Cairngorms National Park
consultative draft Local Plan

CONSULTATION REPORT

JUNE 2006

CONTENTS

INTRODUCTION

1. This Consultation Report summarises the comments and opinions expressed on the consultative draft Cairngorms National Park Local Plan that was formally published in October 2005.

2. The formal consultation period ran between November 2005 to the 28th February 2006, though comments and opinions that were received up to May 2006 have been included in the consultation report.

3. The consultation report includes comments on the Environmental Report of the Strategic Environmental Assessment (SEA) of the Local Plan. This was formally available for consultation between 20 December 2005 and 28 February 2006. Again, representations received after the requested period have been included in the consultation report.

4. In total, 204 written representations were received by the Cairngorms National Park Authority. The consultation report organises the comments into five different interest groups representing: public bodies; general organisations; estates, land owners, land managers and developers; community groups; and individuals. The groups are described in Table 1 below. They are not strict groupings but are intended to reflect possible similarities or differences in views in the consultation report.

5. The consultation report also includes the summaries of community consultation events on the consultative draft Local Plan that were held between September and November 2005. In total, 924 people attended those meetings.

6. The Cairngorms National Park Authority will use the consultation comments summarised in this report along with new and updated information to help prepare a revised version of the Local Plan.

Table 1. Consultation response groupings

PUBLIC BODIES

Aberdeenshire Council - Infrastructure Services Committee
Aberdeenshire Council – Commercial Development Manager
Angus Council
The Highland Council
Historic Scotland
Moray Council
Moray Council – Roads Service
Perth & Kinross Council
SEPA
SNH

GENERAL ORGANISATIONS

Albyn Housing Society
Architecture & Design Scotland
The British Hydro Power Association
The Cairngorms Campaign
The Cairngorms Chamber of Commerce
The Cairngorm Club
Cairn Housing Association
The Civic Committee of the Moray Society
Communities Scotland
Crofters Commission
HIE Moray
Highland Fire Brigade
Homes for Scotland
Inverness Architectural Association on Behalf of RIAS
Inverness, Nairn, Badenoch & Strathspey Enterprise
John Muir Trust
Mountain Bothies Association
Mountaineering Council of Scotland
National Trust for Scotland
Network Rail
North East Mountain Trust
The Ramblers Association
RCAHMS
Royal Deeside and The Mearns Tourist Forum
RSPB
SCNP
Scottish Enterprise Grampian
Scottish Water - Kevin O'Hare
Scottish Wild Land Group
SportScotland
SRPBA
Strathspey Railway Company Ltd
Visit Scotland

ESTATES, LAND OWNERS, LAND MANAGERS & DEVELOPERS

Alvie & Dalraddy Estates
Alain F Angelil - On behalf of Cluny Castle Estate
ASBC Marketing Ltd
Balnafettach Estates Ltd
Ben Alder Estate
Brodies LLP Solicitors
Bruce & Partners – On behalf of Scotia Homes
Crannach Management Group
Danny Fullerton – Landmark Forest Theme Park
Dunecht Estates
Forestry Commission Scotland - Inverness
Forestry Commission Scotland – Dingwall

GL Hearn Property Consultants – On Behalf of The Co-operative Group Property Division
Glenmore Properties
Gordon Land Ltd
Grantown Caravan Park
Hiddleston & Feist
Indigo Planning Ltd
Invercauld Estate
Jacobs Babtie – J Smith
MBM Planning & Development
MBM Planning & Development – On Behalf of Inverburn Homes Ltd
Mono Consultants Ltd – On Behalf of Mobile Operators
Montagu Evans - On Behalf of Amec Projects Investments Limited
Montagu Evans – On behalf of Aviemore Highland Resort
Muir Homes
Muir Smith Evans – On behalf of Aviemore & Highland Developments
Reidhaven Estate
Robertson & Company
Rothiemurchus Estate
RPS Group Edinburgh - On Behalf of Laurel Grant LLP
RWE Npower
Savills – Muckrach Estate
Savills – On behalf of Pitmain & Dochfour Estates
Smiths Gore - On behalf of the Crown Estate of Glenlivet
Smiths Gore - On behalf of J C Forbes-Leith - Dunachton Estate
Strutt & Parker - On behalf of Mr A Macpherson-Fletcher, Balavil Estate
Strutt & Parker - On behalf of Mr M Bruce, Glen Tanar
Strutt & Parker – On behalf of The MacLaren-Webster Partnership
Tweedale - On behalf of Forest Holidays Ltd
Woodland Trust Scotland

COMMUNITY GROUPS

Aviemore CC
Ballater Community Council
Ballater Royal Deeside Ltd
Boat of Garten & Vicinity Community Council
Braemar Community Council
Braemar Royal Highland Gathering Ltd
Carrbridge Curling Club
Dalfaber Action Group
Glenisla Group - J B Muir
Glenlivet & Inveravon Community Association
Grantown on Spey Initiative
Kincraig & Vicinity Community Council
Kingussie & Vicinity Community Council
Laggan Community Association
Nethy Bridge Community Council
Nethy Bridge Tourist Association
Newtonmore Community Council
Newtonmore Community Woodland & Development Trust
Rothiemurchus & Glenmore Community Association

INDIVIDUALS

David Hogg
Mrs J Lamb
Adam Watson
John Partridge
Marjorie Harper
Frank Bardgett
S Masson
J Davison
Jenny Smith
Ann Williamson
Adam Gordon
Ian Kirk
Roy Turnbull
GH Johnston on behalf of A J Baillie
A C Bell
Richard Miller
J Walker
Richard Spencer
John MacDonald
Mr Bloomfield
Jan Semple
D & M McCreath
W S & B A Paterson
S Culliford
Jennifer & David Carrott
P & J Smith

J C D Montgomery	P & L Crane
Maureen Macmillan MSP	J M Gaukroger
Johnny Pott	Olwen Billington
T Levinthal	Alan Billington
R James	A D Wallace
Nick Aitken	Fergus Ewing MSP
Miff Tuck	Alan & Janet Goodall
Gill Nisbet	K Shaw
Keith Mathieson	Stewart G Fulton on behalf of Lorna Fraser
Anne Simpson	Montgomery
Jayne Langran	J G Grant & Son
S & A Dick	N I Thomson
J & C Steinle	Donald Black
A Bremner	Mr & Mrs Brown
Andy Rockall	Mrs Duncan
Hilary Mutch	K Roy King
Michael Franklin	Patricia Rimell
Jean & John Holley	Angus MacPherson
Jane Angus	Anne & Robert Watt
A M Millership	Jean Slimon
Samantha Faircliff	Mr & Mrs Bell
P Bates	Janet Davidson
M Domoney	Amanda Fraser
K Adamson	Residents of Dellmhor
D O'Reilly	Jennifer Bate
Mr Gatenby	Tom Welsh
Jane & Ian Whitaker	Anne Heath
E & D Lambie	Malcolm MacIntyre
Sue Jardine	Michael McAree
Ian Fraser	D Burke
Beryl MacRae	David Shearer
Gregor Mackenzie	David Chandler
Peter Mackay	Raymond Treadwell
Ian Grant	Mr & Mrs Milne
Nat & Michael Hone	Robinson Associates – On behalf of Dan Tindall
Ian Moffett	A W Laing – On behalf of 7 Clients

General Comments on Local Plan & Policies

PUBLIC BODIES

- Must ensure cross-compliance of all policies
- Consideration of the need for appropriate assessments for developments which may affect a Natura site.
- Need to include a statement stating that potential cumulative effects will be considered.
- Should be consistent in whether the term “mitigation” or “compensatory” measures are to be used.
- Should include reference to disability.
- **Introduction**
- Suggest a paragraph explaining how the reader might use the plan and linking General Policies and Topic Polices and linkages between issues.
- There is some concern that some policies may constrain economic/employments opportunities and should be reconsidered.
- The LP follows the standard from and pattern of local plans and amounts to an impressive achievement.
- Potential areas of conflict between the CNPA LP and NEST and the Aberdeenshire Local Plan by way of housing land supply, housing in the countryside and renewable energy.
- **Section 1 – Introduction – para. 1.17**
- It is not clear how a justified relationship could exist within the current legal context for structure and local plans.
- No Objection to Draft Local Plan
- Note that most issues identified area concerned with National Park Policies rather than land use issues.
- Agree that planning doesn’t stop at planning boundaries and there may be cross boundary issues in the future.

GENERAL ORGANISATIONS

- The plan acknowledges its key role in housing provision in the park area.
- Concern regarding the absence of a clear implementation and delivery strategy which brings together the principal housing stakeholders. The danger of this absence is that the Plan becomes the focus of what cannot or should not happen, as distinct to enabling the achievement if the desired outputs.
- As well as zoning sites for general and affordable housing development, the plan must be part of the identification and provision of the investment required to realise the targets it sets.
- The plan must therefore quantify both public and private investment needed to realise the housing targets and define how this is co-ordinated.
- The Plan must address the availability and costs of the land zoned for affordable housing in particular.
- The design and character elements of housing developments must not be the sole primary focus - it is secondary to making the plan happen in the first instance.
- Worth considering the establishment of some form of working group on affordable housing to monitor the Plans performance with a view to addressing development constraints which may inhibit its desired achievements.
- A definition of the Parks special qualities should be appended as part of the plan.
- Consider that sport and recreation contributes to the Parks special qualities and therefore should be protected by the policies in the plan.
- Consider that the Plan would benefit from additional policy which takes a positive stance in relation to development that would enhance the special qualities of the park e.g. that contributes to the promotion of enjoyment.
- Would be useful to define what is meant by the term cultural heritage.
- Consider that sport and recreation form a significant component of cultural heritage.
- In relation to the **Recreation and Access section** of the Local Plan, consider that policy should be included recognising the sometimes unique locational requirements of some recreation related developments. Suggest that the Local Plan should include dispensation for recreational proposals in such areas where it can be proven that development is needed in that location for the effective practise and provision of a recreational facility.
- Pleased to note that some attention has been given to listed buildings, ancient monuments and the recording and preservation of archaeological sites.
- Concern that some of the policies may constrain future economic and employment opportunities.
- LP seems to offer little additional capacity for housing or businesses in the Moray area.
- The additional restrictive criteria contained in some policies are unsupportive towards the fourth aim of the Park.

- Concern that the plans emphasis on development control (particularly sections 1-3) may overly constrain the future economic and social development of local communities and also some aspects of legitimate recreations.
- Suggest it necessary for the CNPA to undertake an appropriate assessment of the Local Plans implications according to the European Court of Justice Decision in October 2005.
- The Local Plan should reflect its duty to further the conservation of biodiversity set out in The Nature Conservation (Scotland) Act 2004, through suitably detailed policies.
- **Paragraph 1.11** – Suggest the fourth listed aim of the development strategy be moved to become the first. This reflects the underlying legal basis for the park and also the structure of the general and topic policies.
- **Forestry**
- Reference should be made to the appropriate adjacent Indicative Forestry Strategies, the forthcoming Park Plan and also to consultation procedures the CNPA may adopt.
- Support in General development initiatives that enhance and further the Commission's policy statement of achieving a thriving crofting community.
- Where croftland is proposed for development, the Commission advise full consultation with the occupiers prior to final designation; this should facilitate the release of the land from crofting.
- The commission finds the draft acceptable as it provides protection for inbye croftland and safeguards the continuation of crofting.
- Suggest potential sites for affordable housing on common grazings on land adjacent to Klondyke Cottage, Tulloch and on croftland at Inchbroke/Topperfettle.
- Crofting landlords are not obliged to equip a croft, the application of Section 75 on the majority of croftland would be counter productive to the benefits crafting brings to communities, suggest practical application on a case-by case-basis.
- Inconsistency between order of aims and vision points.
- **Paragraph 1.17** – Clarification required.
- **Paragraphs 1.19, 1.20 & 1.29** – unclear, statements should be stronger, include a flowchart to show relationship between parties.
- Suggest an additional policy regarding Environmental Impacts and noise and light pollution.
- Attach equal weight to local and visitor views and interests
- Excessively pro-development impression
- In terms of Design Quality, the LP does not include PAN 68 nor does it pick up on the importance of design in a comprehensive way in its Strategic Objectives.
- Other than a reference within General Policy 5, there is no over-arching policy to raise design quality throughout the Park.
- There is no policy to reinforce and enhance local distinctiveness across the park or between communities within it.
- Recommend that the LP include supportive design management initiatives within the Local Plan itself.
- The first, third and particularly the fourth aim of the Park can be interpreted as having some bearing on the promotion of design quality in the Park's built environments.
- Although the Plan does list 'Designing Places', SPP20 and a number of design orientated PANs, it does not include PAN 68, nor does it pick-up on the importance of design in a comprehensive way in its Strategic Objectives.
- Apart from a reference in General Policy 5, there is no over-arching policy to raise design quality throughout the Park.
- Nor is there a policy to reinforce and enhance local distinctiveness across the Park or between communities within it.
- A stronger representation of the importance of opportunities to promote design quality other than just reference to the Sustainable Design Guide mentioned in General Policy 5, should be made within the Local Plan.
- Some design initiatives however, involving management rather than physical development may lend themselves to inclusion in the Park Plan rather than the Local Plan.
- The concerns highlighted in the SEAs Non-Technical Summary should be investigated through the use of Design Statements, as promoted in PAN 68.
- Welcomes the recognition given to the importance of tourism and the commitment shown in particular to sustainable tourism and to quality and associated efforts.
- Welcome the presumption in favour of tourism accommodation businesses remaining as such.
- Suggest that it may be beneficial to extend the 'change of use' powers this to include visitor attractions and other tourist facilities.
- Feel it would be more helpful if there were stronger statements on the issues of displacement and dilution of product regarding the two pages on tourism.
- The lack of growth forecasts in household numbers and population change or economic activity is a serious weakness of the Plan.
- The plan does not properly address the overall need for housing which must be used to make the

case for the infrastructure investment to allow the need to be met at all levels of affordability.

- The Plan does not differentiate sufficiently between different types of affordable housing or make allowance for the requirements of the RSL.
- It is inappropriate for the Park to assume RSL provision when elements of the Parks policy may run counter to the RSL's obligations under the Housing Act 2001.
- Concern that little new land has been added to the existing land allocation and that land introduced is likely to be required to meet the high environmental test of the SEA.
- It should be the role of the Plan to promote high quality development with low environmental impact. Rather than the SEA pointing to the problems of villages growing into towns, it is more important to promote sustainable communities than to resist development for landscape or natural heritage reasons.
- Clearly the above point will conflict with the weighting of the aims of the Park.
- Suggest, where immediate housing supply is a problem, reserving brownfield sites as they become available for affordable housing, only where a change of use if required.
- The plan should be sensitive enough to recognise that some key sites within communities may be best reserved exclusively for affordable housing.
- The LP makes little reference to the Highland Council's Local Housing Strategy.
- This strategy places Badenoch and Strathspey in a housing stress area, therefore the CNP LP should be more robust in its efforts to identify, together with the Council, more developable land for this purpose.
- The Sustainable Design Guide must not be too prescriptive, but sets out a viable, affordable sustainable model which can be copied by other NPs.
- Would prefer to see the Plan as a spur to innovation in design and layout rather than making a virtue of traditional styles in a way which fails to take the opportunity for excellence.
- **Introduction**
- **Para 1.3** refers to housing being a core policy area, however, the detailed policy options on housing appear very restrictive, effectively closing the park to incomers, which could be detrimental to its economic sustainability.
- Concern regarding the weighting of the first aim if a conflict of aims arise, feel that considerations must be given to land based business that continue to enhance the park's qualities and sustainability.
- Concern that some of the policies may negatively impact on the vital role of the private sector.
- Needs to be more emphasis placed on promoting, encouraging and enhancing sustainable economic activity.
- Monitoring and Review: the plan should make it clear whether the "plan, monitor and manage" approach applies to all housing tenures.
- **Topic Policies**
- These should be streamlined so that the Local Plan has a more positive developments focus, delete policies which merely reflect legislation, or place them in an appendix to the development plan or the forthcoming Park Plan.
- It is vital to ensure that all the aims for the national parks legislation are contained within the development strategy. Would prefer the development strategy in **paragraph 1.11** to reflect more closely the sequence of aims as laid out in the original legislation.
- Concern that the vision for the Park does not mention recreation.
- Natural and cultural heritage is listed as the fourth aim, in **paragraph 1.11** although it is the first aim of the Park. Suggest there should be a closer correlation between the aims included in this vision and the aims of the Park
- Would like to see a General Policy on recreation and Access, rather than just seeing this as a topic policy.
- Feel that more cross-referencing of policies would be helpful, especially when relating to other documents such as the Park Plan.
- The settlement plans are focused on housing but do not make sufficient reference to how they relate to the core path plan, access strategy, transport plans for the park etc.
- The national significance of the Park should not be ignored or referred to as *"other interested parties*" as in **paragraph 1.39**.
- No Key forecasts
- Suggest using forecasts of a net +100 people per annum into the Badenoch and Strathspey area over the next decade as a basis for the Plan.
- There is insufficient focus and attention on wild land, in terms of its qualities, its remoteness and its giving of experience to users of the locality
- A number of policy statements are much too vague and give the impression that proposals will be permitted if the contribute something vague to the area.
- Example: **Policy 3** – where if biodiversity is increased then the proposal will be more likely to be approved. Does this mean a housing development with a pond in a remote corner of the site?
- Example: **Policy 26** – where a farm proposal improves diversification then it could be approved

easily.

- These general statements should be omitted or replaced with very specific requirements and linked to controls from other aspects of the LP.
- Whilst the need for flexibility in many of the lower parts of the CNP area, there is a lack of definitive precision in stating what will be preserved from intrusion and development, in the core wilder and remoter areas.
- **Introduction**
- **1.3 b)** – the term "local need" as currently used lacks definition and could lead to confusion if it is to be a significant criterion in assessing development proposals. Could also be discriminatory and excluding.
- **1.10** – All Park Planning decisions should also reflect current Scottish planning legislation and NPPGs. Also local plans are inter-dependant and should be developed and delivered in partnership with overlapping LAs.
- **1.11** – the views of the overlapping LAs should be taken into consideration.
- **1.22** – would be useful to explain the consultation process. And a statement on how development forums, community groups etc contribute.
- The monitoring of housing provision in the Park should not just be against the LP but also the housing needs of the Park itself. It would be useful to elaborate the role of communities in this process.
- Issue of added value.
- Issue regarding aims/vision differentiation.
- Issues with the weight applied to national and international communities compared with local communities.
- A lack of practicality in some policies.
- Omission of second tier sites.
- Forestry should be included as a main heading.
- No data is available for housing provision.
- **Page 22** – second last paragraph; replace "montane" with "arctic-alpine".
- **Page 121-4** – no mention of damaging land uses.
- Support and welcome many of the policies within the Plan.
- Feel that to be justified the CNPA LP must 'Add Value'
- Feel there is a lack of quantification of targets and evidence to support the policies.
- **General Reservations**
- Lack of clarity of language and of definition of key terms.
- Imbalance of focus between local and national/international interests and communities.
- Many problems associated with above points come together in paragraph 1.11
- It is not clear from this paragraph whether the aims listed are intended as the development strategy referred to.
- Cannot understand how detailed plan can be developed from a vision that is still being developed.
- It is important that the aims of a development strategy must also have elements focused on serving the national and international communities; otherwise what was the point of declaring that area a National Park?
- Think Global even when planning Local.
- The objectives stated fail to derive anything from the third aim of the Park.
- Feel that the stated Policy Objectives need changed to take account of imbalance described and lack of attention of the third aim of the park. Object to them in their present form.
- Would be helpful to include a table containing and summarising a list of the reports plans etc that are mentioned in the text as being relevant to the LP.
- Suggest using more up to date OS maps as the ones currently used contain imperial units of distance and altitude but scales seem to be metric.
- **Paragraph 1.11**
- The 5 bullet points partially reiterate the 4 statutory aims for NPs but the order, rewording, and additions weaken the conservation basis for the National Park and increase the development element.
- Four out of the five points refer back to the fourth aim of the Park; the undue weighting here is unacceptable.
- The third aim has been omitted entirely and must be included.
- These bullet points should more closely reflect the aims of the Park. The rewording is unjustified.
- Worryingly, the wording of the first bullet point which relates to the fourth aim of the Park is a significantly broader aim, both spatially and attitudinally than the fourth aim.
- This section must be significantly reworded; otherwise it runs the risk of having contrary aims to that of the park plan when it is written.
- **Local & National**
- Consultation with the national community is only mentioned in **paragraph 1.27**.

- Concern that the CNPA is not consulting enough with interested individuals and groups from outside the Park area.
- It would be useful if the groups who have been consulted were listed in an Appendix.
- **Development Control Process**
- Essential that the Plan keeps environmental consideration to the fore.
- Where is this added value for the environment in the CNP?
- The protection given to the environment should be distinctly greater than in a Local Authority Local Plan.
- **Protected Nature Conservation Sites & Biodiversity**
- The Local Plan should be going beyond the statutory requirements of legislation.
- The first sentence of **paragraph 1.35** shows neither evidence of this nor wider conservation ambition.
- Neither buffer zones nor habitat corridors are not mentioned nor are invasive species and their potential negative impacts.
- Opportunities to include encouragement of positive enhancement of habitats are omitted.
- **The principal of Development**
- Concern that the LP demonstrates a lack of priority given to people and quality of places for people.
- Suggest that the emphasis on the first aim of the park should be intertwined with the main objectives of the plan rather than separated as the overriding aim.
- Suggest the predicted effects of the Local Plan policies should be altered as follows:
  - To provide a framework for development while conserving natural and cultural heritage.
  - To promote sustainable use of the natural resources while conserving natural and cultural heritage.
  - To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public while conserving natural and cultural heritage.
  - To promote sustainable economic and social development of the areas communities while conserving natural and cultural heritage.
- **Location of Development**
- Before the Draft LP was published the aim was to retain much of the required housing in the existing settlements. The consultation process seems to have reversed this thinking and there is now no clear strategy for the required expansion.
- Local people born and brought up in the area are generally supportive of expansion; those who are new to the area tend to oppose development. Therefore suggest that in the interests of sustainability, encouraging improvements to existing services and utilities and retaining the economic vibrancy of existing settlements these are the most appropriate places for expansion.
- At present the plan is giving a misguided impression of the area as a large museum rather than as an area of vibrant working communities with access to outstanding scenery and activities.
- **Servicing Development.**
- No figures available for present and future infrastructure for service providers.
- The lack of credible information renders any projections for these as meaningless and inaccurate.
- Greater pressure should be placed on service providers to improve networks.
- Feel that these issues should be earmarked with a site as part of the process of compiling the Pan; this would highlight areas of deficiency and aid creating a framework for improvement.
- **Sustainability**
- Suggest that the CNP adopt the Highland Council Sustainable Design Guide as a basis for adding requirements relevant to the Park to avoid repeating work already carried out.
- **In Conclusion**
- Feel that the SEA and Draft LP are negative and anti-development.
- Need to have greater emphasis on promotion and positive outcomes
- Need for the first aim to be interwoven and not overriding.
- Support the objectives of the LP but the remainder of the document does not deliver the framework to support them.
- The LP should be a framework for the future of the landscape, habitat and outdoor activities for the people of the Park.
- Recommends that evidence is provided to ensure a scoping exercise is done to ensure that the Local Plan conform to existing Structure Plans and the Park Plan.
- Recommends that clarification id given of the Plans legal relationship to other documents.
- **Sustainable Development**
- Must be greater connectivity between policies, other plans and agency programmes.
- **Vision**
- A more coherent and imaginative vision is needed.
- **Forecasts**
- There are no definite targets or forecasts for future population changes or number of houses to be

built.

- The results of the Herriot-Watt study must be made available.
- **Business Matters**
- It should be clearly stated that a limited amount of housing in appropriate circumstances can lead to the creation of innovative business opportunities
- Should be a positive attitude towards expansion.
- The Aims of the Park need to be more clearly stated.
- Inconsistency – most policy statements use "will" or "will not" while others (**Policies 20A, 21, 24, 26, 28, 29 and 30**) use a variety of other terms.
- Acknowledge the key aims of the local plan in respect of Scottish Waters role.
- Would welcome projections if population/housing trends.

ESTATES, LANDOWNERS & DEVELOPERS

- The National Park Local Plan should demonstrate innovative policies that go beyond practice being followed elsewhere in Scotland.
- In Summary - In respect of the development strategy, the LP provides confusing mixed messages, sometimes promoting development and sometimes not, but with an over emphasis upon an underlying strategy of no new development.
- **Plan Aims**
- Policy of giving a greater weight to the first aim of the park if a conflict arises = very 'anti-development' and could therefore undermine the statutory objectives of the NP.
- Concern over lack of reference to woodlands and forestry.
- Concern that there could be a more proactive approach in supporting policy priorities, such as use of renewable energy and sustainable construction techniques in house building.
- **Paragraph 1.11** – does not seem to be a specific reference to sustainable use of natural resources. Keen to see this highlighted and to ensure that development decisions facilitate the ongoing sustainable management of the forests and woodlands in the National Park.
- Park Plan Objectives – Native Woodlands – Many are managed to provide high quality timber, recreation opportunities and habitats for a wide range of species, it is important to bear this in mind.
- There is a rising interest in community involvement and opportunities from community management, such as Anagach.
- **Introduction**
- Not clear the relationship of this Local Plan to the Park Plan and the Local Authorities 4 Structure Plans.
- Seems that some of the Strategic Objectives quoted in Appendix 1 have not been picked up by the policies in the Local Plan, e.g. that on **page 124** under Integrated Land Management.
- **Appendix 2**
- The River Dee and its tributaries SAC appears to be omitted from **Map 2** of Natura 2000 designations and the accompanying Schedule of designation sites.
- Would welcome clarification of when the local plan will be deemed a material consideration when determining planning applications.
- **Aims** – Meeting aim 2 is an essential part of meeting aims 1 and 3 as can be demonstrated and delivered in Glen Tanar.
- Suggest reviewing the scale at which the Map 2 is shown in.
- Feel that if greater involvement had been had from SEPA Highland Council, the Enterprise Company and SNH in advance of Community meetings the communities could have had access to important information.
- There is a lack of reference to the National Policies that must be addressed in the LP.
- Difficult to identify how the LP took cognisance of PANs such as PAN 74 on affordable housing.
- See no justification to extend constraints regarding national nature conservation, to new areas or add constraints to existing areas throughout the planning system.
- The Draft LP seems to lack vision and slips back into a system of being generally anti development with excessive control – missing meeting the aims of the Park and the primary objectives set out in Scottish Planning Policy 1.
- Believe the LP is far too constrictive and will put off locally based business development, leaving future initiatives to those who have the experience and resources to win at appeal.
- There is a lack of background information.
- **The National Parks (Scotland) Act 2000**

- **Paragraph 1.10**
- Believe that the point about 'greater weight' should be quoted in full including the phrase in the Act "where it appears to the Authority" as quoted on page 9.
- Stage 2 of the bill makes a statement regarding the importance of integrating the aims. Therefore the following must be ensured:

- It must be demonstrated that the utmost has been done to ensure the aims operate together in all circumstances.
- Decide whether to take the view that there is a conflict between the first aim and another aim.
- If there is a conflict, give priority to the first aim.
- Therefore the paragraphs in the draft LP that promote heritage aims at the expense of other aims, including cultural heritage, sustainable land use, recreation, education and social and economic wellbeing are contrary to the Act.
- The Draft Local Plan not only excludes development from designated sites but it also aims to extend 'no-go' areas to non designated sites Strongly object to this.
- Destructive development should not be permitted in the Park
- Full consideration needs to be given to the traditional activities within the Park such as Farming; Forestry; Fishing; Stalking and Shooting, as they provide a basis for rural life
- The importance and value of tourism in the National Park.
- Would like to see a stronger special dimension to tourism in the LP.
- Would like to see recognition that visitor information etc is a legitimate use for High Street Sites.
- Include recognition of the importance of the environmental economy; stewardship, contingent valuation, number of jobs supported.
- Growing pressures from outward commuters.
- Enhanced public transport.
- Need for local cultural/recreational facilities for resident and visitor.
- Implication of climate change.

COMMUNITY GROUPS

- Feel that the present use of language within the LP is giving an unnecessary negative tenor.
- Phrases such as 'presumption against' could be usefully replace with 'will be considered on individual merit'
- Phrases such as 'could be', 'may be' and 'in light of the circumstances' would help to swing the general tone of the document to one which is seen to be meeting individual; aspirations which still aims to protect the areas concerned.
- Too many limitations will dampen the vital dynamics needed to keep the Park area prosperous.

- Concern that there are no policies relating to noise or light pollution included in the LP.
- Feel that the LP should be a set of polices planning can be judged by.
- Not possible to encourage agriculture and crafting at the same time as you build houses on the best soil. Nothing about flats with allotments?
- To use alluvium for house building and call rough grazing 'untouched' is irrational given that the grazing ground has already been altered by liming, heavy grazing, manuring and drainage.
- Wild grasses are indeed rare, look at old crofts and shielings which are still showing results after 200yrs non-cultivation. Also, the post war changes of hill ground.
- The baseline surveys were walk-over and should be carried out properly before any action takes place.
- Water cannot at the same time supply life to fish and wading birds and humanity's washing-up. If you get rid of flood water it does not sink in to re-supply summer needs. Therefore some reforestation / dams and allowing water to spread in winter/spring is required and local population for local employment/enterprise is preferred to disturbing tourism.
- Health requires functional foods (and reduces waste), happiness and fulfilment in work and genetics, not just clean air, exercise and water – though they help.
- Abattoir/creamery/cheese factory, yoghurt making for low food miles and less stressed animals?
- Broadband in the country for workaholics on holiday.
- Any research on thermo-energy and granites – suspect below average – and/or nuclear waste burial/reuse?
- Rapid changes in agriculture as well as costs for commuting/longevity/education for leisure as well as climate cannot be quantified, but should be expected. Therefore policies should be more flexible than implied by these papers.
- Thus should we change our minds about the position of our Save-the-Local-Aspen project at the old land-fill site?

INDIVIDUALS

- Not sufficient for a Consultative draft.
- The Local Plan would be an excellent opportunity to highlight the shambles of conservation designations.
- The NSA system is flawed and of limited value.
- It should be possible for a prospective developer to be able to work out within broad limits the likelihood of obtaining planning permission for a particular project; this is not possible with the draft

local plan.

- The plan should provide a maximum number of dwellings which can be accommodated for each site, with any site specific criteria – currently it does not.
- The plan must state what spare capacity is at present available in each sewage works catchment area and must specify its known weaknesses in the water supply system.

- **Page 5 para 1.30**
- It is not acceptable that an applicant has to consult two different planning offices. The CNPA and the Local Authorities must have agreement in an application.
- Because planning so often is based on maps it is a pleasure to see the statement in the second sentence of paragraph 2.5.
- The future should not be determined on the basis of maps drawn for other purposes.
- suggest that the sentence in paragraph 2.5 be expanded in the final draft to read: *"some criteria (such as species, woodland or areas that are too small to be shown clearly) that are protected by the policies cannot be shown accurately on the proposals maps, and so must be identified at the time of a planning application through more detailed site investigations or consultation."*
- **Light pollution**
- No mention of light pollution.
- Note references in "Lighting in the Countryside" 1997 Office of the Deputy Prime Minister; Parliamentary Select Committee 2003 and PPG23.
- Suggest a new Topic Policy to be added regarding light pollution.
- A park should surely be something different I housing policy.
- The word "Park" suggests beautiful countryside, a peaceful rural setting, not miles of suburbia.
- Social mobility encourages the exercise of choice of living anywhere.
- Unless development is restricted in the three Straths of the Park, incomers will be moving into that which they are trying to escape from – Suburbia.
- Housing has to be restricted in the NP.
- Concern that housing developments may not be appropriate in design and setting to the NP.
- Suggest that better design, setting, landscaping and integrating small business would be more sustainable.
- Agree with Alvie Estates response, particularly policies 11 & 12 and Policy 36.
- A scattering of houses like the west coast townships, if discretely placed, should not be discarded.
- Suggest that the CNPA in conjunction with Highland Council and the Roads Authority should designate certain roads as suitable for shared use by cyclists, walkers, horse riders and cars.
- Signs could be used to re-route heavy vehicles and faster travelling traffic onto larger roads.
- This is already being carried out in Europe, and in England under the Transport Act 2000.
- This would help to fulfil the third aim of the NP.
- Consultations have been inadequate and unstructured.
- Lack of draft Park Plan before the draft Local Plan.
- The overall message of the Local Plan is far too pro-development. It appears little different to what a normal Local Authority would produce for an area of normal countryside.
- **Paragraph 1.11**
- The phrase "to support" the fourth bullet point in this paragraph is not strong enough.
- The different order of the bullet points to that of the aims of the Park is not acceptable.
- Strongly support the move to give greater protection to Ancient woodlands.
- Feel that woodland that is not on the Ancient Woodland Inventory should also be given protection.
- The Plan should make clear that large building schemes will not be permitted.
- No policies regarding the cultural heritage of the Park.
- A need for policies on forestry, farming and fishing, especially addressing the marketing of local produce.
- Understanding and enjoyment of the Park should lead to polices on education and recreation. Unfortunately they do not appear to be fully addressed in the Plan. Particularly on issue of ski centres.
- The CNPA has the responsibility to educate both the residents and visitors to have a caring and proactive involvement with the native species of the CNP. Remind them that this is their Park, and then they will care for it.
- Expansion of our present settlements has an immediate negative effect on wildlife inhabiting the edges of current boundaries.
- A sensitively placed human dwelling in the countryside, with occupants sympathetic towards wildlife, will have a positive effect upon wildlife.
- There is room in Tulloch, outside Nethy Bridge for a few more families to bring this community back to life and have a positive impact upon wildlife.
- Grateful that the services of Herriot-Watt University have been employed. Would appreciate if the CNPA could come up with a forecast on population.
- It is important that the remarkable diversity of drystone heritage within the Park is preserved,

protected and even added to.

- However if any drystone structures are found to be beyond their viable life and have no habitat value they area just as well to be recycled.
- Should include room for innovation
- Recognise benefits of incomers/holiday cottages
- Development should be for the enjoyment of the park and its communities.
- Issues of monitoring housing provision over time.
- **Sporting Tourism**
- The importance of sporting estates has not been mentioned.
- Suggest a policy to cover this.
- **Paragraph 3.74** "hunting" should read "country sports"
- No developments in woodland listed in the Ancient Woodland Inventory or Semi-Natural Woodland Inventory.
- No large scale developments, which would radically change the character of the community, should be allowed.
- Buffer zones should be included around the most sensitive conservation sites (particularly where species especially prone to disturbance such as capercaillie are concerned)
- Sites should be identified which are of particular importance to conservation but which are not covered by a national conservation designation – such as area **H2** in Boat of Garten.
- Feel that the plan contains one central flaw – it fails to take adequate cognisance of the fact of a looming energy crisis.
- Development plans should be planning for this change by encouraging sustainably designed communities.
- Things that might be done include:
  - Actively encourage energy conservation in all developments. This could be added into the 12th paragraph of **General Policy 5.**
  - A presumption in favour of Conservancies or extensions which have the effect of enhancing passive solar gain for houses. **Policy 21** should encourage installation of renewable energy schemes for individual houses
  - Should be stated intent for cycle lanes in all communities and between communities (Kingussie-Newtonmore)
  - Creation of allotments and community gardens should be encouraged
  - Encouragement of smallholdings. Relates to **Policy 39**:
    - Specifically the requirement for *'a fully reasoned case why housing elsewhere is not suitable'.* This effectively means that a person could not buy the land and build a house on it to enable working of that land as a small holding.
    - Feel that a Section 75 alone would suffice
    - The penultimate paragraph of **Policy 39** appears to preclude the possibility of new build residences in remote locations where there may not be existing houses. Surely the CNPA do not intend to prevent people moving back into the deserted straths in the Park?
- Tourism developments should focus on proposals which encourage visitors from within the Highlands and Scotland due to future high fuel cost of long-haul tourism.
- Strongly support the move to give greater protection to ancient woodlands, but feel that woodland not on the Ancient Woodland Inventory should also be given protection.
- Consider that the Plan should make clear that large building schemes should not be permitted.

General Policies

PUBLIC BODIES

- **General Policies 1-3** – More clarity and rationalisation needed.
- Suggest individual maps for each General Policy area.
- Suggest strengthening the emphasis on the national importance of social & economic benefits being required to outweigh adverse effects.
- Although not implicit in the legislation, in terms of policy category A listed buildings carry similar weight to scheduled monuments and could perhaps be included in the criteria for **General Policy 3** rather than **2**, however agree with the principle set out in **General Policy 2**.

GENERAL ORGANISATIONS

- **Paragraph 2.5, General Policies 1-5** and other sections, refer to the Parks special qualities, these are not however, defined anywhere in the Local Plan.
- Consider that **General Policies 1–3** are difficult to follow and that this could be remedied by breaking down into several sub or bullet points.
- In relation to **Table 2.1**, find it difficult to believe that amenity open spaces, core paths, rights of way or other path networks do not extend or could not extend, within the lifetime of this Local Plan, outwith **General Policy 2** areas.
- Suggest a revision of **Policies 1-3 and Table 2.1** to reflect the importance of paths to mountain summits being protected from and enhanced through development and not just in **General Policy 2** areas.
- Welcome the emphasis placed on conservation of the natural environment.
- Suggest that the designations included on the General Policy Overview Map are referred to in **General Policies 1, 2 & 3.**
- There should be mention of third tier sites.
- **Page 9** – clarify definition of "sustainability" used here.
- **General Policies 1-3** – meaning and use of "significant adverse impact".
- **General Policy Overview Map** – a mix of imperial or metric units.
- **Table 2.1** – land without designation does not mean it should not be protected. Define "important croft".
- **Paragraph 2.9** – definition is required.
- Need to clarify the three categories for protection
- Need for precise and consistent wording.
- Suggest that mitigation be taken from **General Policies 1-3** and placed in a new General Policy 6.
- Colour coding of areas could be misinterpreted as traffic light system.
- Concern that the importance of "landscape" has not adequate consideration.
- Suggest the plan needs more innovative policies such as a new General Policy regarding restoration and enhancement if the natural and cultural heritage of the Park.
- **General Policies**
- Too restrictive
- Do not take into account adequately social and economic benefits
- Do little to encourage investment in the long-term sustainability of the park
- Need to be consistent when talking about adverse effects in **General Policies 1-3**, should be referred to as "significant adverse effects"
- Need to indicate more clearly the relationships between the General Policies.
- Concern that the topic polices will not catch many of the subtler issues which combine to define the essence of a National Park.
- For example **General Policy 1** areas are considerable in extent. Protection of heritage assets within these areas could be secured technically, but yet the policies may fail in respect of ambiance or sense of place.
- Strongly feel that special planning in this context will have to make considerable allowance for buffer zones. Suggest the SEA be based on tiered surveys of heritage interest.
- All general Policies should be reconciled amongst the Park's partnering bodies.
- **General Policies 1-3** – issues regarding economic and social benefits, feel that these statements are inappropriate for a National Park Local Plan.
- **Treatment of Landscape**
- Unsatisfied with the treatment of landscape, in that National Scenic Areas in **Table 2.1** are given lesser protection than areas designated for their value to wildlife conservation or science.
- Landscape as the foundation of the Highland tourist industry is the chief economic asset of the park.
- Urge that it is therefore given strict protection.

- **General Policies 1,2 & 3**
- The rationale behind these three polices is not stated.
- The wording these three policies is imprecise and there are small variations in similar phrases between the policies, the reasons for which are not evident. e.g. **General Policy 1** refers to: "…the aims if the national Park or any of its special qualities" whereas **General Policy 2** refers to:"…the aims of the National Park or objectives of designation."
- Concern that the principal to give greater weight to the first aim only where there is a conflict of aims, will may be taken as a presumption.

