated at Nethy
which the issue relates:	Bridge, but neither have consent for
	development. The village risks being left
	without new housing for 20 years.
Modification sought by those submitting	It is essential for all communities to have the
representation:	opportunity to grow.
	The comprehensive review of appropriate
	development levels needs to be brought
	forward. Sites put forward by the estate
	should be reconsidered.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	These proposed sites (with unimplemented
representation:	planning consents – unless these have no
	residual effects) should be included within
	the in-combination assessment of proposals
	in the Plan on the River Spey SAC and the
	various SPAs relating to Capercaillie as part
	of the Habitats Regulations Appraisal.

Representation ref:	43
Body or person submitting a	Highland Council
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	57
Body or person submitting a	Tulloch Homes Group Limited
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	61
Body or person submitting a	The Cairngorm Campaign and The
representation:	Scottish Wild Land Group
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	62
Body or person submitting a	Roy Turnbull
representation:	
Provision of the Development Plan to	I do not support the option for housing or a
which the issue relates:	business site in School Wood, which is an
	ancient woodland site.
Modification sought by those submitting	This allocation should be removed from the
representation:	Local Plan.

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	80
Body or person submitting a	Badenoch and Strathspey Conservation
representation:	Group
Provision of the Development Plan to	We disagree with the preferred option. We
which the issue relates:	do not consider that the built development
	should be allocated in an Ancient Woodland
	Inventory site.
Modification sought by those submitting	
representation:	

Representation ref:	99
Body or person submitting a	Donny Black
representation:	
Provision of the Development Plan to	We do not support the preferred option.
which the issue relates:	
Modification sought by those submitting	The site at Lettoch Road, Nethy Bridge
representation:	should be included for residential
	development.



Issue 5 Spatial Strategy: Tomintoul

What are the options for growth in Tomintoul?

Preferred Option

- Use land with existing permissions together with the land identified in the current Local Plan to provide opportunities for housing and economic growth.
- For the long-term, include an additional site for housing.

- Do you agree with the preferred option?
- If no, do you wish to put forward another option that helps us provide for the right amount of growth in Tomintoul?

Reference	Respondent's Name
21	Roger Tozer
40	Scottish Natural Heritage
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
63	SEPA (Scottish Environment Protection Agency)
70	The Crown Estate
74	Tactran



Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	These proposed sites (with unimplemented
representation:	planning consents – unless these have no residual effects, or carried forward from the existing Local Plan, or new additional longer term allocations) should be included within
	the assessment (alone and in combination) of proposals in the Plan on the River Spey SAC as part of the Habitats Regulations Appraisal.

Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and
representation.	Transport Scotland
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	There are several proposed land
representation:	allocations which may affect the setting of
	category B and C(S) listed buildings at
	Tomintoul. The National Park Authority
	should ensure that any development
	coming forward in these locations is
	considered in line with its listed buildings
	policy.

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Relevant flood risk constraints associated
representation:	with allocations should be highlighted in
	LDP.



Representation ref:	70
Body or person submitting a	The Crown Estate
representation:	
Provision of the Development Plan to	We support the masterplanning process for
which the issue relates:	the village of Tomintoul.
Modification sought by those submitting	However, greater clarity should be given
representation:	within the text of the Plan regarding
	timescales for future consideration of options
	coming out of the masterplanning process
	and consultation with the community.
	There is currently no information on the
	number of units that could be supported by
	each site. The Plan should allow for flexibility
	in the sequence of which sites are brought
	forward for delivery, particularly considering
	the current economic climate, and in line with
	Scottish Planning Policy's desire to enable
	development in all rural areas.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option.
which the issue relates:	
Modification sought by those submitting	
representation:	



Issue 6: Support For Rural Areas

How do we plan for development that supports our rural areas – follow the existing patterns of development or take a different approach?

Options	Implications
Option 1 – the current approach	
Deal with development in an ad hoc way.	 Maximum flexibility. No spatial guidance on how development helps communities. Some clarity on the forms of appropriate development. No clear direction to service providers.
Option 2	
Focus development on key settlements. Restrict development outside settlements to particular forms of development/use.	 Most sustainable way of providing services and infrastructure. Limits development in rural areas. Would allow for some suitable development which would help maintain sustainable communities in the countryside.
Option 3 – the preferred approach	
Support rural communities by providing for growth which matches historic growth patterns. Use the landscape character assessment to protect these important rural areas from inappropriate development.	 arowth builds on existing development.

- Do you agree with the preferred option?
- If no, do you support either of the alternative options?
- If no, do you wish to put forward another option that helps us plan for development that supports rural areas?



Reference	Respondent's Name
14	William Grant
15	Robin and Freda Gibson
21	Roger Tozer
23	The Clouds Partnership
28	Alvie and Dalraddy Estates
34	Strathdee Properties Limited
35	Reidhaven Estate
40	Scottish Natural Heritage
44	North East Mountain Trust
46	Blair Atholl and Struan Community Council
47	RSPB Scotland
49	Scottish Land and Estates
50	Glenprosen Estate
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
52	
54	
58	
60	Forest Holidays LLP
63	SEPA (Scottish Environment Protection Agency)
69	sportscotland
70	The Crown Estate
71	Dunachton Estate
74	Tactran
79	The Mar Estate
84	Grantown-on-Spey and Vicinity Community Council
86	Aberdeenshire Council
87	Scottish Campaign for National Parks
102	Invercauld Estate
105	Kingussie and Vicinity Community Council
108	Sheila Potter
111	Angus Council



Representation ref:	14
Body or person submitting a	William Grant
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	15
Body or person submitting a representation:	Robin and Freda Gibson
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 3).
	Our only reservation is the inclusion of the phrase "which matches historic growth patterns".
Modification sought by those submitting representation:	While this matching "historic growth patterns" is a good general principle for developments, the approach must be sufficiently flexible to allow for substantially greater development if it was felt to be appropriate for the area.