ESTATES, LANDOWNERS & DEVELOPERS

- **General Policies 1-3**
- These policies area welcomed.
- Particularly pleased to see that ancient woodland as been afforded a high level of protection through General Policy 2.
- Any loss of ancient woodland would not be compatible with the Parks 4 aims.
- **Table 2.1 – Core Paths** – These do not exist yet, inclusion of then within **General Policy 2** criteria could lead to a resistance to create them within existing **General Policy 1** areas and other problems, suggest they are dropped from the list of criteria for **General policy 2**.
- **Table 2.1 – Local Sites and Monuments Records** – many are in existing **General Policy 1** areas rather than **General Policy 2** areas.
- Support **General Policies 1-5** although have some reservations about the criteria shown in **Table 2.1**.
- **General Polices 1,2 and 3 & Table 2.1**
- Referring to **Table 2.1**, the column for General Policy 2 omits Local Authority designations such as Aberdeenshire's Sites of Interest to Natural Science.
- This means that less protection will be afforded to these sites within the Park that in the neighbouring areas and is at odds with the CNPA vision and strategic objectives.
- Find it odd that such general identifications as "amenity open space" and "poorly drained areas" should be afforded protection ranking with SSSIs and Geological Conservation Review Sites.
- The approach to these policies appears to be too arbitrary.
- **General Policies 1-3** - Would strongly support flexibility in dealing with development outwith settlement areas.
- Clarification regarding aims/vision differentiation.
- Would support strong flexibility regarding Settlement Development Areas.

COMMUNITY GROUPS

- Consider that the 'Ancient Woodlands' designation is totally flawed as it fails to recognise that much of the areas is now commercial timber forestry.
- Considering the above, suggest that the General Policies should include a commitment to review all designated areas on a regular basis.
- Essential that errors such as these are corrected in the final draft.
- Some of the designations owe their existence to the presence of livestock. This means that the survival of such areas is dependant on being grazed in the traditional manner.
- There are a number of 'draconian' phrases such as the opening sentence to **General Policy 2** which should be revised.
- Concerned over an apparent loop-hole within **General Policy 2** whereby it appears to allow developments – *'where it is considered that these would be outweighed by social or economic benefits of national importance or of importance to the NP'*. This suggests that the LP provisions could be ignored. The LP needs to be more pro-active in how to deal with such situations.

INDIVIDUALS

- Not clear
- Issues of the height criteria.
- Find General Policy hard to accept – unreasonable to expect small development in the countryside to comply with the criteria, should be ambition rather than obligation.

General Policy 1

PUBLIC BODIES

- Suggest rewording to make it supportive of developments which benefit Natura sites.
- Suggest breaking down into two points regarding social and economic issues and mitigation measures.
- Greater definition required of the criteria in table 2.1.

GENERAL ORGANISATIONS

- Propose a rounding off of **General Policy 1** area boundary to exclude some sensitive areas.
- **General Policy 1** should be reworded to show CNPA's clear commitment to promoting sustainable social and economic sustainability.
- Is fairy negative and open to interpretation and is ambiguous. May fail to comply with PAN 49.
- Recommends incorporating PAN 49 into all policies especially **General Policy 1 and 5.**
- Welcomes the wording in **General Policy 1**, however this has to be reconciled with the more restrictive wording used elsewhere such as in **Policy 5**.
- Welcomes this policy, a balanced approach is necessary.

ESTATES, LANDOWNERS & DEVELOPERS

- Fully support **General Policy 1**. – suggest this is proper interpretation of The National Park (Scotland) Act 2000.
- Too restrictive
- Fails to give sufficient weight to first aim.
- Too restrictive
- **General Policies Overview** – the boundary runs through the centre of Lynchat where there are no **General Policy 2** criteria designations in existing planning policy.
- Negative and anti-development, especially if the aims are to be interpreted at site level.
- Important that sensible development is planned for and allowed, and that the aims should only be applied in a wider park area context.
- Define "Significant Adverse Effect"
- It should be made clear that adverse effects need to be significant as defined in NPPG 14 and as such would affect the overall integrity of the National Park.
- Paragraph 33 of NPPG14 should also be referred to as regards giving weight to social and economic interests of local communities.
- As it stands the wording of this policy would restrict any new development except that on zoned land. This does not accord with the views of the National Parks Aims.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- The policy appears to apply to all areas which do not fall into one or more of the conservation designations listed for **General Polices 2 or 3**. It is misleading to a prospective developer and is simplistic. A policy such as this must be founded on a careful survey of the area.
- This is a far too permissive statement. Is more pro-development than that of Highland Council.
- No recognition of the cumulative effects of developments.
- This policy should ensure hat the general countryside area in the lower ground should remain without further development except in the most exceptional circumstances. A very strong presumption against development should be clearly stated in this policy.
- The extract in **paragraph 2.3** does not accurately reflect what is written under section 9 and 1(a) of the National Park Scotland Act. It should read "the NPA shall give greater weight" and not "should give greater weight to the first aim"
- **General Policy 1** needs to be reworded to reflect the presumption in favour of heritage in accordance with the National Park Scotland Act. It is essential that the Plan reflects the statutory requirements.
- Recommend that the Precautionary Principle be introduced into the introduction, along with rewording General Policies 1 & 2 to better reflect the requirements of the National Park Scotland Act.

General Policy 2

PUBLIC BODIES

- 1st bullet point should refer to the first aim of the Park.
- Concern regarding possible impacts to natural heritage if it is clearly outweighed by social and economic benefits.
- Reference to Inventory of Gardens and designed landscapes in criteria in table 2.1
- **General Policies 2 and 3**
- The proposed criterion for housing eligibility seems too restrictive and may be difficult to enforce.
- In **General Policy areas 2 and 3**, one of the criteria to demonstrate that no alternative site is available could be time consuming in terms of confirmation and corroboration.

GENERAL ORGANISATIONS

- Support these policies.
- Wish it to be stated that renovations and improvements to existing buildings in the remote areas of the park will be permitted provided that the proposal does not change essential character of the existing structure or create significant visual impact.
- Crofting regulation can be used to increase the number of crofts by subdivision or by apportionment from the common grazings, the need for housing in these newly created crofts would require planning permission – suggest this be built into **General Policy 2**.
- **General Policy 2** should be reworded to be less restrictive as it covers the majority of land in the NP, and as it stands could have major sterilising effects.
- **Use of the 400m contour as a Policy Boundary**
- Using this contour for the application of **General Policy 2** seems too inflexible
- For most of the visiting public, often car borne, the scenic quality of the lower ground is at least as important as that of the higher hills.
- The Aviemore-Glenmore corridor therefore needs to be protected from creeping urbanization.
- **General Policies 1 – 3 Criteria - 400m as Threshold**
- No explanation why this is a threshold for **General Policy 2** Criteria.
- By applying this threshold, considerable areas of lower lying but sensitive, scenically and environmentally important ground has been included in the **General Policy 1** category.
- There is a need to reduce the altitudinal criteria or to exclude the sensitive areas in **General Policy 1**.
- The requirement in **General Policy 2** applying to land above 400 metres for power schemes to demonstrate there is no alternative, would have the effect of excluding most potential hydropower development (including possible community schemes) because it would be impossible to meet. The remaining provisions would represent a stringent policy test for any development proposals without this requirement.
- **Use of the 400m contour as a Policy Boundary**
- Using this contour for the application of **General Policy 2** seems too inflexible
- For most of the visiting public, often car borne, the scenic quality of the lower ground is at least as important as that of the higher hills.
- The Aviemore-Glenmore corridor therefore needs to be protected from creeping urbanization.

ESTATES, LANDOWNERS & DEVELOPERS

- **General Policy 2 and 3** sets a broad presumption against development of any kind.
- Suggest removing the words *"no suitable alternatives"* from **General Policies 2 & 3** to bring them into line with correct interpretation of the statutory aims of the NP
- **Paragraph 3.19 – Development above 400m**
- Benefit where managing existing and new path routes above 400m. Some such paths can develop through use (under the SOAC) and not through the planning process – having the ability to manage them over time should not be unduly constrained by the Local Plan.
- Is a disincentive and will not deliver the first point form the vision strategy.
- Land in the Ancient Woodland inventory should not be a reason for clarifying it under **General Policy 2**.
- Some land designations should not be used to impose a presumption against development, such as NSAs, semi-natural woodland, some SSSIs.
- Aims and objectives of land owners should be considered along with the aims of the NP.
- Restrictions on future development caused by the majority of land in the NP under General Policy 2 or 3 will result in a decline on economically sustainable activities and an increasing reliance on government funding and employment.
- Paragraph 3.19 – 400m restriction is a crude rule of thumb.

- The application of **General Policy 2**, to land above 400m would have the effect of arbitrarily excluding most potential hydro development in the park, it would be impossible to demonstrate an alternative.
- Suggest that the words *"there is no alternative and"* be deleted from the policy.
- Too restrictive, effectively sterilising vast areas from any development.
- The Woodland Initiatives are meant only as a guide.
- The General Policy 2 area should be reduced in size.
- Overly restrictive, there will always be an alternative. Duplication of areas already under designation, protected again through **General Policy 2**.
- Overly restrictive, there will always be an alternative. Duplication of areas already under designation, protected again through **General Policy 2**. Suggest redrawing as shown on attached map.
- To include all land over 400m within **General Policy 2** is highly restrictive
- There may well be properties, farms located above 400m where it would be inappropriate for **General Policy 2** to apply without any modification. This could have adverse implications for farm diversification.
- The opening statement of **General Policy 2** is a very negative statement that does not accord with the aims of the Park.
- The last point of **General Policy 2** is also too negative to achieve the aims. It should read *"or are mitigated"* not "*and are mitigated"*
- The special qualities of the park should be defined.
- Define "no alternative". The term appears too restrictive.
- This does not accord with NPPG 14 which applies the alternative test only to International Designations.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- Needs to be reference to cumulative impacts.
- **General Policy 2** should include all areas of native woodlands to be consistent with the commitment made at the 2002 World Summit.
- Needs to be recognition of possible adverse impacts coming from outwith the boundary of designated sites.
- Suggest identifying buffer zones around designated areas.
- Suggest identifying and protecting undesignated sites for their nature conservation and landscape features.
- Concern in same way with **General Policy 2.** 2nd Bullet point - if significant adverse effects then there should be a presumption of refusal, regardless of whether there are significant social or economic benefits.
- Recommend that the Precautionary Principle be introduced into the introduction, along with rewording General Policies 1 & 2 to better reflect the requirements of the National Park Scotland Act.

General Policy 3

PUBLIC BODIES

- Within the **General Policy 2 Criteria in Table 2.1** "Flood Consultation Areas" are referred to, but are not defined anywhere. This should be clarified, especially as the functional floodplain is included within the criteria for **General Policy 3**.
- Unlikely to comply with Natura Regs.
- Suggest a statement that effects of activities arising from a proposal on important cultural heritage will be considered.
- Consideration to be given to local landscape designations.
- **General Policies 2 and 3**
- The proposed criterion for housing eligibility seems too restrictive and may be difficult to enforce.
- In **General Policy areas 2 and 3**, one of the criteria to demonstrate that no alternative site is available could be time consuming in terms of confirmation and corroboration.

GENERAL ORGANISATIONS

- Paths extend onto the Cairngorms plateau, yet paths do not appear to be a criterion of **General Policy 3** areas.
- **General Policy 3** should also include candidate SPAs and SACs.
- The **General Policy 3** Criteria contained in **Table 2.1** should include Annex 1 species listed in the Birds Directive and candidate SPAs/SACs.
- Concern over **General Policy 3** - will this effectively block the improvement of access opportunities in these areas? Will path development be blocked as in the recent Glenmore SAC example?
- **General Policies 1 – 3 Criteria - Landscape**
- Suggest re-considering the categorisations for landscape due to the UK signing the European Landscape Convention which will affect the National Scenic Areas designation through the Planning, etc. (Scotland) Bill.
- Given the importance of the Cairngorm landscapes the fact that no area is listed under **General Policy 3** is unreasonable.
- Areas that should be included under **General Policy 3** are:
  - Strath Nethy, Bynack Mor, upper Water of Caiplich and upper Glen Avon.
  - The Headwaters of the Feshie – Geldie, and the upper River Dee, Glen Ey catchments (between the proposed General Policy 3 boundary of the Cairngorm massif and the southern boundary of the NP across to Glen Clunie.
  - The Gaick area and upper catchment of Glen Tromie
- Northern Slopes of Lochnagar, across upper Glen Muick to upper Glens Mark, Lee and Clova.

ESTATES, LANDOWNERS & DEVELOPERS

- **General Policy 2 and 3** sets a broad presumption against development of any kind.
- Suggest removing the words *"no suitable alternatives"* from **General Policies 2 & 3** to bring them into line with correct interpretation of the statutory aims of the NP
- **Protected Nature Conservation Sites & Bio Diversity**
- General Policy 3 – second paragraph - Suggest the deletion of words *"where there are no alternative locations"* and replacement with *"where any adverse effects would be outweighed by social or economic benefits of national importance or importance to the aims of the National Park and where appropriate measures are taken to minimise and mitigate the adverse effects"*.
- Unreasonably restrictive, designations/restrictions should not destroy current use.
- Too restrictive – "adverse impact" rules out most developments.
- Overlapping of **General Policy areas 2 & 3** should be reconsidered in the case of Glen Tanar.
- This is the current legislation for Natura 2000 sites
- How does extending this type of constraint to contaminated land and near sewage works assist the Aims?
- Suggest demonstrating how it is proposed to take forward the four Aims of the Park together in preparation of all policies.
- All criteria other than the international ones should be removed from this general policy and placed in **General Policy 2**

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- Needs to be reference to cumulative impacts.
- Needs to be recognition of possible adverse impacts coming from outwith the boundary of designated sites.
- Suggest identifying buffer zones around designated areas.
- Suggest identifying and protecting undesignated sites for their nature conservation and landscape features.

General Policy 4

PUBLIC BODIES

- Suggest a requirement for development proposals to demonstrate a need for the development to be out with a settlement.

GENERAL ORGANISATIONS

- Suggest the cut off point for development in **General Policy 4** to be 600m not 400, as some properties in the park are above this height.
- Should mention socio-economic and economic impact assessments as part of the 'due consideration' process.

ESTATES, LANDOWNERS & DEVELOPERS

- Would like to see a stronger statement on compliance with General and Topic Policies.
- Suggest replacing "proposals will be favourably considered if they comply with the policies in Sections 2-3" with a stronger statement "*proposals that do not comply with General Policies and Topic Policies set out in the Local Plan will not be considered."*
- Further development should be considered on its merits.
- Too restrictive – "adverse impact" rules out most developments.
- The approach to consider housing outwith settlement in this policy is contradictory with other polices within the plan.
- Object to statement that the wider policies are deemed suitable to guide development within settlements.
- Consideration should be given to the fact that Lynchat was previously identified as a settlement and has potential.
- Considering development outside settlements seems to be contrary to the other policies in the Plan. Object to third paragraph.
- Must continue flexibility of this policy.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- Too permissive.
- **Paragraph 2.11**
- Suggest using the term "carrying capacity" rather than "sustainable" when referring to finite resources, such as land for housing.

General Policy 5

PUBLIC BODIES

- Welcomes this General Policy.
- Supports the requirement for adequate infrastructure such as sewage and SUDS facilities to be readily available or implementable for the site.
- Design Guide development is welcomed, suggest a sustainability checklist also.
- Until this guidance is developed suggest that the policy could be made clearer by expanding the paragraph on waste minimisation and adding the sentence *"….and composting by making provision within the site for the collection, storage and segregation of waste."*
- Welcome the first paragraph of General Policy 5 regarding flooding criteria with the addition of "in full accordance with national planning policy".
- The issue of air quality could be incorporated into **General Policy 5**.
- General Policy 5 – numbering and guidance on how it is to be implemented would be helpful.
- Wording needs to be stronger and clearer.
- Suggest rewording second paragraph so that all developments must avoid damage to the Parks special qualities.
- Suggest rewording of third paragraph.
- The requirement of **General Policy 5** for development proposals to be assessed against Sustainable Development Principals will present difficulty in enforcing compliance.

GENERAL ORGANISATIONS

- Welcome the intent of **General Policy 5**.
- **General Policy 5** – suggest numbered breakdown, some rewording necessary.
- Suggest numbering, rationalising of **General Policy 5** and ensuring they are relevant and enforceable. Include waste minimisation and light pollution.
- **General Policy 5** – suggest rewording to allow this policy to become an ambition rather than an obligation. Replace "will" with "should" and add to the following to the first paragraph:"….compliance with the following sustainable development principals which should be met where possible and reasonable. A balance of economic and environmental costs and benefits should be struck, and a statement of compliance will be required to accompany each application…"
- Concern over how easily this will be to implement. But support.
- Feel that it should be made clear which of the various definitions of Sustainable Development has been adopted.
- Support all the policy conditions listed as pre-requirements for sustainable development within the park.
- The above must be applied flexibly according to the nature of the development.
- Suggest a condition requiring design to ensure effective and efficient water use, given the problem of water demand within some areas of the Park.
- Needs to be a definition and criteria for unsustainable developments.
- Strongly support this policy.
- Recommends incorporating PAN 49 into all policies especially **General Policy 1 and 5.**
- Needs to give a stronger lead in terms of defining the criteria.
- Some items such as provision of electricity supply are outwith scope of control.
- Concern over the stipulating of local labour and local materials.
- General Policy 5 should be accompanied by the Sustainable Design Guide.
- Welcomes the recognition of the importance of a viable Park economy.
- Feel that it should be made clear which of the various definitions of Sustainable Development has been adopted.
- Support all the policy conditions listed as pre-requirements for sustainable development within the park.
- The above must be applied flexibly according to the nature of the development.
- Suggest a condition requiring design to ensure effective and efficient water use, given the problem of water demand within some areas of the Park.
- Needs to be a definition and criteria for unsustainable developments.

ESTATES, LANDOWNERS & DEVELOPERS

- Suggest changing the word *"negligible"* for the word *"minimal"* in the second paragraph of **General Policy 5**.
- This policy is so restrictive that it is likely to result in an unsustainable local economy.
- Suggest rewording parts.

- Issues of attracting visitors leading to disturbance of wildlife etc, and detracting from wilderness. Encourage visitors to spend money.
- Unreasonable to include electricity supply as a criterion.
- Too much detail
- Many aspects of this policy are subjective and open to interpretation.
- A Local Plan should not be prescriptive regarding infrastructure, choice of labour, whether shops can cope etc. These issues will be dealt with by separate negotiations with applicants and market forces.
- Numerous design details are mentioned here; some are best dealt with by building warrant, some are above and beyond the standards.
- A more positive attitude of encouragement rather than prescriptive insistence is required.
- There is no guidance as to which locally sourced materials are considered suitable.
- Regarding the reference to locally sourced materials, this could present a problem to the development industry as any attempt to dictate the use of a single source of material could be interpreted as being contrary to European Competition Policies.
- Over provision may in some cases lead to uneconomic development, wording may be too prescriptive.
- This policy should be based on the Scottish Executive's Sustainable Development Strategy. And the objectives states in paragraphs 7 and 8 of SPP1.
- For consistency it should reflect the Highland Council's Sustainable Design Statement.

COMMUNITY GROUPS

- Some recognition must be given to the fact that in some rural areas using local sources and utilising local labour skills is impracticable because of a lack of available skills, insufficient choice and cost implications.

INDIVIDUALS

- Any proposed development site should not conflict with adjacent areas of natural heritage importance.
- Should address the issue of light pollution.

Policy 1 – Natura 2000 and Ramsar Sites

PUBLIC BODIES

- **Policies 1, 2, 4, 5, & 6** – require to be streamlined. Is it necessary to repeat matters enshrined in law or procedures/regulations in policy?
- Should be a policy or a statement of the need to take account of cumulative impact, especially in the case of Natura interests.
- Text should give reference to geological and Geomorphological interests.
- Mention Nature Conservation (Scotland) Act 2004.
- Licences for research, education, etc available from SNH not SE

GENERAL ORGANISATIONS

- As worded this policy is not clear.
- Presented in what appears to be reverse order.
- Is contrary to the robust approach taken in General Policy 3.
- The wording should be significantly improved to conform to the needs of the Habitats Regulations.
- Needs to be more explicit and offer stronger protection to International designated sites.

ESTATES, LANDOWNERS & DEVELOPERS

- Support Topic Policies 1
- Should take into account economic and social considerations when considering development close to or within a designated area.
- Some clarification is needed.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- Why is this policy in the Plan? It is no more than a statement of the legislative position and should be deleted.

Policy 2 – Protected Species

PUBLIC BODIES

- guidance on how criterion c will be assessed.
- **Policies 1, 2, 4, 5, & 6** – require to be streamlined. Is it necessary to repeat matters enshrined in law or procedures/regulations in policy?
- Should be a statement regarding a protected species survey required by developers.
- Does not fully capture all the protected species that require consideration in planning decisions.

GENERAL ORGANISATIONS

- **Policy 2** – rewrite, strengthen in favour of protection.

ESTATES, LANDOWNERS & DEVELOPERS

- Support Topic Policies 2
- Suggest a more balanced statement.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- No comments were received on this policy.

Policy 3 - Biodiversity

PUBLIC BODIES

- Welcomes the first paragraph in this policy.
- Request that the policy refer specifically to the requirement to protect and create natural and semi-natural habitats and to protect open and natural waterbodies, watercourses, wetland and river corridor habitats including a presumption against excessive engineering and culverting of watercourses and a presumption for the creation of riparian buffer zones and require the restoration of culverted or canalized watercourses.

GENERAL ORGANISATIONS

- Very clearly sets out the local housing context in **paragraphs 3.80 – 3.92**
- The Local Plan strategy for housing as set out in **3.93** is appropriate.
- Welcome the wording of this policy, in particular the emphasis on permission only being granted when habitats of equal conservation value are provided.
- **Page 20** – interest must go beyond NP boundary to prevent adverse impacts.
- Concern over the term "Biodiversity" in this context and concern that the first paragraph may be open to abuse.
- Concern over the current wording.
- Should apply only where the effect on habitats or species is significant.
- More importance should be placed on soils.
- Feel there should be scope to link biodiversity policies within the LP to a General Policy 7 proposed by The Mountaineering Council of Scotland in their submission to the draft LP.
- It is presumed in Policy 3 the criteria should be the Functional Flood Plain and not the Functional Flood Plan?

ESTATES, LANDOWNERS & DEVELOPERS

- Would like to see this policy expanded to enhance protection of valuable non-designated sites, which may not be identified through BAPs or LBAPs such as high conservation value woodlands.
- Suggest that the first paragraph of the policy should read therefore*:"…Nature Conservation Act**, as well as other non-designated areas of high conservation value**, and that…"*
- Support Topic Policies 3
- A survey should only be required where it is clear that the proposed development will have a significant adverse impact on a species or habitat at risk.
- Suggest some rewording.
- Some clarification is needed.
- Should be more explicit in recognising the scope that exists for tourism related opportunities associated with many of the policies: **Policies 3, 4, 5, 6, 8, 9, 19, 20, 21, and 24.**
- The above policies could play a much more prominent role in providing experiences for visitors that would enhance sense of place and understanding of the importance of conservation.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- No comments were received on this policy.

Policy RM9 – Soil Conservation and Management

PUBLIC BODIES

- outline or list principals of best practice.
- Suggest some rewording of the supportive text.
- Should define what might be unacceptable.
- Should be at threshold below which a soil management plan would not be required.
- As this is a completely new topic for Council staff, it would add a further aspect to the application process by way of having to assess the submitted soil management plan, especially since the current wording implies that ***all*** development would apply.

GENERAL ORGANISATIONS

- Should be specific mention of new hill tracks.
- Concern that the additional requirement for a soil management plan in ***all*** developments.
- This implies it would be irrespective of the extra burden of cost, possibly without any clear environmental benefits in many cases.
- Generally feel that some of the policies for development control may be difficult to enforce and add additional expense.
- If this increase were to be material to the raising cost of living and business in the Park then it could impact on the sustainability of future economic and social development therein.
- domestic land curtilages? Clarification needed.
- Inconsistent with the numbering in the plan.
- Requires more balance so that soil management plans are only required where the proposed development is significant.
- Replace “agricultural” with “agriculture”.

ESTATES, LANDOWNERS & DEVELOPERS

- worth noting that there are forest industry best practice guidelines, such as Forestry Soil Conservation Guidelines and Forest and Water Guidelines.
- Support Topic Policies RM9.
- Suggest rewording to be more balanced.
- The requirement to submit a final soil management plan in advance of planning permission would present practical difficulties for those who use design and build contractors.
- With a design and build strategy, soil management can only be finalised after the contract has been awarded and the design phase is well advanced, after planning permission has been granted. It is the contractor who is in the best position to submit a final soil management plan.
- For the above reasons suggest the following:
- A preliminary soil management plan to be submitted with the planning application.
- The submission and approval in writing by the Authority of a final soil management plan prior to the commencement of development (could be a condition of the permission)
- To require ant amendments which may be found necessary to be similarly approved before any work to which they refer is carried out.

COMMUNITY GROUPS

- The curtilage of an existing house should be excluded from this policy in order to minimise the use of unnecessary regulations with their attendant costs in time and money.

INDIVIDUALS

- Soils are much more than just a natural resource. Without soils, there would be no above-ground vegetation, or animals, including man. Soils are the basis for all terrestrial life on earth.
- Issues of building development s on pinewood and moorland soils.
- Better to site developments on former arable soil where drainage problems seldom arise.

Policy 4 - Landscape

PUBLIC BODIES

- **Policies 1, 2, 4, 5, & 6** – require to be streamlined. Is it necessary to repeat matters enshrined in law or procedures/regulations in policy?
- Suggest some additions to text.
- **Landscape, Proposal 1**
- Would welcome this being extended to cover PDRs which significantly affect the Park's historic environment assets.
- The above could be useful for strengthening **Policy 8**.

GENERAL ORGANISATIONS

- Acknowledge the inclusion of HLA data.
- Support these policies.
- Wish it to be stated that renovations and improvements to existing buildings in the remoter areas of the park will be permitted provided that the proposal does not change essential character of the existing structure or create significant visual impact.
- Should be Policy 1 due to importance of landscape.
- Consider that not all past human activity has been beneficial.
- Some inaccurate/misleading sentences. Suggest rewording **paragraph 3.14**.
- Hesitant wording over the issue of wildness.
- Suggest replacing "wildness" with "remoteness".
- Feel that the absolute wording of this policy is not consistent with **General Polices 1-3** which would overrule it.
- Replace "some" with "sum" in **para 3.14**
- **Paragraph 3.19** – consideration must be given to the fact that land over 400m is used for; forestry; livestock shelter; grazing; a source of potable water supplies; renewable energy schemes; fieldsports; and general recreation.
- **Policy 4** is inflexible and should take account of the possibilities of mitigation and adverse effects.
- Development should be approved where it will make a positive contribution to park aims.
- Welcome the proposal to review PDRs as it is a crucial marker and statement of intent by the CNPA.
- Suggest that the Cairngorms Landscape Character Assessment becomes a fundamental reference point for developers.
- Welcome **Policy 4**.
- Suggest stating in **Policy 4** that the Cairngorms Landscape Character Assessment will be a material consideration in the identification and assessment of development proposals.
- The importance of landscape to the Park area is not recognised sufficiently.
- Landscape should be placed as Policy No 1 and given a key prominence on judging development opportunities, elements of this policy and other CNP policies.
- Seek greater prominence and protection for the NSA areas and not just to look at all land over 400 metres as being the same.
- **Paragraph 3.14** is an overstatement and inaccurate.
- Disappointed at the timidity with which the subject of wild land is approached.
- Find it unacceptable given that the extent of wild land was one of the key reasons for designating the Park.
- Therefore object particularly to **paragraph 3.18**
- Support the rewording of **paragraphs 3.14, 3.18** and **3.19** as suggested by The Mountaineering Council for Scotland in their submission.
- Object to these paragraphs as they currently stand.
- **Landscape**
- **Paragraph 3.11** – entirely endorse this statement.
- Due to the importance of landscape feel that **Policy 4** would be better situated as **Policy 1**.
- **Paragraph 3.14** – this statement could be interpreted as a justification in support of further human activity, it should be noted that not all past and recent human activity has been beneficial to the Cairngorms.
- **Wilderness – Paragraphs 3.18 & 3.19**
- Given the nature of the Cairngorms, the hesitant wording of these paragraphs in relation to wild land is unhelpful and surprising.
- It is generally agreed that the terms "wildness", "wild character" and wild land" do apply to significant parts of the Cairngorms.
- These paragraphs need to be strongly rewritten to remove this hesitant language and to make the

importance of such areas and experiential qualities clear.

- **Policy 4**
- A policy should be included that recognises the fact that some past decisions and activities have led to landscape degradation in the Park, and which encourages restorative work of the affected sites.
- Would like to know what is proposed to help to protect the natural woodlands, natural areas of heather and areas of Scots Pines.

ESTATES, LANDOWNERS & DEVELOPERS

- Support this policy
- Would like to see it go further by committing to prevent development in areas which are of great value for extending and creating habitat networks.
- Suggest therefore the first paragraph of the policy should read*:"…will not be permitted.* ***Development that is proposed in an area identified as suitable for expansion and creation of habitat networks will also not be permitted."***
- Re-word **Policy 4** as in suggested in response so that it is no longer at odds with **General Policy 1**
- Support Topic Policies 4
- This may result in recreating a wilderness that cannot sustain the people who have invested in or depend on their land holding for their livelihood. Not compatible with the first point in the vision strategy.
- Need a more balanced statement.
- Access tracks can mean the difference between an economically viable and an unviable land holding.
- Disagree with wording in **paragraph 3.19**.
- Object to **Proposal 1**.
- The varied landscapes within the CNP are largely a consequence of land management practices that can only be maintained if existing land management practices receive support. Care should be taken to ensure that policies are not introduced which impinge upon existing good management.
- Concern regarding the removal of certain permitted development rights (**Proposal 1**). It must be ensured that this does not adversely affect the economics of farming and forestry.
- Endorse the content of **Policy 4** particularly the second paragraph.
- This policy should include an allowance for development, with the potential to have an adverse impact on such areas, subject to satisfactory and appropriate mitigation measures.
- Should be more explicit in recognising the scope that exists for tourism related opportunities associated with many of the policies: **Policies 3, 4, 5, 6, 8, 9, 19, 20, 21, and 24.**
- The above policies could play a much more prominent role in providing experiences for visitors that would enhance sense of place and understanding of the importance of conservation.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- Support these.

Proposal 1 – Permitted Development Rights in the National Park

PUBLIC BODIES

- No comments were received on this policy.

GENERAL ORGANISATIONS

- Support **Proposal 1**
- needs definition and should be tightened, especially to control vehicle tracks.
- Support proposal 1 – removal of certain permitted development rights.
- This proposal is strongly supported.
- The strong wording is welcomed.
- The impacts of removing PDRs on economic development should be examined in detail.
- Strongly suggest this should include hill tracks.
- The CNPA should incorporate any changes resulting from the consultation of the White Paper "Modernising the Planning System" regarding PDOs into the LP particularly reference to hill tracks.

ESTATES, LANDOWNERS & DEVELOPERS

- Object to **Proposal 1**.
- Concern regarding the removal of certain permitted development rights (**Proposal 1**). It must be ensured that this does not adversely affect the economics of farming and forestry.

COMMUNITY GROUPS

- Would be helpful at this stage to know which permitted rights the CNPA wish to remove.

INDIVIDUALS

- Support these.

Policy 5 - Archaeology

PUBLIC BODIES

- **Policies 1, 2, 4, 5, & 6** – require to be streamlined. Is it necessary to repeat matters enshrined in law or procedures/regulations in policy?

GENERAL ORGANISATIONS

- Detailed areas for clarification.
- Special features given inadequate attention
- Feel that the 'Planned Village' is a special feature unique to Scotland, e.g. Tomintoul, resulting from lowland clearances and Ballater, originally planned as a Spa town.
- Feel that the relevant policies need to capture the social and historical significance of the 'Planned Villages'.
- Feel that the Military Roads are an important and unique feature that should be strictly protected.
- Restoration of unsightly areas
- Policies make no provision for the design and 'restoration' of areas such as the socially and architectural incoherence of Aviemore – this needs attention.

ESTATES, LANDOWNERS & DEVELOPERS

- Support Topic Policies 5
- Would welcome better support for the preservation of cultural heritage.
- A more pragmatic approach needed to the first paragraph of this policy.
- Should be more explicit in recognising the scope that exists for tourism related opportunities associated with many of the policies: **Policies 3, 4, 5, 6, 8, 9, 19, 20, 21, and 24.**
- The above policies could play a much more prominent role in providing experiences for visitors that would enhance sense of place and understanding of the importance of conservation.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- The Local Plan does not reflect the fact that the prime responsibility for the protection of ancient monuments rests with Historic Scotland and not the Planning Authority.

Policy 6 – Listed Buildings

Policy 6A – Demolition of Listed Buildings

PUBLIC BODIES

- **Policies 1, 2, 4, 5, & 6** – require to be streamlined. Is it necessary to repeat matters enshrined in law or procedures/regulations in policy?
- The Memorandum may be subject to change within the lifetime of the LP, so there may be merit in building more flexibility into this policy.
- **Policy 6A**
- This policy has been abbreviated from NPPG 18 and omits some significant factors.
- In particular it omits the need to submit a feasibility study which explores the viability of retaining the building in active use, addresses the importance of the building and the extent to which the community would benefit from redevelopment.

GENERAL ORGANISATIONS

- No comments were received on this policy.

ESTATES, LANDOWNERS & DEVELOPERS

- As written this policy will not be effective.
- **Policy 6A**
- Disagree with this policy.
- Add 'their associated land' so that the last sentence reads: *"changes of use to listed buildings and their associated land"*
- Should be more explicit in recognising the scope that exists for tourism related opportunities associated with many of the policies: **Policies 3, 4, 5, 6, 8, 9, 19, 20, 21, and 24.**
- The above policies could play a much more prominent role in providing experiences for visitors that would enhance sense of place and understanding of the importance of conservation.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- No comments were received on this policy.

Policy 7 – Conservation Areas

PUBLIC BODIES

- Comments as for **policy 6**.
- This policy could be strengthened with a proposal to produce conservation area appraisals and supplementary planning guidance for conservation areas.
- The policy could then be more positive and proactive.

GENERAL ORGANISATIONS

- No comments were received on this policy.

ESTATES, LANDOWNERS & DEVELOPERS

- **Policy 7** is unduly negative and should be reworded to be consistent with the memorandum of Guidance on Listed Buildings and Conservation Areas, Historic Scotland 1988
- Suggest some rewording.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- No comments were received on this policy.

Policy 8 – Locally distinctive and vernacular architecture

PUBLIC BODIES

- No comments were received on this policy.

GENERAL ORGANISATIONS

- **Policy 8** – should be combined with **Policy 6**, buildings should be identified using criteria.

ESTATES, LANDOWNERS & DEVELOPERS

- Object as it is over restrictive.
- Consider the potential of existing buildings to accommodate housing, economic and recreational needs.
- Some rewording/clarification is needed to the second paragraph.
- Object as overly restrictive. This policy should allow a pragmatic approach to the alteration and conversion of vernacular buildings, preserving features while allowing innovative alteration to suit modern requirements.
- Support the content of **Policy 8**.
- Should be more explicit in recognising the scope that exists for tourism related opportunities associated with many of the policies: **Policies 3, 4, 5, 6, 8, 9, 19, 20, 21, and 24.**
- The above policies could play a much more prominent role in providing experiences for visitors that would enhance sense of place and understanding of the importance of conservation.

COMMUNITY GROUPS

- This can be a matter of perception.
- Who will decide on what is worth retaining?
- Will there be a common date throughout the Park which marks a building out as 'in the vernacular style'? (Harling and corrugated iron are vernacular in some areas at some periods)

INDIVIDUALS

- Support this policy.

Policy 9 – Local Cultural Heritage Features

PUBLIC BODIES

- No comments were received on this policy.

GENERAL ORGANISATIONS

- **Paragraph 3.26** – the importance of the Park fro recreation should be expressed more strongly.
- Support this policy.
- This section contains the only reference to bothies. Do not consider this section truly represents the importance of mountain bothies.
- Many bothies have been present for over 100 years and form an important link in the tourist accommodation chain and serve as valuable (sometimes lifesaving) refuges in adverse weather.
- The true status and value of bothies should be clearly stated in the draft Local Plan, either in this section or elsewhere as appropriate.
- **Policy 9** – "Known" should be "listed".
- Support this policy.
- Regarding Mountain Bothies it is unclear what attitude is likely to be taken to proposals to extend, renovate or remove mountain bothies, shelters or bridges.

ESTATES, LANDOWNERS & DEVELOPERS

- Hope that **policy 9** will ensure that we do not lose any more milestones of Scotland's natural and cultural heritage.
- **Paragraph 3.26** – would be helpful to have an indication of how the Local Plan sees the "cultural importance of trees" in relation to planning decisions.
- Support Topic Policies 9
- Should be more explicit in recognising the scope that exists for tourism related opportunities associated with many of the policies: **Policies 3, 4, 5, 6, 8, 9, 19, 20, 21, and 24.**
- The above policies could play a much more prominent role in providing experiences for visitors that would enhance sense of place and understanding of the importance of conservation.

COMMUNITY GROUPS

Paragraph 3.27

- An effort should be made to codify many features referred t.
- Wide spread publicity should be used to enlist the help of the public in drawing up a comprehensive list.
- Additional features could include limekilns; former mills, bridges, churchyards.

INDIVIDUALS

- No comments were received on this policy.

Policy 10 – Protection of the Water Environment

PUBLIC BODIES

- Reword
- Any development that would cause damage to waterbodies be refused.
- Recognise impacts on water quality, quantity flow rate habitats and species, floodplains and catchments.
- Suggest an amendment to allow soft engineering approaches to flood management to be favourably considered.

GENERAL ORGANISATIONS

- **Policy 10** should include protection of water where it is important for recreation purposes.
- Consider in context of PD provisions, Habitat Regs and Natura 2000.
- This should be worded to make it more precautionary *("if they are likely to adversely affect the water quality etc…")*

ESTATES, LANDOWNERS & DEVELOPERS

- **Policy 10** is a very black and white statement. There can be short term localised impacts which are reasonable.
- Suggest that in most communities within the Park water is not a scarce resource.
- Should make clear that the policy refers to new development and not to maintenance of existing.
- Believe that **Policy 10** requires some qualification.
- From time to time 'in river' and river bank works are required as a matter of absolute necessity.
- Should be recognition within **Policy 10** that river bank works, if carried out correctly can have negligible impact on the river environment.
- Failure to carry out maintenance can have a severely detrimental impact due to large volumes of silt released from damaged banks.
- SEPA control this, so why have it in planning policy?

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- The PDO has a material impact, and should be mentioned.
- This policy should be reworded as SEPA will shortly have detailed control over these matters and there is a danger of duplication of bureaucracy.

Policy 11 – Water Supplies

PUBLIC BODIES

- Object to wording: does not require the environmental impact of such abstractions to be considered.
- should recognise the potential for public water supplies.

GENERAL ORGANISATIONS

- Sentence addition
- RSPB encourages the CNPA to work closely with SERA and other water users to ensure sustainable use of water resources.
- Due to problems regarding provision of public water supplies in the CNP **Policy 11** should therefore recognise potential for private water supplies.
- An issue for SEPA and Scottish Water.

ESTATES, LANDOWNERS & DEVELOPERS

- Disapprove of the statement that states that new development will only be approved where it can be connected to a public system.
- No need to incorporate water minimisation measures.
- This is a matter for SEPA, Scottish Water and the applicants.
- Surely in a mountainous region in Scotland the shortage of water is not a problem that requires such restrictive policies.
- Dependant on Scottish Water Making available the resources at sustainable price, otherwise this policy may frustrate new development within the Park – flexibility is needed.
- This policy should be neutral about competition so the use of alternative supplies to those of Scottish Water should be permitted if certified by the LA.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- Reference should not be made to whether a development can be connected to the public system, but whether or not adequate capacity exists.
- Natural resources become exhausted if too many people are living in the one place. Loch Einich's water table is dropping; this will affect the char, it may be necessary to look for alternative water supplies.
- Do not agree with water minimisation in NP countryside areas.

Policy 12 – Foul Water Drainage

PUBLIC BODIES

- Recommends that a policy should be developed to be consistent with SEPA's Policy on Provision of Waste Water Drainage in Sewered Areas and Memorandum of Understanding with Scottish Water on the Management of Development Constraints caused by Sewage Systems and Waste Water Treatments.
- Could make an important contribution to limiting diffuse pollution if it could be confirmed that development outside the public sewerage system would be permitted in exceptional circumstances.
- Definition of "shared facilities"

GENERAL ORGANISATIONS

- Appropriate wording should be inserted to state that land drainage should be managed in a way that improves and enhances the status if wetland habitats.
- **Policy 12** – Statements regarding SEPA and Scottish water are vague.
- Great care should be taken in **Policy 12** to ensure that everything possible is done to avoid build up of phosphates and nitrates and occurrences of organic pollution through necessary intercepts and processes.
- Recommends that the plan be more specific on the types of foul water drainage systems likely to be acceptable.
- Needs to put pressure on Scottish Water.
- The plan should ensure allocation of land for development free from constraints caused by infrastructure constraints.

ESTATES, LANDOWNERS & DEVELOPERS

- Developers should not be forced to connect into a public system where foul water can be adequately managed and treated locally.
- Private foul drainage infrastructure for developments is supported, however the cost of this provision may render the development unviable unless development is of an appropriate scale.
- Why Scottish Water? SEPA are the relevant agency and can take SW advice if they wish.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- Not enough is being done with recent housing developments to recycle water.

Policy 13 – Surface water Drainage

PUBLIC BODIES

- Reword the policy to clarify an number of issues:
  - Whether SUDS will be required for all new developments creating surface water discharge
  - Recommend that all developments require surface water to be dealt with sustainably.
- Recommends that the policy refer to PAN 61 Paragraph 23
- Does not consider that interceptors to be a SUDS measure.
- Text should refer to requirement for developers to demonstrate how SUDS will be maintained.
- Currently in the Moray LP, only developments within settlements, in excess of 10 residential units, or 2000 sq m of non-residential land require SUDS provision, to apply this to ***all*** developments as the LP implies, could add to work involved with this issue.

GENERAL ORGANISATIONS

- Point for clarification.
- Support this policy
- SUDs and reedbed treatments should be used as sustainable solutions to waste treatment problems, where connection to mains id not an option.
- Due to problems regarding adequate sewerage infrastructure in the CNP **Policy 13** should take account of very small rural schemes and allowances should be made.
- The CNPA should also be encouraging local authorities and the Scottish Executive to put in place mitigation measures to reduce water runoff from public roads.
- Recommends that a threshold size of development/number of units be set in relation to this policy.

ESTATES, LANDOWNERS & DEVELOPERS

- Allowances should be made for small local schemes involving no more than 4 or 5 houses.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- How does an inceptor catch salt in solution?
- is not valid where surface water helps to process foul water.

Policy 14 – Flood Risk and Management

PUBLIC BODIES

- This is a policy of flood management rather than flood avoidance.
- Clarification of **c)** is needed.
- The Local Plan does not take a strategic view of flood risk.
- SPP7 states what should be included in Local Plans.
- There is no evidence in the Local Plan that flood risk has been assessed for all land allocations.
- Recommend that where a site is identified at risk of flooding, it should be removed and alternative sites allocated.

GENERAL ORGANISATIONS

- Should mention encouragement of natural floodplain storage areas, habitat management and soft engineering.
- Welcome the presumption against building on a floodplain.
- No mention is given to new flood defences. A policy should be incorporated, stating where new flood management of prevention measures are required for existing developments, preference will be given to sustainable, soft engineering approaches.
- Recommends that the policy take account of advice in PAN 69.
- Recommends the policy considers the issue of flood storage areas, and addresses any housing shortfalls that occur as a result.
- Suggest rewording the Policy.

ESTATES, LANDOWNERS & DEVELOPERS

- There should be a presumption in favour of maintaining and repairing of flood defences.
- Flood risk assessment should only be required where there is a significant risk and no existing flood alleviation system.
- If risk is too great to allow private sector development, it should be too great for public sector development also.
- Suggest alternative wording.
- Possibility of identifying areas at risk of flooding.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- No comments were received on this policy.

Policy 15 – Safeguarding Mineral Resources

PUBLIC BODIES

- Supporting text should clarify whether assessment if commercial viability is to be based on the Cairngorms area.

GENERAL ORGANISATIONS

- A cordon sanitaire around existing workings of 400 m, due consideration of noise, dust etc.
- **Policy 15** – Lacks clarity should be re-written.
- **Policy 15** is unclear and requires some redrafting.
- The safeguarding mineral resources for the future should be made on the basis of value and scarcity, relative to the value of the proposed development to the locality.

ESTATES, LANDOWNERS & DEVELOPERS

- The decision to sterilise workable reserves should be made on the basis of value and scarcity of reserve being sterilised relative to the value of the proposed development.
- Anticipate the possibility that resources may be extracted before development takes place.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- This policy is simplistic and therefore of no assistance. Most of the CNP is covered by a blanket of sand and gravel, which is a workable mineral reserve.
- suggest “to prevent working of a mineral reserve”

Policy 16 – Mineral Extraction and Processing

PUBLIC BODIES

- Suggest agreement of operating procedures for new mineral extractions.
- Could be strengthened by requiring to demonstrate there is no suitable alternative.
- Extra time and work will be involved in having to assess whether the 'market' is genuine and would justify approval of the application.

GENERAL ORGANISATIONS

- **Policy 16** - it is important to appreciate that recreation can provide appositive after use of mineral extraction sites.
- Some additions
- Recommend rewording to detail in what circumstances mineral working will be acceptable.
- Where a site is deemed suitable for mineral extraction, a planning condition relating to site restoration and aftercare must be attached to any consent.
- Do not believe it is sufficient to include imprecise references such as *"combined with other policies in the Local Plan".*
- Believe that a policy against future developments of this indigenous primary industry could hamper future rural economic development.
- Policy 16 requires refinement so that small-scale and large excavation activities are treated differently. To allow for example estates to have a small quarry for road maintenance etc.
- Limiting the market to one only within the boundaries of the CNP could have a significant impact on business viability; applications should therefore be treated on their own merits.
- Flexibility should be built into the policy regarding reinstatement and restoration, as there may be opportunities for the provision of recreational activities; rock climbing, water sports.
- Provision of a bond as a guarantee should not be a blanket requirement but should be treated proportionately.
- Reference should be made to the need for restoration as a result of a range of activities (not just excavation) which may affect peat
  - No mention of follow-up measures on how to minimise and mitigate peat damage from activities such as forestry or engineering works.
- Suggest a policy statement is needed to address this or cross reference to other reference to other policies which do address the issue.
- Welcome the recognition of the importance of peat areas and strongly worded policy.

ESTATES, LANDOWNERS & DEVELOPERS

- Feel the policy would be a disincentive to business development.
- Need to continue to use local stone.
- Concern that bonds are being used as a means of taxation.
- Believe that **Policy 16** requires further thought.
- Too restrictive to expect any new mineral workings to only service a market within the CNP.
- This policy is interfering with the market.
- The importance should be put on the site itself, its reserve, and how it is developed rather than where the material will be used.
- Feel the Local Plan should adopt a positive policy regarding small scale mineral extraction for own use.
- This must be far preferable than bringing non-local material into the Park. It is far less likely to blend in and implicated additional transportation costs etc.
- Consider schemes that generate employment within the Park, it may not be economically sustainable to supply an internal Park demand.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- too all embracing – should differentiate between small and large scale excavation.

Policy 17 – Commercial Peat Extraction

PUBLIC BODIES

- No comments were received on this policy.

GENERAL ORGANISATIONS

- Should be a review of the existing permission for the Tomintoul peat extraction site.
- Believe that a policy against future developments of this indigenous primary industry could hamper future rural economic development.

ESTATES, LANDOWNERS & DEVELOPERS

- Peat harvesting is a historic part of culture. Suggest rewording.
- Due to the abundance of peat in the Park the policy should be less restrictive.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- No comments were received on this policy.

Policy 18 – Contaminated Land

PUBLIC BODIES

- Include reference to PAN 33
- Policy and text should recognise the potential effects on contaminated land on the water environment.

GENERAL ORGANISATIONS

- **Policy 18** – inadequate, greater protection is required. Include a definition of "contaminated land"

ESTATES, LANDOWNERS & DEVELOPERS

- Should follow national guidelines.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- No comments were received on this policy.

Policy 19 – Waste Management

PUBLIC BODIES

- Policy should be expanded to include non-municipal waste.
- Add a further category to regarding waste management facilities.
- **a)** Important to liaise with LAs
- **c)** Expand to reflect SEPAs thermal treatment guidelines.
- **d)** Amend to take account of instances where residual landfill may be required.
- Expand policy to cover: locational and directional guidance, and the safeguarding of existing strategic waste management facilities.
- Need to identify and safeguard existing and proposed waste management facilities.

GENERAL ORGANISATIONS

- **Paragraph 3.45** – example should be set by practice.
- The CNPA should be proactive in ensuring its own targets are produced in collaboration with the targets of the other local authorities.
- It should be part of the CNPA's role to secure involvement of local communities in recycling and composting.

ESTATES, LANDOWNERS & DEVELOPERS

- Need a proactive and practical approach to the inconsistencies in what is described as waste and how it is dealt with.
- Production of energy from waste should be supported.
- There will be a need for landfill in the Park in the future.
- Should be more explicit in recognising the scope that exists for tourism related opportunities associated with many of the policies: **Policies 3, 4, 5, 6, 8, 9, 19, 20, 21, and 24.**
- The above policies could play a much more prominent role in providing experiences for visitors that would enhance sense of place and understanding of the importance of conservation.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

Page 33 para 3.45

- Waste disposal is the responsibility of the Local Authority.

Policy 20 – Energy Sufficiency and Saving

PUBLIC BODIES

- **Energy – paras 3.48 and 3.49**
- Would welcome further consultation on sustainable design guide and assessment, and Interim Planning Policy No 2.
- On what basis will these energy saving measures be assessed?
- What/how much is regarded as compliance?
- How can applicants be encouraged to exceed the Building Standard regulations for insulation etc.?

GENERAL ORGANISATIONS

- **Policy 20A** – Give further consideration to undergrounding
- **Policy 20A**
- Should be noted that underground cabling of transmission lines has the potential for impact on birds through loss of habitats.
- There should be a requirement for the submission of an EIA as required by The Electricity Works (EIA) (Scotland) Regs 2000.
- **Policy 20** – add d) siting and control of external lights to avoid light pollution and to conserve energy.
- Needs to be some flexibility within **Policy 20** to take account of any potential conflicts that might arise when developing historic buildings.
- **Paragraph 3.49** refers to Interim Planning Policy 1 on renewable energy, but the footnote refers to Interim Policy 2 also on renewable energy.
- The undergrounding of cabling in a NP should be a presumption, based on a targeted amount each year.
- Where cabling can not be undergrounded it should be re-routed.
- Strongly support **Policy 20**.
- Energy efficiency must be accompanied by conservation or demand reduction in order to be effective, the latter may be outwith the scope of the Local Plan, but should be clearly linked with a supporting strategy somewhere within the CNPA policy remit.
- Support **Policy 20A**, but only where the undergrounding would not result in significant damage to the environment.
- Suggest that a percentage is identified of the existing wirescape to be put underground each year.
- Feel the proposal of undergrounding of all power lines in the park is unnecessarily onerous.
- This will affect the costs of all new development from the smallest house to any large new tourism projects.
- It may also impact the ability of the wider Highlands and Islands to develop its substantial renewable resources and secure downstream economic and social benefit from doing so.
- Fully support **a)** and **c)** and are prepared to consider participation in **b)**
- Strongly support **Policies 20, 20a** and **21**
- Welcome the commitments to ensuring development proposals have energy conservation measures.
- Welcomes **Policy 20**.
- Welcomes encouragement of small-scale local power developments but concern over the policy of permitting high voltage cables to be undergrounded.
- The bland statements in the Plan regarding reinstatement of land after undergrounding cables are inadequate.
- Regarding the fist paragraph of this policy, it is unclear in several ways; what baseline? Within what scale? The word “these” presumably refers to “levels”. Impossible to judge compliance with an unpublished Design Guide. The best practice examples are vague and should not for part of a policy statement.

ESTATES, LANDOWNERS & DEVELOPERS

- Support Topic Policies 20
- Would prefer to see a presumption in favour of energy efficiency rather than the rigid statements as they are.
- Welcomes the statement in paragraph 3.47.
- Designing to the highest standard may be uneconomic in some circumstances.
- Should be more explicit in recognising the scope that exists for tourism related opportunities associated with many of the policies: **Policies 3, 4, 5, 6, 8, 9, 19, 20, 21, and 24.**
- The above policies could play a much more prominent role in providing experiences for visitors

that would enhance sense of place and understanding of the importance of conservation.

COMMUNITY GROUPS

- Agreement with **Policy 20**. (undergrounding new cable.)
- Suggest that the sustainable design guide be available for consultation before the final version of the LP is published.
- Concern over the lack of general design guidelines – not just those on energy efficiency and saving.

INDIVIDUALS

- Not aware that energy conservation is a legitimate function of the development control process. This policy is ultra vires.

Policy 20A – Transmission and Distribution Infrastructure

PUBLIC BODIES

- Disagree with this policy as it could prejudice potential for alternative energy production and the rural economy.
- Recognise undergrounding not suitable in all areas.
- The potential destructive nature of undergrounding cables on archaeological resources needs to be highlighted and balanced in this policy.
- Although the General Policies should address this, to a large extent, there may be conflicts between this policy and the provisions of the General Policies.
- This could be addressed by inclusion of a reference to careful planning and routing to avoid adverse archaeological impacts together with a caveat stating that in some cases above ground cabling will be considered where underground cabling would have a detrimental impact on nationally important archaeology.

GENERAL ORGANISATIONS

- No comments were received on this policy.

ESTATES, LANDOWNERS & DEVELOPERS

- Support Topic Policies 20A
- Practicality and cost effectiveness issues in undergrounding, suggest rewording.
- In some cases it is more detrimental to ecology to route power cables underground.
- In some cases it is impossible due to rock.
- Due to the cost involved in undergrounding cables concern that otherwise viable hydro schemes might be made uneconomic.
- Suggest that this policy be amended to require that where new overhead lines are proposed, the applicant should demonstrate that there are environmental or economic reasons why underground cabling is not a practicable alternative.
- Feel that **Policy 20A** as a blanket policy could threaten welcome development due to associated costs.
- Believe this policy needs to be much more flexible with each proposal/site considered on its merits.
- Might not always be achievable due to physical conditions or economically viable, should not rule out alternatives to undergrounding.

COMMUNITY GROUPS

- Concern that this requirement will prove expensive to the developer and may dissuade them from building houses that are needed.
- Suggest that each application is considered on its own merits and the decision should take into account existing overground cabling.
- The community strongly supports this policy.

INDIVIDUALS

- The cost implication of this would be significant in terms of capital cost and increased energy losses. Should be deleted or revised to give greater clarity.

Policy 21 – Energy from Renewables

PUBLIC BODIES

- Suggest a similar approach to Highland Council's Renewable Energy Strategy.
- This policy states a 'presumption against development' in relation to new commercial wind farms within the park. Whilst this policy is aimed at large scale wind farms, which impacts may not be permitted under other policy areas in the LP, such a policy is in direct conflict with Policy 5 of NEST.

GENERAL ORGANISATIONS

- "Commercial" to be defined. Distinction to be made between storage hydro schemes and run of river schemes. Some re-jigging of b) and c)
- The plans presumption against commercial schemes and support of small scale or domestic schemes appears to be based on the assumption that community schemes will be small in scale – this may not be the case.
- Therefore believe this could be restrictive.
- Believe the CNP should take a wider responsibility towards climate change.
- **Policy 21** – clarification on use of "wind farms" and "wind energy" Impacts caused outwith boundaries. **Footnote 23** should be 1 not 2.
- Support **Policy 21**, most sensible renewable energy policy statement produced in Scotland to date.
- Large scale land based wind turbines should not be pursued as they are a stop gap technology until more reliable marine technologies mature.
- The adverse impact they will have on upland areas after their short lifetime is disproportionate to the benefit they produce.
- Increasing the number of domestic and community schemes will be more beneficial.
- As regards promoting community wind farm schemes, it should not be assumed that these will be small scale.
- The Park should play its part in contributing to talking climate change.
- Interest in **b)**
- Strongly support **Policies 20, 20a** and **21**
- Disappointed that the LP includes a general presumption against the development of all commercial hydropower schemes.
- Believe that hydropower developments are not incompatible with National Parks.
- There are no intrinsic reasons for differentiating between community and commercial schemes nor should size of scheme be a limiting factor.
- Many commercial hydropower schemes are run-of-river schemes that do not require large impoundments.
- The industry has a range of measures to meet and counteract environmental impacts.
- Believe that environmentally sensitive development of hydropower could be undertaken without undue negative impact on the National Park.
- Suggest that a presumption against commercial hydropower schemes would not be justified and that every scheme should be assessed on its own merits.
- Inconsistency in the text and wording of **Policy 21**. Needs to be clarified.
- There should be an impact condition here corresponding to that stated for **Policy 25.**

ESTATES, LANDOWNERS & DEVELOPERS

- Support Topic Policies 21
- **Policy 21b**
- Replace the words *"this Local Plan"* with *"Cairngorms National Park Authority"* - as it is the Authority which will support this clause and not the plan.
- Suggest there should be a presumption against inappropriately sited energy schemes that have a severe detrimental effect on the landscape or local environment, rather than the rigid policy as it is.
- Ideally the Park should aim to produce all the energy it consumes.
- Believe that not all hydro-electric schemes are incompatible with the National Park.
- Disappointed that the Local Plan includes a policy establishing a general presumption against all commercial hydro scheme development. And also provisions in General Policy 2 which would preclude exploitation of the hydro resource in the Park, whether commercial or otherwise.
- Large scale impoundments are not a necessity for large-scale schemes and a run-of-river design can be used.
- Run-of-river schemes do not require a large dam or impoundment but only a small intake weir perhaps 1 – 1.5m high, pipeline is buried, powerhouse are small & discrete. It is possible to

develop such schemes with minimal impact on the landscape.

- No merit in limiting the acceptable generating capacity of a hydro scheme. If a scheme is acceptable it makes environmental sense to obtain max power output which is economically feasible within local environmental constraints.
- No valid planning reason for excluding commercial as opposed to community schemes.
- Each hydro scheme must be assessed on its merits, and are opposed to a blanket presumption against commercial hydro schemes.
- With regard to Interim Planning Policy RE5. This policy states that small scale hydro would be permitted subject to restrictions; see no reason why this should not be continued.
- As hydroelectric development is expensive, by restricting development to community groups only, many valuable hydro resources may not be developed.
- Concern that a presumption against hydro power in the CNP could lead to pressure on other authorities to adopt a similar blanket presumptions.
- This could greatly restrict the scope for future hydro development in Scotland having a direct impact on renewable energy targets.
- Prohibiting developments that utilise the natural hydro resources in the Park is contradictory to the second aim of the Park.
- Feel that Policy 21 is overly restrictive and that proposals should be considered on their own merit.
- Cautions are advised in NPPG6 and PAN47 but they do not promote an embargo on wind farm development within NPs
- National policy aims to encourage commitment to renewable energy and NPPG advises that areas designated for protection should not pose unreasonable restrictions on the ability to meet the overall requirement for renewable energy.
- Suggest the LP should consider the degree of protection afforded to the NP as a whole, and specific areas within the National Park area.
- Suggest that the LP should consider the areas within the National Park that will be affected visually by renewable energy developments outside of the park, and identify the CNPA position in respect of such situations.
- No policy or text within the draft LP that considers the potential impact of proposed developments on the setting of National Parks (as stated in PAN45)
- Suggest that a policy should be included to identify the position of CNPA in respect of the setting of the National Park and development with the potential to affect that setting.
- Such a policy should be contained within the landscape section of the Plan
- Definition of “commercial” required.
- If a scheme is economically viable is it therefore commercial?
- In some cases local wind driven schemes may provide the most sustainable addition to local power supply.
- Should be more explicit in recognising the scope that exists for tourism related opportunities associated with many of the policies: **Policies 3, 4, 5, 6, 8, 9, 19, 20, 21, and 24.**
- The above policies could play a much more prominent role in providing experiences for visitors that would enhance sense of place and understanding of the importance of conservation.

COMMUNITY GROUPS

- Strongly support this policy in principle
- Suggest the word ‘commercial’ be dropped from **(a)** as any renewable project needs to be economically viable.
- If larger projects are meant by this statement then wording needs to be brought in which recognises scale as an important factor and that scale could vary according to circumstances without damage to the environment.
- Some developments could be hidden from view and could usefully provide jobs, economic benefit and diversification for estates.
- Welcomes **Policy 21**. (Supporting community small-scale renewables.)
- Item c) - Commercial biomass or bio-fuel projects, should, wherever possible have a community benefit.

INDIVIDUALS

- Strongly support the view that wind farms should be prohibited.
- The policy on renewables appear to be at odds with itself; while supporting renewables, the document does not appear to support renewables in the Park, if this is the case, this stance needs to be justified.
- Strongly support the Parks stated view that wind farms should be prohibited.
- Strongly support the encouragement of small scale/micro renewable energy schemes.
- Currently investigating the viability of such a scheme at Gaskbeg Farm.

Policy 22 – Integrated Transport Network

PUBLIC BODIES

- Paragraph 3.52 – the initial phrase is very sweeping.
- Policy 22 d) – timing an implementation is not clear.
- The LP should support upgrading of the A9 and A95 and recognise the benefits of the rail network. The A9 Services policy does not represent the Councils position.
- Supporting text should consider issues relating to the maintenance of rural character.
- Insertion of "well-designed".

GENERAL ORGANISATIONS

- Although the Plan refers to an "integrated" transport network, there is no mention of Rail transport.
- Aviemore railway station is a major gateway to the Park.
- Recognition of Part One of the Scotland Rail Planning Assessment, stating that improvement of the service between Central Scotland and Inverness is a major objective, should be given in the Policy.
- Request that the Policy be amended to include reference to the rail service and the objective to extending to Grantown-on-Spey.
- **Policy 22a** - it is important that consideration is given to how public transport can be adapted to accommodate the needs of recreational users in the Park, - promoting public transport to recreational areas and options for transporting recreational equipment (bikes, canoes) on public transport should be considered.
- Some general comments including parking facilities.
- **Transport & Policy 22**
  - **Paragraph 3.50** – unsustainable, requires explanation.
  - **Paragraph 3.51** – positive ethos here not carried over to **Policy 22.**
- **Policy 22** – include new cycle paths, footpath signage/interpretation.
- Agree with **policies 22 & 23**.
- **Paragraph 3.50** requires greater clarity
- Would like to see more initiatives to secure safe walking/cycling/riding routes within the Park.
- The proposed study to rationalise existing road signage must also include all the design issues associated.
- Support **Policy 22**, but would like to see a more inspirational statement on the provision of walking /cycling path networks.
- Should be a policy to enhance connections between communities by ensuring there are off-road links between them.
- Support **Policy 22a)** Communities Scotland housing grants is for housing purposes only and cannot be used for contributions to transport infrastructure.
- Strongly support **Policy 22** but agree with The Mountaineering Council for Scotland's submission that there is a need for a fresh look at **Policy 23** to permit the development of selected and carefully sited roadside facilities.
- Endorse the proposal to address the issue of unnecessary and intrusive road signs.

- Greater emphasis should be placed upon the existing rail network.
- It is not clear whether a new path or cycleway etc, which involve non-motorised travel, would constitute development.

ESTATES, LANDOWNERS & DEVELOPERS

- Support Topic Policies 22d
- Disagree that new developments be required to make contributions to public transport facilities.
- Public access should not be detrimental to local businesses/proposed developments.
- This policy and supportive text fails to specify the level of contribution that would be required towards public transport facilities in relation to a new development proposal.
- Para 27 of SPP1 states that it is essential that policies provide clear guidance to the developer
- The terms of any policy must relate to Circular 12/96.
- The LP should ensure that a close link between developer contributions and the nature of the extent of the impact arising from the development is established.
- The LP supporting text should make clear the mechanism for calculating the apportionment of developer contributions, where shared contributions are sought. And the mechanism for collecting those contributions.
- Suggest contributions are lodged as a Bond with the Council, in an account administered with the council.

- Understand what **Policy 22(b)** is trying to achieve, but feel in many instances it is impractical to connect new development to an existing pathway system, i.e. a small scale steading development.
- Do see the merit with regard to large scale development within existing settlements, but otherwise point to the access provisions set out in the Land Reform (Scotland) Act 2003.
- **Paragraph 3.50** – Definition of "Community Cars" needed.
- Would like to see a stronger coverage of transport issues within **Policy 22**.
- The issue of signage has to be more positively addressed.

COMMUNITY GROUPS

- **Policy 22** (Road maintenance issues) Difficulty in past in contacting the road maintenance Contractor as regards lack of road maintenance. *It is essential that a system is put in place at Community level for determining a desirable standard of maintenance, monitoring it and communicating comment to a responsible office as and when necessary.*
- Statement c) – essential that the LP ensures adequate parking in Aviemore for those who use the bus and rail links – due to rural locations people may need to leave cars parked for days at a time, this needs to be taken into account when considering parking facilities.
- Statement d) – this statement is welcomed, together with a recommendation that local knowledge be utilised to give correct place names etc.

INDIVIDUALS

- **Policy 22d**
- Support point **d)** of this policy. The public need not be spoon fed but encouraged to use initiative, maps and written details rather than signs for every eventuality.
- No mention of rail transport, this is a major omission and requires to be rectified.

Policy 23 – Roadside Facilities on the A9

PUBLIC BODIES

- Suggest strengthening by adding a requirement to consider natural heritage impacts in proposals.

GENERAL ORGANISATIONS

- **Policy 23** – this should be restricted to the main entry points.
- Agree with **policies 22 & 23**.
- Supports **Policy 23**.

ESTATES, LANDOWNERS & DEVELOPERS

- Should include Blackmount, north of Carrbridge, as an area for commercial refreshment facilities in line with the existing Badenoch & Strathspey Local Plan.

COMMUNITY GROUPS

- Fully supportive, however can only be justified if such services (Petrol) are available for longer hours than is currently the case.

INDIVIDUALS

- No comments were received on this policy.

Policy 24 – Upland Vehicle Tracks

PUBLIC BODIES

- Suggest some amendments to the supporting text.
- Suggest matching titles for the Policy and text.
- Suggest insertion of a caveat recognising the possible occasions where tracks may have a beneficial effect on designated sites and features.
- reference should be to "paths" rather than "foot paths"
- Not clear if the second bullet point in this policy, regarding designated sites would include scheduled monuments.
- Would be clearer if the first sentence of the second bullet point in this policy specifically mentioned archaeological factors.
- Welcome the reference in this point to cultural heritage issues. Would like to point out the potential damages that can occur by use of historical routes by bad use of upgrading.
- Wish to see a slight amendment to the final sentence in the last bullet point in the policy to cover the potential archaeological/historic interest of some long established tracks. This should be added to the end of the last sentence of the policy:*"….unless a significant historic route/track"*
- Feel that this whole policy tends to be focused on managing the development of new tracks rather than controlling the upgrading of old ones.
- Suggest this could be more clearly addressed through a slight rewording of the second sentence of the policy to read: *"In exceptional circumstances, new tracks, or the upgrading of existing tracks, may be considered…"*

GENERAL ORGANISATIONS

- **Policy 24** - it is important that this policy is not used to restrict potential proposals that might arise for mountain bike facilities.
- Addition of point. Check paragraph 3.56 for accuracy and compliance with Circulars. Include prehistoric landscapes.
- Needs to be stronger and the presumption should include the creation of tracks for red grouse management.
- Support this policy.
  - An active rather than passive approach to the reinstatement of tracks would be appropriate and suggest the final sentence of the policy be amended to read "…tracks which are no longer essential for the efficient working of the estate/farm…"
- **Policy 24** – add a positive encouragement of non- vehicular access. Ad key points of SNH Good Practice Guide
  - The term "demonstrates it is vital" is undefined.
- Suggest rewording of policy using General Policy areas as criteria.
- If **Policy 24** is to replace Interim Planning Policy 3 then this should be stated.
- Comments in **paragraph 3.55** should be substantiated or replaced. Estates require properly designed track which will not wash out every winter. More damage will occur, in the absence of properly maintained tracks by the use of off road vehicles.
- These developments should be permitted with safeguards in place.
- The wording of **Policy 24** should be amended; the first bullet point should revert to Interim Planning Policy 3: "The proposal can be demonstrated as necessary for the efficient working of the estate/farm…"
- The policy statement should perhaps consider and initiative to undo the damage which has already been done.
- Support Policy 24.
- Trust that the criteria referred to in **Policy 24** will be applied to forestry access tracks through a review of PDRs.
- The damage done by use of tracks which have not been designed and constructed should be recognised in the policy.
- Feel there should be a strong statement that all new or upgraded track proposals would be refused (whether they are deemed to be essential by the land owner or not) for areas covered by **General Policy 3**.
- needs tightening regarding demonstrating whether vital.
- Find the whole approach to this **Policy 24** unacceptable and object on two grounds:
- The wording of the first bullet point in the policy renders that condition unenforceable as neither term (vital & efficient) is defined and developers could easily evade this condition.
- This policy ignores the history of this issue within the Park area where planning controls have been ignored or evaded.
- This policy needs to be replaced by a proactive policy which fulfils the first aim of the park.

Suggest rewording as suggested by The Mountaineering Council for Scotland.

- This section and policy is disappointing.
- This is clearly a major issue that needs to be more strongly addressed.
- The landscapes, habitats and public enjoyment are not given adequate protection by **Policy 24.**
- Bullet Point 1 – this would effectively facilitate construction of a new track anywhere if it was stated it was "vital".
- Neither "Vital" nor "efficient workings" are defined.
- Bullet Point 3 – SNH's Good Practice Guide is not yet published and so consultees cannot make judgement on this.
- Bullet Point 4 – regarding the statement where it is stated that consideration should be given to public access – if the track is suitable for estate vehicles then surely it is suitable for public access and therefore provision should reflect the statutory situation, i.e. gates.
- How is it proposed to determine which tracks are no longer required?
- An important issue not even mentioned is that of the use of ATVs. And the damage they can cause through multiple tracking.
- **Paragraph 3.56** should give approx percentages of park area designated NSAs.
- Clarification is needed regarding permission not being needed for tracks for agricultural and forestry purposes.outside NSAs – whether they are single or multiuse and whether this proviso also covers enlargement of existing tracks and creation of new tracks by simple repeated use.
- Revise wording of footnote 27.
- Welcomes stringent conditions to be imposed on the consideration "in exceptional circumstances".
- Would favour a blanket prohibition.
- Not clear what steps could be taken to ensure tracks no longer required are reinstated, nor what "approved" means in this context.
- Reinstatement of existing (but relatively new) track is more important than the hypothetical reinstatement of a proposed track.
- Who will jugde when a track id no longer required?
- The Word "against" in the second bullet point is redundant.
- Historic drove/military roads are not in themselves issues.
- In the fourth bullet point it is not clear how stiles are linked directly to proposals for new upland vehicle tracks.

ESTATES, LANDOWNERS & DEVELOPERS

- Upland Vehicle Tracks and Quarries – note that tracks established or upgraded for forestry purposes are covered by the Environmental Impact Assessment (Scotland) (Forestry) Regs 1999.
- The last bullet point appears to refer to a laudable intention that lengths of the track made redundant by new proposals should be *"reinstated to an approved natural condition or reduced to footpath width"*. Consider that this should be rephrased as a separate criterion for consideration of proposals.
- The requirement of a bond for such work (as in **policy 16**) should be included.
- To deny a land occupier vehicular access to parts of his land may make the business unviable.
- Disagree with presumption against new vehicle hill tracks and suggest rewording.
- This policy would greatly restrict the possibility of hydroelectric development within the Park.
- Believe an absolute ban on tracks for hydro development purposes is excessive.
- Suggest this policy be amended to include the efficient construction and operation of a hydro scheme as a reason why new access tracks can be considered.
- Essential that the plan recognises the importance of upland vehicle tracks for land management.
- Feel that it is essential that **Policy 24** makes a clear distinction between the creation of new roads and tracks and the maintenance of existing networks.
- Suggest that the plan incorporates some clarification to ensure that regular maintenance is not interpreted as upgrading.
- As a minimum the policy should state that the repair and maintenance of existing upland roads and tracks can continue.
- There is no mention of how the steps that should be taken to reinstate tracks that are no longer required is to be achieved or who will foot the bill.
- Disagree with the presumption against new tracks.
- Should be more explicit in recognising the scope that exists for tourism related opportunities associated with many of the policies: **Policies 3, 4, 5, 6, 8, 9, 19, 20, 21, and 24.**
- The above policies could play a much more prominent role in providing experiences for visitors that would enhance sense of place and understanding of the importance of conservation.

COMMUNITY GROUPS

- Where there is non visual impact for walkers some discretion should be employed over new temporary tracks.

- If all new tracks are subject to regulations there will be a temptation for land owners/managers to use off road vehicles on virgin land, without employing a proper track, this will have damaging impacts on upland areas and can be more damaging than a temporary track which recovers quickly.

INDIVIDUALS

- Should be a programme of removing poorly constructed new and "upgraded" tracks.
- Not sufficiently strongly worded.
- Feel that **paragraph 3.55** is not true.
- Suggest that provision is made in policy to ensure existing tacks are properly maintained, to prevent scarring etc. New tracks should meet strict criteria.

Policy 25 - Telecommunications

PUBLIC BODIES

- Some clarity needed.

GENERAL ORGANISATIONS

- **Policy 25 – Item 2** – rewrite.
- Suggest rewording of parts **3), 4)** and **5)** of **Policy 25** in order to tighten it up.
- If **Policy 25** is to replace Interim Planning Policy 2 then this should be stated.
- **Point 1 of Policy 25** should refer to "significant adverse impact"
- The requirement in **Point 6** to remove access tracks when equipment becomes redundant should be reconsidered when that time arises as the track may have been developed for other in that time, such as a route for non-motorised recreational access.
- Welcome the intention to limit the spread of telecom masts and to address access track issues in **Policy 25**.
- needs a qualifying phrase on mitigation.
- **Criterion 1)** "sites" presumably include "areas"?
- **Criterion 2)** what does "established" mean?
- **Criterion 3)** would the investigation of any one (or two) alternative sites be sufficient?
- **Criterion 4)** why is "should" used in the first sentence but "will" in the second?
- **Criterion 6)** the structure is unclear: does the bond attach only to access tracks?

ESTATES, LANDOWNERS & DEVELOPERS

- Condition in **1)** and **2)** too restrictive.
- Access tracks after decommissioning of masts etc may be useful for other purposes. Bonds should not be used.
- Agree with **point 1**.
- **Point 2 and 3** – wording is awkward and contradictory in terms of mast/site sharing.
- Suggest rewording as follows:
- *2) "There is an operational need to justify the proposed location of the development."*
- *3) "If proposing a new mast, it should be demonstrated that all alternative options for the siting and design of the development have been explored, including the possibility of erecting apparatus on existing buildings, masts or other structures. Mast/site sharing will be encouraged where it represents the optimum environmental solution and does not result in any adverse visual impact to the surrounding area."*
- The last sentence in **point 2** fails to recognise that a mast of suitable design for sharing, which in itself will be a bulkier and taller structure than normally required, may not be the most appropriate design for the proposed location. Note the advice contained in Paragraph 45 of PAN62.
- Given the need to balance the demand for a high standard of mobile phone coverage with the sensitive setting of the National Park, suggest removing the provision from **point 2** to require all masts to be structurally capable of mast sharing and to consider each proposal on its merits thus allowing for the optimum siting and design solutions to be achieved.
- Note that Class 67 of the Town & Country Planning (GPDO) (Scotland) Amendment Order 2001 removes permitted development rights to alter a mast granted planning permission until the expiry of the statutory 5 year period for commencement of the development from the date of permission.
- **Point 4** is generally supported, but the provision to locate all power lines underground does not take account of possible conflicts with archaeological sites etc. Suggest that the second sentence in **point 4** is reworded as follows: *"Related power lines should generally be routed underground where there will be no adverse effect on archaeological sites, important habitats or other ecological site."*
- **Point 5** fails to take account of necessary signage required for operational and Health and Safety reasons. Note PAN 62 Annex G.
- Therefore object to **Point 5** and suggest it be deleted.
- **Point 6** - Object to the inclusion of this provision and suggest that **point 6** is deleted. Note PAN 62 Annex G.
- Typing error in **footer on page 38** – it should refer to NPPG19 and not NPPG15.

COMMUNITY GROUPS

- Item 6) – Not clear whether this stipulation applies to new installations or will also affect existing equipment.
- What would the implications be if the owner of a transmitter (perhaps a community in the case of the Deskie Self Help Transmitter) is not able financially to remove the structure?

INDIVIDUALS

- No comments were received on this policy.

Policy 26 – Development on Farming and Crofting Land

PUBLIC BODIES

- make clear that housing development is not diversification.
- Concerns regarding wording.
- Should have definition of diversification.
- Suggest that explicit reference be made to protection, enhancement or management of natural heritage. Suggest alternative wording.
- Wish to highlight the potential to re-use redundant traditional farm buildings and the need to protect their character.
- This could involve the drafting of the legal agreements before proposals are approved.

GENERAL ORGANISATIONS

- Should be a precautionary mention of possible adverse diversification activities e.g. large scale quad biking across agricultural land of nature conservation value, such as fields important for breeding waders.
- Concern at the open-endedness of this section.
- Concern that **Policy 26** leaves a Carte Blanche for any kind of development.
- Viability of a business is not a relevant planning consideration
- Suggest rewording **Policy 26** using General Policy areas as Criteria.
- **Paragraph 20** refers to **Policy 20** as a means of supporting development of agricultural or croft land. The relevance of this is questioned. The SRPBA endorses support to "diversify or increase the viability of the farm or croft business" but the fact that not all diversification will be agricultural should be noted.
- Current CAP policies should be reflected in the preamble and brought out in the development proposals.
- Diversification should be subject to the farm enterprise remaining as the major activity, unless there are environmental gains.
- needs updating due to CAP reforms regarding subsidies.
- The current opening wording of **policy 26** is almost an open door for any development of whatever scale.
- A reworded policy should be limited to the area defined for **General Policy 1**; it should reflect the scale of development that is subsidiary to the farm or croft. Viability of a business is not a planning consideration and should not be included in this policy.
- Not clear why there are no environmental conditions attached to this policy.
- An impact condition as under **Policy 25** should attach to all development proposals, including farm/croft diversification ones.

ESTATES, LANDOWNERS & DEVELOPERS

- **Policy 26** should be adjusted to be consistent with SPP15 need to remove the requirement for conditions or agreements to secure appropriate or long term agricultural management of a farm or croft.
- Consideration should be given that not all diversification will involve agriculture.
- Requires further consideration to allow better encouragement of diversification.
- Tying diversification to the long-term management of the farm/croft is contrary to NEST.
- Support the content of **Policy 26**.
- There is potential for conflict however with **General Policy 2** in relation to any agricultural units located over 400 metres. (see comments under General Policies)
- Due to pressures on agriculture it should be recognised that diversification may be away from "agricultural" activities.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- Why have a chapter on agriculture but not one on Forestry.
- The Plan is not sufficiently specific where it states the encouragement of development related to diversification.
- A few paragraphs on Agriculture and Crofting are insufficient to give due attention to and appropriate guidance for such a major industry within the Park.
- Suggest Policy 26 is amended to make reference to the Parks Polices.
- Too permissive.

- Whether the proposal is economically viable is irrelevant in planning terms. Should not extend into upland areas.