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support option 2, so that rural development
which the issue relates:	does not damage the special qualities.
Modification sought by those submitting	
representation:	

Representation ref:	23
Body or person submitting a	The Clouds Partnership
representation:	
Provision of the Development Plan to	We broadly support the preferred option
which the issue relates:	(option 3).
Modification sought by those submitting	
representation:	

Representation ref:	28
Body or person submitting a	Alvie & Dalraddy Estates
representation:	
Provision of the Development Plan to	We support the preferred option (option 3)
which the issue relates:	but are concerned that proposed developments that have the potential to make the area more self-sufficient, provide jobs and inward investment, may be rejected because it is perceived they might compromise the landscape.
	We welcome the acceptance that small scale development is appropriate in the countryside, in order to provide housing for those who work in the local area.



Modification sought by those submitting	Providing housing for rent will prevent
representation:	houses being purchased as holiday houses.

Representation ref:	34
Body or person submitting a	Strathdee Properties Limited
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Some rural areas may have seen no growth
representation:	over recent years. Using historic growth
	pattern as the main justification for future
	growth is unlikely to meet the aspirations of
	these communities or reflect what may
	actually be perfectly acceptable development
	in a particular location.

Representation ref:	35
Body or person submitting a	Reidhaven Estate
representation:	
Provision of the Development Plan to	Housing development outside settlements is
which the issue relates:	unduly restrictive and is a topic which should
	be revisited. It effectively prevents any new
	housing outside settlements expect in
	exceptional circumstances. Development of
	housing in rural areas is important in
	supporting thriving and sustainable
	communities.
Modification sought by those submitting	A more flexible approach is needed in order
representation:	to allow some housing in rural areas subject
•	to good design and in keeping with the
	character of the surrounding area.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	Production of "settlement boundary area"
representation:	boundaries for smaller settlements where specific allocations are not considered necessary.
	This could be complemented by the production of citing and design guidance that took account of the different nature of small settlements in the Cairngorms.



Representation ref:	44
Body or person submitting a	North East Mountain Trust
representation:	
Provision of the Development Plan to	We support option 2.
which the issue relates:	
Modification sought by those submitting	Restricted development as in option 2 would
representation:	allow the addition of a house to say 5
	existing houses or a building to support a
	small local rural business.

Representation ref:	46
Body or person submitting a representation:	Blair Atholl and Struan Community Council
Provision of the Development Plan to which the issue relates:	We generally support the preferred option (option 3).
Modification sought by those submitting representation:	Our only reservation is the inclusion of the phrase "which matches historic growth patterns". While this is an admirable general principle for most developments, the approach must be sufficiently flexible to allow for a substantially greater development if it was felt to be appropriate for the area.

Representation ref:	47
Body or person submitting a	RSPB Scotland
representation:	
Provision of the Development Plan to	We support option 2.
which the issue relates:	
Modification sought by those submitting	Such a planned approach is more likely to
representation:	encourage sustainable service provision and
	prevent attrition of special qualities of the
	countryside by built development.

Representation ref:	49
Body or person submitting a	Scottish Land and Estates
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	50
Body or person submitting a representation:	Glenprosen Estate
Provision of the Development Plan to which the issue relates:	A policy approach that can balance the protection of rural areas from inappropriate development and support integrated and multi-functional economic development and initiatives is essential.
Modification sought by those submitting representation:	



Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
Provision of the Development Plan to which the issue relates:	The Plan should support opportunities for small scale housing development in rural areas and we are pleased that recognition has been given to this in the MIR. We are also content that reference is made to design, siting and use of materials as playing a significant contribution to the sustainability of rural development sites.
Modification sought by those submitting representation:	

Representation ref:	52
Body or person submitting a	
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	54
Body or person submitting a	
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	58
Body or person submitting a	
representation:	
Provision of the Development Plan to	I support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	60
Body or person submitting a	Forest Holidays LLP
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	More information needs to be provided to
representation:	inform what the National Park Authority
	would consider to be "inappropriate
	development" in rural areas.



Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	69
Body or person submitting a representation:	sportscotland
Provision of the Development Plan to which the issue relates:	
Modification sought by those submitting representation:	We would like to see a policy that took a positive approach to outdoor and adventure sport development in the National Park. In addition, we consider that it would be useful to include a definition of tourism development in the Plan that made it clear that this includes outdoor and adventure sport.
	Outdoor sport developments, such as mountain bike trails, outdoor centres, equestrian centres or boat storage facilities can all have specific locational needs based on the natural resource they are dependent on. It is important that policy in the development Plan is flexible enough to allow these forms of development to take place.

Representation ref:	70
Body or person submitting a	The Crown Estate
representation:	
Provision of the Development Plan to which the issue relates:	Policy Approach The preferred approach seems to suggest that CNPA will set out policies which will allow for different approaches in different communities. We support this approach and recognise that the character of rural areas differs from area to area across the Park, and a blanket approach will not be beneficial.
	We also support the approach of allowing development in areas " <i>where previously</i> <i>dispersed development has determined</i> <i>character</i> " and we would further support policy resulting from this approach which allows appropriate development in rural areas.
Modification sought by those submitting representation:	Policy Approach We request that further clarification is provided as to the definition of <i>"inappropriate</i> <i>development</i> " and the policy implications for



this classification within the Plan.
The preferred option suggests that growth should " <i>match historic growth patterns</i> ". This focuses on the quantity not layout of growth. We suggest amending the wording to state "settlement" instead of "growth" to be less contradictory to the remainder of the MIR text and policy approach.
It is difficult to comment in detail on the proposed policy direction for rural areas as the MIR is very broad and does not contain any details of key policies. As such, we would request that an interim consultation is carried out by CNPA prior to the publication of the Proposed Plan to allow interested parties to comment on more detailed proposals for rural areas before they are set out in the Proposed Plan.
Small Building Groups The adopted Cairngorms Local Plan allows for development of new housing within existing rural building groups in appropriate locations. We request that a similar policy is carried over to the LDP. The current adopted Plan defines a rural building group as "three or more occupied dwellings". We consider that this policy could be less restrictive and account for instances where there may only be two occupied dwellings but there are also several other buildings which would form part of a cohesive group.
Enabling Development We request that a policy is included within the LDP focussing on enabling development to fund restoration of listed properties and in some case, to support the development of rural enterprises. For business and tourism development, an enabling policy would also be beneficial to allow maximum flexibility and encourage economic development within the Park.



Representation ref:	71
Body or person submitting a	Dunachton Estate
representation: Provision of the Development Plan to	Policy Approach
which the issue relates:	The preferred approach seems to suggest that CNPA will set out policies which will allow for different approaches in different communities. We support this approach and recognise that the character of rural areas differs from area to area across the Park, and a blanket approach will not be beneficial to allowing maximum flexibility and a positive approach to rural development.
	We also support the approach of allowing development in areas "where previously dispersed development has determined character" and we would further support policy resulting from this approach which allows appropriate development.
Modification sought by those submitting	Policy Approach
representation:	We request that further clarification is provided as to the definition of " <i>inappropriate</i> <i>development</i> " and the policy implications for this classification within the Plan. The preferred option suggests that growth should " <i>match historic growth patterns</i> ". This focuses on the quantity not layout of growth. We suggest amending the wording to state "settlement" instead of "growth" to be less contradictory to the remainder of the MIR
	text and policy approach. It is difficult to comment in detail on the proposed policy direction for rural areas as the MIR is very broad and does not contain any details of key policies. As such, we would request that an interim consultation is carried out by CNPA prior to the publication of the Proposed Plan to allow interested parties to comment on more detailed proposals for rural areas before they are set out in the Proposed Plan.
	Small Building Groups The adopted Cairngorms Local Plan allows for development of new housing within existing rural building groups in appropriate locations. We request that a similar policy is carried over to the LDP. The current adopted Plan defines a rural building group as "three or more occupied dwellings". We consider that this policy could be less restrictive and account for instances



where there may only be two occupied dwellings but there are also several other buildings which would form part of a cohesive group.
Enabling Development We request that a policy is included within the LDP focussing on enabling development to fund restoration of listed properties and in some case, to support the development of rural enterprises. For business and tourism development, an enabling policy would also be beneficial to allow maximum flexibility and encourage economic development within the Park.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	79
Body or person submitting a	Mar Estate
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	84
Body or person submitting a	Grantown-on-Spey and Vicinity
representation:	Community Council
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	86
Body or person submitting a representation:	Aberdeenshire Council
Provision of the Development Plan to which the issue relates:	We are concerned that the needs of dispersed rural communities are not met by the proposals, and the significant contribution that might be made from new housing on appropriate sites within country areas to meeting both need and demand is not recognised.
Modification sought by those submitting representation:	



Representation ref:	87
Body or person submitting a	Scottish Campaign for National Parks
representation:	
Provision of the Development Plan to	We support option 2.
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	102
Body or person submitting a	Invercauld Estate
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	The LDP should make provision to apply
representation:	Perth and Kinross 2009 Housing in the
	Country policy in Highland Perthshire.

Representation ref:	105
Body or person submitting a	Kingussie and Vicinity Community
representation:	Council
Provision of the Development Plan to which the issue relates:	It is vital that small rural communities have access to the best electronic communications infrastructure possible, enabling them to compete effectively with world commerce.
Modification sought by those submitting representation:	

Representation ref:	108
Body or person submitting a	Sheila Potter
representation:	
Provision of the Development Plan to	I support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	111
Body or person submitting a	Angus Council
representation:	
Provision of the Development Plan to	We support the preferred option (option 3).
which the issue relates:	
Modification sought by those submitting	
representation:	



Issue 7: Connectivity and Communications

How can we help people move around the Park – local access, tourists, people travelling through the Park?

Options	Implications
Option 1 – the current approach Secure improvements to the transport and access routes throughout the Park by providing a clear framework for development.	 Maximum flexibility. Does not address the needs of different communities. Does not encourage a balanced provision of access across all Park communities.
Option 2 – the preferred approach	
Identify weaknesses in the communications network, focus on the 'hot spots' of activity and key links/routes across the Park, including review of the core paths network to ensure it is sufficient to meet the needs of residents and visitors. Where key improvements are needed by requiring developments to make a contribution towards existing and new routes.	 Shows the areas of pressure and opportunity. Focuses development on areas best placed to accommodate it. Flexibility. Allows infrastructure providers to focus investment in key areas. It may increase problems in pressured areas.

- Do you agree with the preferred option?
- If no, do you support the alternative option?
- If no, do you wish to put forward another option that helps us improve the communications links across, into and out of the National Park in the future?