Policy 27 – Access Rights

PUBLIC BODIES

- No comments were received on this policy.

GENERAL ORGANISATIONS

- Need strengthening to include reference to possible adverse effects of recreational route development and adverse environmental effects of large outdoor recreation centres.
- Access rights are not generally matters of planning policy and **paragraphs 3.62-63** might be condensed.
- Suggest tightening up on wording concerning developments which impinge on or improve physical access arrangements.
- Welcome section on tourism
- **Recreation and Access**
- Again confusion over policy reference numbers in **paragraph 3.67.**
- Fully support **Policy 26**
- Should be more proactive in this area.
- In respect of large outdoor recreation centres, the SCNP recognise the possible effects of climate change on skiing opportunities, therefore, will be supportive of sustainable improvements to recreational opportunity at these sites.
- Concern that **Policy 27** does not actively promote access.
- Would like to see a positive statement on the planning of more managed path networks, including the core path network and sustainable transport routes, and a statement on how this would relate to **General Policies 1-3**.
- There should be some provision for ensuring that development results wherever possible in improved access infrastructure.
- Would like to see stated policies regarding important paths and tracks including, Speyside Way, the Larig Ghru, the Larig an Laoigh, Glean Einich and Glen Tilt.
- The meaning of an “appropriate” alternative solution when development would mean loss of “significant” access rights is unclear.
- Do ROWs not involve existing legislation?

ESTATES, LANDOWNERS & DEVELOPERS

- Support Topic Policies 27

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- No comments were received on this policy.

Policy 28 – Large Outdoor Recreation Centres

PUBLIC BODIES

- Text should mention Speyside Way.
- Definition of "large" needed.
- Suggest some rewording and strengthening.

GENERAL ORGANISATIONS

- **Policy 28** – would benefit from clarification. Is the policy intended to apply to existing centres only? It could be interpreted to mean that it allows for development of new and additional centres which are not linked in any way to existing centres.
- Need strengthening to include reference to possible adverse effects of recreational route development and adverse environmental effects of large outdoor recreation centres.
- The relevance of the European Charter should be explained in more detail.
- **Policy 28** – concern regarding whether the CNPA should be able to resist proposals that would reduce the tourist facilities of an area where they are not viable.
- The above applicable also to **Policy 31**.
- There should be specific mention in this section to field sports and its contribution to tourism, the landscape and environment of the Park. A separate paragraph is required justifying a policy which permits development associated with field sports.
- Suggest the wording in **Policy 28** *"…best practice in terms of sustainable design and business"* does not adequately cover the situation. Suggest rewording to secure the need for sustainable environmental use by the business, economically viable proposals and good design.
- Agree with **Policy 28**.
- Although existing centres provide economic and recreational benefits, the fact that they have been established should not mean that they have to be retained through diversification.
- Policy should not be written to artificially facilitate survival if the centre is environmentally or otherwise unsustainable.
- The proposal that extensions to ski areas will not be permitted may have a negative impact on the future sustainability of these centres.

ESTATES, LANDOWNERS & DEVELOPERS

- Support Topic Policies 28
- Unclear what is meant by *"Sustainable Design"* in the first sentence.
- Consider that the words *"and low environmental impact"* should be added to this first sentence.
- See no reason why extensions to existing ski centres should not be allowed.
- **Tourism, Recreation and Access**
- Would like to see a more balanced narrative about recreation and access.
- No definition of "Large Scale" in Policy 28.
- Ski Centres & Outdoor activity centres face severe challenges in the future and this should be reflected in the LP.
- The narrative on tourism could be strengthened by using more facts and figures.

COMMUNITY GROUPS

- Would like to see the deletion of the final sentence *'Extension to ski areas will not be permitted'*. The earlier wording is adequate.

INDIVIDUALS

- The sentence *"extensions to ski areas will not be permitted"* appears harsh given that tourism is the principal economic activity in the Park and the skiing industry provides valuable winter revenue to the cairngorms.

Policy 29 – Tourism Developoment

PUBLIC BODIES

- there is reluctance within the Local Plan to accept second homes and new caravan sites.
- Needs to include a requirement to follow good practice in terms of location and design.
- Possibility of supplementary planning guidance for tourism.

GENERAL ORGANISATIONS

- Should be specific mention of potentially adverse effect, rather than just assuming there will be catered for by general policies.
- **Paragraph 3.71** – Include the value of youth hostels.
- **Tourism - Paragraph 3.70** – feel that eco-tourism is replaced with nature based tourism.
- The sustainable nature of tourism in the European Charter should be explicit.
- What is the threshold for new 'large' tourism developments to provide staff accommodation?
- should show evidence from Switzerland regarding tourism and damage to communities.
- Find this section to be inadequately tackled.
- Tourism should be *THE* principal driver of the parks economy and hence needs particular attention.
- The consideration of tourism and associated policies within the LP does not consider the fundamental Key issues in sustainable tourism
- At no point do the policies on tourism developments consider broader impacts on the environment nor do they consider potential social impacts on local communities.
- These policies need to be revised to take heed of these problems.
- The Plans commitment to sustainable tourism is welcome.
- What is required is a "geography of tourism" to enable policies to be tailored to emerging trends and would provide the foundation for a stronger spatial dimension to the Plan.
- Paragraph 3.68 is ugly English and not entirely clear.
- The definition of "sustainable tourism" in paragraph 3.69 seems weak. In the last part of the sentence "needs" can be highly contentious.
- The following sentence should not mix up "significant" tourism developments and "all proposals which require a site-specific countryside location"
- Not clear why eco-tourism projects (undefined) should "ideally" be located in the countryside.
- In the first paragraph in the policy a hyphen missing between "tourist" and "related".
- Not clear how this proposal would "reduce the tourist facilities of an area"
- In paragraph 3.71 a hyphen should be placed between "high" and "quality".

ESTATES, LANDOWNERS & DEVELOPERS

- The relevant parts of the European Charter for Sustainable Tourism in Protected Areas should be spelled out in the LP.
- Disagree with the last part of the last paragraph. The LP should not insist on retaining an unviable visitor facility.
- More emphasis for self catering accommodation.
- Need for more flexibility to allow diversification of tourism businesses.
- Support this policy.
- Policy 29 could be strengthened to recognise the requirements of a modern tourist industry.

COMMUNITY GROUPS

- The policy makes reference to the '*ethos of the European Charter for Sustainable Tourism in Protected Areas'* as of obvious importance, feel that the 'ethos' needs to be spelt out.
- Uncomfortable with **paragraph 3** as circumstances can change and interests switch to other things.

INDIVIDUALS

- No comments were received on this policy.

Policy 30 – Tourist Accommodation

PUBLIC BODIES

- there is reluctance within the Local Plan to accept second homes and new caravan sites.
- Could be strengthened with the inclusion of associated infrastructure.
- Clear guidance needed in relation to what may be permanent structures.

GENERAL ORGANISATIONS

- Parking issues.
- Should be specific mention of potentially adverse effect, rather than just assuming there will be catered for by general policies.
- The policy not to allow new caravan parks on undeveloped sites even when appropriately screened from view could be overly restrictive if facilities for touring caravans were not exempted.
- **Policy 30** – it would be helpful to clarify the meaning of the principals of eco-tourism.
- The last sentence of part **(d)** should also refer to other accommodation sectors, with the possible exception of B&B where this is offered in a family home.
- Strongly feel that the same principal should apply to visitor attractions.
- Feel that the Local Plan should at least discuss the problem caused by supermarkets in small towns and villages who 'poach' staff from tourism business by offering a more attractive package.
- Recommends that advice in SPP15 is incorporated into the policy.
- Mention should be made of the positive influences that such development can bring to rural areas.
- Policy 30 & 31 – needs guidance on types of evidence that is required regarding the un-viability of the existing use.
- **Policy 30b**
- This may have impact on existing parks such as Ballater.
- The second half of **b)** is not a policy statement.
- In **d)** it is not clear why "adverse impact on existing residential amenity" and "scale" are mentioned here but not elsewhere.
- The first part of **e)** is not a policy statement
- In **f)** revise wording of the wording "provision of staff accommodation must be provided by…"

ESTATES, LANDOWNERS & DEVELOPERS

- Request that this policy is considered carefully in light of the need to be able to respond to the needs of a competitive international tourism market.
- **Paragraph 3.71** is contradicted by **Policy 30**.
- **a) & b)** should encourage and promote appropriate landscaping and design of further campsites and caravan sites.
- **d) & e)** should not force property owners into maintaining unviable businesses.
- **f)** in some cases it is inappropriate to provide staff accommodation close to their place of work.
- Suggest some rewording as follows:
- Camp sites: Proposals for the development of new camp-sites, or enlargement of existing ***campsites***, will be permitted on the basis of them making a minimal impact on the environment and landscape. Basic ***services and*** amenities should be provided, but principles of eco-tourism should be applied***, where appropriate***

- Caravan parks: Proposals for new caravan parks will not ***normally*** be permitted on undeveloped sites within the Park, ***unless the siting location and appearance of the proposals will not unduly impact upon the character and appearance of the area.*** Extensions ***and improvements*** to existing sites may be considered ***appropriate where they can be accommodated without having a detrimental impact upon its surroundings***.
- Caravan parks ***can have*** a considerable visual impact on the
- landscape and community in which they are sited, and ***can*** require sites to be levelled and cleared of most of their vegetation, as well as requiring considerable areas and installation of services.
- ???
- c) Chalets/***Log Cabins***/time-share: Proposals for chalets/***log cabins***/timeshare, which are most likely going to be in rural/semi-rural locations, should be sited to minimise their impacts; developments by woodland settings are preferred ***and where such developments are well screened from its surroundings***.
- Object to parts (d) and (e) as the restrictions may deter investment by restricting flexibility.
- Part (e) should recognise the benefit that environmentally sustainable self catering accommodation can make.
- No mention of second homes/weekend retreats; these should be catered for as tourist

accommodation.

- **a)** – Do not assume "minimal impact". **f)** – should be "provision of *necessary* staff accommodation"
- **Caravan Parks**
- The estate supports the social inclusion polices by way of the provision of caravanning and camping.
- Coylum Bridge Caravan Park has space to expand and needs to be modernised.
- Wish the LP to be amended to enable caravan park expansion and for new sites.
- **Hotel Staff Accommodation Policy 30(f)**
- This needs to be thought through
- In the past, staff have been recruited, housed in the staff hostel, loose the job, become homeless and need to be re-housed, exacerbating the housing shortage as happened in Aviemore in the 1960's and 70's the result is a build-up of social problems and then piecemeal development to try to alleviate the problem.
- The issues regarding staff accommodation in Policy 30 (f) is a wider issue than is dealt with.
- Would like to see the concept of "housing for key workers" applied to those employed in the tourism and hospitality industry.
- Should recognise the importance of key villages.
- The importance of good design needs to be stressed.

COMMUNITY GROUPS

- **(d)** Concerned that the restriction on change of use of a small hotel back to a private residential property, might be a disincentive to potential buyers if there is no longer the need or economic viability to retain it as a hotel.
- **(b)** This policy is too exclusive and should be amended to allow static caravans for tourist purposes.
- Wording is currently to negative
- **(b)** Suggest the wording *'Caravan Parks' need not 'make a considerable visual impact……'* as can be easily screened by vegetation.
- Prefer to see the last sentence of **(b)** deleted in its entirety or at least a substantial rewording to give encouragement to show how intrusive effects can be mitigated.
- **(d)** This part of the policy places a restriction on the selling of commercial property back into the private sector. Appropriate maybe for large hotels but not for guest houses. The B&B sector has always enjoyed a certain amount of freedom of choice by the authorities and this should remain.
- **(e)** Cannot understand why it should not be permitted to switch these to permanent residential accommodation. Where certain changes in personal circumstances or market changes occur, a change of use should be allowable on review. Possible redevelopment for the affordable sector.
- **(f)** This raises an issue of scale which is cause for concern. Large scale developments threaten smaller scale traditional tourist accommodation and/or attractions. Needs to be rephrased.

INDIVIDUALS

- **Policy 30c**
- Concern that point **c)** in this policy is far too permissive and will allow unrestricted developments in the countryside. This type of development should only be allowed within the settlement boundaries of villages.
- Object to clause in **Policy 30d** regarding change of use of hotels.
- Small hotels (less than 8 rooms) should not be imposed upon in this way by the CNPA. It is a bureaucratic restriction on enterprise and entrepreneurs.
- This restriction will limit enterprise in this sector. It is unfair as it could have a devastating effect of the lives of the owners, who have invested their life savings into the venture.
- Welcome the requirement for staff accommodation for large developments. Would also be useful to ensure that accommodation would also include homes suitable for workers with families.
- Policy 30 does not sit well in more rural areas.

Policy 31 – Proposals for Retail/Commercial Development

PUBLIC BODIES

- **Policy 31 and 35**
- The residency criteria in both of these policies will involve obtaining, checking and assessing this information in addition to drafting Section 75 agreements, and is not currently part of the housing policies in the Moray area.
- **Conclusions and Implications**
- Whilst the intent of the policies are well meaning concerns exist about:
  - Additional workload
  - Use of ambiguous or differently interpreted wording
  - The practicalities of implementing the policies as they stand.
- This is likely to lead to fewer applications being determined within 8 weeks and have a knock on effect on performance indicators
- This has financial and staffing implications.

GENERAL ORGANISATIONS

- Welcome section of Town centres and retail/commercial with a tightening up of wording in **Policy 31(e)** in terms of scale Likewise in **Policy 35(d)**
- **Policy 28** – concern regarding whether the CNPA should be able to resist proposals that would reduce the tourist facilities of an area where they are not viable.
- The above applicable also to **Policy 31**.
- Support Policy **31c)** with minor rewording: include "underutilised or empty" upper floors.
- Policy 30 & 31 – needs guidance on types of evidence that is required regarding the un-viability of the existing use.

ESTATES, LANDOWNERS & DEVELOPERS

- Should not force property owners into maintaining unviable businesses by refusing or unreasonably restrict ting a change of use.
- **Provide Planning Policy Support for Established Retail Uses**
- Concern that there are no specific policy allocations for the existing Co-op Market Town Stores at Ballater, Kingussie and Newtonmore.
- Consider that the Local Plan should recognise the existing retail use of these sites as main food shopping destinations and are an integral component of retail provision for the residents of these towns and villages.
- In order to ensure consistency with NPPG8, the Local Plan should offer more explicit support for existing supermarkets in small towns.
- **Implementation of Sequential Approach as part of Retail Planning Policy**
- In addition to **Policy 31a** the CNP should adapt a 'sequential approach' in relation to retail development in accordance with NPPG8, to allow out-of-centre locations to be considered when it has been demonstrated that all town centre and edge-of-centre options have been thoroughly assessed.
- **Policy Support for Extensions and New Stores**
- In Accordance with NPPG8 the CNPA should identify the need for new retail floorspace, beyond existing commitments in the area for the Local Plan period, review the need for convenience retailing if a need is identified but is not sufficient to support a new store and address this deficiency through the expansion of existing convenience stores.
- **Define Designated Town/Retail Centres in All Settlements**
- There appear to be no identified retail centres in Ballater, Kingussie, Newtonmore or Grantown-on-Spey within the Local Plan, where there are established stores.
- The support for traditional High streets contained in Policy 31a are not identified on the proposals maps. Also the statement for Grantown-on-Spey identifies an *"existing shopping core"* but the proposals map does not show this.
- Consider it imperative that the proposals maps define the boundaries of retail centres in all settlements as this would provide retailers and developers greater clarity as to the policy allocation of premises and sites.

COMMUNITY GROUPS

- It has to be possible to take account of the economic knock-on result of such developments (the Tesco effect)
- Maintaining financial viability must be recognised.
- Where the above is not occurring, a change of use must be made possible.

- Current wording is too restrictive.

INDIVIDUALS

- No comments were received on this policy.

Policy 32 – Proposals for Retail/Commercial Development in Aviemore

PUBLIC BODIES

- No comments were received on this policy.

GENERAL ORGANISATIONS

- Parking issues.

ESTATES, LANDOWNERS & DEVELOPERS

- Support this policy.
- The policy should be amended, however, to make reference to any updates to the Aviemore Masterplan or other change in circumstance that may supersede the existing masterplan.
- The intention to prepare a Masterplan for Aviemore does not fulfil the states purpose of the LP in terms of retail/commercial development in Aviemore. Insufficient guidance in the plan to adequately frame development during the plan period. No time frame for the Masterplan.
- AHR broadly support **Policy 32**
- AHR reserve their position with regards the Aviemore Masterplan

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- No comments were received on this policy.

Policy 33 – Proposals for Large Scale Retail/Commercial Devlopment

PUBLIC BODIES

- Acceptability of large scale proposals.

GENERAL ORGANISATIONS

- Policy 33 – not clear whether the requirement of impact and transport assessment applies only to Aviemore.
- Should address the issue of soil being dumped in Landfill due to lack of recycling facilities available.

ESTATES, LANDOWNERS & DEVELOPERS

- Commercial developments that will have little or no impact on the retail sector should not be obliged to produce a retail impact assessment.
- No clarification why a retail impact assessment is required for proposals over 1000m^2 when in NPPG 8 the figure is 2500m^2.
- NPPG 8 also states that within the setting of a town centre a retail development will enhance the area and therefore a retail impact assessment is not required.
- Various Ministerial Statements address this point.
- SPP8 also addresses this issue.
- Policy 33 should therefore be amended to reflect the provisions of SPP8 and NPPG8.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- No comments were received on this policy.

Policy 34 – Improving the Town Centre Environment

PUBLIC BODIES

- **Paragraph (a)** – should make clear that where appropriate these issues are subject to listed building or other built heritage considerations.

GENERAL ORGANISATIONS

- No comments were received on this policy.

ESTATES, LANDOWNERS & DEVELOPERS

- Access should be fit for the purpose; it is not always practical to change access facilities.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- **Policy 34a**
- This is a duplication of existing legislation, enforceable through other parts of the statutory system, has no relevance as part of a Local Plan and should be deleted.

Policy 35 – Proposals for Business & Economic Development

PUBLIC BODIES

- There is a need for directional guidance for new developments regarding waste management facilities, this could be incorporated into **Policy 35** or alternatively a further policy developed.
- **Policy 31 and 35**
- The residency criteria in both of these policies will involve obtaining, checking and assessing this information in addition to drafting Section 75 agreements, and is not currently part of the housing policies in the Moray area.
- **Conclusions and Implications**
- Whilst the intent of the policies are well meaning concerns exist about:
- Additional workload
- Use of ambiguous or differently interpreted wording
- The practicalities of implementing the policies as they stand.
- This is likely to lead to fewer applications being determined within 8 weeks and have a knock on effect on performance indicators
- This has financial and staffing implications.

GENERAL ORGANISATIONS

- Should be specific mention of potentially adverse effect, rather than just assuming there will be catered for by general policies.
- Welcome section of Town centres and retail/commercial with a tightening up of wording in **Policy 31(e)** in terms of scale Likewise in **Policy 35(d)**
- In the table relating to paragraph 3.74 replace "hunting" with "field sports" as this term includes gamekeeping.
- Suggest the term *"permanently unviable"* needs to be defined in Policy **35b)**.

ESTATES, LANDOWNERS & DEVELOPERS

- **Policy 35d**
- Support this policy as it will be helpful in locations such as Laggan where buildings for business have constrained the development of the forest partnership in the area.
- There should be no attempt to maintain uneconomic businesses. Suggest alternative wording.
- Should adopt a proactive approach to business.
- Part (a) misleading.
- Part (b) is overly restrictive.
- Part (c) has been omitted.
- Part (d) overly restrictive.
- Mention should be made of a steady and sensible supply of new houses providing healthy levels of employment in the building and maintenance sectors as well as the service sectors.
- Policy 35 should recognise the potential for diversification in countryside settings for new types of recreational/tourism products and support given for all tourism businesses/enterprises, research and development.

COMMUNITY GROUPS

- **(b)** The comments raised in relation to **Policy 30 (d)** are equally relevant here.
- Debatable whether smaller premises would be lost to the business sector forever.
- Some freedom of movement between private and commercial use should be permitted.

INDIVIDUALS

- No comments were received on this policy.

Policy 36 – Proposals for Business & Economic Development in Aviemore

PUBLIC BODIES

- No comments were received on this policy.

GENERAL ORGANISATIONS

- Should be specific mention of potentially adverse effect, rather than just assuming there will be catered for by general policies.

ESTATES, LANDOWNERS & DEVELOPERS

- Support this policy.
- The policy should be amended, however, to make reference to any updates to the Aviemore Masterplan or other change in circumstance that may supersede the existing masterplan.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- No comments were received on this policy.

General Comments on Housing

PUBLIC BODIES

- **Policies 37-41 - Housing**
- Analysis of needs and issues not accepted – need to take into account projected trends.
- Consider the role of developer contributions.
- The Local Plan should refer to Local Housing Needs Assessment
- Particular emphasis in terms of affordable housing provision should be placed on the Badenoch and Strathspey area as it is a housing stress area.
- Clarification is needed regarding affordable housing contributions and diversion to an enhancement project.
- Consider allocating land for affordable housing as part of a wider set of initiatives (PAN 74)
- The principle of restraint on the housing market by residency criteria etc as set out is not supported.
- A policy restricting infill to single houses is not appropriate.
- Due weight should be given to the principles of PAN 72 in relation to derelict land and property and rural business development.
- Might be better to provide a clear statement establishing expectation of excellence in design.
- **Housing**
- Insufficient attention placed on location and design.
- The rate of housing proposed is not clear.
- The provision of services to developments out with settlements is not mentioned.
- Housing policies could benefit from a similar clause to **Policy 20A**.
- **Housing**
- **Paragraph 3.81**
- Ensuring an adequate supply of housing land is provided in the Aberdeenshire part of the Park is an important consideration, but this paragraph states that this assessment will be done at the next stage. The preferred areas shown for housing indicate a level significantly higher than that in NEST which would require justification.

GENERAL ORGANISATIONS

- **Housing**
- **3.80** – would like to see evidence provided to support the three statements in this paragraph.
- **3.81** – suggest rewording the final sentence so that it reads: *"some small scale sites will……"* to be in line with PAN 74, para 29.
- **3.82** – instead of the requirement to undertaking local housing needs studies, which would lead to problems and repetition, suggest the CNPA undertake housing need assessments, and then any development could be assessed by them.
- **3.87** – the issue of affordable housing could be more fully developed within the Plan.
- Very few references to the role of low cost home ownership and intermediate housing tenures.
- Would expect to see explicit references to the fact that LA housing need assessments and strategies show that low cost home ownership and shared equity housing can play a significant role in meeting housing need.
- Agreement should be reached with partners regarding ways to look for more housing provision/allocation where it is required.
- **3.88** - The expression *…[Those] "who also do not qualify for affordable "social" housing"* would be more accurately replaced with "who are unlikely to be able to access affordable rented housing" as there are no qualifying data, other than age, relating to applicants for social housing.
- Expect to see reference to intermediate housing tenures. Specifically relevant to those who cannot afford to purchase in the private market.
- **3.90** – crucial to receive feedback form Scottish Water on both waste water and water supply.
- **3.92** – the final draft should make use of GROS estimates.
- **3.93** – welcome the strategic objectives in this paragraph
- The proposed policies would need to be developed to ensure this happens.
- Suggest the CNPA should ensure consensus amongst stakeholders, including communities, on this issue before any such policy is introduced to the area.
- **3.94** – definition of "local need" and "residency" has to be dealt with carefully.
- Policies on affordable housing must allow for essential incoming workers, especially for low cost home ownership options.
- Consideration must also be given to the Homelessness etc (Scotland Act 2003 and homelessness duties of authorities and registered landlords.
- **3.96** – Clarification is needed on the time period for this allocation.

- **Affordable Housing**
- **3.99** – Suggest this paragraph should include references to be made to all categories of affordable housing set out in PAN 74.
- **Housing**
- Very few areas for housing development designated in the Plan.
- Considering the demand and shortage of supply this would seem to be inadequate.
- This part of the Plan is not based on any information and therefore is not of any use.
- Concern that by limiting the designated areas for affordable housing only, this will further reduce development, and is economically unsustainable.
- Would expect some form of encouragement for a younger population to counteract the trend of an older/retired population in this area.
- The estimated number of affordable homes required, which was deemed unsustainable in the LP was not based on any evidence at all.
- There are conflicting statements in the LP regarding concentrating new development in existing settlements and discouraging housing in the countryside.
- Need to show population/housing projections/allocations for consultation purposes.
- Should mention the fact that the population of the Highlands will rise by more than half a million in the next 20 years.
- Very little factual background/analysis and no clear opinion of number, locations and categories of houses to be planned for.
- A need to provide evidence.
- Unclear why the 2400 new homes would be unsustainable.
- The CNPA should not proceed to the finalised draft stage without population/housing projections/allocations have been made available for consultation.
- The legality of proposed restrictions on allocation for housing development set out in **paragraph 3.101** should be checked.
- The comments in **paragraph 3.90** fail to do justice to the chronic under investment by Scottish Water in its Badenoch and Strathspey assets.
- Good opportunities for sustainable housing within a woodland setting, e.g. Forestry Commission land. However the definition of local areas may determine such opportunities unacceptable to the Park – Suggest exceptions where a small development of for affordable housing in perpetuity would provide good examples of sustainable development.
- **Paragraph 3.79** – identify not allocate sites.
- Recommend that a Housing Needs Assessment be produced, along with population /household information projections.
- Recommend a housing land audit be carried out.
- **Housing**
- Welcomes the recognition of the role of the private sector in the provision of housing within the NP.
- Concern over the lack of population/housing projections/allocations.
- **Paragraph 3.87** should be extended to include data tables to further illustrate problems in accessing the housing market.
- Need for a further paragraph after **3.88** to explain that the overall housing need within the Park is higher than the 132 figure in the Heriott-Watt Study.
- An additional paragraph should be inserted before the summary of issues on **Page 52**, to refer to the findings of Dr Mark Bevan's research into the impact of second and holiday homes in rural Scotland. Essential that any relevant information relating to their role and impact is included in the document.
- Needs to be better cross-referencing of housing to the paragraphs on business and economic development, and vice versa. There cannot be one, without the other.
- **Summary of Housing Issues**
- Needs to be consistency when referring to the figure of affordable homes, within this section this figure is referred to "nearly 600 affordable homes to rent" and "around 600" and "possibly more than 600".
- If this figures relates to the Heriott-Watt study of 132 houses per year for 5 years equates to 660, this is not clearly reflected in any of the three references mentioned in this section.
- Paragraph 3.92 appears to imply that affordable housing is limited to homes for rent, however the Herriott-Watt study clearly notes that "affordable housing could encompass any housing opportunities…"
- Suggest that both findings of the Heriott-Watt research and the issue of affordability should be expanded considerably.
- **The Local Plan Strategy for Housing**
- The SRPBA question the aim that *all* rented and low cost housing is provided in perpetuity.
- To provide *all* affordable housing in this way will impact on the desirability of housing and the ability of the occupant to access property on the open market in the future.

- Such a restriction would preclude the use of certain grant mechanisms to create affordable housing.
- Communities Scotland Empty Property Grant would appear to be supported by **Policy 39**, but would be prevented by a policy that *all* affordable housing must be in perpetuity. The scheme would not meet the requirement set out in **paragraphs 3.93 and 3.94 part 1**
- Supportive of a proportion of new housing being affordable and/or meeting local needs. Suggest that in the CNP area this proportion should be significant. But would not support a policy in which all new housing developed in the Park to be affordable and meeting local need.
- **Paragraph 3.96** needs to be expanded to include an explanation/reasoning for the inclusion of this land allocation.
- **Affordable Housing**
- Welcomed with expansion to **paragraphs 3.87 and 3.88** as previously stated above.
- As mentioned **paragraph 3.92** does not accurately reflect all the options for delivering affordable housing. Even though they are listed in **paragraph 3.99**, suggest they should be detailed within the **general housing paragraph**.

ESTATES, LANDOWNERS & DEVELOPERS

- In identifying land for affordable housing the CNPA must ensure that any forest sites do not contain Ancient Semi Natural Woodland, Planted Ancient Woodland Sites (PAWS) or other woodland with existing high biodiversity value/potential.
- There should be a buffer area between development and woodland.
- Suggest as an absolute minimum the following conditions to apply to any relevant permission:
  - Provision of services through woodland areas should not generally be accepted. However in exceptional circumstances the developer must consult with the landowner well in advance of permissions being sought.
  - The development should not impede any management access routes assigned to a woodland owner.
  - The developer is responsible for ensuring that any drainage from their site, including that from pre-existing field drains is effectively prevented from entering adjacent woodlands, the developer shall ensure that natural drainage from the wood is not impeded by the development.
  - The developer shall not, without prior permission, remove any boundary fences or markers or otherwise use woodland for access, dumping or storage purposes. They will also be responsible for ensuring that litter etc. resulting from the development is cleared daily from woodlands.
  - The principals and safeguards recommended in BS 5837: Trees in relation to construction 1991, are applied as a minimum requirement and referred to in planning guidance. Particular measures required to protect trees:
- An adequate stand-off distance of 15m between mature woodland and development
- Works likely to damage root systems should not take place, within a minimum protection area as set out in BS5837.
- Works to be avoided within the protection area are those likely to cause, asphyxiation of root systems, poisoning, root-cutting, physical damage to stems and branches.
- Bitumen, concrete and oil should be kept at least 10m from the edge of the canopy, no fires within 20m of canopy.
- Suggest that in planning only for a 5 year timescale is contrary to SPP3, even the finalised draft which will take a longer term view of up to 10 years is not sufficient and therefore suggest this should be extended to look up to 15 years ahead.
- Suggest that the assumption that the new LP should take historic completion rates as the basis for future housing targets is woefully inadequate.
- Fundamentally disagree with the last sentence in **paragraph 3.92**. There is no evidence to support this statement and therefore suggest it is deleted.
- Paragraph 3.81 – zoning for affordable housing needs full agreement with landowner.
- Restrictions in house building completions in last years due to a lack of service infrastructure.
- Therefore it is misleading to base future housing needs on previous house completions.
- Housing market issues resulting from imposing residency criteria.
- Urgent need to address problems rather than further restricting development.
- **Housing**
- Population/housing need projections /allocations are essential
- It is vital that the LP recognises and provides for increasing the accessibility of rented and owned housing and ensures land and investment for affordable housing.
- To limit the housing in the park to affordable and local need is unthinkable for various reasons:
  - Breach of human rights.
  - Nimbyism should never be tolerated as a planning argument.
  - Supply and demand imbalance causing price increases, consequently leading to a market dominated by wealthy incomers/second home buyers.

- Buying then selling on open market.
- A lack of housing within the Park would force people to live outwith the Park boundary and commute in, increasing car journeys.
- Such a policy goes against of the Scottish Parliaments efforts to combat Scotland's dwindling population and their efforts to encourage incomers to settle here.

- **Affordable Housing**
- Keeping houses affordable should start with providing housing for everyone's needs, including second homes market, if second homes market not provided for, second home buyers will continue to out bid locals.
- Polices must comply with Circular 12/1996.
- It is premature to set percentages of affordable housing without a Housing Needs Study being completed.
- Affordable housing should only be asked for where there is a proven need and therefore funding for same.
- **Affordable Housing**
- In order to accommodate the affordable need and continue growing at a sustainable level paragraph 3.94 debates limiting all new housing to housing associations or to persons meeting residency criteria. Thus Policy 38 requires all persons buying the new houses to have full time employment in the area or have resided in the area for 3 years.
- This deterministic approach will cause serious harm to the areas economy.
- Unless they have a job to go to it will not allow economically active people to migrate into the area and buy a house.
- It will not allow people to retire to the area.
- It will increase the price of existing houses when they come on to the second hand market. Therefore only being available to the well off.
- It will dissuade housing developers from building in the area and will discourage inward investors.
- No evidence has been provided where such a similar policy has stood the test of time.
- No evidence that the local communities, environment and economy can sustain a building rate of 115 houses per annum throughout the NP.
- Planning against part-time workers is potentially highly discriminatory, possibly contrary to principals set out in SPP1.
- Therefore the Estate feels that the LP should not discriminate in the housing market in terms of residency criteria, but should pursue an effective affordable housing policy by maintaining land supply and encouraging developers to co-operate in new initiatives, particularly those emerging from Communities Scotland.
- **Advantages of the current LP housing allocation**
- The ability of a single, properly phased development to deliver:
- A higher proportion of low-cost housing than could be obtained through the aggregation of smaller, piecemeal developments.
- A more secure vehicle for delivering infrastructure improvements (in particular water and drainage) than could be delivered via piecemeal and unpredictable development proposals for smaller sites.

COMMUNITY GROUPS

- As regards to affordable housing development, it is essential that it is made clear to the Scottish Executive that Scottish Water has to give a firm commitment to planning for future provision. The problem with water supply in Badenoch and Strathsey should be acknowledged under **The Strategy for Housing** part of the Plan.
- **Housing – Second Homes (Paragraph 3.80)**
- Second homes within Chapletown in particular are more often that not owned by people with strong family and cultural ties to the area. And through time many become the owner's main residence.
- Majority of holiday homes for let within this area are owed by local people – vital for tourism, a mainstay of the local economy.

INDIVIDUALS

- The draft Local Plan does not attempt to express a view on whether or not it is necessary to allocate land for the foreseeable housing demand.
- Surely the phrase "housing needs" should apply to those people requiring a house to live here permanently or work here, not holiday homes.
- Affordable housing does not come without its negative impacts on the natural and cultural heritage of the Park.
- The reference in **paragraph 3.85** to the aging population of the Park is over exaggerated when looking at the 2001 census information.
- The question of how much immigration, if any, is desirable, is not directly addressed.
- The figures for housing need are unsupported.
- The report from Heriott-Watt is unavailable for scrutiny.

- The demand for housing within the Park (for affordable or otherwise) may arise from outside of the Park.
- Concern over the rate and scale of change in villages due to demand led housing completions.
- The demand for housing is coming from people who want second homes or houses for holiday lets.
- Strongly support the policy that permission for new housing should only be given to the people who work in the area or who have very strong local connections.
- Support emphasis on housing
- Support view that affordable housing should be of the same quality and density as other housing. However this could lead to added expense and reduced affordable housing provision. Suggest this is re-examined to give a degree of flexibility. Public transport provision for affordable housing.
- The 25% goal for affordable housing may need to be increased in some areas where local need is demonstrated.
- The prohibiting of residential caravans may need to be reviewed in light of housing need. This review should look at phasing out the use of residential caravans as and when housing is provided.
- Would strongly advise against affordable housing for any new developments outwith settlements. Suggest instead well-build homes that are properly birthed into the landscape and culture of the area.
- Houses should be allocated for rent to locals, which they could buy if, or when they are able.
- Young families wishing to continue to live in the NP should be encouraged, where possible to inherit the family home; this may help reduce the demand for new housing. Those living long term in the NP should think carefully to ensure that their family does not have a negative pressure upon the Park.
- Affordable “need” proven?
- in perpetuity is not a reasonable concept
- Provide work and with it housing.
- More thought needed.
- Strongly support the stated policy that permission for new housing should only be given to people who work in the area or who have strong local connections.

Policy 37 – Proposals for Affordable Housing

PUBLIC BODIES

- This policy indicates an approach which is 'weaker' than that within the Aberdeenshire LP. Such an approach could have adverse implication for the implication of affordable housing policy in the Aberdeenshire LP.

GENERAL ORGANISATIONS

- Residency requirements could become unduly burdensome on local residents and possibly difficult to enforce.
- Within the specific context of the part of Moray in the national Park, the requirement to have a development of 4 or more houses to contribute 25% to affordable housing may be too high. And therefore may adversely affect the level of housing developments, ultimately *not* leading to increased affordable housing.
- Suggest providing more land for housing adjacent to existing settlements and housing designed to have a higher density and flexibility in the changes of use of existing buildings.
- Polices aimed at affordable housing can only regulate a small proportion of the total stock.
- Suggest consideration of Scandinavia system and log cabin projects.
- Suggest dropping "other 75%" wording in paragraph 3.92.
- Suggest restricting housing outwith settlements by S.75 local occupancy for 10 years.
- **Policy 37**
- Wholly supportive of the statement at the end of the second paragraph in **Policy 37**.
- Strongly advocates the inclusion of a rural exemption site policy within Policy 37.
- Support the intention to zone sites specifically for affordable housing – this will have a deflationary effect on the value of land, which would allow housing providers to deliver affordable housing more cost effectively.
- Should the reference to **Policy H3** in the third paragraph in **Policy 37**, actually refer to **Policy 38**?
- The proposals for affordable housing and housing within defined settlements should be offered in the context of producing landscape masterplans for key settlements (not just Aviemore)
- Important characteristics such as cliffs, moraines, Scots pine/birch woodland should be protected and enhanced within a masterplan context, which will enable new development in settlements to be integrated properly with the surrounding landscape.
- Examples: Inverdruie expansion coalescing with Coylumbridge Hotel complex? Inverdruie expansion to penetrate pine/birch woodland north of the road? To what extent should the formal grid pattern of Grantown-on Spey be perpetuated into new developments?
- There should be a robust means of assessing the proportion of open market housing allocation.
- In regard to housing outside existing settlements, the granting of permissions for single house plots should be conditional on permanent residence and a need to live on-site as a requirement of business etc.
- Restricting housing to affordable for locals only sends out a very negative message to those seeking to invest in the Park.
- Needs greater explanation regarding developer's contribution to an enhancement project. Must comply with the requirements of Circular 12/1996.
- Issues regarding the outbidding of locals for houses by a policy of restriction.

ESTATES, LANDOWNERS & DEVELOPERS

- Support **Policy 37** and the states minimum 25% contribution required of **Policy 38**
- Suggest alternative wording for the first paragraph.
- Areas should not be zoned specifically for affordable housing.
- The last 3 paragraphs are counterproductive in encouraging affordable housing, suggest alternative wording.
- Detailed zoning required to ensure appropriate community integration of housing developments.
- Suggest a policy in favour of affordable housing for developments over 4 houses.

COMMUNITY GROUPS

- Need some indication of what is 'affordable'
- Perhaps an indication of average income levels around the park might help.
- Affordable housing needs to address a wide range of situations and incomes
  - Good quality housing for rent
  - Assisted purchase via housing associations and/or RHOG grants in the mid price band
  - A variety of sites should be made available both within and out with settlements.
  - Encouragement needs to be given to 'start-up' accommodation for young single persons.

- Enabling affordable housing to be developed on private estates without necessitating sale of the site would increase supply whilst adding a useful means of diversification.
- Concern of a tendency for conditions to be more restrictive for affordable housing than for free market developments.

INDIVIDUALS

- No comments were received on this policy.

Policy 38 – Proposals for Housing Within Defined Settlements

PUBLIC BODIES

- Recommend rewording of **c)**
- Not clear under which circumstances the alternative clause would be added.