Reference	
15	Robin and Freda Gibson
21	Roger Tozer
23	The Clouds Partnership
25	Michael Franklin
28	Alvie and Dalmaddy Estates
40	Scottish Natural Heritage
44	North East Mountain Trust
46	Blair Atholl and Struan Community Council
47	RSPB Scotland
48	NESTRANS
49	Scottish Land and Estates
51	Scottish Government Directorate for the Built Environment, Historic Scotland
	and Transport Scotland
60	Forest Holidays LLP
66	Scottish Churches Rural Group
67	Forest Enterprise Scotland
69	sportscotland
74	Tactran
75	MacDonald Aviemore Highland Resort Limited
78	Scotia Homes Limited
84	Grantown- on-Spey and Vicinity Community Council
86	Aberdeenshire Council
87	Scottish Campaign for National Parks
91	John Porter
96	Strathspey Railway Company and Trust
105	Kingussie and Vicinity Community Council
111	Angus Council
114	Laggan Community Association



Representation ref:	15
Body or person submitting a	Robin and Freda Gibson
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
	Service providers and transport operators
	should be encouraged to co-operate to
	ensure that all sections of the community,
	and particularly those without ready access
	to cars, can be fully served.
Modification sought by those submitting	
representation:	

Representation ref:	21
Body or person submitting a	Roger Tozer
representation:	
Provision of the Development Plan to	I support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	23
Body or person submitting a representation:	The Cloud Partnership
Provision of the Development Plan to which the issue relates:	We broadly support the preferred option 2, provided the link between improvement and the need brought about by development is clearly demonstrated in line with circular 1/2010.
Modification sought by those submitting representation:	

Representation ref:	25
Body or person submitting a	Michael Franklin
representation:	
Provision of the Development Plan to	The Aberdeenshire Rural Partnerships
which the issue relates:	Federation (ARPF) is a loosely knit body comprising Rural Partnerships which either support community groups or carry out their own projects. The Partnerships work with Aberdeenshire Council. Such a body in the National Park would allow for the exchange of experiences and knowledge between partnerships. Due to geography, electronic information sharing would benefit such a body.
Modification sought by those submitting representation:	Rural partnerships should be encouraged.



Representation ref:	28
Body or person submitting a representation:	Alvie and Dalmaddy Estates
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We question if the proposal to charge
representation:	developers for the maintenance of access
	routes will be counterproductive.
	Re-opening some railway stations will help reduce reliance on cars. Cycle routes should be developed.

Representation ref:	40
Body or person submitting a representation:	Scottish Natural Heritage
Provision of the Development Plan to which the issue relates:	We welcome the preference to link future development to travel facilities that would enable access to work, services, open space etc without the use of a private car. Development should support public transport where this is available.
Modification sought by those submitting representation:	 Where this is available. The preferred option also would seek contributions from developers towards existing and new routes, and this should include paths for walking and cycling. In terms of paths, taking forward this preferred approach should not be limited to core paths, but should look to develop a strategic path network more generally The LDP could include the Speyside Way and proposed extension as an important strategic route, subject to the final route being determined in time. Depending on the current review of the General Permitted Development Order, the LDP should include consideration of hill tracks, e.g. locations of special sensitivity outwith NSAs, Natural sites and SSSIs, and expected standards of construction Connectivity and communications' should not be limited to physical components and helping people to move around the Park. Also vital are telecommunications links such as high-speed broadband connectivity and increased coverage of the mobile phone network.



Representation ref:	44
Body or person submitting a	North East Mountain Trust
representation:	
Provision of the Development Plan to	We do not support either option. We find this
which the issue relates:	too general to be of any use.
Modification sought by those submitting	Improving the road network, with or without
representation:	developer contributions, will simply generate
	additional traffic with consequent additional
	emissions, etc. We do not support improving
	the road network, except for dualling the
	whole of the A9 through-route.

Representation ref:	46
Body or person submitting a	Blair Atholl and Struan Community
representation:	Council
Provision of the Development Plan to	In general we support the preferred option
which the issue relates:	(option 2).
Modification sought by those submitting	
representation:	

Representation ref:	47
Body or person submitting a representation:	RSPB Scotland
Provision of the Development Plan to which the issue relates:	We prefer a variation of the preferred option 2. We are unhappy with the proposal that a review of the core paths network be carried out just to ensure it is sufficient to meet the needs of residents and visitors – it is essential that such a review considers the effects on the natural heritage of path provision to meet perceived need.
Modification sought by those submitting representation:	Identify weaknesses in the communications network, focus on the 'hot spots' of activity and key links/routes across the Park, including review of the core paths network to ensure it is sufficient to meet the needs of residents and visitors. Communications improvements will only be acceptable, however, where it is demonstrated that they will have no adverse impact on the special qualities of the Park. Where key improvements are needed, developments will be required to make a contribution towards existing and new routes.



Representation ref:	48
Body or person submitting a	NESTRANS
representation:	
Provision of the Development Plan to	The draft Plan recognises at the start that the
which the issue relates:	National Park does not exist in isolation but
	is an integral part of its surrounding areas
	and that management needs to consider the
	cross boundary influences and recognise its
Modification sought by those submitting representation:	 wider connections. However, the draft Plan seems to pass over some important issues relating to transport. There would be value in recognising the role that the three Regional Transport Partnerships (RTPs), including Nestrans, have and their role (along with the individual councils) in relation to the transport of visitors to the Park as well as transport within it. With the claimed 1.4million visitors to the Park on an annual basis, transport to the Park may well have a greater impact than transport within the Park, particularly its environmental impact. In terms of transport within the Park, Nestrans supports the emphasis that is put on the promotion and development of active travel networks to encourage greater levels of cycling and walking. There is however more limited reference to public transport, particularly bus, which is equally important to encourage sustainable travel to and within the Park for trips that are not feasible to cycle or walk

Representation ref:	49
Body or person submitting a	Scottish Land and Estates
representation:	
Provision of the Development Plan to which the issue relates:	We agree that increased connectivity and infrastructure is essential in the future successes of the National Park. Access to services such as broadband is essential in growing businesses and is an essential asset in attracting visitors to the National Park.
Modification sought by those submitting representation:	

Representation ref:	51
Body or person submitting a	Scottish Government Directorate for the
representation:	Built Environment, Historic Scotland and
	Transport Scotland
Provision of the Development Plan to	We are pleased to see that recognition is
which the issue relates:	given to development being as accessible as
	possible in order to reduce the need to

	travel.
	We welcome your support for well planned improvements to the A9 road and the main railway line between Perth and Inverness.
Modification sought by those submitting representation:	You should consider promoting the use of green networks in the Plan as an opportunity to deliver the Park Plan's strategic objectives, and in helping to increase accessibility within settlements. There is no indication from the MIR that any form of Transport Appraisal has been undertaken. It is recommended that proportionate appraisal work is undertaken prior to the publication of the Proposed Plan
	in line with the DPMTAG, providing a clear understanding of the transport implications for your spatial strategy

Representation ref:	60
Body or person submitting a	Forest Holidays LLP
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Further emphasis and support should be
representation:	given to the enhancement of the visitor
	destination venues, together with the
	associated infrastructure supporting these.

Representation ref:	66
Body or person submitting a	Scottish Church Rural Group
representation:	
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 2).
	We particularly support the aim of improving communication within the Park area by improving the numbers of people with access to high speed broadband.
Modification sought by those submitting representation:	

Representation ref:	67
Body or person submitting a	Forest Enterprise Scotland
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	69
Body or person submitting a	sportscotland
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	It is important for policy to protect all
representation:	important access routes and not just core
	paths and to ensure it is not just paths but all
	important routes (e.g. those on water) that
	are protected.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	75
Body or person submitting a representation:	MacDonald Aviemore Highland Resort Limited
Provision of the Development Plan to which the issue relates:	We support the preferred option (option 2).
Modification sought by those submitting representation:	Since the LDP looks ahead for the next 20 years, consideration should be given to providing a new access off the A9 into our resort.

Representation ref:	78
Body or person submitting a	Scotia Homes Limited
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	84
Body or person submitting a	Grantown-on-Spey and Vicinity
representation:	Community Council
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	Promote Strathspey railway and additional
representation:	public transport.



Representation ref:	86
Body or person submitting a representation:	Aberdeenshire Council
Provision of the Development Plan to which the issue relates:	We fail to understand how the land allocation policy proposed can be reconciled with the promotion of development in communication hotsposts.
Modification sought by those submitting representation:	

Representation ref:	87
Body or person submitting a	Scottish Campaign for National Parks
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	The reference to planning gain from
representation:	developments, on the past and current
	performance of the NPA simply suggests to
	us that the National Park environment will
	take the hit.

Representation ref:	91
Body or person submitting a	John Porter
representation:	
Provision of the Development Plan to	There is a lack of transport inter-connecting
which the issue relates:	the three major areas of Speyside, Deeside,
	Tayside across the Cairngorms.
Modification sought by those submitting	The 'Heather Hopper' service should be
representation:	reinstated connecting Pitlochry, Glenshee,
	Braemar, Crathie, Ballater, Donside, Lecht,
	Tomintoul, and Grantown.
	It could be franchised to an existing bus
	company or the Park Authority should
	maintain the service with adapted vehicles
	capable of carrying bicycles, wheelchairs,
	rucksacks, dogs, etc.

Representation ref:	96
Body or person submitting a	Strathspey Railway Company and Trust
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	



Representation ref:	105
Body or person submitting a	Kingussie and Vicinity Community
representation:	Council
Provision of the Development Plan to which the issue relates:	Much needs to be done if the vision of sustainable development is to be achieved. It is essential that any policy reflects the need for fully integrated efficient transport services.
Modification sought by those submitting representation:	

Representation ref:	111
Body or person submitting a	Angus Council
representation:	
Provision of the Development Plan to	We support the preferred option (option 2).
which the issue relates:	
Modification sought by those submitting	
representation:	

Representation ref:	114
Body or person submitting a	Laggan Community Association
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Essential need of public transport provision.
representation:	



Other Issues

How can we help people move around the Park – local access, tourists, people travelling through the Park?

General Topics to be Carried Forward

- Cultural Heritage will include issues associated with archaeology, conservation areas, listed buildings and other cultural heritage which is of local or wider cultural importance to the Park.
- **Developer Contributions** will include direction on the types of development that will require the making of a contribution, the way that contribution can be made and the levels of contribution to be made by the developer.
- **Design** will include guidance on all aspects of design in the landscape, and design to improve sustainability.
- **Development Standards** to set any required standards for development which will be taken into account during the assessment of planning applications.
- House Extensions and Alterations will set out the standards to be reached for common household modifications which require planning consent.
- **Replacement Houses** will set out the circumstances when an existing house can be replaced by a new one.
- Conversion and Reuse of Existing Traditional and Vernacular Buildings will set out the standards to be reached for this form of development.
- **Gypsies and Travellers and Travelling Showpeople** will set out the standards to be reached for this form of development.
- **Tourism Related Development** will support appropriate development to enhance the range and quality of tourism attractions, infrastructure and accommodation.

- Do you agree with the topics to be taken forward from the adopted Local Plan and the general approach they set out?
- Should the general direction given under these topics be revisited? If so, please indicate the way in which the direction should change to better achieve the guidance provided.
- Do you with to put forward alternatives or additions which you think would be more appropriate?



Reference	Respondent's Name
1	Kelsey Tainsh
5	Susan John
21	Roger Tozer
23	The Clouds Partnership
28	Alvie and Dalraddy Estates
34	Strathdee Properties Limited
40	Scottish Natural Heritage
43	The Highland Council
44	North East Mountain Trust
46	Blair Atholl and Struan Community Council
51	Scottish Government Directorate for the Built Environment, Historic Scotland
	and Transport Scotland
57	Tulloch Homes Limited
60	Forest Holidays LLP
63	SEPA (Scottish Environment Protection Agency)
67	Forest Enterprise Scotland
69	sportscotland
70	The Crown Estate
71	Dunachton Estate
74	Tactran
75	MacDonald Aviemore Highland Resort Limited
78	Scotia Homes Limited
79	Mar Estate
84	Grantown-on-Spey and Vicinity Community Council
96	Strathspey Railway Company and Trust
108	Sheila Potter
109	R J Searle
111	Angus Council



Representation ref:	1
Body or person submitting a	Kelsey Tainsh
representation:	
Provision of the Development Plan to	The CNP should encourage submission of
which the issue relates:	planning applications during winter to allow
	building work prior to the arrival of winter
	weather.
Modification sought by those submitting	
representation:	

Representation ref:	5
Body or person submitting a	Susan John
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	To provide work in the area and to preserve
representation:	the appearance of the housing stock, people
	should be trained to restore and preserve
	sash and case windows.