GENERAL ORGANISATIONS

- Recommend adopting Highland Council Policy with regard to road adoption (4 house rule)
- Concern that the Draft LP could be designating too little land for additional capacity for new housing or business expansion in Moray settlements.
- This might limit the ability of these communities to realise their share of the benefits from the Moray Community Planning Partnership's Vision and Strategy for the Diversification of our Economy, Moray 2020.
- Concern about the impact that the introduction of a conservation area in Tomintoul might be on sustainable economic and social development in the village.
- Suggest giving the fullest possible consideration of local resident's views.
- Due to agricultural support changes, diversification enterprises will be commonplace, requiring new buildings and facilities – **paragraph 3.105** provides some comfort but it should be strengthened to allow such development without linking to Section 75 agreements as a standard route.
- **Policy 38** is an example of this issue, specifically an RSL's ability to limit the age at which tenancies are offered or illegal residency qualifications.
- **Policy 38(c)**, integration of affordable housing within successful balanced communities is fully supported.
- This must be balanced against economic viability, however.
- Early dialogue with developers is important regarding this issue.
- **Policy 38**
- The figure of 25% referring to affordable housing requirement should be detailed within Policy 37.
- SRPBA would not support the inclusion of the policy clause.
- However would support a policy which restricted a proportion of housing developed to those applicants meeting the criteria listed in **paragraph 3.101**.
- If this approach was taken clear guidelines on the proportion housing that would be required would need to take into account the following:
- If affordable element is required would it include any local restriction provision or would the housing for local people be in addition to the minimum affordable housing provision?
- People meeting the criteria, but who want rather than need a house would be prevented for doing so if a total/high restriction of new development must go to applicants meeting the criteria. Resulting in a reduction of lower priced properties, which would exacerbate the affordable housing supply problem. Suggest that a policy of this type may result in the out-migration of existing residents.
- Concern over the residency criteria under **Policy 38**. Feel a better solution is to ensure an adequate supply of land for housing in the LP and to use other policy mechanisms such as ensuring 25% of land is provided for affordable housing to meet local needs.
- **Policy 38b)**
- Regarding the 25% allocation for affordable housing consideration should be given to issues of: valuation, costing and procurement.
- The policy requires to be clear and sufficiently flexible so as to ensue it can cater for both allocation of land for future use as well as housing units resulting from planning approval.
- Suggest the last sentence in part b (in brackets) be deleted from the policy, as it is unnecessary, where there is an up-to-date housing needs assessment and local housing strategy.
- **Policy 38d)**
- Clarification on the meaning of "applicant" needed.
- No account taken of Homelessness legislation, believe this legislation would not allow letting of council and RSL properties only to local people.
- Inclusion of part d) would benefit from fuller evidence and the reasons for the specific criteria.
- To achieve the objectives it will be crucial that mechanisms put in place to ensure affordability in perpetuity are clearly set out in the Policy.
- Restricting access to housing provision – balanced and sustainable communities?
- Could be viewed as excluding people who want to move to the Park to set up businesses, it may have a detrimental effect on economic health of the area.
- Part d) could have far reaching consequences for Park Communities.
- Must be more carefully defined and discussed with the full range of stakeholders, including

communities.

- **Policy 38 – Alternative Clause**
- If the percentage of affordable housing is correctly apportioned then this alternative clause would not be required.

ESTATES, LANDOWNERS & DEVELOPERS

- Object to the alternative policy clause which is suggested at **paragraph 3.101** could be added to **Policy 38**. Suggest that this would lead to virtually no new housing being built anywhere. Suggest that no house building company that would meet the criteria of this alternative to **Policy 38**. In addition to being unworkable it is likely that such a policy would be unlawful and in breach of European Legislation concerning anti-competition issues and human rights.
- Disagree with paragraph 3.100; villages should be capable of accommodating the full spectrum of housing demand.
- Suggest that the residency criteria will create anomalies and difficulties within the local economy.
- Should the CNPA dictate who lives where?
- Paragraph 3.101 –object to local occupancy criteria.
- Object as the affordable housing needs cannot be addressed through housing provision alone.
- The LP should contain a "Rural Exceptions" Policy.
- Objection to **clause (d),** overly restrictive, contrary to SPP3, could stifle development.
- Should look at specific affordable housing developments rather than developments featuring elements of affordable housing.
- The LP should contain a "Rural Exceptions" Policy.
- Need a definition of "affordable"
- Need to recognise the role that communities outside the park play and the movement across the Park boundaries.
- Objection to **clause (d),** overly restrictive, contrary to SPP3, could stifle development.
- Do not think it correct to add **policy clause (d)** to **Policy 38**.
- The market restriction suggested has the potential to severely influence house prices and render developments uneconomical.
- **Policy clause (d)** does not make it clear whether a developer would be required to enter a Section 75 Agreement and thus influencing the market in respect of any future sales.
- Would be serious implications for the mobility of labour and if it is not there will be considerable market distortion.
- If the owners of zoned sites and developers see significant gains being made when houses are sold on there is the potential for land being held back from development.
- For the above reasons it is strongly felt that there should be no interference with the market.
- The release of housing may reduce the requirement for affordable housing.
- The alternative paragraph d) is not required.
- Be bold in terms of allocations.

COMMUNITY GROUPS

- **Within Settlements Boundaries**
- Unhappy with the presumption against affordable housing in the countryside.
- Support the *'integration within the heart of the existing community'* rather than 'Zoning'.
- Reference to zoning would appear to be redundant as would 'not separate or segregated'
- The 1997 HC LP recognised Lynchat and Drumguish as separate settlements.
- Would support defining maps for Lynchat and Drumguish, and feel that Inveruglas and Dalnavert could be usefully added.
- Think that the terms for communed payments **(b)** should be spelt out.
- Consider that the **alternative policy 3.101**is not water tight and therefore should be deleted as it creates as many problems as it seeks to solve.
- Accept that rules will need to be set regarding who can occupy affordable housing, but do not think this is the place.
- Assessment of qualifications for occupancy should be made by the housing association at the time.
- Variation is to be expected depending on demand and the need to achieve occupation for most of the time (not good to have houses standing empty for any length of time)
- Welcomes **Policy 38** clause in favouring new build for residents.
- How will a ruin be judged as integral to the cultural heritage of the park and who will make the judgement?

INDIVIDUALS

Housing policy – provision for permanent employed residents

- Do not think there is any argument against an active discriminatory housing provision policy.
- It is clear from examples such as Glen Borrowdale that unless active measures are taken, the

process of loss of housing for “locals” will continue. Do not think that there is any balanced state before full retired/holiday home ownership.

- Do not think there is any legal bar to a planning policy ob absolution priority to affordable housing as long as that policy is carefully drafted.
- The actual design of the policy is critical to its achieving its end.
- An absolute bar on any other kind of housing development gets over the problem of treating the potential sellers of building land inequitably.
- It is vital to massively lower the sale price of land for building. The application of the clause above gets over the problem of price competition from private buyers.
- This in itself will not be sufficient. Current planning practice would be to allocate what the planners believe to be sufficient land to meet the need over the life of the local plan. The life span normally runs over and the provision is never enough to depress the market price of land.
- Way around this is to make provision that is massively in excess of the needs of future housing. Only this will drive the land acquisition price down. This will require the abandonment of many of the criteria, such as connection to a public water supply road standards etc. But these criteria are not necessary; a ‘Perfect’ policy which fails to achieve its end is a contradiction.
- However this will require ruthless political direction to overcome resistance from planning officials.
- The process regarding who will qualify for affordable housing must be robust.
- For the above reasons support the policies restricting new house building to those meeting residency criteria.
- **Part d) ii)** – remove words *“in a business”*

Policy 39 – Proposals for Housing Outwith Defined Settlements

PUBLIC BODIES

- Some definitions/clarifications needed in the supportive text.
- As written Part 1 would allow anyone meeting the criteria to build a house outwith defined settlements irrespective to land management mentioned in the supportive text.
- Suggest rewording and strengthening.
- Welcome proposals set out in **paragraph 3.106**.
- Consider that this needs to be carried through into the wording of **Policy 39**.
- Restriction to local people is not consistent with the approach of the Aberdeenshire Council. The approach advocated in the CNPA LP could result in a dysfunction with NEST in the vicinity of the boundary of the Park.
- This policy states an existing group threshold of three houses, which is in conflict with NEST's and the Aberdeenshire Local Plan's threshold of five houses. This would require justification.

GENERAL ORGANISATIONS

- Recommend adopting Highland Council Policy with regard to road adoption (4 house rule)
- Housing in rural areas may have negative impacts particularly through traffic generation and disturbance to protected species such as Capercaillie.
- **Policy 39** must be clear that environmental impacts will be considered at all scales – also applies to **Policy 38**.
- **Policy 39**
- Overly restrictive
- Would be a major disincentive to diversification and investment in rural businesses.
- The criteria set out in **Policy 39** does not reflect the positive message set out in SPP15 regarding small clusters and groups of dwellings.
- Consideration must be given to small-scale development outwith defined settlements, if housing need is to be met within the NP. SPP15 states that occupancy conditions tying dwelling units to agricultural and forestry use will no longer be relevant to these new housing groups – this Draft Local Plan appears to be contrary to that.
- Issue of economic justification must be carefully considered .e.g. unpaid contributions to crofting or agricultural units by family members.
- Suggest the criteria should be explained more fully and clarification to "applicant" is required.
- The statements regarding road upgrading for development over 8 units is contrary to LA policies but is welcomed in rural areas.

ESTATES, LANDOWNERS & DEVELOPERS

- Suggest smaller groups of houses will have less environmental impact than larger groups of houses requiring tarred roads, pavements, street lighting etc.
- There should be fewer constraints on dwellings in the countryside.
- Feel that the proposals in this policy are neither practical nor warranted. They would be a major disincentive to diversification and investment in rural businesses.
- Object due to a lack of research into housing requirements.
- The restricting housing criteria for housing outwith settlements is contrary to SPP3.
- Suggest "Rural Exemption" sites for 100% affordable housing.
- Policy generally to restrictive.
- Objection to parts 1 & 2, due to lack of research into housing requirements.
- The residency criterion is contrary to SPP3, overly restrictive and could discourage people from coming to work in the Park area.
- Need more flexibility to allow a review of the need for this accommodation at the end of each tenancy.
- Suggest a direct affordable housing policy approach is needed rather than occupancy conditions.
- Feel that the last paragraph in **Policy 39** is an onerous and unnecessary burden which has the prospect of threatening the economic viability of a development.
- It appears inequitable to expect the developer to have to meet the cost of what could benefit up to seven other properties, with no share of the cost.
- For larger development schemes such a policy might be appropriate but the cost should form part of the negotiated planning gain package.
- To apply such a policy to all development is too rigid, danger of resulting in the suburbanisation of rural areas, which does not sit with the aims of the NP.
- Support sections of both **Policies 39** and **40** which permits the extension of existing rural buildings.

- **Paragraph 3.102** – Consider new housing in the countryside in a wider context than just for essential workers.
- **Paragraph 3.105** – Should not be too restrictive regarding development on crofts and agricultural units.
- **Policy 39** – Overly restrictive, does not comply with SPP15.
- Clear lack of research into housing requirements. Residency criteria unsustainable and contrary to SPP3. Employment criteria too restrictive. Should reword **part 2** of the policy to allow more flexibility, and review at end of each tenancy.

COMMUNITY GROUPS

- **Out with Settlement Boundaries**
- Again Unhappy with the presumption against affordable housing in the countryside.
- This should be determined on merit.
- An element of 'social engineering' here.
- Application of Section &5 clauses is clumsy at best and a presumption to use that legislation should be avoided.
- Conditions 1 & 2(1st sentence only) would suffice.
- Too much detail – the setting of principles is preferred.
- Regarding the last paragraph, suggest this is left to a decision by residents, including lighting and pavements
- Statement No.1 – Merits of this are recognised, however, special consideration should be given to former residents or close families who have been resident for several generations.
- No apparent policy to prevent such a successful applicant building a home and selling it on.

INDIVIDUALS

- The policy should state that outside settlement boundaries, existing land uses are expected to remain for the most part undisturbed.
- The permission of additional dwellings adjoining groups of three or more is a dangerous policy which will lead to gradual erosion of the countryside.
- Allowing any person with 3 years residency in the area to build in the countryside is to open the flood gates to development.
- This policy is seriously flawed.
- The policy must be more tightly drawn to stop indiscriminate development outside villages, essential workers dwellings can and should be located in village settlements.
- The reference to 8 houses in the last paragraph of these policies conflicts with Highland Councils reference to 4 houses.
- As presently worded would appear to give a carte blanche to anyone who satisfied **criteria 1)** to build anywhere in the countryside.
- Such applications should also be required to satisfy **condition 2).**
- Suggest removing the word favourably from the first paragraph in the policy, as this is too permissive.
- New housing outwith defined settlements - The further expansion outwith settlements must stop.
- Support **Policy 39** insofar as it seeks to secure the sensitive siting of houses relative to the existing pattern of settlement, but argues that the requirement imposed under points 1-3 of this policy are unduly restrictive and are likely to conflict with the wider objectives of the Plan and with National Policy. Request a rewording of this policy.
- Suggest that **Policy 39** is not consistent with national policy set out in SPP3 and NPPG15 and SPP15, relating to support for dispersed communities and the introduction of proactive planning measures to increase the resident population.
- The policy as currently drafted will exclude development of potentially great importance to the National Park and its resident communities.
- Suggest the inclusion of a new policy or the introduction of a new **point 4 in Policy 39** as currently drafted, which supports the provision of a house or houses, where it can be demonstrated that there will be economic and social benefits in accordance with national and other local plan policies without environmental disbenefit.

Policy 40 – Conversions of Existing Non-Residential Buildings

PUBLIC BODIES

- The principals are welcomed.
- It is proposed in the CNPA LP that non residential buildings may be extended by up to 50% and that more than three units may be created if for 5 affordable housing, but omits any requirements for a business space. This is all in conflict with NEST Policy 12. This would require justification.

GENERAL ORGANISATIONS

- **Policy 40**
- Welcomes the comments made in **paragraph 3.108** regarding the re-use of existing buildings for residential purposes.
- And would support the aim regarding incorporating space for an office/workshop.
- An error in paragraph a) should it read "The building is redundant" or "the proposal relates to a building which is redundant"?
- The SRPBA is not wholly supportive of the restriction that no more than three residential units may be created from a conversion.
- The statement "tenure to be secured in perpetuity" requires further clarification.
- **Policy 40** is a hostage to fortune by being too generous with extensions to footprints. This should be pitched at 25% - 30% to allow existing vernacular building styles to predominate.
- The sentence *"unless they are for affordable housing"* is open to misinterpretation. Suggest changing to: "however, if they are for affordable housing this may be increased."
- Conversion of existing non-residential buildings would need clarity in terms of defining and proving that they are no longer economically viable and therefore redundant for their original use.

ESTATES, LANDOWNERS & DEVELOPERS

- Too prescriptive and a further disincentive to diversify existing businesses or embrace new business opportunities.
- There should be a balance between the needs of wildlife and the needs of people.
- Object to the restriction on the number of units to be provided for in a conversion to 3 units, this would result in inefficient conversions.
- Object to the requirement to maintain style/character in terms of materials and detailing, this is the level of protection for listed buildings.
- Reference should be made to reporters comments in Aberdeenshire Local Plan Policy HOU/5 on traditional buildings
- Object to the restriction on the number of units to be provided for in a conversion to 3 units, this would result in inefficient conversions.
- Object to the requirement to maintain style/character in terms of materials and detailing, this is the level of protection for listed buildings.
- Reference should be made to reporters comments in Aberdeenshire Local Plan Policy HOU/5 on traditional buildings
- Welcome policy 40.
- But feel it is unnecessarily restrictive.
- Feel it is wrong to restrict a development proposal to the number of residential units, as in Policy 40 (a).
- It may be that no affordable housing need has been identified in the location of the proposed development.
- The existing non-residential buildings may be extensive and suited to conversion of four units or more.
- Believe that the policy should be general in nature only with each location and development site considered on its own merits.
- Feel it is inappropriate to stipulate that the development should incorporate space to allow for continued commercial use/economic diversification. If demand exists then development will proceed to provide business space.
- By applying the policy rigidly the business space will be created but may lie unoccupied, thus impacting upon the cost of the development and putting upward pressure on prices.
- Repeat comments on access roads as under **Policy 39**.
- (a)It appears inequitable to expect the developer to have to meet the cost of what could benefit up to seven other properties, with no share of the cost.
- (b)For larger development schemes such a policy might be appropriate but the cost should form part of the negotiated planning gain package.
- (c)To apply such a policy to all development is too rigid, danger of resulting in the suburbanisation

of rural areas, which does not sit with the aims of the NP.)

- Support sections of both **Policies 39** and **40** which permits the extension of existing rural buildings.
- Too restrictive.

COMMUNITY GROUPS

- Feel that the conditions are too restrictive, given the almost unlimited demand for housing.
- Suggest that provided extensions are carried out in the vernacular, there should be no requirement to restrict the developed footprint to 50% of the original.
- Logic regarding the restricting of the number of residential units to three in any one conversion?

INDIVIDUALS

- The reference to 8 houses in the last paragraph of these policies conflicts with Highland Councils reference to 4 houses.

Policy 41 – Extensions and Alterations to Existing Residential Buildings

PUBLIC BODIES

- **Policy 41** should recognise that bats are resident in some existing residential buildings.
- Suggest some rewording regarding the "replacing" of roosts.

GENERAL ORGANISATIONS

- Unclear what the difference is between the Councils LHS identification and 'demonstrable need' is. This should be the same and partners would need to reconcile this as well as agree to how sites should be identified.

ESTATES, LANDOWNERS & DEVELOPERS

- Agree with a presumption in favour of retaining character.
- Disagree with prescriptive restrictions on size and other aspects of the building.
- **Policy 41 – Design Guidelines**
- Suggest an exception to this proposal:
- "Where a development has been planned with clear guidelines, agreed by the planning authority, changes should only be permitted according to the terms of those guidelines. If in time the owners come together and make representations to the authority, the authority may consider a review."

COMMUNITY GROUPS

- If the Caveat in brackets is applied, the building should still fit in with the area and surrounding development. Again the quality judgement is subjective. Who will judge the quality of the existing building?

INDIVIDUALS

- No comments were received on this policy.

Policy 42 – Proposals for Residential Caravans

PUBLIC BODIES

- No comments were received on this policy.

GENERAL ORGANISATIONS

- No comments were received on this policy.

ESTATES, LANDOWNERS & DEVELOPERS

- Disagree with this policy, given the shortfall in affordable accommodation.
- In order to meet the demand for affordable housing allowing residential caravans that meet specified standards must be included in the list of solutions.

COMMUNITY GROUPS

- Feel these are un-necessarily restrictive in view of the quality of modern caravans, and when set against the shortage of affordable housing in the area.
- It is comparatively simple to merge such housing into a woodland situation to create an attractive living environment.
- Suggest 6 months 'temporary necessity 'is far too short when such a facility is being used as temporary housing while a new house is built, or when an old building is being renovated or converted.
- 18 months would be more realistic.
- Or provision made to extend the initial 6 months on application.

INDIVIDUALS

- No comments were received on this policy.

Policy 43 – Gypsy/Traveller Sites

PUBLIC BODIES

- Policies on this topic should make reference to Paragraph 26 of SPP3.

GENERAL ORGANISATIONS

- **Policy 43** – include definition of "Gypsy/traveller".

ESTATES, LANDOWNERS & DEVELOPERS

- No comments received on this policy.

COMMUNITY GROUPS

- Provision for travelling people is a seasonal issue, giving rise to capacity problems at peak times.
- The Newtonmore site is under capacity for most of the time.

INDIVIDUALS

- No comments were received on this policy.

General Comments on Settlement Statements

PUBLIC BODIES

- Would be helpful to include a statement with each settlement regarding foul drainage provisions.
- **Settlement statements**
- Feel that as things stand there may be a cumulative shortfall in the overall land stocks for existing settlements.
- Feel that failure to include Cambusmore would be a fundamental deficiency.
- Must address deficiencies in land for business and economic development at Kingussie and Newtonmore.
- Concern over the tight drawing of settlement boundaries.
- Where white land is subject to infill, concern that piecemeal development could prejudice the opportunity to maximise the potential for development in the longer term.
- The plan should include more flexibility to enable upgrading and modernisation of services and community facilities and to dynamics for change.
- Priority should be given to upgrading or new provisions of schools, transport interchange, Aviemore Service Point, Landfill and Kingussie Civic Amenity sites.

GENERAL ORGANISATIONS

- There are areas close to some settlements (such as Boat of Garten and Tomintoul) where there is significant nature conservation interest. It would be appropriate for the Local Plan to ensure that sites and areas known to be of interest that lie in close proximity to settlements are identified so as to ensure that inappropriate development proposals are not made.
- Issues due to new housing allocations being in close proximity to A9.
- **Badenoch & Strathspey**
- Not enough land zoned for housing.
- Instances where land zoned in local authorities Local Plan has been taken out for this Plan – leaving fewer opportunities.
- In some cases land zoned is in communities with less need or demand.
- Section **3.92** suggests a figure of 600 new affordable homes, but the amount of opportunities in the mapping exercise does not appear to allow this rate of growth to happen.
- More land should be zoned for affordable housing especially on brown field sites and gap sites in Grantown-on-Spey, Newtonmore and Kingussie in particular.
- It is essential to understand the role and dynamics of stakeholders.
- A need for consistency/clarity regarding infrastructure, especially water supplies.
- Need to evaluate transport/access issues around eastern area of Park. A93 corridor requires strategic review.

ESTATES, LANDOWNERS & DEVELOPERS

- **Tourism in the Settlement Statements**
- Should recognise the possibility for the need for change from tourism uses if the product is no longer viable in the market place.
- Should be stronger policy support to enable tourism development to take place in new locations
- The scope to inject special differentiation between settlements.
- Suggest a more proactive and positive approach to tourism development in communities outwith settlements.

COMMUNITY GROUPS

- No comments received on this policy.

INDIVIDUALS

- Delighted that there is to be no more building allowed outwith the settlement boundary lines.

Angus Glens

PUBLIC BODIES

- Concern over Recommendation 1 – infrastructure, Angus Glens.
- No evidence to suggest road safety issues in the Angus Glens.
- Does not consider winter maintenance to be a land use planning issue.
- Several recommendations under the Angus Glens section with no details or suggestions as to what may be required.

GENERAL ORGANISATIONS

- Angus Glens – Oppose upgrading of local roads, part of the character of the area.
- The dedicated strategy here regarding tourism contrasts with the more urban areas of the Park where tourist infrastructure improvements are masked behind more traditional planning policies and zonings.
- Strongly supports new car parks in Glen Prosen, Glen Isla and Glen Clova.

ESTATES, LANDOWNERS & DEVELOPERS

- **Support for development opportunities associated with Glen Clova Hotel**
- Propose 15 Holiday Chalets within Glen Clova village settlement
- 3 Sites each ¾ Ha (shown on attached map)
- Aims of project:
  Sustainability
  Employment
  Quality
  Improvement of existing infrastructure
  Biodiversity

COMMUNITY GROUPS

- Importance of weekend road maintenance through this part of the Park

INDIVIDUALS

- Concern over the positioning of the visitor centre at Glen Doll car park – not a natural entrance or access point.
- Obvious entrance to the park is at Glen Clova so the visitor centre should be at the Clova Junction
- Suggest possible conversion of the Clova Kirk building or add to the clova cluster of buildings to give it a community feel again.
- Suggest promoting the Angus Glens as the Southerly access point to the Park for walkers who could use the existing paths from Glen Muick to Doll to Callater. There is certainly a need for an official campsite in the Glen.

Community Council Area	**Angus Glens Drop in Sessions**
Meeting & Date	27 September 2005
Staff/Facilitators present	Norman Brockie
Attendance:	23 (Esk 5, Clova 14, Isla 4)

Issue	Comments	No. of similar comments
Housing	Many people are on short-term tenancies via private landlords; there's a need for more choice in 'affordable-rented housing to keep people in the Glens.	
Tourism	There's a need to develop tourism and recreation (facilities and amenities) in harmony with the estates.	
	Glen Esk: need for a formalised campsite; develop one next to Tarfside toilets	
	Glen Esk Retreat: museum and café will be fully operational by summer 2006 and a great attraction/facility for tourists.	
	Car park at InverMark needs to be enlarged and more facilities added for visitors	
	Clova: need for a campsite but not at Acharn, where it was un-supervised.	
Signage	All the Glens need better signage, incorporating the National Park status (including signs on the A90)	
Park Boundary	Why does the boundary only take in the heads of the Glens? ~ should take in the communities further down, too arbitrary at present	4
Access	Need to clarify the network of paths around the Glens	
	Access road to Glen Doll inadequate and in poor condition for the number of visitors it gets	
Heritage	Runtaleave in Glen Prosen, interesting collection of stone-built sheep pens and associated structures; in danger of decay and needs restoration/preservation.	
New Clova/Doll ranger/visitor centre	Questions regarding the justification for this and the lack of community consultation	3

Attendance						
Age	Male			Female		
	Esk	Clova	Isla	Esk	Clova	Isla
0 - 4						
5 - 15						
16 - 24		3				
25 - 34			1	1		1
35- 44		3				
45 - 64	1	7	1	1		1
65 – 85+	1	1		1		
Totals	18			5		
TOTAL	23					
Comments collated by:	Norman Brockie					

Aviemore

PUBLIC BODIES

- Consideration and regard should be given to: Urban Design Strategy; Expansion north and Community uses.
- **B4** – expansion likely to have adverse effects on birch woodland part of which is in AWI (Ancient Woodland Inventory)
- **H2** – small area currently zoned for environment/community.
- **E2** – requires rezoning to match designation of SSSI and SAC.
- **B2** – more appropriate than **B4**. if no need identified then suggest zoning as environmental.

GENERAL ORGANISATIONS

- Owners of area south of Spey Lodge allocated on Draft LP to an Environmental Policy.
- Propose to develop this site 2007/8
- Concern over up-grading of Dalfaber Level Crossing.
- Suggest policy should state that no further development which would increase the traffic load carried by the Level Crossing will be approved until such time as upgrading is complete.
- Concern over the continuance to approve development in what is now a large village with only one vehicular access.
- The proposed site for a new primary school for Aviemore should be included in the Finalised version of the Local Plan. Provision for replacement playing field facilities, of enhanced quality should be undertaken.
- Support Cambusmore proposal as Aviemore must be given scope to extend its boundaries as the main driver for growth in the Park.
- Feel that the CNPA has stepped back form the clear commitment set out in the Badenoch and Strathspey Local Plan 1997, regarding the new settlement at Cambusmore.
- The development of Cambusmore is a unique opportunity for the CNPA to influence a planned new village based on sustainable design principals.
- **Cambusmore**
- Believe that a proposed development such as this should have no place in a National Park.
- Its location and scale bear no relationship to local needs.
- The argument that is would balance up settlement pattern on both sides of the Spey, has no substance as all Speyside settlements in the Park are contained on one side of the Spey.
- Cambusmore is required as a buffer zone in landscape and ecological terms to offset the expanding settlement of Aviemore.
- Feel that Aviemore still has considerable unrealised potential.
- Disappointed to see lack of support for the Cambusmore proposals.
- The issue of Cambusmore should be addressed in the plan.
- There is the opportunity to do something innovative and sustainable with the Cambusmore opportunity.
- Policy site **H1 in Aviemore** – there has been land set aside for community use on this site.
- The new Aviemore Masterplan must be done within a tight time scale.
- It must also include a creative brief.
- The proposed Cambusmore development is an essential component of the Aviemore growth objective.
- Owners of area south of Spey Lodge allocated on Draft LP to an Environmental Policy.
- Propose to develop this site 2007/8
- Concern over up-grading of Dalfaber LC
- Suggest policy should state that no further development which would increase the traffic load carried by the LC will be approved until such time as upgrading is complete.
- Concern over the continuance to approve development in what is now a large village with only one vehicular access.
- **Cambusmore Settlement Strategy**
- In considering the need for a new village at Cambusmore, impacts on Aviemore station and facilities will have to be considered as well as how developers will be required to address these impacts.

ESTATES, LANDOWNERS & DEVELOPERS

- Environmental designations should not preclude development in a designated area.
- Better to develop new settlements such as Cambusmore than expanding existing settlements to the detriment of their rural character.
- **H4** – Cost issues, unsuitable for affordable housing.
- **B2** – do not believe that this area is included in the Ancient Woodland Inventory, as the SEA suggests.
- **C4** – currently in agriculture use, not all of the site floods.
- **E1** – does not support the inclusion of the land south of Coylumbridge.
- Dalfaber Crossing – Traffic Impact Assessment does not suggest upgrading.
- North Dalfaber – Object to the omission of land currently zoned for housing in Badenoch and Strathspey Local Plan.
- **Flooding – Recommendation H5 (Aviemore Settlement Statement)**
- Flood risk from River Spey.
- Should be addressed by fold protection/prevention works and enhancement of the river bank.
- Any works would need to demonstrate that flooding on the right bank would not be exacerbated by the new embankment.
- **Recommendation T3 (Aviemore Settlement Statement)**
- The Estate supports this recommendation.
- Note that the "tourist/recreation attractions" support environmental management through interpretation and by enabling people to enjoy these areas in a responsible way – contribute to all the aims of the Park.
- Wish the former BP Garage site and adjoining land at the southern end of Aviemore to be identified as an area for housing (a high quality flatted development.) for following reasons:
- Sustainable use of a brown field site
- Would reduce the amount of new land required to be identified as housing.
- Would conform to key sustainable policies and key housing objectives set out in the Draft Local Plan.
- This development will involve removal of contamination left by previous use.
- Redevelopment will improve the visual amenity of this site.
- Allocation of this site as suggested would comply with **General Policy 4**, **General Policy 5** and **Policy 38** of this Local Plan.
- Aviemore development area should be widened. Lack of identified sites in Aviemore to meet housing demand.
- **Proposal for housing at Kinkyle, adjacent to Aviemore**
- The proposal at Kinkyle is relevant to and would be capable of complying with; **General Policy 5, Polices 4, 13, 14, 20, 38** and the **Transport Section**.
- **Aviemore Settlement Statement**
- Does not actually address the fundamental issue of development over the plan period.
- **Aviemore Masterplan**
- Contrary to SPP1 Section 41.
- No parameters set.
- The suggestion that development to the south is constrained by the conjunction of the road is untrue as Kinkyle is to the north of this convergence and is capable of integrating fully with the existing settlement.
- Provisions for consultation on the Masterplan should be included.
- **Cambusmore**
- No critical analysis of the Cambusmore concept
- The Local Plan needs to incorporate a strategy for Cambusmore rather than examining the need for a new village.
- **Housing Policy**
- Insufficient housing sites identified/allocated for Aviemore. The structure plan requirement has not been met.
- The building rate in the past plan period is not an appropriate basis for calculating future housing demand.
- **LA2** should refer to the extant consent for a superstore.
- **LA3** is erroneously described in the LP as being a live application for a superstore – reference should be made to outline consent for a retail and commercial development.
- An error occurs on **page 62** where site **B2** is identified as **B3**.
- The plan identifies a concern that retailing is concentrating on visitor needs and not those of the local community. The new foodstore both consented and proposed will principally concentrate on the needs of the local community and this should be acknowledged within the Local Plan.
- The LP fails to designate the town centre of Aviemore. The town centre should be clearly defined in the LP as should the area to be covered by the Aviemore Masterplan.
- Concern that the Highland Structure Plan and Local Plan Policy regarding Cambusmore have

been disregarded in this Local Plan.

- **Cambusmore**
- Lack of forecasts for population and economic change and as a consequence, no settlements strategy.
- The settlement strategy within the current Local Plan justifies the development of a new community at Cambusmore. This is supported by the Highland Structure Plan.
- Estate studies have demonstrated that the site can be developed with an acceptable level of environmental impact, fully considered and mitigated.
- Concern that the LP has stepped back from the clear commitment to this new community which the current Local and Structure Plans contain.
- Feel that it is wrong for the LP to assume that this site will not be required to contribute to housing supply before 2017 as it is not borne out of current projections for the take up of housing land in Aviemore.
- At current rates zoned land in Aviemore will be running out by 2010 - before the end of this Local Plans lifetime.
- Therefore failure to reaffirm Cambusmore would be a fundamental deficiency in maintaining an effective land supply consistent with needs over the 5-10 year plan period.
- Care has been taken to progress this development with extensive community involvement, environmental/sustainability studies, and in accordance with all current planning policies.
- Interest in working with CNPA to mitigate flood risks and the raising of land for the creation of a sustainable location for housing.
- Interest in mitigating flood risks at Dalfaber Road in accordance with SPP7, SPP3 and SPP1.
- The raising of land could be balanced by the creation of wetlands
- The above proposals could therefore provide affordable housing within the extreme close proximity of the town centre addressing other needs also.
- Interest in development of Cambusmore

COMMUNITY GROUPS

- Wish the area known as Dalfaber North to be zoned as an area of Green Belt/Amenity Woodland.
- Business Sites – Job developments to match housing expansion.
- Possibility of relocating commercial/industrial land, or including more.

INDIVIDUALS

- There is no justification for the Cambusmore scheme.
- With regard to the proposed Cambusmore development, would be useful if the CNPA conducted a survey of the level of houses in Badenoch and Strathspey that are second homes.
- Opposed to the proposed Cambusmore development.
- Strongly support the omission of the proposed Cambusmore development from the Plan.
- Wish for **Policy 36** area to be zoned for Commerce and Community use.
- Objection to the continued zoning of the northern aspect of Milton Wood (**H4**) for housing.
- The plan as it stands does not reflect public opinion given the level of opposition for previous development of this site. i.e. by Goldcrest 2004.
- Previous applicants and planning committees had agreed this area would be suitable only for *non-affordable* housing.
- The local population wish this area to be used for community purposes, as few areas available in Aviemore for local recreation, dog walking etc.
- Pleased that Milton Wood is nearly de-zoned from housing development
- Concerned that **H4** is still zoned for housing
- Understood from previous meeting that this area was to be used as a park/picnic area and the old mill was to be restored for public use
- Concerns over possible flooding to existing properties due to re-routing of the burn and subsequent flooding as has happened many times during past 8 years
- Concern over the access road not being suitable
- Concern over an overprovision of large unaffordable houses in the village
- Using Banff National Park in Canada as a model – owning of property tied to whether people live and work there and better road infrastructure.
- More green spaces and safer roads please.
- Pleased that Milton Wood is not zoned for housing however,
- The area to the north of the orbital path behind Grampian View is still zoned for housing – this is contrary to the planning committee's decision in Oct 2004 to view the whole area (both north and south of the orbital path) This decision was supported by the local residents
- Possible restoration of the mill and use with area for community use.

- Orbital path well used by local residents as an easily accessed local amenity
- This path already being compromised by access road for future development on other side of the A9
- Existing green pockets are and integral part of the village and should not be taken away
- Concern that new housing developments in Aviemore are used as holiday homes
- Cambusmore would be a more suitable site for housing, moving away from ribbon development and traffic pressure at the centre of the village
- Concern over the effect of development behind Grampian View would have on Butchers Burn as already sensitive to small and medium changes within the vicinity
- **Cambusmore**
- Entirely unconvinced of the need for the proposed Cambusmore Development.
- Given the extant planning permissions for housing in Aviemore, the settlement will grow by 50% within the life of this LP.
- No independently produced figures that show the need for Cambusmore
- It would have a detrimental effect on the existing social fabric of the community.
- No known support for this development within the village.
- **Overall Size of Aviemore**
- Feel that above the extant permissions there should be no other new housing constructed within or adjacent to the settlement within the lifetime of this LP.
- **H4**
- The community recently fought off developers proposing to build on land, of which part of is allocated as **H4**.
- The community wishes this land to be protected, perhaps by adding it to the adjacent **E1** area.
- **B4**
- This allocation is entirely inappropriate, needlessly extending a business area into an area of semi-natural woodland.
- Would extend the *de facto* boundary
- The existing business area **B2** is largely unused, so is inappropriate to create a new area.
- **Land to West of A9**
- Aviemore should be bounded to the west by the A9.
- All land to the west of the A9 should be protected from development.
- Concerned that the unshaded area to the south of H2 has no current protection, this should be allocated as either community or environmental.
- The High Burnside development should not act as a precedent enabling expansion across the A9.
- Strongly support the omission of the proposed Cambusmore development.

Community Council Area	**Aviemore Drop in Session**
Meeting & Date	4 October 2005
Staff/Facilitators present	Don McKee, Anna Barton, Ian Malcolm, Henderson Pollock
Attendance:	117

Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
Affordable	Please define affordable housing – affordable to whom?	
Building	No more building approved until infrastructure catches up with the needs of the community and stock of what is required is considered.	1
Building	Enough is enough – let's have a breathing space before we become the Milton Keynes of the north.	
Cambusmore	Object to this housing development. More development on land used by wildlife!	4
Cambusmore	Must be a self-contained 'village' – shops, school, community facilities, pub, etc, etc, with adequate road infrastructure.	1
Cambusmore	Creation of a whole new village and community would be much more beneficial than extending or filling in any more areas in Aviemore. Aviemore is fast becoming a housing ghetto without any amenities.	1
Cambusmore	Should be developed to spread village in alternative direction and create feature with river and possibly open parkland.	3
Cambusmore	Undeveloped area used by the local aeromodel club for last 25 years.	
Cambusmore	Why not build Cambusmore and stop constantly building and covering the whole of the north of Aviemore?	2
Cambusmore	How big is Aviemore going to be? This is a village with a good community spirit. This will be lost if Aviemore expands any more. Wildlife will also be affected and pushed further and further out. We may be top of the species in the natural world, but surely it is our responsibility to protect our wildlife and ensure that they too have a home (natural habitat).	2
Cambusmore	Development at Cambusmore would take the pressure off Aviemore.	1
Cambusmore	Thought this had already been agreed – we've said we want it to happen	12
Cambusmore	Much better to have future development at Cambusmore and retain the remaining green spaces in Aviemore	2
Cambusmore	Rethink the village shape with river as central focus – build on Rothiemurchus proposed site.	3
CNP	Why are continued developments of housing going ahead without a stated and guaranteed input of services – new school, village hall, indoor sports facilities? Also 2 and 3 storey building seems to be going ahead – spoiling other people's views and light. The quality of build in general is	6

	poorer than other national parks anywhere in UK and abroad! Many visitors state that the outlook as they enter Aviemore from the north is extremely ugly – is this how the Park Authority want the main village in the Park to be viewed?	
Development	Consideration should be given to curtailing development in Aviemore.	
H1 and H2	Where is the infrastructure to go with all this housing – eg bus stops, shops	1
H1 and H2	What percentage is affordable housing?	1
H2	Provides valuable flood defence.	
H2	No further plans – other than those in place – should be allowed. The southern part of this should be for community use. This is a nice area for walking. Another consideration is that this area floods in winter even with drainage – where will this water go?	2
H2 Rothiemurchus	H2 seems a more sensible housing site than LA1, which is pretty restricted	3
H2, H3, H4	Should be an element of affordable housing which cannot be bought as holiday homes	
H3	Should be used for community use, picnic spaces, play areas, etc.	
H3	Too many houses on flood plain	6
H3	The old golf course was the finest open space in Aviemore, but money talks and now it will go under bricks and mortar.	
H4	Local residents campaigned for Milton Wood and adjoining land (now marked red for housing) to be kept safe for the benefit of the local community for recreational use. It is a disgrace that it is still shown as potential housing.	18
H4	This area is integral to Milton Wood and would be better used for community purposes.	12
H4	This part of Milton wood and should be kept for community use.	15
H4	This area proposed for housing was discussed in conjunction with Milton Wood. The majority of people objected to housing on both sites. I would prefer to see a play area of swings and other equipment on H4 and Milton Wood left for natural woodland for recreation.	8
H4	Was originally included in Milton Wood local opposition and should remain so. It was requested that the field be used for community use. Building in the most westerly part of H4 would result in loss of trees and pond. The field would be better used as a picnic area with the path extended along the burn.	2
H4	Don't see why Milton Wood is dezoned and H4 is for housing. Best to dezone H4 as well. Seems crazy to have a road for a few houses. Road at present not suitable.	5
H4	The planning authority refused permission originally for this area as they felt it should be treated as a whole with Milton Wood – why should this be overturned? It's part of the same local amenity – there's little enough of it left.	4
H4	Strenuous opposition to this. There are already large amounts of houses being built to the north. There are no jobs for local people as it stands. This small piece of land could be left for community amenity land, the same as Milton Wood. Building on this area would severely inconvenience the residents of	1

	Grampian View.	
H4	Access from Grampian View inadequate; no green spaces – site of old mill could be one.	4
H4 and H2	Risk to human life as housing would be right next to extremely busy road.	
H4 and H3	Should be left as was, we have no green area as such left in the village. Where do our children play and play safely? With all this building is infrastructure (e.g. sewerage, shops, etc) going to be extended as they can't cope at the moment?	6
Housing	This present plan continues to favour incremental development with no thought to the long term needs of an ever expanding town. The single road with cul de sacs is no longer acceptable. There is no evidence that there is a land back for housing or communal development in the next phase of development beyond 5 years. The present land available is now being all used. Cambusmore must be zoned and the access and bridging must be a priority in this plan. Housing need for Aviemore for the last 40 years has always been underestimated by a factor of 50%.	
Housing	Can CNPA look at housing development needs for next 10 years, if not 20 – not just 5. How long has it taken to get any houses built in Aviemore? 5 – 15 years minimum.	
LA1	This area should not be used for housing, but as an environmental area for the community with paths, similar to Wild Cat Trail at Newtonmore.	2
LA1	Please don't build at LA1 – leave us some trees and local space to walk, as well as houses.	1
LA1	Ensure adequate separation from existing houses by means of tree belt.	
LA1	I object to this housing development as one of the only remaining green sites in Aviemore.	25
LA1	Further housing on this site would be surplus to requirements.	4
LA1	Object strongly to the proposed development – loss of woodland.	19
LA1	Should be designated amenity area.	9
LA1	This area is the only open space area left in Dalfaber for amenity use and also the railway crossing is not able to carry the additional road traffic which will be generated.	8
LA1	Need to keep green areas and protect what we have.	13
LA1	A recent survey by locals indicated a large percentage use by visitors.	4
LA1	A very small number of affordable houses proposed. Lots of presumably expensive houses. Housing market for expensive homes is stagnant. Why destroy this area of woodland, used by lots of people for walking, for more holiday homes? Locals will not be able to afford them.	
LA1	Original Dalfaber North Phase 1 – 4 – Robertson's – no green areas or play parks. Flanked by railways and main road north. Children playing in the street in Aviemore North.	
Live application	Fox area behind Corrour Road and near 18 hole golf course – why build houses which are too expensive for practically all locals? What need is there for these?	3
Live application area above H3	Provides valuable sound and pollution barrier against A9	

Live applications	No to Cambusmore. All live applications should be used for conservation and amenity areas.	1
Business		
AHR	Dislike intensely the practices used by AHR with their employees, i.e. hours worked at basic rate.	6
B1, B2, B3	Seems a bit counterproductive to have business centres which are inaccessible unless industrial, which leaves no space for walk in.	1
B4	Strongly object to the extension of the business area into the woodlands, as this is one of the last areas for woodland and wildlife within walking distance of the village.	5
B4	Strongly object to northern extension of business park into conservation and amenity woodland.	2
Congestion	Should have shops in outer areas of village to stop people having to come into middle of village and causing traffic chaos!	5
Employment	Real jobs for people who want to stay / settle long term.	1
Local businesses	Would like to see more small local businesses in the area and not be reliant on the tourist trade which because of the weather can be extremely fickle.	3
Retail	Need shops at Dalfaber.	
Supermarket	When will we see a proposal for a new supermarket? – nothing on the map.	2
Supermarket	LA1 or LA2 for a second supermarket – either site needs to be looked at carefully for access and parking, etc. I would also like to see a possible site within the developments to the north, east of the main road. If a second supermarket does arrive, it should be a different company to the one already in the village. This would benefit villagers due to the healthy competition.	1
Tourism		
Employment	Tourism should not be built on immigrant labour who have no employment (and very few human) rights.	2
Environment		
Everywhere	The environment has been tossed aside in favour of indiscriminate housing developments.	
Everywhere!	Environment/species protection must not be a PR 'spin'/leaflet distribution exercise. Desktop administration guesswork does not protect anything. Too many PR and media exercises distract from the factual assessment of any environmental impact report and/or assessment.	1
Green areas	These should be extended, not squeezed out.	2
H2	The underpass to Craigellachie should be preserved.	1
H3	Is home to a fine group of marsh orchids.	
H4	This should be preserved.	2
H4	Burn has altered course and eroded land, including residents' properties.	3
LA1	Loss of woodland used by visitors.	4
LA1	It is essential to preserve historical artefacts within this area.	11
LA1	If this goes ahead, we need significant environmental areas within the development.	8
LA1	Should be preserved, not developed.	8

LA1	We need to protect the wild animals and wild flowers in this area.	12
LA1	If the application for housing is rejected, the area should be retained as natural woodland.	9
Milton Wood	Needs to be conserve – hardly any amenity woodland left.	6
Paths	Tourist are looking for, but cannot find, scenic footpaths around Aviemore for short walks, i.e. without use of car.	7
Wildlife protection	Attention to detail. Facts not PR spin.	
Community		
All developments	Open spaces should be included – kick pitch and play areas – in any new housing	1
C1	Site of current school is totally unsuitable for any future building – bog.	2
C3	Possibility of community ice rink.	11
C3	Must be retained for community use.	9
C3	This piece of land is so disconnected from the community that it would benefit more from some sort of compensation/alternative use granted by McDonalds.	5
C3	An area of community ground should have some corridors of community access.	1
C3	Should	
Cambusmore	We need the Cambusmore development to get a sizeable new school and community facilities.	5
Community land	Land between E1 and C4 should return to community recreational/open space.	3
Community land	The land between E1 and C4 has been downgraded and has not been given a proposed use. This land should be included in C4 as community/environmental.	3
Community land	We need significant areas of amenity land for the community, e.g. Milton Wood.	
E1 and E2	Should be for community use only	3
Facilities	Why should the community have to share with the school? Our existing facilities are well used and this justifies having stand-alone facilities.	
Fence	McDonald's fence is still a blot on the Aviemore landscape. The path from Laurel Bank is a right of way.	
Fence	Why is the right of way still closed?	6
H1	Does not have a sports pitch. It has a very small kickabout area	
H1	Community land is inadequate – can all future permissions include bigger sites.	1
H4	This is community land – not for housing of any sort. We need it for our children.	7
H4	This should be community land to keep children sale and take them off the streets.	
LA1	This land should be left alone. It is the only place where you can walk with your dog. It is not everyone who has a car!	2
LA1	If this goes ahead there need to be significant amenity/ community areas within this development.	1
Local bus service	Often unable to keep to time due to congestion – how are locals to keep appointments?	1
Play areas	No parks in the National Park? We need areas for children.	4
Other Issues		

Cambusmore	It should definitely be considered, but must be properly integrated with at least two access roads, one north and one south end of proposed site. It needs to be able to be accessed speedily by emergency service vehicles – if you only have one point of access you increase response times, endangering both the population and emergency service personnel.	
Development	It's shocking that we have to fight for our village!	
Development	The village is not being allowed to evolve as a normal village largely caused by large companies building huge numbers of houses, causing local people unable to buy a home in their own village.	5
General	The general feeling in the village is that the infrastructure is at 'exploding point' and the quality of life is suffering in many ways.	
Infrastructure	LA1 – infrastructure not sufficient for existing community, let alone this development.	7
Infrastructure	No more development without increased services	1
Level crossing	Can it cope with increased development?	1
Master Plan	Why does Aviemore need a 'Master Plan'? Won't everything be delivered via the Local Plan?	
Orbital path	H5/E2 orbital path needs to be finished and the existing area of the path used be re-structured and repaired.	6
Paths	There are no proposed paths on the plan – why?	2
Paths	The Orbital Path used to be like walking in the countryside – now it's becoming like walking past people's back gardens. How big is Aviemore going to get?	2
Paths	Can all paths be shown on final draft of the plan?	1
Paths	There is a sad lack of footpaths around Aviemore. Other villages are able to promote their area with booklets on footpaths.	9
Roads	Definite need for a roundabout at the junction of Dalfaber Drive and Grampian Road.	2
Zoning	Dalfaber should be white.	
Attendance		

Age	Male	Female
0 - 4	3	1
5 - 15	1	2
16 - 24	1	0
25 – 34	3	1
35 - 44	12	14
45 - 64	28	30
65 - 84	14	7
85+	0	0
Totals	62	55
TOTAL	**117**	

Comments collated by:	Anna Barton

Ballater

PUBLIC BODIES

- Wish for the business park site to be kept as opposed to being zoned for housing
- The council wish to retain employment land for future ventures and would find it very difficult to obtain an alternative site.

GENERAL ORGANISATIONS

- Agree with the statement that there is a pressing demand for more affordable accommodation for those who live and work locally. Would like to see a clear reference to the importance of low cost homeownership and intermediate tenures in meeting this need.
- A pro-active approach to tourism development is required.
- Policy should be developed to increase affordable housing.
- Need to promote and develop tourism, business and affordable housing within a positive and pro-active land use framework.
- Request to rezone area marked on attached map from **Policy 1** to **Policy 2** or **Policy 3** as the owner is about to sign a Conservation Agreement with the Trust.

ESTATES, LANDOWNERS & DEVELOPERS

- **Town Centres & Retailing/Commercial Business**
- Importance of Ballater due to the National Park Office is not recognised. Suggest the policies relating to business and economic development be expanded to acknowledge the increasing importance of Ballater.
- Support Polices E2, E3 and Proposal FE1 regarding Ballater.
- E2 and FE1 allow no flexibility for the future.
- C2 should be preserved and incorporated into a future development
- Possibility of use of brownfield site (former quarry) in Crathie as a site for housing development.
- LP fails to recognise heightened importance of Ballater as the home of CNPA
- LP underestimates the anticipated requirement within Ballater for new housing, business/employment, community and tourism needs
- Proposals for 21 new houses on 3 sites wholly inadequate – inconsistent with the conclusions of the reporter (Aberdeenshire Local Plan Inquiry)
- Suggest a substantial new planned extension to Ballater could provide sustainable economic and social development of the local and wider area whilst conserving the natural and cultural heritage of the National Park.
- Suggest that the Preliminary Masterplan Study by PRP Architects should form the basis of an allocation within the LP.

COMMUNITY GROUPS

- Welcome the statement regarding affordable and local needs housing.
- Support sites **H1**, **H2** and **H3**
- Object to site **FH1**.
- Housing need in excess of the 21 units proposed for sites **H1**, **H2** and **H3** could be provided by:

Further gap sites

The provision of rural exemption sites which would allow for small groups of affordable housing outside the settlement boundary.

- Public consultation carried out by BRD indicated that the majority of residents were in favour of establishing a community woodland to the north-east of the settlement, encompassing site **FH1**. Aberdeenshire Council supported this proposal.
- Creation of community woodland on site **FH1** would enhance the landscape and biodiversity in accordance with **Policy 3**, and be of benefit to residents and tourists in accordance with **Policy 29**.
- Need info on the demographic study.
- The formation of the Plan should reflect the Park's Aims.
- Require local business activity to continue social coherence, increase sustainability and reduce transportation.
- Support **H2**, the continuance of tourist activities, **Paragraphs 3.67-70, Policies 28-29, 35b, paragraph 3.74**, a truly local letting initiative,, a variety of accommodation in **FH1** and the inclusion of Craigendarroch as part of Ballater.
- Not in Favour of housing at **H1**, **H3**, restriction of communal area east of Monaltrie Park, a letting initiative which permits affordable housing to be pre-empted by comparatively recent residents rather than longer term (**Policy 37**), Ghettos of affordable housing (**Policy 34**).

INDIVIDUALS

- Ballater School Premises should be put to use as soon as possible.
- School Premises to be used for either leisure use or low cost rental accommodation for young local people.
- Issue of second homes and pension portfolios.
- Issue of being able to afford a house locally on service sector pay.
- Current change of use of tourism accommodation etc within Ballater, to the detriment of the tourist trade.
- Need to ensure that any development on the triangle of land bounded by A93, the Pass of Ballater and Ballater itself does not become detrimental to residents and does not reduce the appeal of the town.
- A larger town will need a larger community space: should reserve an area equal to the size of Monaltrie Park – therefore **FH1** should be moved further east.
- Public consultation carried out by BRD indicated that the majority of residents were in favour of establishing community woodland to the north-east of the settlement, encompassing site **FH1**. Creation of community woodland on site **FH1** would enhance the landscape and biodiversity in accordance with **Policy 3**, and be of benefit to residents and tourists in accordance with **Policy 29**.
- If development is to take place in FH1 it needs to be handles with great sensitivity.
- Serious concerns about any sort of development within Ballater's Boundaries
- Similarities to Milton Keynes if development takes place.
- Possibility of developing an exercise area/business on site of old bus station :Climbing frames Trampolines, snack bar etc.
- The Majority of **H3** (Dee Street) is a children's playing field given only to be used for that purpose.
- Object to the other small area included in **H3** also.
- Factors to consider when planning for housing developments:
  Environmental issues
  Sustainability issues
  Water availability issues
  Engineering issues for sites dug into hillsides rather than using agricultural land
- Building asthetics

Community Council Area	**Ballater Drop in Session**
Meeting & Date	14th October 2005
Staff/Facilitators present	Jean Henretty, Gavin Miles, Andrew, Eric Baird, Bell MacAulay.
Attendance:	167

Issue	**Comments** (and location, if applicable)	No. of similar comments
	Move zones FH1 further east to allow larger community area C2. An enlarged Ballater will require a large park.	
	Have affordable housing required for mature couples who at present are only offered one bedroom council properties i.e. to rent. Therefore making entertaining at home very difficult due to lack of space. Council property should no longer be available to purchase.	
	Use local skills and companies on new developments to give local people jobs.	
	Affordable housing could be housing for sale not for rent – for local people.	
	There need to be a very strict limit on the number of second homes and retirement homes.	
	A figure of 25% affordable housing will mean death to the village it needs to be more like 90%.	
	Object to FH1& FH2 being used for housing.	
	Who regulates 3.101 which is to be added to policy 37.	
	FH1 should not have any housing.	
	FH1 for houses not trees.	
	Ample car parking for the Ballater highland games is of paramount importance	
	H3 - ?nature conservancy own the land. It is prone to flooding.	
	Housing , curtailing of second homes – some areas in UK bar people who do not already live in a village from purchasing property. They need to have resided in the village for a number of years.	
	Nothing wrong with well designed housing of all types – the village has to grow!	
	No provision has been made for recycling of green waste. It has been rumoured that the council site over the bridge is to be used for this purpose. If green waste was composted on site it could be sold to residents providing funding for the project.	
	Why ring fence the village with trees?	
	In this plan no allowance has been made for the 1000 people at Craigendarroch who require services and car parking in the village.	
	Let us have affordable houses on the site of the old school.	
	There should be no further development N&E of E2, FE1 and E3.	
	Any new housing should be affordable preferably for sale to occupants rather than renting.	

	Any new developments should be in keeping with the traditional Ballater – and not the new suburban type houses built over the last few years.	
	There needs to be strict capping of second homes and retirement homes.	
	In building should be in keeping with the present desity of housing.	
	Housing on H1 & H2 must be similar in style and density to adjacent development to maintain appearance on entrance to village.	
	Planners and developers should be made to bring low energy/eco friendly building technology into the main stream – it has been proven in Aberdeen that this type of housing does not cost anymore to construct.	
	There is a great need for affordable accommodation in the village. Houses for rent which cannot be bought and then sold at great profit would be really helpful for young people.	
	For the good of local community please implement housing item 3.101. we need housing, affordable hosuing not more holiday homes.	
	I am against any housing on FH1.	
	I would like to see a limit to the number of homes available to second home owners, and affordable housing set at a price that locals could buy over the long term rather than rent – unless this is local authority housing only and not privately owned.	
	I think there are not enough houses for working people. There are a great many “holiday homes” in my street, I am surrounded by homes lived in a few times in a year.	
	How do they intend to access housing sites FH1?	
	What period does proposal cover ie when is the next local plan due?	
	As a young woman with a husband and child all of Ballater it is of great concern that we cannot afford to buy property here. Wanting to live here and contribute to the village is not enough, affordable housing and facilities promoting young families must be made available, please!	
	There is a great need in Ballater for this but if these houses are then sold on they will no longer be affordable. Could we not devise a scheme whereby houses are built for rent, or resale be controlled so that they remain available.	
	Is there not enough trees in Ballater after the hideous way they were planted on the eastern fringe last time.	
Attendance		

Age	Male	Female
0 - 4	3	3
5 - 15	3	5
16 - 24	1	0
25 - 34	0	1
35 - 44	5	12
45 - 64	32	38
65 - 84	36	28
85+		
Totals	80	87
TOTAL	167	

Comments collated by:	Jean Henretty

Boat of Garten

PUBLIC BODIES

- Consideration should be given to the alternative to expansion to the south, of linear expansion of the village to the west.
- **H2** – has a high level of natural heritage interest.
- **H1** – should preserve existing contours.
- **H3** – Capercaille/loss of woodland issues.

GENERAL ORGANISATIONS

- **Site C4** - reference should be made to "Railway" not "train" museum.
- The boundaries of the railway land shown on the maps do not agree with either boundaries of use nor ownership.
- The map & text should make reference to the community scheme for the improvement of the area around the hotel and station to fit it for use as a village square.
- Major developments proposed at Carrbridge and Boat of Garten would benefit from higher than 25% affordable housing levels.
- Boat of Garten Current application – would welcome a high than 25% allocation of affordable housing or at least 25% land area.
- 3 proposed sites for a New Applicance Garage
  - Unused house site, end of Craigie Avenue
  - Farm owned by George Adams, Balnacruie Farm, Seafield Estates
- Lorry Park, adjacent to Craigie Avenue, heading towards Aviemore, Seafield Estates.

ESTATES, LANDOWNERS & DEVELOPERS

- Object to the omission of woodland currently zoned for housing within the Badenoch and Strathspey Local Plan.
- Suggest the existing local plan allocation fro residential development should be carried forward to this LP with appropriate amendments.
- The CNPA's apparent opposition to the continued allocation of this site has no basis in reasoned argument.
- Potential alternative housing sites have been promoted without any serious assessment being undertaken.
- Suggest the specific policies and proposals contained within the draft plan are no founded on any coherent strategic approach
- For example although the plan contains site-specific policies in relation to housing, this is not linked to any forecasts relating to the economic aspirations of the area and the implications this may have for population trends and household information.
- Suggest the plan fails to recognise the importance of Badenoch and Strathspey as a primary contributor of the economy of the Highlands as a whole. Need to accommodate and encourage net in-migration to the area to ensure a healthy and regenerating population base.
- A clear settlement strategy is required in order to ensure that the fragile recovery of the economy of the Badenoch and Strathspey area is not jeopardised.
- Appreciate that the Park is aware of these deficiencies within the plan.
- No justification is given within the plan for the abandonment of the land allocated for residential development contained within the current LP for Boat of Garten and the replacement with a different approach in this new LP.
- Suggest this is a flawed approach and fails to address key issues ion relation to the provision of housing land within Boat of Garten.
- Within the assessment of the proposed housing sites in Boat of Garten, the SEA concludes that **H2** should be deleted and **H1** and **H3** implicate a new and highly visible settlement edge and impacts on woodland.
- Nowhere within the draft local plan or the SEA is any appraisal made of the important and pressing infrastructure needs of the village.

COMMUNITY GROUPS

- **H1** – Concerns about this site including access. It is feared that cost would preclude dev of affordable housing.
- **H2** has a significant level of support, easily accessible. As this area is being withdrawn as a result of the SEA, possibility of considering reduced housing development area.
- The character of the village must be maintained. Even though low coat may lead to higher density.
- Demographic change. The plan does not say who defines local need. The recent Housing

Survey should be considered before decisions made about number and type of houses to be built

- Summary of issues **3.92.** Figures shown are for whole park, but the figure for affordable homes in BOG is far higher than 25%. The figures do not take account of people leaving the area.
- BOG needs housing which is affordable in perpetuity to allow for progression up the property ladder and free the affordable houses for others. The community v strongly feels we should be providing affordable housing for local need. To include anyone moving in to take up local employment and settle. But should not be used to reduce urban lists is not desirable.
- Development must take place at a rate whereby residents can be assimilated into the community Slowly
- The possible addition to **Policy 38 Clause D** should consider the situation of young people leaving for education then wish to return. Unless they have obtained a full-time post in this area (not easy) they would be unable to obtain housing under this clause.
- This clause does not take account of those who have 2 or 3 part-time jobs (common in area) or those wishing to set up own business. **Criteria V** seems to preclude people moving either just because the wish to or because they have saved enough money to move up the property ladder. This needs to be clarified in the Plan.
- As many residents only venture into areas of the National Park within 30mins of easy walking of the village so the environment surrounding is of prime importance. This needs to be recognised in the Plan (Local Footpaths set up as Millennium Project)
- A site to be definitely zoned for a new school. **E1** has not met with universal approval, suggest other sites: South of the Playing Field (where it would be if **LA1** went ahead), West of the new Community Hall or on **H2** if possible.
- Promotion of Sustainable Development. Fear that irrevocable decisions will be made by landowners, developers and planners, who do not have to live with the consequences.
- Little point in zoning land if the infrastructure cannot support any development. Strong pressure must be kept on Scottish Water & the Scottish Executive.
- Concern that the sale of the Campgrounds of Scotland Caravan and Camping Site will become a site for housing as it is adjacent to one of the proposed housing sites in the LP.
- Wish this area to be allowed to continue as a high-standard tourism business.

INDIVIDUALS

- Suggest that references to in-fill housing in Street of Kincardine should be deleted.
- Street of Kincardine is explicitly not a zoned area.
- The references to street of Kincardine on page 65 are inconsistent with the general approach of the Plan to small clusters of housings outside main settlements.
- **Wood Boundary**
- Suggest that the boundary of wood around Street of Kincardine (**Category 2** woodland) should be extended as it currently extends past the break for the pylons.
- Suggest that woodland of the same sort should come under the same category and ownership should not be a material factor.
- **Environment**
- The meadow land between Street of Kincardine and the RSPB boundary has not been reseeded or chemically treated and is rich in wild flowers.
- **General**
- Little attention has been given to the categorisation of open countryside.
- Original consultation showed a clear desire to keep the whole of Badenoch and Strathspey as it is. To do that detailed plans will be needed for the open countryside.
- Suggest greater use of **Category 2**
- Leaving large areas of the park under **Category 1** would seem to be an open invitation to change.
- The proposed expansion areas are greatly favoured to the highly damaging proposal into woodland to the south.
- **Housing**
- A small amount of affordable housing for local people would be welcome. Plenty of open market housing in other local villages, no more needed in BOG.
- **H1** is best site for housing adjacent to existing estate and caravan park.
- **H3** is the next best site foe housing. TPOs needed, but generally a degraded area not of prime wildlife value, overused by people and their pets. Possible buffer zone to protect adjacent forest.
- **H4** infill is fine for housing.
- **H2** – Major concerns;
- Wildlife value and visual impact value of species-rich semi natural grassland and lowland heath
- Serveral UK BAP species are found there, also a poorly drained area.
- This area should be designated under **General Policy 2**; development should only be permitted if there is no alternative. As other sites are available **H2** should not be zoned for housing but for environmental use
- Possibility of establishing a local nature reserve at this site.

- **LA1** totally unsuitable as the proposal is in an area of semi-natural woodland, large part listed in the Ancient Woodland Inventory, with a capercaillie population – 1% of national population. This area should be proposed as an SPA for capercaillie.
- This proposed development is also on a large scale and would double the size of the village. It would have a huge effect on the character of the community and village atmosphere with adverse effects on both wildlife and tourism.
- **Business**
- **B1 –** This site is right at the gateway to the village, largely concerned with wildlife tourism. A Business site here would be inappropriate. Suggest a small car park and display area with information about local walks and nature reserve more appropriate for this site.
- Concerns that the sites identified for residential development in the LP are not commercially viable for development.
- The final outcome will be no further housing in the village resulting in no additional families being able to move into the village, jeopardising the future of the school.
- Suggest conducting feasibility studies about the whole structure if the village.
- **H1**
- As the site is very boggy, drainage costs and issues would apply.
- Sewerage issues
- Access issues.
- **H2**
- This site is adjacent to moorland/grassland with as many environmental issues as the site on the other side of the road.
- **H3**
- Feel that for the size of the site it will not be viable for any housing association/developer to make the sewerage system affordable for only 30 houses say.
- **Area currently designated for housing in the existing Local Plan**
- **Impact on Wildlife Habitat**
  - This area is used currently by local residents as a dog walking/recreational area – the revised plans for the site now propose to use less of the site so that recreational activities may still take place.
  - Previous objections have made reference to 'ancient woodland' within the site – this woodland was actually planted by a life long resident of the village who is still alive.
  - Previous objections - elements of NIMBYism
- **Existing Problems with Sewerage System**
- Feel that the cost of one sewerage plant for all future housing in Boat of Garten has more chance of being viable and cost effective if carried out y one developer for one development. This will surely make the housing more affordable.
- As there are no plans within the next five years to have any work done to the sewerage plant, current issues for some residents are not likely to be resolved just because no further housing takes place in the village.
- **Additional Benefits to the community**
  - Future site for relocating of school, if required.
  - Working group for liaison with local community regarding stages of development.
  - Safer Access Road to New Community Facility
  - 40% affordable housing
- Suggest reconsidering the proposed sites and leave the existing area in the current HC LP to be the designated area in this new LP.

Community Council Area	**Boat of Garten Drop in Session**
Meeting & Date	26 September 2005
Staff/Facilitators present	Anna Barton, Willie Cruickshank, Lorraine MacPherson, Norman Brockie
Attendance:	43

Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
Affordable	Housing allocation of affordable houses should be fair and transparent giving a high tariff to those in village/area who need to rehouse	5
Affordable	Essential that affordable housing should be phased over a number of years so that it answers local need in the long term	8
All	The CNP local plan allows for 3 zones for housing. I like this and object strongly to the current proposal in the woods. Existing pathways should be protected.	1
All	There is no accommodation planned for disabled people	
All	More houses = more families = better chance for school	5
All	More houses means possibility of more business for local shops, etc	4
All sites	To assimilate the new families into the village, the development must be at a controlled rate. How many a year? How many overall?	
	I would say that 10 houses/year is about right.	
All sites	No more developers – use HSCHT to landbank for self build	2
H1	This should go ahead	7
H1	This is an area rich in ground nesting birds, to the extent that dog owners are requested to keep their dogs on leads from March to August	3
H1, H2, H3	Housing on these sites directly affects the amenity of far more existing houses than the development on SW of village which CNPA opposes	6
H2	This should not go ahead	9
H2	This development should go ahead, instead of in our precious woodland	1
H2	Should become available to build the new hall and the hall site released for housing.	
H2	This would be the most logical area for housing development as services could easily be connected from Grampian Crescent	3
H3	This should go ahead	9
H3	Please show Strathspey Park road and its expected extension on next presentation.	2
H3	The existing access in Strathspey Park development would be inadequate. Is there room to widen this access?	2
H3	Where is it intended to build the road extension from Strathspey Park – what route will it take?	
H3	More houses in this area	4
LA1	This should not go ahead	8
LA1	If this goes ahead, there should be no more housing	4

	development zoned in the next local plan	
LA1	Should be scrapped/moved to H1, H2 and H3 in line with new local plan	6
LA1	Too many houses in proportion to size of village. Should now stick to small developments	9
LA1	Affordable housing should only to to persons in employment	4
LA1	AWFUL	6
LA1	The proposed clear felling of this area of woodland would be criminally irresponsible and a negation of all the work carried out by conservation groups and individuals. This is a famous wildlife area, attracting visitors from great distances who hope to catch a glimpse of Scottish wildlife which can be seen nowhere else. The need for affordable housing for local people could be met in area H1	2
LA1	This may be too many houses at once, but if it goes ahead we can ask for phasing and we get a free site for a new school and access to the new hall.	4
Old hall	Am not keen that it might be a railway museum – keep that to the railway station. A more social use for hall would be good, e.g. sheltered flats.	7
Business		
B1	Any business development planned at the entrance to the village must be effectively screened and accessed separately to preserve amenity of entrance to village.	1
B1	This should not go ahead at the suggested location. Any such business site should be near the sawmill	6
B1	Business zoning should remain at B1	3
Pub	How about a village pub?	2
Tourism		
Old hall	To be turned into a focal point for tourism	1
Old hall	Village pub?	4
Restaurant	Desperate for another restaurant in village	1
T1	This should not be allowed unless there is absolute agreement that a new school will be built and housing for young local families will be a priority.	1
Environment		
C1 – C5, E1	No further buildings or developments in these areas	3
LA1	Do not allow any development in this special amenity	1
Paths	Paths and Rights of Way – presumably they will all be established and maintained. How wide will they be?	1
Woodland	Woodland around Street of Kincardine – current shading for Category 2 isn't accurate.	
Woodland	Protect all woodland sites	5
Community		
Community Hall	If land on left coming into village is allocated for housing, it could be swapped so hall could be built there!	
Community hall	Don't agree with above comment. New hall incorporates changing facilities for playing field.	5
Fire station	We need a site for the new fire vehicle	2
Public Hall	The statement should allow for any disposal or development of this that the community agrees once new community hall is built.	8
Public hall	Could old hall not be turned into a restaurant pub? i.e.	4

	community enterprise	
Public hall	The community has to decide on a future use for the old hall, not CNPA	6
Other Issues		
Infrastructure	How soon do we know if there will be sufficient water supply and a sewage system that will cope – something that it frequently doesn't at the moment.	
LA1	Rights of way, or commonly used tracks, should be kept – the latest plan seems to ignore them	7
Attendance		

Age	Male	Female
0 - 4	0	0
5 - 15	0	0
16 - 24	0	0
25 – 34	0	2
35 - 44	3	5
45 - 64	9	7
65 - 84	9	7
85+	0	1
Totals	21	22
TOTAL	43	

Comments collated by:	Anna Barton

Braemar & Inverey

PUBLIC BODIES

- **H2** – concern that it will affect the appearance and setting of the village. Potential impacts to NSA.
- **T1** – visually intrusive. Would significantly change the southern approach to Braemar. In a prominent position within an NSA. Suggest fields between current camp site and the river is a better site.
- **H1** – part of this under AWI.
- Entire area within NSA.
- Site **H3** includes the Category B listed bus depot and a row of traditional cottages/workshops worthy of sympathetic re-use.
- Feel that Castleton hall (a.k.a Victoria Hall or Invercauld) Galleries is B listed, its community use under C2 must ensure the protection of its character and garden setting.

GENERAL ORGANISATIONS

- Should be reference to the important role low cost housing and intermediate housing tenures have in meeting housing need in Braemar, demonstrated in Aberdeenshire Council's recent Housing Needs Assessment.
- Will not be necessary to require an affordable housing needs survey as an up-to-date needs assessment has recently been completed.
- **H1, H2, H3 & H4** make reference to meeting local needs – is this covered by **Policy 38d)** or is there some other definition?
- Promotion of tourism needs development.
- Promote innovative type and tenure housing to support seasonal workers.
- More business/commercial land is supply analysis needed.
- Should be placed as the 'Heart of the Park' as a key tourist and leisure destination.
- **Glen Shee**
- Should take a robust and pro-active approach to the development and promotion of the Ski Centre as a leisure destination and gateway to the Park.
- Disappointing that nothing is said about how residential and economic activities in this location are to be encouraged, and the implications of Inverey being a "zoned" area are unclear.

ESTATES, LANDOWNERS & DEVELOPERS

- B1 should be a mix of business and affordable housing.
- Propose additional housing sites:
  - To the north of H3 forming a natural edge to the settlement.
  - To the west of Balnellan housing area.
- Need for a semi-wild and basic campsite in the Braemar area to cater for the campers who currently use the Clunie flats.
- Gordon Land are in control of land zoned **H2**.
- Has unreserved commitment from current land owner of another 2 sites within Braemar zoned for affordable and community housing.
- Believe this would provide an opportunity to retain local, young people within the area.
- Also that the housing should remain as affordable into perpetuity.
- **Site A (includes H2)**
- Feel that the land identified for 29 units does not justify or allow for the quality of plot size that would be required in this area.
- Propose to enlarge the outlined area which would:
- Allow proper use of topography
- Maximise the potential views
- Allow for proper sized plot areas
- Continue with the 29 house allocation over a larger area
- **Site Access**
- Current proposals for access are not ideal
- The junction at Marr Road/St Andrews Road will require upgrading
- The narrowness and steepness of the initial brae is not ideal
- Access along St Andrews Terrace is limited due to residents parked cars
- Existing route towards Cairnadrochit not preferred for similar reasons
- **Alternative Proposed Access**
- Alternative access taken off of the Linn of Dee Road would provide a properly formed access meeting all current standards

- This could be positioned to maximise potential use of land from Linn of Dee Road to site **H2**.
- **Future Housing Allocation FH1**
- Have identified on attached map 2 areas for future housing.
- **Community Woodland**
- Identified on attached map a section of the site to be put to use as community/environmental space.
- **Medical Centre**
- As part of the overall scheme an area of land has been set aside for development of a new medical centre.
- **Site B**
- Proposed for Affordable Housing
- Access – good clear access can be taken from Cluniebank Road
- Site Location – ideal centrally located position within the settlement
- Site Size – 2.36 acres
- **Site C**
- Second alternative site suitable for affordable housing, felt that only a flatted development would be possible in this location.
- Access – no ideal having to be taken through narrow winding lanes, but achievable to current roads standards.
- Site Location – just off the centre of Braemar behind a variety of existing properties
- Site Size – 0.67 acres.

COMMUNITY GROUPS

- **H4 & H5** on Chapel Brae are totally unacceptable, essential for parking at Braemar Gathering.
- Suggest areas for housing just south of the existing Balnellan houses, piece of ground east of the track.
- Gaps to the north of Chapel Brae are valuable views for visitors.
- **E2** described in the LP as "communal green space" are in fact front gardens.
- Support area **T1** but feel that this will have little impact on the Cluny wild camping problem.
- Doubt that **B2** is fit for that purpose.
- Object to housing on sites **H4** and **H5** on Chapel Brae.

INDIVIDUALS

- Concerned about potential development of campsite on banks of River Clunie

a) Scenic Landscape issues
b) Suitable alternative sites
c) Conservation/wildlife issues

- Part of the area marked **E2** is a privately owned garden attached to dwellinghouse known as 3 Castleton Terrace.

Policy Sites H4 & H5

- Believe that the proposed development at the two sites would compromise the scenic beauty of surrounding landscape
- Believe these sites should be under Environmental Policy
- These areas also presently used for parking for the Braemar Gathering

Policy Site T1

- Do not object the caravan park extension, however do not think it would reduce wild camping on the banks of the Clunie, as those sorts of campers do not wish to pay for site camping.

Site B2 Braemar

- Currently zoned in Aberdeenshire LP for potential low density housing in keeping with that which surrounds it.
- Sole reason for the siting of the water treatment plant was that the water supply runs there and not that the area should be rezoned from any other use than residential properties.
- Area to the west of this site and around 100 meters of it is the Birchwood Moss – an SSSI. This area would undoubtedly be affected by the siting of any commercial activity within the vicinity.
- The residential properties bordering the area on three sides would be affected by the siting of commercial activity there.
- Access issues within and out with the site.
- Possible alternative sites: – close to either the main road from Aberdeen or the road out towards Glen Shee. In the vicinity of the proposed dry ski slope on the road in from the south and on site **T1** where there is existing infrastructure already in place.

Business & Economic Development

- Para 3.76 – business units not to have negative impacts. Suggest this statement ought to be embodied in **Policy 35**.
- Objection to **B2** regarding the suitability for 2 – 3 small workshop units for local tradesmen.

a) Negative impact on residential amenity

b) Increase commercial traffic to area used for amenity/leisure activities
c) Goods may be stored outside, further adding to negative amenity impact
d) Proximity to a SSSI

Housing - Sites H4 & H5

- Possibility of ensuring that existing areas for housing are properly used and not left idle.

Recreation and Access

- Not clear from the LP how the 3rd aim of the park will be taken forward. What are the specific plans for working with existing bodies and new ventures in *promoting* public enjoyment?

Community Council Area	**Braemar Drop in Session**	
Meeting & Date	5th October 2005	
Staff/Facilitators present	Jean Henretty, Gavin Miles, Sue Walker	
Attendance:	58	
Issue	**Comments** (and location, if applicable)	No. of similar comments
	Houses must be rented accommodation so that there is always house stock.	
	Bowling green – should this not be part of the community facility?	2
	Designated medical centre and police station as business use.	
	No infill on Chapel Brae	4
	Consider housing south of Ballellan – new bridge & footpath from Golf Course Road to A93.	
	Consider redrawing of conservation area to include all traditional houses.	
	No extension to water works for business or industry.	
	Houses for key workers and locals.	
	Reduce number of holiday homes.	
	Provide opportunities for small businesses e.g. as part of H3	
	E2 communal area is privately owned.	2
	Develop proposals for commercial development both retail/office and industrial.	
	H3 – this will need a new access road – Castleton Place, as this is only a single track road and will not take traffic, mirrors needed at each junction.	
	Do not demolish H5 & H4 because sledging area.	
	Desperately need small industrial/business units as no opportunity for all these people who are coming to these low cost houses to start businesses.	
	Rezone immediately south of H1 up to ditch & towards river. This ground is useless for anything else.	
	T1 people wild camping won't want to camp in formal campsite.	
	Recycling to protect the environment.	
	Village hall should be classes as community area.	
	Zone present clinic as business – it will hopefully move soonest to C3 and present site for an office.	
	Zone area between caravan park and A93 as environmental, it's a bonny wee plantation.	
	H3 – I live and have a business here. I am not happy new development going as far as the smiddy/firestation. I will have lost privacy, shadow will increase oise. I know I don't buy the view but I can see Ben Avon on one side of my cottage and Craig Choinach an the other. I will lose both	

	these. I am also concerned about affordable housing – I hope these are what they say and for locals. The term local needs I believe is not necessarily local (Braemar). We don't want rehabilitation i.e. drugs/out of prison etc. Braemar people have to adhere to conservation rules so with this in mind I hope local need do too. I have recently opened a new business and although I am catering for visitors in a wet weather environment CNPA don't want to help me.	
	Strongly in favour of affordable housing under certain conditions. Only for people of Braemar or who are going to make this their only residence. That they must in time be returned to the community. If purchase is allowed there must be provision for resale to the community at a reasonable price or only to someone making it their only residence.	
	Conservation area should include all housing areas.	
	Housing development perhaps south of Blanellan, east of the river.	
	Up grade local shops.	
	I believe that any new housing must be designated for local needs and affordable. There are already far too many second holiday homes in the village.	
	Regarding the housing policies on Chapel Brae, I would support H4 site for local needs units. I disagree with site H5 proposal as this has always been an open space for childrens sledging in winter, as general through path to Linn of Dee Road and I believe should remain so.	
	Regarding business policy site B2, the road and access up Chapel Brae and the access road would ned upgrading before developments. Also consideration to control lorry traffic which could develop with business use.	
	Business zones B1 & B2 both suffer from problem of access. The roads are not up to allowing increased traffic, especially around C1, children will be at risk. Roads are not wide enough for safe lorry/large van access.	
	Possible housing site beside H4 – site of old school.	
Attendance		

Age	Male	Female
0 - 4		
5 - 15	5	8
16 - 24		
25 - 34	3	2
35 - 44		1
45 - 64	9	9
65 - 84	11	9
85+	1	
Totals	29	29
TOTAL	58	

Comments collated by:	Jean Henretty

Carrbridge

PUBLIC BODIES

- SAC runs through **E1**

GENERAL ORGANISATIONS

- Major developments proposed at Carrbridge and Boat of Garten would benefit from higher than 25% affordable housing levels.
- 5 Proposed sites for a new appliance garage
  - Main Street Car Park, Road End – Unused
  - Golf Club Car Park, Old Inverness Road
  - Police Station Garage or Grounds, Main Street
  - Vacant Ground, Station Road by Dulnain Cottage, Earmarked for Industrial/Commercial Use
  - Land on Old Inverness Road, Next to the Spinney, owned by Mrs Rodgers.

ESTATES, LANDOWNERS & DEVELOPERS

- Request to re-designate low quality lodgepole pine plantation south west of the village immediately behind and to the south of Landmark as General Policy 1 rather than General Policy 2. This differentiates it from the high quality genuine ancient woodland in the locality.

COMMUNITY GROUPS

- Considering a plan to provide an outdoor curling facility within Carrbridge
- Possible sites include existing pond on Station Road or another suitable site within the village.
- Possibility of rezoning the site at Station Road to Housing should a move to another venue be the preferred approach.