Representation ref:	21
Body or person submitting a representation:	Roger Tozer
Provision of the Development Plan to which the issue relates:	I agree with the topics to be taken forward from the adopted Local Plan and the general approach they set out.
Modification sought by those submitting representation:	

Representation ref:	23
Body or person submitting a	The Clouds Partnership
representation:	
Provision of the Development Plan to	We are content with the topics being carried
which the issue relates:	forward from the Adopted Local Plan.
Modification sought by those submitting	
representation:	

Representation ref:	28
Body or person submitting a	Alvie and Dalmaddy Estate
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Cultural heritage has been neglected in
representation:	contrast to environmental conservation,
	though many physical structures have been
	neglected by local authorities.
	Developer contributions can have
	unintended consequences. They can
	discourage further investments or in the case
	of housing make dwellings on the open
	market more affordable.



Representation ref:	34
Body or person submitting a	Strathdee Properties Limited
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	For the most part the other issues identified
representation:	in the MIR could be carried forward but it
	would be good practice to make them
	subject to review as part of the LDP to make
	sure that they are in line with national policy
	and represent realistic deliverable policies.

Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	_
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	A change since the Local Plan relating to the
representation:	natural heritage is that we now have the
	licensing function in respect of European
	Protected Species and protected species
	under Schedule 5 of the Wildlife and
	Countryside Act 1981 (as amended). The
	possible need for a licence as well as a
	planning consent is relevant for example to
	the section of the Plan dealing with the
	conversion and reuse of existing traditional
	and vernacular buildings. We have
	produced guidance on how planners and
	developers can consider the relevant tests
	for a licence.

Representation ref:	43
Body or person submitting a	The Highland Council
representation:	_
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	The CNP should facilitate the development
representation:	of housing suitable for older and disabled
	people.

Representation ref:	44
Body or person submitting a	North East Mountain Trust
representation:	
Provision of the Development Plan to	We agree that the listed issues also need to
which the issue relates:	be considered.
Modification sought by those submitting	We are concerned about Developer
representation:	Contributions and see this as a slippery
	slope leading to An Camas Mòr proposals.
	Developer Contributions should be for
	affordable housing only and not considered
	as conventional contributions.



Representation ref:	46
Body or person submitting a	Blair Atholl and Struan Community
representation:	Council
Provision of the Development Plan to which the issue relates:	We agree with the topics to be taken forward from the adopted Local Plan and the general approach they set out.
Modification sought by those submitting representation:	

Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and
	Transport Scotland
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	It is not clear that the Authority is aware of
representation:	the new Scottish Historic Environment Policy
	for the provision of appropriate policies in
	connection with battlefields. In the Park area
	Killicrankie and Cromdale should be the
	subject of such policies.

Representation ref:	57
Body or person submitting a	Tulloch Homes Group Limited
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting representation:	The Development Standards are to be addressed in the LDP. We would like the general direction under this topic to be revisited.
	The amount of documentation requested for developments should be revisited, and brought in to line with other authority's standards.

Representation ref:	60
Body or person submitting a	Forest Holidays LLP
representation:	
Provision of the Development Plan to	Both the Draft National Park Plan and the
which the issue relates:	Main Issues Report set out the importance of
	tourism in achieving the 4 aims of the
	National Park. In order to achieve the
	strategic objectives and vision set out, the
	National Park Authority must provide
	appropriate support of both existing and new
	tourism development in suitable areas (both
	within and outwith settlements) that conform
	to the aims for Scottish Parks.
Modification sought by those submitting	
representation:	



Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We would wish to see the Development
representation:	Contributions topic enable, amongst other
	things, improvements to the water
	environment.

Representation ref:	67
Body or person submitting a representation:	Forest Enterprise Scotland
Provision of the Development Plan to which the issue relates:	Given the importance of tourism related development to the Glenmore area, FES is fully supportive of the inclusion of this subject within the other issues covered by the LDP.
Modification sought by those submitting representation:	

Representation ref:	69
Body or person submitting a	sportscotland
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Any policy on renewable energy, minerals,
representation:	waste, and telecoms must comply with the
	advice of the SPP on the need to take
	recreation interests into account.

Representation ref:	70
Body or person submitting a	The Crown Estate
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We do not consider that the MIR goes far
representation:	enough within each issue to propose any options for specific policies.
	This MIR falls short of giving assurance that issues which are of particular importance will be considered and included in the LDP.
	We request that an interim consultation is carried out by CNPA prior to the publication of the Proposed Plan to allow interested
	parties to comment on more detailed proposals before they are set out in the
	Proposed Plan.



Representation ref:	71
Body or person submitting a	Dunachton Estate
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We do not consider that the MIR goes far
representation:	enough within each issue to propose any
	options for specific policies.
	This MIR falls short of giving assurance that
	issues which are of particular importance will
	be considered and included in the LDP.
	We request that an interim consultation is
	carried out by CNPA prior to the publication
	of the Proposed Plan to allow interested
	parties to comment on more detailed
	proposals before they are set out in the
	Proposed Plan.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We agree with the topics to be taken
which the issue relates:	forward from the adopted Local Plan.
Modification sought by those submitting	
representation:	

Representation ref:	75
Body or person submitting a	MacDonald Aviemore Highland Resort
representation:	Limited
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We are disappointed that tourism is not
representation:	considered as a key issue to be addressed in
	the LDP.