INDIVIDUALS

- Consider the scenario: **Policy 38d)** restricts new housing, therefore the market for houses in **H1** and **H2** will largely disappear, and they will not be built. By the time of the next Local Plan in five years, planning permission for **H1** and **H2** would have lapsed and the new Local Plan could be produced that answers the needs of the community rather than the developer.
- Gardens at Battanropie, The Broch and Lag na Coille have been designated to be environmental
- Suggest that the edge of the River Dulnain should be environmental as it is part of the River Spey Special Area of Conservation and the gardens coloured white.
- Rosevean House in Bogroy, Dalrachney Road has been omitted from the Plan.

Community Council Area	**Carr-Bridge Drop in Session**
Meeting & Date	27 September 2005
Staff/Facilitators present	Norman Brockie, Anna Barton, Kate Adamson, Mary Grant
Attendance:	40 Adults, 13 Young People

Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
Duthil	Not to double size of village in one go – listen to locals' objections	2
Housing	General comment that it is good that no further housing complexes are proposed for next 5 years	8
Density	Density of housing in big development – village but not be overwhelmed	5
H2	??All affordable houses? Village wanted it to be integrated throughout site. Affordable could be partly on H2 and partly on H1 by Carr Road	8
H2	To include houses for single people	1
H2	Affordable housing must be phased. Some every 2 years	2
H1, H2, H3	Affordable housing must be phased over next 4-5 years or longer	9
H6	Existing agricultural land should not be released for infill developments in Duthil, but maintained for agricultural use	6
H6	The community could be overdeveloped and lose its character if multiple single house developments on the same site are allowed. Infrastructure (roads, water, waste) will not support extensive development	6
H2 General policy sustainable development	The area marked out for the 28 affordable houses is bogland. Will it have adequate drainage and where would the excess water flow to?	1
Housing	Is the village going to be overtaken with all of these new houses when there seems to be a problem selling the ones that are for sale at present?	1
H6	Before more development is to occur in Duthil, the main road should be considered and a speed limit put on it to make it safer. Too many houses in Duthil will spoil good agricultural land.	2
H1, H2, H3 &E2	Strong support for proposal that at Reserved Matters stage, Carr-Bridge Community would like to join discussions on development of these areas.	
C2	Behind village hall is undesignated – could be housing	1
H1, H2, H3	Affordable and open market housing would be better integrated	9
H1, H2, H3	As above. Would prefer to integrate housing. Separation at start, particularly at H2 smarts of a 'ghetto' type area!	
Carr-Bridge	Any future developments should not be as dense as recent new developments have been	5
H4	Flats should not be built on this site	

Infill	Boundary should include some of the land between Lilac Cottage and golf course as this seems an ideal infill area	
H4	It could become crowded	5
Business		
B1	This area could be used for a lot of different things, e.g. lorry park, new business	3
B1/B2	Access to these areas directly off A9 for lorries would reduce the heavy traffic in the village	
Tourism		
T1	The Landmark extension car park is missing from the present map – this could be used as a focus for new footpath development behind Landmark	2
T1	As above – or for abike park, skateboards, scooters, etc	
Blackmount	Scenic picnic area between old and new A9. Information on CNP	
Environment		
Protect	Protect ancient woodland around Duthil to Carr-Bridge birch woods	8
Area between The Spinney & Lilac Cottage	This area should be designated as a water collection area (hence the name Bogroy!)	1
Fields adjoining village	Consideration on zoning these as green areas	2
H1 – H3	The Reporter's decision also required the developers to show they would protect against flooding – very important	2
Flooding	Groundwater/flood protection will be very important for any future housing development or infill	3
Fields behind Carr Place & by football field	Bring within village boundary and designate as green areas	
E1, E2, E3	Very happy that these are protected	3
General policy 1	Area behind village hall also has a substantial area of natural woodland. Would be desirable to see this looked after on an environmental/community basis.	1
Community		
Facilities	Skate board park	5
As above	Should be planning gain in H1	3
Play park	A bigger park – more swings, etc	8
Entertainment	More films shown at Village Hall	6
Activities	Low ropes assault course in woods	5
Activities	Dirt jump in woods	7
Facilities	A toilet store	5
C4	The Curling Rink could be used in the summer time for children, e.g. basketball, tennis	3
Facilities	Café or Youth Centre for 11 – 17 yrs	1
School	School will need to be enlarged if planned expansion of village goes ahead. Need to be diligent as regards funding, etc before it all happens	
Youth facilities	Need a useable area for teenagers to meet and socialise/	

	exercise	
Other Issues		
Duthil	Valuable arable ground being lost to large scale developments	4
Main road	Cannot cope with further development	2
Carr-Bridge	Developments should not be allowed to fill the pockets of speculators	7
Duthil	Developments should not be allowed to fill the pockets of speculators	7
Water table	Serious concerns that water table would be adversely affected by developments	2
H6	Agree with this comment, but think that such a small place as Duthil should be kept at the size it is.	1
Road Safety	How is safety to be developed on boundary of H1 and Carr Road	1
Water supply	Can it sustain the future housing developments already in the pipeline – let alone any additional developments	1
R1	Increased capacity should be done well in advance of housing development and access road should be capable of dealing with increased traffic, including construction vehicles	
Attendance		

Age	Male	Female
0 - 4	2	0
5 - 15	9	2
16 - 24	0	1
25 - 34	3	3
35 - 44	1	6
45 - 64	12	9
65 - 84	3	2
85+	0	0
Totals	30	23

TOTAL **53**

Comments collated by:	Anna Barton

Cromdale

PUBLIC BODIES

- **H1 & H3** – Boundary not clear, may include a BAP habitat.
- SAC runs through **E1**

GENERAL ORGANISATIONS

- No comments were received on this settlement.

ESTATES, LANDOWNERS & DEVELOPERS

Environmental

- Area next to Cromdale Burn bridge (highlighted Green on attached map, marked #1.) already been fenced off and is suitable for adding in as 'Environmental' this would act as a continuation of the area marked on the other side of the bridge.

Housing /Access

- Suggest that the area marked in yellow highlighter on the attached map (#2), be included within the village blue boundary. As there are already new properties on the Lethandary Road. This would offer a further infill possibility and a possible second access to the **H1** and **H3** future housing areas, relieving pressure on the single access onto the A95.
- If above point is accepted then moving the boundary line out from the original (in the area highlighted pink, marked #3) would permit an access way to be brought to **H1** and **H3**

General

- Concern over possible pressure on building plots within the area which may lead to developers acquiring land used previously for other purposes. The loss of non-domestic premises in any community can significantly alter the character and culture of a community.
- Suggest area (shown on enclosed map) to be zoned for private housing. This area is a natural extension to the area already zoned and would finish of the development.

COMMUNITY GROUPS

- No comments were received on this settlement.

INDIVIDUALS

- Supports the draft LP
- Delighted that the boundaries have been kept as they are, to keep the settlement small and attractive.
- Good to see an area outlined for community development and no zoning for further housing.

Community Council Area	**Cromdale Drop in Session**	
Meeting & Date	29 September 2005	
Staff/Facilitators present	Gavin Miles, Anna Barton, Yvonne Nugent	
Attendance:	32	
Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
Balmenach	There is an opportunity to enlarge the settlement area to allow a reasonable number of new houses, both at north and south ends.	
Open countryside	Shouldn't allow any houses in the middle of nowhere, whoever is going to live there	
Farm land	Don't build on all our farm land	
Balmenach	Ground proposed (by Mr Strathdee) is unsuitable for building.	8
Balmenach	Mr Strathdee stated that if he did get permission to build houses it would be affordable housing. £50,000 - £250,000 a plot is certainly not that in this area.	16
Aesthetics	I bought my cottage (existing) to look at fields and wildlife, not other houses. If I wanted to live on a housing estate I would have moved into the village and not to Balmenach. Leave the countryside, leave Balmenach. We don't want more vehicles down these country roads – regardless of the lay-bys that have been put in in advance.	16
Balmenach	This is not a suitable location for affordable housing and should not be used for expensive second homes at the expense of wildlife.	18
Business		
Balmenach	Distillery and bonded warehouse should be zoned for business	
Tourism		
Haugh Hotel	Should be zoned for tourism – now operating very successfully	3
Environment		
	Any further development will be detrimental to the unique environment	18
	Noise, pollution and deterioration of the atmosphere will ensue from development.	5
Balmenach	Absolutely no housing around Balmenach. This is prime wader territory and also swifts, swallows, bats and owls. Infrastructure is being put in to try to get housing which has already caused tawny and barn owls to leave their territory.	
Community		
Balmenach	Good to see a community open space	8
Other Issues		
Infrastructure	Further development will increase the problems in the area of water and sewerage.	
Traffic	Tractors and bogies that are travelling up and down at the moment go too fast!	21

Boundary	Boundary at S end of Balmenach where new house is being built is not accurate – plot shown is too big.	
Water supply	Water pipes have been laid all along Feith Bhuidhe Road – why?	
Infrastructure	Work that has already been carried out (on unzoned land) is substandard (lay-bys are no more than disguised access roads in preparation for future building.	8
Attendance		

Age	Male	Female
0 - 4	0	0
5 - 15	0	0
16 - 24	0	0
25 - 34	1	0
35 - 44	2	2
45 - 64	5	5
65 - 84	4	3
85+	0	0
Totals	12	10

TOTAL **32**

Comments collated by:	Anna Barton

Dalwhinnie

PUBLIC BODIES

- **H1** – concern about the visual setting.
- **H2 & H7** – will breach current informal limit to the settlement sormed by trees.

GENERAL ORGANISATIONS

- No comments were received on this settlement.

ESTATES, LANDOWNERS & DEVELOPERS

- Need to see more housing along the roadside in Dalwhinnie to give a more village atmosphere. No village centre equals no cohesion at present
- Urgently need better parking facilities for walkers – becomes chaotic at present during the summer especially along the railway track. Parking facilities are needed on the village side of the railway with good foot and cycle access on desired routes

COMMUNITY GROUPS

- No comments were received on this settlement.

INDIVIDUALS

- No comments were received on this settlement.

Community Council Area	**Dalwhinnie Drop in Session**
Meeting & Date	26 October 2005
Staff/Facilitators present	Norman Brockie, Anna Barton, Bill Carr
Attendance:	16

Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
H1	Don't build here – vital for agricultural use.	2
H1	Not a suitable site or location for houses.	
H2	Part of essential field for agricultural use, very wet.	
H2	Very boggy land for housing!	
H5	Road needs to be adopted.	
Business		
	No comments	
Tourism		
	No comments	
Environment		
E1	Important that this area is only used for community approved purposes.	
E1	Should include a zoned are for a sports field close to the school.	
Community		
C3	Now apparently included in the planning application for housing under H7. Will be trees planted!	2
E1	There is a need for a sports field in this area.	
Other Issues		
Boundary	Land west of the railway id not included in the CC boundary.	

Attendance

Age	Male	Female
0 - 4	1	0
5 – 15	0	0
16 - 24	0	0
25 – 34	1	0
35 - 44	2	2
45 - 64	9	0
65 - 84	3	1
85+	0	0
Totals	16	3
TOTAL	**19**	

Comments collated by:	Anna Barton

Dinnet

PUBLIC BODIES

- No comments were received on this settlement.

GENERAL ORGANISATIONS

- Aberdeenshire's Local Housing Strategy does not identify provision of affordable housing in Dinnet as a priority.
- It is not clear from the NP LP how this need has been identified.
- This is not a suitable site for large numbers of affordable houses due to the lack of services.
- Believe this proposal is counter to **Policy 37** and other statements within the Plan, with regard to basic services and facilities.
- Review business designations in order to facilitate a robust gateway for the village.

ESTATES, LANDOWNERS & DEVELOPERS

- No comments were received on this settlement.

COMMUNITY GROUPS

- No comments received on this settlement.

INDIVIDUALS

- No comments were received on this settlement.

Mid Deeside & Cromar

PUBLIC BODIES

- Title of statement and map should match.
- There is the potential for Recommendation 1 (**R1**) to affect the River Dee SAC.

ESTATES, LANDOWNERS & DEVELOPERS

- Consider including Glen Tanar as an identified settlement, due to size, employment, infrastructure, facilities and services.
- Suggest considering proposed Settlement statement for Glen Tanar.
- Object to the extent of land at Glen Tanar which has been designated as Designed Landscape.

INDIVIDUALS

- Confusion of whether Ordie is a designated settlement: Policy **H4** suggests it is, whilst verbal assurances say it is not. Is a zoned area the same as a defined/designated settlement? What is the definition of an Existing buildings group? Present definition is ambiguous and will encourage attempts to exploit the loophole.
- As the current Structure Plan states that Ordie is termed as Countryside not designated as Green Belt and under Policy 12 of this there is a presumption against house building. Suggested infill development does not meet any of the criteria for exemption with this policy. Is this LP to comply with the Structure Plan?
- Object to statement on page 107 of this LP that infill development be acceptable at Ordie for following reasons:

a) Historic and Cultural Landscape issues
b) Road Access & Safety issues
c) Drainage & Sewerage issues
d) Sustainable Development issues going **against General Policy 1**

- Consider it more in-keeping with the General Policies if new development and infill be concentrated on communities at risk and in communities with existing facilities and regular public transport.
- Request that the northern part of site **E1** Dinnet, be zoned for housing. (1 dwellinghouse).
- The wooded sites across the road from the church are zoned for housing, can't see why the part of **E1** north of the church should not be zoned for a single house.
- Concerned that unclear wording in the LP regarding housing may put some areas at risk of development.
- On page 107 paragraph 3 in the LP *"the LP should seek ways to concentrate development in Dinnet and Ordie settlements within the drawn boundaries"* but Ordie does not have a drawn boiundary within the LP.
- The text then goes on to suggest that development should be consolidated, but not to compromise

the high landscape value of the area. – how can Ordie be consolidated with out such a compromise occurring?

- Ordie has not been zoned for development, but if it is recorded as being an area suitable for consolidation, it will be at risk of development in the future.
- Local Residents do not wish for Ordie to become a 'Settlement'
- Total Lack of facilities makes Ordie unsuitable for affordable housing and any private housing might soon become empty holiday homes.

Community Council Area	**Mid Deeside& Cromar Drop in Session**
Meeting & Date	27 September 2005
Staff/Facilitators present	Jean Henretty, Mary, Eric Baird, Anneke Stolte, Claire Fraser
Attendance:	25

Issue	**Comments**	No. of similar comments
	If more houses with young children are proposed in Dinnet would the area require a new school?	
	How is a “cluster” defined?	
	What is the definition of affordable housing?	
	What could be defined as an infill site?	
	How many houses would be in sites H1, H2 and H3?	
	Would prefer not to have any new expensive homes in Dinnet.	
	How could CNPA ensure new houses are allocated to local people?	
	Is there a need for homes for local people?	
	Would welcome new younger people and their families to the village.	
	Smaller homes for sale may suit the existing elderly residents who could sell their large homes to new families.	
	Housing in the area marked H1, H2 & H3 may contravene Policy 37a and policy 3 of the draft local plan. This area is birch woodland which is an LBAP habitat, removal of which may result in an adverse significant impact. Hosing should be, if possible, be located on land of low ecological value e.g. intensive farmed fields. If all the houses were low cost housing there may be a case for social benefit overriding ecological impact.	
	Ordie is an historic Clachan, one of the few remaining in Aberdeenshire, and should not be infilled, otherwise the structure will be lost.	
	Although upgrading the caravan site behind the hotel would result in an improvement in visual amenity, and possibly bring in more money, it would on the other hand mean that folk who currently come from Aberdeen to enjoy the countryside will	

	lose the facility.	
Attendance		

Age	Male	Female
0 - 4		
5 - 15		
16 - 24		
25 - 44	4	5
45 - 64	6	6
65 – 85+	2	2
Totals	12	13
TOTAL	**25**	

Comments collated by:	Jean Henretty

Donside

PUBLIC BODIES

- **Donside – Zone T1**
- Development of a tourism development at this site would have significant adverse impact on the setting of the scheduled monument, Doune of Invernochty, which lies immediately to the NE of the site.
- Do not consider that this land allocation accords with the commitment in the last sentence of **page 110**, to protect this monument.
- Feel that the area zoned as **E1** is not enough to protect this monument and feel that the area zoned as **T1** should not be zoned for any form of development.

GENERAL ORGANISATIONS

- Tourism potential needs to be reviewed and developed.

ESTATES, LANDOWNERS & DEVELOPERS

- Feel it is important that the contribution to the local economy made by land based businesses other that farming is recognised, i.e. forestry and fieldsports.

COMMUNITY GROUPS

- No comments received on this settlement.

INDIVIDUALS

- Disappointed that the settlement boundaries do not include Forbestown, Waterside and Heughhead, when noted as such in the settlement statement.
- There is restricted potential for housing development within the named settlements in Strathdon, whereas in Waterside and Heughhead there are several landowners who may consider land for affordable and local needs housing.

Community Council Area	**Donside Drop in Session**
Meeting & Date	6th October 2005
Staff/Facilitators present	Jean Henretty, Gavin Miles, Eleanor McIntosh
Attendance:	29

Issue	**Comments** (and location, if applicable)	No. of similar comments
	Provision of service should balance any interest in local population.	
	Having looked at the draft plan I believe the general policy zones are appropriate. I am please to be able to view the plans and discuss the matters.	
	Why is Waterside not zoned as settlement or indicative of new housing.	
	Settlement boundary too restrictive. Insufficient scope for new building.	
	Lobby Central Government on our behalf to provide fuel as we live such a long way from any petrol, this is a basic need.	
	I would like to see more affordable housing built in the Bellabeg/Strathdon area that could accommodate young families.	
Attendance		

Age	Male	Female
0 - 4		
5 - 15		
16 - 24		1
25 - 34		1
35 - 44	4	3
45 - 64	7	4
65 - 84	4	5
85+		
Totals	15	14
TOTAL	**29**	

Comments collated by:	Jean Henretty

Dulnain Bridge

PUBLIC BODIES

- No comments were received on this settlement.

GENERAL ORGANISATIONS

- No comments were received on this settlement.

ESTATES, LANDOWNERS & DEVELOPERS

- **H1** – the boundary should be extended to include the whole area in the current Local Plan.
- Currently working closely with Highland Council to secure provision of two affordable housing units on the Walkmill Croft site to the west of Dulnain Bridge.
- Area 1 is a natural extension to the Waulkmill development. Benefits: stretching the 30mph zone thus lowering speed in area.
- Areas 2a and 2b – natural extension to the east of the village. This forested area due to be clear felled over next 5 yrs. Plan to plant a buffer zone to the south east of the village

COMMUNITY GROUPS

- No comments were received on this settlement.

INDIVIDUALS

- Request to continue to safeguard area of woodland owned by Speyside Heather from Development.
- Request to include Speyside Heather Centre's ground as land identified for Commerce/tourism purposes, this will allow the company to continue to expand and improve a 4 star visitor attraction.

Community Council Area	**Dulnain Bridge Drop in Session**
Meeting & Date	28 September 2005
Staff/Facilitators present	Norman Brockie, Anna Barton, Mary McCafferty and 5 other Community Councillors.
Attendance:	40 Adults, 2 Young People

Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
Housing plot	Is there planning permission on a site adjacent to Church Place where the settlement boundary juts out beyond the wall?	
Housing	25 houses in 5 years? Not enough for local businesses.	
Housing	Dulnain Bridge needs more housing for people living permanently in the area at affordable cost.	
Housing	Affordable housing needed.	
Second homes	Holiday homes contribute nothing to the local economy.	
Housing	The two areas designated for housing on the draft Local Plan should be reserved for affordable housing.	
Business		
B1	This site next to garage could provide small café, public toilets, bus shelter and pull-in for cars. There is presently nowhere to stop at the shop. There are no public toilets. A building which was placed well back on the site could house a small café and public toilets. The café could sell crafts, local paintings, photographs, etc, to generate enough to finance the project and create employment, possibly several part-time positions.	3
Shop	It is essential to support the local shop and expand opportunities for business generally.	
Shop	A local shop is essential to the community – need to find a way to bring tourists into the village to help sustain this business ventre and to expand to enable the shop to increase its lines. Is there any funding available for this.	
Tourism		
Tea shop	A tea shop in the centre of the village would attract visitors. The old filling station area would be a suitable site. We desperately need something to attract people to stop in the area.	
Crafts	A teashop could attract craft makers to exhibit.	
Artists	(Added to above) and local artists of whom there are many.	2
Tea shop	The site at Granite House is to become a licensed restaurant/tea shop aimed at the local trade as well as visitors, i.e. reasonable prices.	
Visitors	We need more people to stop, stay and come back again.	
Environment		
	No comments.	
Community		
Bus shelter	A bus shelter in front of B1 would be beneficial to the	3

	community as a whole. This is a very exposed area in a cold area of the National Park.	
Toilets	We need public toilets.	
Toilets	We desperately need public toilets – too many visitors use the Roches Moutonnees site for this purpose – shameful!	
Other Issues		
Previous comments	Please note all comments previously submitted by the Community Council. Thank you.	
CC Boundary	What's shown on the map doesn't tally with HC map of CC areas. Can you check, please?	
	Tullochgribbain High to the west and Gaich Farm to the east are both in DBCC area. Map is incorrect.	
Attendance		

Age	Male	Female
0 - 4	0	0
5 - 15	1	1
16 - 24	0	0
25 - 34	1	1
35 - 44	3	1
45 - 64	11	7
65 - 84	9	7
85+	0	0
Totals	25	17

TOTAL **42**

Comments collated by:	Anna Barton

Glenlivet

PUBLIC BODIES

- Need to clarify if the area zoned for community use adjacent to Blairfindy Monument is one of the areas referred to in the last sentence of the fourth paragraph on **page 101**.

GENERAL ORGANISATIONS

- No comments were received on this settlement.

ESTATES, LANDOWNERS & DEVELOPERS

- No comments were received on this settlement.

COMMUNITY GROUPS

- Concern that the proposals for Knockandhu/Auchnarrow and Chapletown of GLenlivet will lead to ribbon development and completely change the character of there areas.

Knockandhu/Auchnarrow

- Currently a scattered collection of houses
- Designating it as a formal settlement would lead to the development of a 'street' which would dominate the surrounding landscape and completely change the character.

Chapletown of GLenlivet (The Braes)

- Most residents would welcome more houses, but would not welcome the creation of a 'street 'as this would drastically change the character.
- Felt that the scattered characteristic should be maintained from both a social and a scenic standpoint.
- Felt that the proposal to limit new housing in the countryside to sites already occupied by groups of at least three existing houses might be unnecessarily restrictive in this area. The lack of suitable water supplies already provides a natural restriction of development.

INDIVIDUALS

- Concern over proposed power plant on site adjacent to The Glenlivet Distillery.

Community Council Area	**Glenlivet Drop in Session**
Meeting & Date	12th October 2005
Staff/Facilitators present	Jean Henretty, Gavin Miles, Eleanor McIntosh, Fiona Toovey
Attendance:	48

Issue	**Comments** (and location, if applicable)	No. of similar comments
	Zone Tomnivoulin heritage centre as Tourism	
	Important sites for ground nesting waders, peewees, snipe, curlew, oyster catchers, black grouse etc – Glenlivet	2
	Important site for curlew, snipe, lapwing, merlin, black grouse in Corries Glen	
	Red Start, Woodcock, Tree creeper, Bullfinch, song thrush etc in Clash Wood.	
	Houses should be in keeping with surrounding buildings	
	Not necessarily single storey	
	Houses to be in the design of local houses – single storey.	
	Knockandhu water supply may not support more housing.	
	"The Park" to be protected. No development.	
	Heather Fold viewing area – tourist amenity.	
	Water plant not included in Chapeltown?	
Attendance		

Age	Male	Female
0 - 4	1	1
5 - 15	1	
16 - 24		
25 - 34	3	2
35 - 44	4	4
45 - 64	12	14
65 - 84	3	3
85+		
Totals	24	24
TOTAL	**48**	

Comments collated by:	Jean Henretty

Grantown on Spey

PUBLIC BODIES

- **E1 & H1** – fields to the north and east of the settlement – recommend a high proportion be allocated **E1**.

GENERAL ORGANISATIONS

- Last paragraph in the text section headed "steam railway" – the phrase *"should be made"* is not understood, it should read: *"provision is made…"*
- The Business zoning at the south end of Grantown should be redrawn to reflect the existing detailed planning permission for the proposed station.
- The Plan should be amended to show the alternative terminus site.
- Suggest that the land to the south east of the alternative site (**E1**) should in general be allocated to housing development.

ESTATES, LANDOWNERS & DEVELOPERS

- **H1** – but the designation between **C3, E1**, and **H1** are overly prescriptive.
- **H2** – should be extended to include whole area zone in the current Local Plan.
- The paddock and adjoinging garage area on Mossie Road/Church Avenue should be zoned for housing as per the current Local Plan.
- Feel the LP is too prescriptive; this stifles creativity and common sense development.
- The area on the opposite side of the central green area from Mossie road has been designated as housing, feel this is an environmentally sensitive area as consists of 2-3 metres depth of peat.
- While there is an environmental designated area over some insignificant grazing land directly adjacent to Mossie Road.
- Would be better to shade the whole area as housing, then refer in the text to an element of environmentally sensitive area, but do not specify where. Then detailed environmental studies would form part of a submission and the correct site would be identified through this process.
- Alternatively, amend the housing areas to that shown on the accurate Muir Homes draft layout, informed by the land studies done so far.
- Request for an extension of the park to build 10 Chalets on triangle of land North of park up to the dismantled railway
- Request for extension to park on square of land to east of park

COMMUNITY GROUPS

- The high profile area by Grantown East Station should be rezoned as tourism to make the most of the passing traffic and allow development of a new tourist facility.
- The west end of the area opposite the caravan site should be rezoned as tourist rather than environmental to allow the option of a station for the Strathspey Steam Railway.
- The last paragraph on page 81 should be amended by replacing the word *'continuation'* for the word restoration.
- Concern that community facilities out with the boundary will be lost if not zoned properly or included in the boundary. These include:
  a) **C2** should be extended to include the school playing fields, new sports facility, Grantown show ground and golf practice ground (Heathfield Park area)
  b) The area around the Skating Pond/Kylintra Park needs to be zoned for community use and incorporated into the town boundary
  c) The area around the curling pond by the golf course needs to be zoned for community use and incorporated into the town boundary.
- Confused over whether the Community Woodlands of Anagch Woods is zoned under **General Policy 1** or **General Policy 2.**
- Concern that this means some of the woods are deemed less in need of protection from development than others.
- Auchnagolin Industrial Estate (**B2**) effort needs to be made to make the units more attractive to businesses by lower rents and encouraging use.
- The area zoned for a new housing development (**H1**) is deemed as adequate for the town.
- Concern that development needs to be in scale with the town and its facilities and that it will benefit the community, not swamp it.

INDIVIDUALS

- Objection to develop the wooded land **H1**on the Mossie as it would affect the adjoining land which is to be a protected area.

- Surprised that half of the area of natural woodland from the caravan park end of Spey Avenue up to the Ian Charles Hospital, behind Mossie Road, is designated for housing development, while retaining the other half as a conservation area
- Surely the valuable habitat does not just exist in one half of the woodland.
- Concern that the development will have adverse effects on the habitat in the protected portion.
- If the development is to go ahead it should be ensured that the houses are to be built in stages as is stated in the plan.
- Surprised that part of the area of **H1** is designated for housing development. While the remaining part of the natural woodland has been zoned for protection from development.
- This is part of an area of considerable natural beauty and constitutes between a quarter and a third of the tree covered part of the area referred to in the LP as valuable habitat to be maintained.
- Concerned that the removal of such a large number of trees and the consequent disturbance of plant life and soil in one part of the woodland could have an adverse effect on the wildlife and plant life in the protected area.
- Concern that development on this area would necessitate draining of the peat, which would disturb the water table of the entire moss and destroy the valuable habitat to be maintained.
- Since all the remaining areas marked **H1** are on open land, it would appear unnecessary to destroy a large part of valuable habitat.
- The areas referred to as **H2**, should be designated as housing and should be accessed from Seafield Road.
- The housing zoning should extend into parts of the area **E1** between the **H2** zones and Seafield Road.
- The proposals for this area in the HC LP Aug 1996 are a better alternative.
- Future housing provision should develop slowly; consistent with the growth rate over the last 10 year period and local firms should have the opportunity to participate in this growth.

Community Council Area	**Grantown Drop in Session**
Meeting & Date	5 October 2005
Staff/Facilitators present	Norman Brockie, Anna Barton
Attendance:	16

Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
The Mossie	This area is not suitable for housing – subject to flooding. Better on land to the east of Grantown close to the railway track.	
H1	Strongly resist an explosion of houses over a short period – preference for slow natural growth, preferably using local services.	1
H1	Areas designated for houses have reduced since last local plan. Would prefer certain designated E1 areas being reinstated for housing.	1
H1	Strongly opposed to large development Mossie area by national builders. Considerable areas of H1 zones are in fact very wet and boggy and therefore the whole Mossie area would lend itself much more to small developments by local builders with local knowledge.	
Housing	Rapid expansion of housing would spoil the character of Grantown and the necessary enlargement of the present infrastructure would destroy the very thing which appeals to visitors and presently attracts tourism.	
Business		
B1	Includes land required for Strathspey Railway terminus and approach.	
Achnagonalin	Business	
Supermarket	An out of town supermarket would destroy the main shopping area, as has been proved time and again in other areas.	
Tourism		
Caravan site	Redraw boundary at T1 to reflect statement.	1
Environment		
Parkland	Parkland and lochan opposite Craiglynne Hotel must be within the boundary.	
Community		
Grantown Show field	Field should be within boundary and zoned for community.	1
Other Issues		
Roads	Recommend early implementation of A95 improvement at Gaich.	
Paths	Create all abilities path beside Kylintra Burn from opposite Craiglynne to bypass.	1
Attendance		

Age	Male	Female
0 - 4	0	0
5 – 15	0	0
16 - 24	0	0
25 – 34	1	1
35 - 44	3	1
45 - 64	7	1
65 - 84	2	0
85+	0	0
Totals	13	3
TOTAL	16	

Comments collated by:	Anna Barton

Kincraig

PUBLIC BODIES

- The natural buffer which separates Kincraig from the A9 should not be breached.
- **H2 & H3** – parts of these are on Ancient Woodlands Inventory.
- Title of statement and map should match.
- Suggest the moving of some boundaries between **C2, H4 and E3**
- **H5** – contains a small area of an AWI site.

GENERAL ORGANISATIONS

- No comments were received on this settlement.

ESTATES, LANDOWNERS & DEVELOPERS

- The *statement "Sites for affordable housing may also be available via agreements with the forestry Commission"* is welcomed, however land in an existing community (Forestry Compartment 4090) which was formerly zoned for housing has now been reallocated to Policy **E1**.
- This represents a reduction in the area made available for housing in this small community. Request that at least part of this land remains zoned for housing; the land to the south more suitable. The existing shelter-belt of trees and the wetter ground to the north could provide the environmental protection required within the village.
- **T1** – believe that Inshriach forest should also be listed as a tourist destination in this area. The Speyside Way extension should also be considered in this respect, rather than just a reference to Sustrans link.
- Safety issues regarding access onto the A9.
- Feel that the village benefits from being integrated into its rural surroundings and feel that this should be the way to continue development.
- Consider housing in small groups outside the settlement boundary.
- Concern that infilling in **H1** may compromise the woodland character of the village.
- Affordable housing should be integrated into the community and not form down market ghettos as may result form **H4 & H5**.
- Issues regarding the designations of some of the woodlands.
- Suggest zoning whole areas in an indicative rather than prescriptive manner to be looked at in more detail as to the suitability of the whole site by developers.
- Important that new business opportunities are encouraged within and out with the settlement boundaries in order to maintain the local economy.
- Feel that the areas zoned under C1 and C2 are too restrictive.
- Have to take into account that as the community changes, preferred locations for community facilities will inevitably change, therefore policies for this should not be overly restrictive.
- Would not be practical for the bottom part of the field E3 to be retained as grazing if the top part was developed for housing.
- Recommend that Kincraig Bridge be strengthened and supplemented with a pedestrian walkway.
- **Proposed New Housing in and Surrounding Kincraig**
- None of the proposed sites identified for housing would lead to "a loss or disturbance of locally valuable wetland" the water problems in the Field identified for **C2, E3**, and **H4** is caused by an accumulation of blocked field drains.
- Kincraig has spare sewerage capacity, suggest extending housing into woodlands north east of **H4** & **H5**, integrated with good design and landscaping.
- Suggest consulting more and integrating with the local community/residents/landowners.
- Additional areas to be included
- Areas shown on enclosed map in Brown – potential new housing development
- Areas shown on enclosed map in Green – amenity planting to act as development boundary definition.
- Area to the south of Suie Hotel is felt to be suitable for housing development
- **Housing**
- Suggest increasing areas zoned for housing (**H2 & H3**) with buffer zone **E2** being decreased.
- Suggest extension of **H2** towards south west boundary to allow harmonisation with current development area.
- **Community**
- The location of community facilities should be decided in discussion with the community.
- The protection of existing community facilities from non-community use seems rather prescriptive.
- **Environment**
- Suggest consideration to be given to decreasing **E2** as in point above regarding housing.

COMMUNITY GROUPS

- Change the south block of **H2** to an extended **C2** (used for Kincraig Fair)
- Adjust the environmental boundary to follow the fence lines below the Suie Hotel to Dunachton Road
- Extend **H1** to the Brae
- Retract **B2** to north of the Station House garden
- Extend the property line for Tom-na-Criagie
- Add an environmental strip on either side of the Baldow Burn
- Re-draw the bog margin at **H4**
- Show **B4** at Insh
- Land for houses in the strip between the A9 and the B9252 is increasingly shown to be building up resistance. **H2** Should perhaps be shown as an area for later development if at all – different shade of colour for this area maybe.
- Reference to previous planning determination for Squirrels Leap (Ref 05/002287/REMBS) Paragraph 5 in particular. The CC is anxious to see the old FE buildings scheduled for 'Start-Up' Sites.
- The HSCHT are concerned that their proposed Affordable Housing Project in Milehouse Wood above the Loch Insh Watersports Centre should not be omitted from the LP.

INDIVIDUALS

- **Site B1** – the phrase *"high environmental sensitivity"* requires to be quantified.
- **Site B2** – both existing vehicular accesses are poor and are incapable of improvement to a reasonable standard. Only satisfactory vehicular access route to the site would be through land to the west, possibly uneconomic. The proposal should be deleted.
- **Site E4** – the only original features of Kincraig Bridge are the piers and abutments. No longer merits listing.
- The impeded drainage of the land between the railway line and smithy is significant and required to be recognised on the map.
- The easterly boundary of **E1** does not reflect any feature of importance. The green area should be extended to include the entire TPO area except for those areas within curtilages.
- The TPO should be shown on the map.
- The existing S.75 Agreement on the land to the west of the housing estate between the railway and the old A9 should be shown on the map.
- The school house and its garden should be included in the "school" allocation.
- Appear to be some odd black lines on the map that should be described or deleted.
- Far too much land is allocated fro residential development. There should be no housing allocations in the strip between the two main roads.
- Include a statement of principal (SoP) about protecting the landscape and views around the Speyside Way. In particular:
- Where the proposed route passes to the south of Insh along edge **H6** and **E1** and past areas designated for housing, an SoP that the actual buildings should be set back from the line of the path, to maintain views over Insh and the Monaliadths.
- Struans route 7 should not be refered to as a path as is a public road
- The Badenoch Way should be included under "Paths" as should a number of recognised RoWs in the area
- Suggest a Statement of firm principle that in general in rural areas new houses should be no higher than 1 ½ storeys and in keeping with other styles
- Suggest a presumption against approval for houses outside settlements located by roadsides.
- Insh Map – request to remove the environmental designation from an agricultural field along the B970 within the registered Greenfield Croft. Need this field to stay as it is, for the croft to stay viable.

Community Council Area	**Kincraig Drop in Session**
Meeting & Date	6 October 2005
Staff/Facilitators present	Norman Brockie, Anna Barton, John Anderson, Nic Bullivant
Attendance:	55

Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
Affordable	Housing for young people should be a priority, but there should be a mechanism to prevent so-called 'affordable' housing being sold on for profit/holiday/second homes and taken away from the locals' needs.	2
General	There should not be a presumption against single housing developments.	2
General	There should be more houses in the countryside.	1
General	Housing should be permitted in the countryside for people who belong there.	
H2	If poor winters are to come again, they are in line with snow drifts!	
H2 and H3	Hope they will not materialise, but better there than other options.	1
H2 and H3	Can these be held back until the next plan?	
H2, H3	Housing should not spoil views to the hills.	
H4	Happy for it to be affordable, but not otherwise	4
H4 and H5	These should be less prescriptive and penetrate into the adjoining woodland utilising the trees to screen houses and break up the woodland edge.	
H4, E3	Should be housing in forest to create a balance to both sides of the village.	
H5	Agree.	1
H6	Development should be in a manner sensitive to the rural nature of Insh.	
H6	There is an existing planning permission in the E7 area to the west of H6. Need to keep new housing well clear of Badenoch/Speyside Way. Right of way out east side of H6 to be protected.	
H6	Should be as unobtrusive as possible. Definitely no street lights.	
Retirement homes	The area is not providing homes for older people to retire to. No shepherd, gamekeeper of ths like will want to live in a scheme. For these, do not consider 1 bedroomed houses – minimum 2 bedrooms.	
Business		
General	Not sufficient land earmarkes for local business opportunities. Suggest area east of school on other side of road.	
B2	Invasion of privacy of properties in Sepybank Walk – noise and light pollution, loss of woodland area, affecting those immediately by the railway.	1

Tourism	No comments	
Environment		
Noise pollution	To be avoided by all business developments	2
E1, E2, E3	Strongly agree	
FC land	Why is the section of FC land (part of Inshriach) at the SW end not uncluded in the NSA. It should be.	
E3	Too much environment zoning in wrong place.	1
E3/C2/H4	The split of this field shows no knowledge of the type of ground. Top half of H4 is OK for houses and C2 possible. However, with regard to the wet ground in the middle, best create a nature pond! Why not include part of area north of H4?	2
E3	This should reflect the character of the ground and include area unsuitable for housing that is wet, rather than ground suitable for housing. Too prescriptive.	1
E7	Existing planning consent for two houses here (Insh).	
Community	No comments	
Other Issues		
Boundary	Houses within boundary should be white, not General Policy 2.	1
Boundary	To include garden of Tom na Creige (formerly 'Carrington')	
Drumguish	Should be a development plan for Drumguish.	
Footpaths	No mention of Speyside Way	
Full local plan	Not enough copies of full plan to include housing policies.	2
Policies 21 & 22	Fully supported – most other aims also well thought out.	1
Policy 22	No charging for car parking which gives access to the countryside.	
Policy 27	Why will there be 'no extension to ski areas'? What about an artificial ski area for use in adverse weather conditions? Old habits still persisting. Time to break out of the box!	
Your language	Please use plain English – no jargon. There are far too many AMCSs, SACs and SPAs. I cannot see all the links between any of these.	3
Attendance		

Age	Male	Female
0 - 4	0	0
5 - 15	1	1
16 - 24	0	1
25 - 34	0	0
35 - 44	5	3
45 - 64	15	7
65 - 84	14	8
85+	0	0
Totals	35	20
TOTAL	**55**	

Comments collated by:	Anna Barton

Kingussie

PUBLIC BODIES

- SAC runs through an unmarked environmental area.

GENERAL ORGANISATIONS

- Support Highland Councils view that there is a need to identify more land for business and industrial use in both Kingussie and Newtonmore.
- An area of former sidings adjacent to Kingussie Station has not been included within the settlement boundary; this might hinder Network Rail from using it for operational purposes or making best use of its assets. As Brownfield land adjacent to the settlement it would be appropriate to include it within the boundary.