Representation ref:	78
Body or person submitting a	Scotia Homes Limited
representation:	
Provision of the Development Plan to	The CNP should include a policy on the
which the issue relates:	housing land requirement and supply.
Modification sought by those submitting	
representation:	

Representation ref:	79
Body or person submitting a	Mar Estate
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	The topics carried forward from the last Local
representation:	Plan should be generally reviewed to make
	sure they are in line with national policy. In



particular the issue of developer
contributions and its impact on the
deliverability of development is one that is
currently subject of extensive debate.

Representation ref:	84
Body or person submitting a	Grantown and Vicinity Community
representation:	Council
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Greater protection of culture, built and
representation:	natural heritage. Safeguard Grantown
	Square regarding excessive or inappropriate
	advertising and parking etc.

Representation ref:	96
Body or person submitting a	Strathspey Railway Company and Trust
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Tourism development is under-developed in
representation:	policy proposals.

Representation ref:	108
Body or person submitting a	Sheila Potter
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	Renovate abandoned farm buildings.
representation:	

Representation ref:	109
Body or person submitting a	R J Searle
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	The CNP should add 'Gaelic' to the topic
representation:	around cultural heritage.

Representation ref:	111
Body or person submitting a	Angus Council
representation:	
Provision of the Development Plan to	The broad approach set out in the MIR to
which the issue relates:	land use planning in Cairngorm National
	Park and that part within Angus is generally
	supported. We support the preferred option.
Modification sought by those submitting	
representation:	



Supplementary Guidance

Supplementary guidance to support the next Local Development Plan.	
Topics to be included as supplementary guidance	Existing supplementary planning guidance topics
 Cultural Heritage Water Resources Sustainable Design Landscape Carbon Emissions Development Standards Housing Use of Resources Natural Heritage Sustainable Communities Developer Contributions Core Paths 	 Sustainable Design Guide Open Space Core Paths Plan Natural Heritage Water Resources Conversion and Reuse of Existing Traditional and vernacular Buildings Housing Development in rural Groups Wildness Developer Contributions Carbon Emissions Site Specific Development Briefs
 Question 28 Do you agree with the topics to be covered by supplementary guidance which will support the Local Development Plan? 	

- Do you agree that we use the general direction given in our current supplementary guidance as a starting point? Should the general direction given under these be revisited? If so, please indicate the way in which the direction should change to better achieve the guidance provided.
- Do you with to put forward alternatives or additions which you think would be more appropriate?

Reference	ce Respondent's Name
16	The Mountaineering Council of Scotland
21	Roger Tozer
23	The Clouds Partnership
28	Alvie and Dalraddy Estates
40	Scottish Natural Heritage
43	The Highland Council
46	Blair Atholl and Struan Community Council
47	RSPB Scotland
49	Scottish Land and Estates
51	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
60	Forest Holidays LLP
63	SEPA (Scottish Environment Protection Agency)
67	Forest Enterprise Scotland
69	sportscotland
70	The Crown Estate
71	Dunachton Estate
74	Tactran
78	Scotia Homes Limited
79	Mar Estate
97	Keith Miller
111	Angus Council
-	



Representation ref:	16
Body or person submitting a	The Mountaineering Council of Scotland
representation:	
Provision of the Development Plan to	We welcome the commitment to formally
which the issue relates:	adopt guidance on wildness, and consider
	this necessary to make effective use of the
	guidance. But we think the mapping could
	offer increased clarity.
Modification sought by those submitting	The working map should be in zones, as it
representation:	was presented in the draft version.

Representation ref:	21
Body or person submitting a representation:	Roger Tozer
Provision of the Development Plan to which the issue relates:	I agree with the topics to be covered by supplementary guidance which will support
	the Local Development Plan.
Modification sought by those submitting	
representation:	

Representation ref:	23
Body or person submitting a representation:	The Clouds Partnership
Provision of the Development Plan to which the issue relates:	We find the supplementary guidance topics and monitoring report, we consider them to be appropriate.
Modification sought by those submitting representation:	However, in drafting the LDP Policy and supplementary guidance, we would direct the NPA to the Reporter's findings of the Highland-wide LDP Examination and Aberdeenshire LDP Examination, particularly in regard to their consideration of objections to the quantity and detail contained in the Supplementary Guidance and the policy basis that they are prepared to support.

Representation ref:	28
Body or person submitting a representation:	Alvie & Dalraddy Estates
Provision of the Development Plan to which the issue relates:	We welcome supplementary guidance but have concerns that those tasked with writing these guidance documents may not be adequately equipped to provide this guidance.
Modification sought by those submitting representation:	



Representation ref:	40
Body or person submitting a	Scottish Natural Heritage
representation:	
Provision of the Development Plan to which the issue relates:	We welcome the proposal for Supplementary Guidance (SG) on Natural Heritage.
Modification sought by those submitting representation:	As you will know, the licensing system for work which could affect bats is now administered by ourselves.
	Section 7.4 Other priority species - the first bullet point, last sentence, could include ancient and long-established semi-natural woodland. It would be useful to identify ancient woodland as a priority habitat.
	Section 7.10 Biosecurity - this section does not mention North American signal crayfish (NASC). It might be worth adding them to the first bullet point, or mention animals, since they are neither a plant nor a parasite. Raising the profile of NASC would be helpful, although we acknowledge that this is less likely to be a planning issue than species such as Japanese knotweed.
	Annex 3, page 12, 1st paragraph underneath the table - Insh Marshes is given as an example of overlapping designations, and the designations are listed. To help make the point, Insh Marshes is also designated as a Ramsar site.
	We welcome the intention for SG for Landscape, but query whether this could not be amalgamated into the Natural Heritage SG. It is for example unclear whether the present SPGs on Wildness and Open Space would feature within the proposed SGs on Natural Heritage or Landscape. Green Networks/Habitat Connectivity should feature within the Natural Heritage SG.
	We suggest SG is required for small scale renewable energy developments, although perhaps it is the intention that this should be included in the proposed 'Use of Resources' SG?



Representation ref:	43
Body or person submitting a representation:	The Highland Council
Provision of the Development Plan to which the issue relates:	We note that developer contributions guidance capture even small developments. This approach is unlikely to tie in exactly with the Council's approach. Therefore we expect there to be two different values on developer contributions – one inside the Park area and in the other parts of Highland.
Modification sought by those submitting representation:	

Representation ref:	46
Body or person submitting a	Blair Atholl and Struan Community
representation:	Council
Provision of the Development Plan to which the issue relates:	We agree with the topics to be covered by supplementary guidance which will support the Local Development Plan. We agree that the general direction given in the current supplementary guidance should be used as a starting point.
Modification sought by those submitting representation:	

Representation ref:	47
Body or person submitting a	RSPB Scotland
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	A policy on renewable energy should also be
representation:	included here to ensure that any
	developments are compatible with the
	special qualities of the Park.

Representation ref:	49
Body or person submitting a	Scottish Land and Estates
representation:	
Provision of the Development Plan to	We agree with the topics to be covered by
which the issue relates:	supplementary guidance to support the LDP.
Modification sought by those submitting	
representation:	

Representation ref:	51
Body or person submitting a representation:	Scottish Government Directorate for the Built Environment, Historic Scotland and Transport Scotland
Provision of the Development Plan to which the issue relates:	
Modification sought by those submitting representation:	It may be useful to transfer the current Open Space guidance into the proposed supplementary guidance on either 'Development Standards', 'Sustainable Standards' or 'Sustainable Design'.



Briefs and master plans could be used to identify the type and quality of open space required on a development site and how it could be integrated within wider the network, and highlight specific criteria such as maintenance requirements or access for disabled people.
There may be scope to broaden supplementary guidance on core paths to include green networks.

Representation ref:	60
Body or person submitting a	Forest Holidays LLP
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	To enable comprehensive development, of
representation:	large scale sites within the Park, we would
	welcome Site Specific Development briefs
	which involve interested stakeholders –
	specifically for Glenmore village.

Representation ref:	63
Body or person submitting a	SEPA (Scottish Environment Protection
representation:	Agency)
Provision of the Development Plan to	We welcome the range of topics that will be
which the issue relates:	covered by supplementary guidance to
	support the Local Development Plan and are
	in agreement that the general direction of the
	current supplementary guidance is used as a
	starting point for the emerging guidance.
Modification sought by those submitting	We would particularly welcome additional
representation:	supplementary guidance for site specific
	Development Briefs provide a good way of
	identifying both site specific constraints and
	environmental improvements that can be
	enabled very transparently.

Representation ref:	67
Body or person submitting a	Forest Enterprise Scotland
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	There is a need to develop a spatial strategy
representation:	which will help guide development of the built
	infrastructure of the Glenmore area.



Representation ref:	69
Body or person submitting a	sportsscotland
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	We seek to be consulted on the development
representation:	of proposed SPGs on water resources,
	landscape, use of resources, natural heritage
	and core paths.

Representation ref:	70
Body or person submitting a representation:	Crown Estate
Provision of the Development Plan to which the issue relates:	Of specific relevance to the Crown Estate is the Supplementary Planning Guidance on Housing Development in Rural Building Groups. We agree with the proposal to use the direction given in the current supplementary guidance as a starting point to revisit the range of guidance, particularly with Housing Development in Rural Building Groups.
Modification sought by those submitting representation:	We request that the range of supplementary guidance published by CNPA will reflect the policies within the Local Development Plan and allow for a period of public engagement and comment on the proposed guidance.

Representation ref:	71
Body or person submitting a representation:	Dunachton Estate
Provision of the Development Plan to which the issue relates:	Of specific relevance to the Crown Estate is the Supplementary Planning Guidance on Housing Development in Rural Building Groups. We agree with the proposal to use the direction given in the current supplementary guidance as a starting point to revisit the range of guidance, particularly with Housing Development in Rural Building Groups.
Modification sought by those submitting representation:	We request that the range of supplementary guidance published by CNPA will reflect the policies within the Local Development Plan and allow for a period of public engagement and comment on the proposed guidance.

Representation ref:	74
Body or person submitting a	Tactran
representation:	
Provision of the Development Plan to	We agree with the topics covered by
which the issue relates:	supplementary guidance which will support
	the Local Development Plan.
Modification sought by those submitting	
representation:	



Representation ref:	78
Body or person submitting a	Scotia Homes Limited
representation:	
Provision of the Development Plan to	
which the issue relates:	
Modification sought by those submitting	The MIR refers to supplementary guidance
representation:	being provided on 'Housing' – we request
	this is extended to cover 'Affordable
	Housing'.

Representation ref:	79
Body or person submitting a	Mar Estate
representation:	
Provision of the Development Plan to which the issue relates:	We agree with the issues identified on the basis that they are reviewed to ensure they are in line with national policy.
Madification county by the consult within a	
Modification sought by those submitting representation:	

Representation ref:	97
Body or person submitting a	Keith Miller
representation:	
Provision of the Development Plan to which the issue relates:	The guidance on natural heritage, water resources, and landscape needs to be sufficiently clear and robust to achieve real protection, conservation and enhancement of habitats, plants, animals, biodiversity, landscape and wildness of the Cairngorms.
Modification sought by those submitting representation:	

Representation ref:	111
Body or person submitting a	Angus Council
representation:	The breed engages act out in the MID to
Provision of the Development Plan to	The broad approach set out in the MIR to
which the issue relates:	land use planning in Cairngorm National Park and that part within Angus is generally
	supported. We support the preferred option.
Modification sought by those submitting representation:	