ESTATES, LANDOWNERS & DEVELOPERS

- Suggest that Lynchat, outside Kingussie should be a recognised settlement, with a boundary and settlement statement.
- Suggest consideration of proposed settlement boundary and statement for Lynchat.
- Area of land shown on attached map has been previously zoned for housing in the Badenoch and Strathspey LP.
- Suggest this area remains ideal for development and should be zoned in this LP.
- Suggest a broad zoning of the entire housing development site of Kingussie (as shown on attached map) as opposed to discrete pockets
- Suggest producing a masterplan for Kingussie.

COMMUNITY GROUPS

- Concern that the land set to housing; **H1** to **H4** will be accessed via road through the existing Dunbarry settlement. This access route will not safely or practically support the construction traffic or the increased transport needs. This will pose safety issues to the large proportion of young families with children living there.
- Suggest a new access via Kerrow, which can also service the proposed future developments at **FH1 and 2**.
- Welcomes and agrees with the general comments identified under Business/Employment, Community, Environment and Tourism. **Policy T1** and **Proposal E1** broadly agreed with.

INDIVIDUALS

- Regarding the proposed site for a local electricity generator at the River Gynack, this would be a good opportunity to reinstate the gravel traps which were previously along the river.
- The plot of ground allocated for housing at the east end of Kingussie is coloured red in error.
- A woodland corridor could be established off Dunbarry Terrace as squirrels use this area.
- Wish area west of the former Ruthven farm buildings to be allocated for affordable housing as it is in the current Local Plan.
- Concern over how areas **H1** and **H2** will achieve appropriate road access.
- At present none of the existing public roads to the west or the south of these areas could accommodate additional traffic.
- Objection to the exclusion of area of white land to the north of Ardvonie Road and land shown as General Policy 2 area (green) from within the settlement.
- This LP fails to meet housing objectives in Kingussie, as the areas zoned have been partly built on, very little further land available in short/medium term to meet housing needs.
- Need to consider housing in woodland settings.
- Housing completion figures in the LP are inaccurate and do not reflect realistic housing demand.
- Concern regarding road safety & traffic issues regarding **H2**.
- The existing amenity space in area **H2** and **H1** should be preserved.
- The environmental space in **H1** seems too narrow.

Community Council Area	**Kingussie Drop in Session**
Meeting & Date	3 October 2005
Staff/Facilitators present	Gavin Miles, Anna Barton, Alan Hunt, Tom Wade, Donny Grant
Attendance:	28

Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
Affordable	Local need should take priority with transparency in allocation process.	
West Terrace	Why has the area previously zoned for housing been removed from the plan? Do the planners have any reasons other than 6 objections in the previous survey?	3
H1 – H4	The road is inadequate already – could not cope with another 80 houses, which could mean 160 extra cars!	2
FH2	This should be developed first.	
FH1 and FH2	No further housing until new road out onto old A9.	2
Business		
Market Stance	Does current use of the cattle/sheep holding zone by the Market Stance justify retaining it as it is? It would seem to be more appropriate for small workshop units.	
Tourism		
Highland Folk Museum	If this is closed and the collection moved away from Kingussie, it will be a disaster for the community - a great cultural loss and will have serious adverse effect on many local businesses, not just hotels, guest houses and retail, but also small tradespeople. The buildings should be refurbished and then the Museum facilities enhanced without losing attractive character.	
Iona Gallery	This needs money spent on it to enhance its availability. Better signage needed too.	
Environment		
Green zones	Who manages/maintains these areas?	
Protected sites	Why is the area behind West Terrace not suitable for building development? Were the comments relating to this made by incomers and holiday home owners?	
Community		
Court House	This listed building should not be allowed to deteriorate further – it must be refurbished and then open to the public.	
Other Issues		
Footpaths	No mention of Kingussie footpaths, many of which are in need of maintenance – should be included.	
Footpaths	Extend network to link up and plan maintenance of paths.	
Water/sewerage	Do we have to wait for Scottish Water to invest before there is any more development?	
Water/sewerage	Essential, surely, before further building.	
Policy 41	Temporary permission for caravans should be 9 months for self-built houses.	

Attendance		

Age	Male	Female
0 - 4	0	0
5 – 15	0	0
16 - 24	0	0
25 - 34	0	3
35 - 44	1	6
45 - 64	4	5
65 - 84	6	3
85+	0	0
Totals	11	17
TOTAL	28	

Comments collated by:	Anna Barton

Laggan

PUBLIC BODIES

- **H1** – contrary to landscape capacity study. Within RSBP study area

COMMUNITY GROUPS

- Disagree with the policy of encouraging exclusive development of village centres (alien to historic settlement patterns of a village such as Laggan) Small clusters the norm historically.
- Scattered development is the most socially inclusive form of population expansion.
- Where the village centre is to grow it should be outwith the existing curtilage. The committee does not want to see ribbon development branch out from the centre with attendant invasive infrastructure such as light pollution from new street lighting etc.
- On the above principle the area between the shop and the village hall (serviced by street light and gritters) is a better for a new build than any area west of the hall. The lower part of the football field could therefore be released for development, with the upper part remaining zoned for community.

INDIVIDUALS

- Opposed to proposed affordable housing site at Catlodge for following reasons:
- Existing drinking water and waste pipes cross the site
- The existing septic tank has no further capacity
- The close proximity to a Listed Building Curtillage
- Road Safety issues.
- Concern over proposed residential building at Catlodge
- Concern that offering affordable housing sites may be used as a tactic for further commercial gain.
- Feel that the level of need for affordable housing in this area does not warrant the obliteration of beautiful and historic countryside.
- Feel that if development were to take place at this site it would totally destroy a piece of heritage that we should be trying to salvage within the National Park.
- The proposed development would increase the amount of dwellings at Catlodge by approx 60%
- Sporadic building within Catlodge is unsuitable.

Balgowan Settlement Boundary

- 0 as marked on attached map – triangle of ground fenced off from the grazing, must have been part of the curtilage of Cluny Croft (now Swallow Cottage) is excluded – Why?
- 1 as marked on attached map – is dwelling house that should be part of Balgowan.
- 2 on attached map - The Cabin is historically the tied cottage of the Balgowan Shepherd. It is emphatically an inherent part of Balgowan.
- Strip of Ground above the road is not suitable to be built on; it only comes into Balgowan if the Cabin brings it in.
- 3 on attached map - There are several buildings below the road but further construction is not a good idea. Why is the bit of crofters in bye land included whereas other similar ground is not?
- 4 on attached map – this area would have historically had dwellings on it. With a bit of drainage work this area would probably take two houses.
- 5 & 6 on attached map – area 5 should be outside the boundary like area 6 is.
- 7 on attached map – this is a steep slope and unsuitable for development. Why this is within the boundary when 6 is out?
- 8 on attached map – Ivy Bank, now called Drumlaggan is an inherent part of Blagowan – it was the School – it should be within the boundary.
- The nature of Balgowan is a crofting community, 2 of the six crofts have recently been split whereby the senior crofter stays in the house while a relative gets the land. One of the relative requires to build a dwelling on the plot, but this is out with the settlement boundary. This must be included within the boundary in order to facilitate a young crofting family building, settling and rebalancing the community. This is in line with the Parks 4th Aim.

General Policy 4

- It is essential that well-defined and sensible boundaries are selected.
- Objection regarding Balnagowan Boundary.

Landscape

- Much greater attention should be given to the protection of designed landscapes. This policy may be too broad to ensure correct management of some features.

Archaeology

- Policy 5 is not adequate in meeting the statutory requirements set out in section 1(a) of the National Park Scotland Act. Policy 9 is helpful but does not offer the necessary provisions.

- Suggest inclusion of a number of policies/proposals to assist in achieving aims.
- New Policy – regarding archaeology
- New Proposal – regarding the establishment of a Historic Environment Record
- New Policy/Proposal – use of conservation area designation to protect areas of known archaeological interest

Listed Buildings

- A new Policy regarding that Historic Scotland carries out a resurvey of the National Park.
- Support policies 6, 7 & 8.

Water

- Welcome Policy 11. Helpful to include a statement regarding the possibility of a hydrological survey being required in respect of any planning application in this area.

Housing

- Support comments on Section 75 Agreements
- Given recent history of development in Balnagowan, there is no justified housing need.
- Proposals in Policies 39 & 40 are welcomed, however Concerns with Policy 41. A 50% threshold is too large a percentage increase of an existing building footprint. A 25% increase might be wiser, due to the differences in building size.

Housing Design

- Major criticism of lack of clear commitment of improving the architectural input of new development despite Soc Exec having a number of policy initiatives on this.

Settlement Statements

- Support recommendations R2 & R3.
- Serious Objection regarding proposed settlement boundary for Balnagowan.
- Need to consider the case involving the Scottish Land Court and the Balnagowan Grazings
- Therefore the northern settlement boundary as discussed in the above case should be taken as the formal boundary line.
- Boundary as it is does not take account of the land regarding the crofting or agricultural workings. The line as drawn does not follow any logical land pattern. (Details and alternative in letter)
- The boundary where it follows the line of recently granted planning consent also would allow space for some other small scale development.
- The community has always been dispersed through small clusters.
- Within the LP only Gergask is considered for expansion.
- To allow this largest centre within the cluster to further expand with no development to the others would change the character of the area.

Housing

- Support the principal of extension of the Laggan Bridge and Gergask settlement boundary and further support the site **H1** as suitable for affordable/local needs housing.
- Suggest that site **H1** may be extended east to the Gergask burn, south to maximise the elevated ground above the flood plain and west along the south site of the Corrieyairack road.
- This site will shortly be served by access of an adoptable standard, has grid power and is adjacent to the new public water supply.
- Suggest sites for sensitive, well designed, energy efficient housing:

a) Land north of Am Bothan and the former Gergask School House and west of the Gergask Burn, accessing through the Gergask plantation.
b) Land north of Laggan Stores and Corriebuie Cottage.

Environment

- Support the village Elm Tree being protected.
- Feel that this area behind the hall would be enhanced by creating grass parkland around it and forming a pedestrian access linking the village hall, doctor's surgery, Albyn housing scheme, Gergask Avenue and the picnic area and playpark.
- Some potential developments:

a) Extension to the hall to the north
b) Extension to garden and new access to Gergask Cottage to the north west
c) Extension to the Garden of New house on Gergask Avenue to the south west.

- Feel that these three small developments could take place alongside the enhancement of this area as a whole.

Infrastructure

- Strongly support **Recommendation R1**
- Support **Recommendation R3** – Suggest:

a) A circular footpath around the village for dog walking/amenity and could link areas within the village.
b) A loop footpath/route from the Corrieyairack road bridge over Gergask Burn following the bank of the burn north and returning south to the same point by the opposite of the burn.
c) Plant the sides of this deep gully with a native trees mix.

- Suggest that the upper reaches of the Gergask Burn be suitable for a well designed micro hydro development. Could be achieved with very little visual, environmental or water flow impact.

CNPA Local Plan Consultation		
Community Council Area	**Laggan Drop in Session**	
Meeting & Date	27 September 2005	
Staff/Facilitators present	Gavin Miles, Anna Barton, Sheena Slimon	
Attendance:	34	

Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
Affordable housing	Visually adverse to have this density of housing. Should follow the existing line of houses.	
R2	The same applies to A889.	
R3	The same applies between Catlodge and Laggan.	
Housing	Reinforcing character of hamlets – only Laggan Bridge and Balgowan are zoned areas - would be helpful to zone other hamlets also.	
H1	Wouldn't the other side of the road be more suitable – higher ground and doesn't obstruct view.	3
More sites	For self-catering – current housing zones far too restrictive – more houses can only benefit Laggan	
More sites	Current housing zones far too restrictive – more houses will be good for Laggan whatever their use.	
Glentruim Road	There used to be housing right along Glentruim Road, should be once again. Would help to liven the place up a bit. Current housing zone far too restrictive – regulations should loosen up a bit, nothing to lose by having more scattered development.	1
Above	The consequences of 'livening the place up a bit' would be the utter devastation of an unspoilt, respected and popular beauty spot.	5
Policies 1 – 5	With reference to the above two comments, Policies 1 -5 would apply and these are to be applauded and sensible – i.e. Glentruim Road/Catlodge is outwith these policies and totally unacceptable.	4
Proximity – why so close to existing houses?	Why not do a hamlet further away with potential for 10-20 houses that doesn't have to be on top of each other or on top of existing houses and yet have safe accessibility to village facilities.	1
Privacy	The Local Plan should protect existing residents' privacy and favour existing residents rather than potential new ones.	1
Present houses	Gargask/Laggan Bridge – 28; Glen – 15; Blagowan – 24; Catlodge – 21; Cluny – 13; Strathmashie - 15	
H1	This is a large site – if 10 affordable homes are built, will they go to local people?	4
H1	Too large – we don't want speculative development	2
H1	Will spoil the view for the many visitors and residents who walk here.	1
H1	Not suitable – find alternative smaller sites.	1
Affordable	Local need should come first.	2
	Each application should be on its own merit.	2

H1	Not suitable – single track road – do not want street lighting on Glen Road. Better, if needed, to extend Albyn Housing into top of picnic site area – footpath to shop and extend doctor's surgery road to link into western end of Albyn houses.	2
Response to above	No thanks!	
H1	10 in a row very ugly = ribbon development. Much better in small groups.	1
H1	A totally non-aesthetic site. It is not of the Highland design of clachans or settlements. If houses are needed, the sites around the surgery and Albyn housing would be more suitable. The all-round view would be blocked to tourists and photographers.	3
H1	The Glen Road proposal should be discarded – 3 septic tanks, electricity poles and wildlife habitat (lapwings, waders) on this site.	
H1	This site has so many things against it: 1. the water supply for the village would go right through the middle and there are 3 septic tanks and soak aways in the area. 2. Access would be very difficult, single track road. 3. One of the few lapwing nesting areas. 4. Visual impact for visitors and walkers up the Glen Road would be spoilt. It was rejected in 1975 and should be again.	
H1	Concern that this is not the most cost effective site to build on for affordable housing and that the visual impact would be significant in a very small village.	3
H1	Affordable housing – in 1975 this area of land was not granted planning permission as it was not thought suitable for village development as it would spoil the view up the glen and sewage and water supplies were in the field. Nothing appears to have changed!	
H1	This proposal would do nothing add to Laggan/Gergask. It would completely alter the balance, line and demographics of the village. The upper area of Glen Road, the wooded area, is much more obvious as a site for houses in the Highlands! No need for lights and a 'street', please.	
H1	Would these houses – affordable or otherwise – be occupied by people working outwith Laggan? – 2 cars per household – poor wee road!	
	There are hundreds of thousand of acrs of nothing around Laggan – what's wrong with a few more houses in it? The community needs more people to give it life and to keep the shop and the school and the pub going and more taxpayers for the upkeep of services. Far too many numbies writing here.	
Business		
	Laggan is wider than Laggan Bridge. To apply an urban view to the community of Laggan is quite unfair. All our businesses are of importance – whether it is the pub (as important as the shop to many), coffee shop, hotels, farms, estates and BandBs. We do have Broadband and at least 3 home based national businesses.	
Home working	Encourage home working through subsidising Broadband	1
Wolftrax	Beneficial to the area – increased business opportunity	3

Small businesses	Need storage sheds for forestry and fencing equipment – other than in FC land close to Laggan Bridge.	4
Small businesses	These should be sited withint the community – avoid centralisation on FC land away from village.	5
Business	How can any one business have more priority than another in a community? The Laggan Stones are only 1 business, there are 3 other businesses of long standing who are part of our infrastructure and good employees. It is important to consider how to maintain their accessibility.	9
	No more development of retail or catering facilities just like supermarkets on the outskirts of town centres. Business is not spread inwards. Tourist numbers are falling – this has been the worst year for 20 years – fuel costs too high – home market goes abroad.	3
Broadband	Fully functional Broadband a high priority.	
Economy	The future has to be other than 'land based' and 'tourism'. 'Home working' devalues those of us who run businesses from home!	1
Tourism		
Lochan Uvie	Strongly support improved car parking for climbers	1
More tourists	Mean more work – extend the Wolftrax Mountain Bike facility	6
Environment		
Flooding	Gergask Burn where it enters Spey – trees increase likelihood of flooding.	1
SSSI – Spey	Trees now so thick that inhibiting flow of Spey.	3
C2	Village Elm needs a TPO.	
Farms	Local Plan should not make is easy for farmers to develop house sites – why should the environment suffer to supplement the farmers' incomes?	
Farms	Farmers look after the environment and are penalised if they do not!	
	Any development should include a wide strip of woodland or hedge.	
Community		
	To say Laggan's community facilities are 'limited' to the Village Hall, etc is another example of an urban view –f or a community of 200 people, we have a well used community hall, shop, church, doctor's surgery, primary school and sports field – this is much more than many larger communities.	
Other Issues		
Transport	Train/bus transport needed	3
Anonymity	Your last consultation reports published the names of authors of written comments – it should not.	
Paths	Footpath from Catlodge to Laggan Bridge	5
Paths	Footpath Cluny – Laggan and Strathmashie – Laggan	6
Farms	Local Plan should allow farmers to develop house sites as easily as possible. Supplementing farm income keeping farmers in Laggan is best way to help environment.	
	How many farmers are in Laggan?!	3
Farms	This is nonsense and would go totally against the CNPA's policies for the environment for this outstanding nationally scenic area.	2

Farms	There are 8 farms and 4 crofts in the Laggan area.	
Farmers	Farmers get far too much subsidy. Non-farmers should be protected and favoured, too.	
Balance	There has to be a balance – we need farming community, but we also need tourism and so need to keep our scenic value.	
	Scenic value is helped by keeping livestock to keep scrub birch at bay as recognised by Highland Council.	
Paths	The idea of a path along the A86 linking Balgowan and the Monaliadh Hotel and Strathmashie would open so many social and healthy opportunities and would encourage people to walk and to use local services in so doing.	12
Cycling	Safe cycling for ordinary cyclists, children, families) in a car-free zone would be a bonus.	4
Speyside Way	It is planned to extend it to Newtonmore and perhaps this could further be extended to its source in Laggan, thus bringing more folk to the community.	4
Marketing	Tourist not here this year – need better CNP advertising/ marketing	2
Safe routes	Extend off-road all abilities route planned for Strathmashie – Garstean all the way to the village and up to Catlodge.	6
Road	Improve road layout at Wolftrax to give safer access/exit.	5
Pylons	It is proposed to build pylons across the Correyarrack Pass which is in directcontravention of Policy 5 in Local Plan.	
A889	Road has more traffic than A86 – need for R2 first.	4
Attendance		

Age	Male	Female
0 - 4	4	1
5 - 15	0	0
16 - 24	0	0
25 - 34	0	4
35 - 44	2	2
45 - 64	6	6
65 - 84	5	4
85+	0	0
Totals	17	17
TOTAL	**34**	

Comments collated by:	Anna Barton

Nethy Bridge

PUBLIC BODIES

- Concerns that development of **LA2** may cause adverse impacts.
- A dwelling has been included under the adjacent designation – east of Tulloch Road.

GENERAL ORGANISATIONS

Possible sites for new appliance garage for Highland Fire Brigade

- Vacant House site at the corner of Lynstock Cres & Mackenzie Cres
- Undeveloped forestry site, Proposed low cost housing site
- Disused Builders Storage site, Proposed house sites

ESTATES, LANDOWNERS & DEVELOPERS

- Suggest rezoning areas currently zoned for housing.
- The site at Duack Bridge should be extended to include the bottom half of the field adjacent to the road.

Braes of Balnagowan

- Recommend the eastern part of **LA1** suitable for housing
- Western parts of **LA1**identifiedas protected open space or landscaping.
- No need to identify affordable housing as part of the overall housing on the site.

Reasons for recommending housing on Balnagowan Site

- Only remaining New Development site identified in the 1997 LP still to be granted PP
- The only one of the Long Term Development sites in 1997 LP that is not identified as housing within this draft LP
- This site is centrally located within the village
- The allocation of housing to this site would meet the objectives set out in the Nethy Bridge part of the draft LP
- The plan states that future housing development should be focused on in Nethy Bridge, this site would be developed as soon as PP granted and so this objective could be met.
- Specifically allocate this site to match the boundary of the current planning application and current LP zoning and to identify the north and north west part of the site as open space or landscaping to avoid consideration of the site as infill.
- Housing on this site would comply with **General Polices 4 & 5** and **Policy 38**

Land as Shown on attached Map

- Suggest using symbols on the maps to represent the criteria applicable to each of the **General Policy 2** sites.
- This land provides good amenity woodland for the village so should form part of the settlement boundary along with the golf course. Also to encompass the school and housing lying to the north east already included. The above sites all provide important functions for the village.
- Suggest therefore that the land shown on attached map be identified as a potential long term option for a low density development and/or high quality affordable housing within a strong landscaped setting. This would be consistent with **H2** and **H3**
- Propose tourist accommodation on land 600 metres from the north east extremity of the settlement boundary
- There are no suitable sites for tourism development within the defined boundary, s those allocated in the previous LP have been developed.
- There are no allocations for tourist development within the draft LP therefore the LP is unable to satisfy its aims in relation to Nethybridge without allocating sites outside the boundary.
- Suggest modifications to the policy approach to support tourist development outside settlements as long as it complies with other policies in the LP. This would then meet a defined need for tourist accommodation in the area.

COMMUNITY GROUPS

- Under no circumstances should any development be allowed which would materially alter the village.
- No wholesale suburban sub division type development should ever be entertained for Nethybridge.
- The Local Plan must maintain the ambiance of the village.
- No Development to take place in these areas:
  1. Field below Nethybridge Hotel and Mountview Hotel
  2. Field adjacent to the playing field on the B970 bounded by the Duack Burn and the woodland surrounding it.
  3. the fields adjacent to Craigmore Wood

4. The Castle Roy/Milton area and surrounding woods
5. The area known as the Nursery along Dell Road. if development must take place here then it must be kept to a minimum.
6. The open fields bordering the River Nethy.

- The above was so strongly felt by the community that they wished to protect them under Section 75 Agreements, and to ensure that no holiday homes would be allowed.
- Development to take place should be only allowed if well spaced out, minimum tree felling sanctioned, no more than 4 houses to be built in any one area at a given time.
- Should be included in the Plan that the sheltered housing project be guaranteed.
- Boundaries roughly: Castle Roy in the north, Mondhuie to the south, Cul,na,kyle to the west and Craigmore/Lettoch to the east.
- Possible addition of footbridges over the Duack Burn for safety reasons
- Provision to be made for affordable housing
- Suggest reverting to the Local Plan that has an allocation for 10 houses at Braes of Balnagowan
- Suggest the sloping area at the Braes of Balnagowan be maintained under Section 75.
- No access that would cause the destruction of a path to be tolerated.
- Field at Craigmore, overlooked by Craigmore House and Craigmore Mill, should remain undeveloped.
- Woodland area near Castle Roy and the Golf Course included within the village boundary.
- The area from Willow Cottage to Duack Side beside the football field to be included within the boundary.
- Wish to extend the village boundaries to include Balnagowan Wood, the area from the Football Field to Culvardie and also the area from the bridge over the Aultomore at the Golf Course up to Castle Roy.
- The Pollyannas site development must be exclusively for the elderly. Either sheltered housing, amenity housing for the elderly or disabled.
- The development should be built on one level and should remain as housing for elderly or disabled in perpetuity.
- Pollyanna site to be used to build houses for elderly and for no other purpose.

INDIVIDUALS

- Infilling development in the villages should be of a sensitive nature respecting existing densities and favouring low cost affordable housing.
- The site **H2** is large and out of character with the design of the village and in a woodland area adjoining popular walks.
- Modern housing on this scale would detract from the tourism appeal.
- **LA1** is similarly of an over-intensive scale but a more sustainable location.
- Suggest the settlement boundary should encircle the new development north of the Causer and omit **H2**.
- Consideration should be given as above for areas **H2** and **H3**
- **H3** should include a green environmental strip along the roadside.

Oppose the inclusion of the area of the nursery on Dell Road; this area should be a buffer zone between the NNR and any development.

- Suggest need for local awareness of changes in landownership in favour of developers and vigilance against tree felling in preparation for future asset stripping
- Important amenity woodlands potentially at risk:

a) Balnagowan Woods/School Wood/Culstank Woods (Eagle Star)
b) Hotel field triangle of ancient trees & width behind houses from Causer-Balnagowan (Wilburn)
c) Lynstock Woods (Knox-Goldcrest)

- Skyline developments not desirable
- Native species for landscaping garden boundaries
- Traditional road layouts for housing developments in harmony with character of village road system and not creating social sub-communities
- Wants LP to reflect garden
- Feel that the boundary which runs north west behind Lettoch Road and Lynstock Crescent is well placed other than the absence of any opportunity for some affordable housing
- In favour of affordable housing provision with criteria in place to ensure that local people were the beneficiaries.

Comments Regarding the Suitability of Proposed Developments

Ancient Woodlands

- Development proposals fall outside the village boundary and point to areas described as ancient woodland.
- This ancient woodland was largely felled in the 1940's and 50's. Is this being used to influence the configuration of future development proposals?

Access for the Developments

- Proposals indicate access from a new road joined with Lurg Road, this give cause for a number of concerns:
- This is where the oldest Scots Pines in the area are to be located. Even if not felled the shallow nature of the roots would mean risk of damage during the construction process.
- Road Safety issues on Lettoch and Lurg Road

Sewerage

- Concern over possible 'temporary' solutions to sewerage issues

Marshland

- Drainage problems connected to this site.
- Attached map shows area wish to be zoned for a small scale housing development.
- Development of this are would meet criteria and enhance this derelict area.

Objection to new proposed new boundary

- Sewerage issues
- Road safety issues
- Will extend village beyond its heart
- 66% of homes in the village are holiday or second homes
- Need a pre conceived idea of how the village should grow
- Previous meetings have concluded that the footprint of village must not expand
- Development within the forested area of Lettoch Road would destroy valuable wetland
- Wildlife habitat issues
- The community wants and needs housing for the elderly
- Does not need any more amenity housing
- Pollyanna's site ideal for elderly housing
- Area designated H1 was meant to be specifically scheduled for housing for the elderly. Suggest re-designating for this purpose.
- Few if any other sites suitable for this purpose within the community.
- With regard to LA2 which is not proceeding, strongly support retention of "environmental"
- LA1 would completely change the character of the village destroying an historic open hillside. This land should be protected and retained in its present form.
- Pollyanna's site to be used for housing for the elderly as an ideal site for this type of development.
- Not another location in village that may be used for this purpose
- Support aim to keep woodland character of the area
- Support delineation of village boundary, existing zoning for housing allow for ample development of the community
- Nethybridge to be saved from unlimited sprawl
- Further development at a distance from the two shops and recently approved business development at the Old Station will not be in the interests of the community
- Agree the need for a well designed pedestrian bridge
- Support environmental protection measures within and out with the village boundary
- Agree with support for development of appropriate tourism business, but would also welcome equal support for non-tourism business also.
- Feel that path planning should be left the core path planning exercise however the word Foot should be removed to be compliant with the Land Reform Act and a clear statement about access by horse and bike should be made.
- Area marked **H1** should be zoned for sheltered housing for the elderly as supported by the local survey

Land Adjacent to B970 in Nethybridge

- A clear need has been identified for elderly accommodation in the village
- The village already has a stock of affordable family housing
- No suitable housing for elderly I the village at all
- This area is perfect with flat ground and close to services
- As the elderly in the village would vacate their current properties to take up accommodation on this site, their own properties would become available to families etc.

Land Adjacent to B970 in Nethybridge

- Use as sheltered housing would be perfect.

Land Adjacent to B970 in Nethybridge

- Site ideal for elderly housing as close to services.
- Current elderly accommodation not ideal as build adjacent to a steep hill.
- No other provision in Nethybridge for elderly housing.
- This site to be retained for sheltered housing in perperuity.
- Wish the area outlined on red on enclosed map to be considered for designation as housing. Feel that this would not be out of character and would continue to reflect the street layout of houses on either side of the road.

- Community desire to see provision for housing for the elderly and sheltered development on the Pollyannas site. Ideal location as close to all services.
- Important that the footprint of the village should be adhered to and not extended or altered.
- Opposed to any movement of the boundary line to include land east of Lynstock Park within the village envelope.
- Planning proposal by Goldcrest Lettoch/Lurg Road – if these were approved then this would legitimise the zoning of the other side of the road – southeast of Lynstock Park, for further and sizable development.
- If the above proposal takes place access proposals would suggest a new road joined with Lurg Road. Objection due to Caledonian Pines, increased traffic.
- Sewerage facilities unfit to cope with additional development here.
- Development unsuitable on the east side of Lettoch/Lurg Road due to the terrain being boggy.
- Opposed to any more chalet type or holiday homes in the village.
- Support Proposals for Nethybridge
- Pleased to see Balnagowan Field is no longer zoned for housing.
- Identification and recognition of the planning position on the site of the refused application at Fasgagh, Blair Ghorm, Nethybridge
- Agree with view that any further large scale housing development should not be permitted and development restricted to infill.
- Care must be taken however to avoid obliteration of all open spaces – a 'pack them in' policy would not enhance the village.
- Every effort must be made to ensure that the detailed layout/design is to a high standard.
- As much woodland as possible must be retained within the village, any new developments should incorporate planting where possible.
- The existing derelict curling pond does not feature in the LP. Its site should be safeguarded so that it is available for future use as a valuable village recreational facility.
- Provision should be made for future pedestrian bridges across the River Nethy. Replace the structure at Lyngarrie, provide one at the ford(2km south of Forest Lodge)

- Land for future growth of Nethybridge is not sufficient for its needs.
- Wish land at Lynstock owned by Donald Black to be included in the new LP.

Community Council Area	**Nethy Bridge Drop in Session**
Meeting & Date	7 September 2005
Staff/Facilitators present	Norman Brockie, Anna Barton, Richard Renton
Attendance:	65

Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
Affordable	Local needs housing in woodland at Lynstock	2
Affordable	Local needs building plots in woodland at Lynstock	2
Housing	Small scale development within village boundary keeping character	3
Housing	Draft policy H3 My appreciation is that a Section 75 agreement would be unenforceable in the European Court. An option for sale by the developer to the Park if the restriction on occupation was not observed might be enforceable as a private contract. Otherwise change land law.	
Housing policies	General policies for development nos. 1 – 3 are too woolly. They give no more guidance for consistency in decision making than with the previous local plan. Park board planners have been seen to make their own political self-interested decisions, often with total disregard to Park planners' recommendations and planning guidance. Woolly general policy will not help to change this.	1
Chalets	Chalet developments are not appropriate in a village where many local people depend on small scale holiday letting. Nethybridge could become a 'chalet park experience' for visitors.	7
Brian Rothnie proposal	Local low cost amenity housing is already proving difficult to let by Albyn Housing. Other identified sites within the village would fulfil the need for extra housing without going outwith the village boundary.	1
Affordable	How much affordable housing is required in the village/further to Broomhill and the new development and Eagle Star's proposals for School Wood? Small scale – 4-6 houses may be suitable to stay in sympathy with revised village thinking which is to avoid schemes for any kind of housing.	
Chalets	Plans for area of chalet holiday accommodation not a good idea. Nethybridge already has a far too high percentage of holiday accommodation.	4
Affordable	Concern about Goldcrest affordable housing site. Very wet and will revert to bog when trees are felled.	2
Housing	Housing should be encouraged in open countryside	
Chalets	Surely just another lot of second homes – already identified as being of no value to the community.	
Business		
B1	Business area on village edge on Lurg Road inappropriate and unnecessary	
Tourism		
Chalets	Chalet development within woodland at Lynstock	

Chalets	20 chalets are too many for village and may destroy existing businesses in self-catering sector	6
Chalets	No chalet development required, the village maintains enough good accommodation already.	2
Hotels/hostels	Can these be coloured purple for tourism on the map?	2
Chalets	Would destroy B&Bs and letting of established housing	2
Chalets	Goldcrest chalet park should not be considered as an option, based on the current holiday house population statistics.	1
Environment		
Protect	Field between Craigmore Mill and Craigmore House to be free of development to retain character of the locality	
	No large scale development between Nethybridge hotel and Mount View	7
Goldcrest	Their Option 3 suggests we need more open market/executive housing instead of existing woodland – this must be in doubt following the experience of the Eagle Star developments going through before CNP was up and running.	
Trees	Maximum number of trees should be retained in any developments, especially for screening purposes.	1
Trees	There should be some control of species of trees planted for screening – fast growing hedging not suitable.	
Green areas	Imperative that green areas within the village are maintained, e.g. area between Mount View and Nethybridge hotel, football field and field adjacent in order to maintain character of village.	
Protect skyline	We must not lose the large field on the crest of the hill behind the Nethybridge Hotel to 'proud skyline' development	3
Community Facilities		
Paths	To be developed through Explore Abernethy Initiative	
Other Issues		
Boundary	Proposed settlement boundary should encompass the woodland at Lynstock	6 1 disagree
Boundary	The tight boundaries on the draft plan are a useful way to contain development	
Boundary	Village can expand out SE up Lettoch Road (Lynstock Field)	
Road Safety	Urgent need for pavement/footpath from the bridge to Broomhill court	1
Road Safety	Clear need for footbridge alongside or near to the Nethy Bridge and extension to Broomhill Court.	
Road Safety	Speed limit in centre of village should be 15 or 20 mph.	4
Road Safety	Suggest speed limit restricted along the road by the school	1
Road Safety	Footbridge required adjacent to Duack Bridge and footpath extended to village boundary south	2
Road Safety	Road junction at top of Balnagowan would be unsafe	1
Chalet	The idea that a chalet park could help to free up houses for 'local purchase' may be flawed because the market may well not be a finite one.	
Boundary	Balnagowan Woods and the Golf Course should be included within the village boundary and protected.	
Boundary	The proposed settlement boundary should be the 'footprint' of the village, with no prospect of development, housing or	5

	otherwise, outwith the boundary for the lifetime of this plan.	
Road Safety	All roads in CNP badly need trees cut back at least 12ft from side of road – this applies to the whole of Scotland	
Boundary	Why does the boundary at Dell Road exclude the two cottages between Talisker and the church?	
Attendance		

Age	Male	Female
0 - 4	0	5
5 - 15	3	3
16 - 24	0	0
25 - 34	1	1
35 - 44	5	6
45 - 64	19	11
65 - 84	6	4
85+	1	0
Totals	35	30
TOTAL	65	

Comments collated by:	Anna Barton

Newtonmore

PUBLIC BODIES

- **H1 & H2** – Concern over prominent position and that they will affect the appearance and setting of the settlement.

GENERAL ORGANISATIONS

- Support Highland Councils view that there is a need to identify more land for business and industrial use in both Kingussie and Newtonmore.

ESTATES, LANDOWNERS & DEVELOPERS

- Why is it proposed to move the village envelope to the east in respect of land between the Perth and Laggan roads when this land is currently zoned for long term housing?

COMMUNITY GROUPS

Errors within Plan

- Land north of Laggan Road to the east of Lodge Hotel, and two small parcels of land immediately north of Lodge Hotel have already been developed and should be shown uncoloured

Road Planning

- Wish a new road line marked on map, extending along western edge of boundary, south west across the Perth road by a roundabout, along the periphery of the area zoned for housing towards the railway line, turning south east to skirt northern edge of Jack Richmond Woodland Trail, to meet with access road to the industrial estate
- This would address and/or solve a multitude of current problems and safely issues in and around the village.

Zoning for Housing between Perth Road and Railway Line

- Wish a planned scheme of developing in smaller sections buffered by green space and tree planting
- Need an indication of acceptable maximum housing density for whole area and any one part of it.
- Scope for a schema for road accesses to be indicated from the new road and for an indication of areas where tree planting ought to be carried out and to indicate that this should occur well before the developments actually take place.
- Feel that in context of the road layout suggested above, that the parcel of land to the south of the road once it runs parallel to the railway line, up to the Jack Richmond Trail, should not be zoned for housing but for Community Space.

Zoning for Housing Between Laggan Road and Perth Road

- Same comments as above area.

Both Primary Zoned areas for Development

- Should be a clear commitment accompanying the LP to planning authorities to consider the developments as a whole, to comprehensively consult with the residents who will be affected by any application and to insist that developers have a defined landscape plan put in place well in advance of the development.
- Do not wish to see the village's strengths and integrity sacrificed by ill-considered and/or piecemeal development

Areas outside the village boundary

- Land out from Spey Bridge towards the Ralia former information centre has been developed in the past, with scope for a limited number of houses to be built and feel that this area should not be ignored and wish to see a definitive plan for this area. Do not wish for presumption against development though.
- Area along Strone Road, possibility of release of some unproductive land from Crofting Tenure for use as affordable housing. Possibility of recognising this in some way in order to take planning proposals forward. Do not wish this area to be included within village boundary or given a separate zoning map.

Land south of Community space at Clune Terrace – White Space

- Wish this area to have a more definitive designation for this space, preferably housing (if access difficulties resolved) or community open space.

Changes from Previous Plan

- Now wish the environmental designation of the two fields between Station Road and Golf Course Road to be re-instated

Public Footpaths

- Would be useful to highlight known and recognised paths. See no reason why the LP should not make reference to the work being done to define footpaths and allow for the inclusion of the results as a form of codicil to the LP once they are known.
- Support the decision to preserve the environmental amenity status of the fields between Station

Road and Golf Course Road.

- Provide good views
- This is particularly important in view of the plan to fill the field on the other side of the road opposite the Chef's Grill, with up to 90 houses

INDIVIDUALS

- The LP shows new housing allocation for only 1 of the 2 areas previously allocated. It only shows area previously zoned for new development, but not area Perth Road/Laggan Road previously zoned as long term.

Arguments against new zoning for housing & business

- Area zoned for business adjacent to the railway line is prone to flooding
- One of the 4 blocks allocated for housing (immediately adjacent to the Perth Road) has been bought by a developer and will inevitably be developed
- The 3 remaining blocks skirt a pine-clad glacial deposit which is a landmark feature on entering Newtonmore from the south. There are landscape character and settlement pattern arguments against the siting of new developments at the base of this glacial deposit on the flat open land adjoining Newtonmore

Alternative land for housing, business and tourism

- The area previously allocated for long term housing development suitable for reasons below

a) Well drained, no flood risk
b) Ample space to accommodate 100+ houses
c) Mature trees make a natural screen
d) Well serviced on both sides by the Laggan Road and the Perth Road
e) Recent settlement expansion
f) Well suited to accommodate a business park due to proximity of Chef's Grill on Perth Road

- Further area which might be considered is area 3.3 of previous LP. Open space between Station Road and Golf Course Road, zoned for agriculture/community space 2 separate houses have been developed, therefore its value as open space is questionable.
- Continue Cycle paths and extend them safely at north end of village
- Proper path alongside the river Spey between Newtonmore & Kingussie
- For safety reasons suggest blocking off one end of Station Road or making it one-way and also traffic calming on main roads in village.
- Consider banning HGVs from travelling north through village
- Suggest relocating petrol station and Chef's Grill to Ralia, removing the need for HGVs in the village
- Suggest signs to alert drivers to lack of pavements in places
- Build new road from the Laggan Road across near to the shinty field to take traffic across to old A9
- Pedestrianise main shopping areas
- Cycle lanes through village
- Build more council houses
- A need for community services
- Concern over re-zoning of the fields to the south of Alvey House Hotel.
- Concern over area of green land below Alvey House now shown as white land.
- This area is important because it gives a vista from the southern entrance to the village to give a feeling of spaciousness.
- Object to creating large housing developments and ruining the aspects to the southwest when there are other areas are available for infill
- Increase in traffic justifies a new road, but the area should not be bordered by this road.
- Should be screening of the industrial site at the Little Chef
- Should be linked proposals to ensure that the required infrastructure development will occur within the village; water, sewerage, dog walking areas, parking, pavements and encouragement of local families within the village centre.
- Logic behind use of land for housing between Perth Road and main railway line and the Perth Road and the A86.
- Arable land important in preserving the culture and natural heritage of an area and in light of global warming
- Can this area sustain more people?
- Support the decision to preserve the environmental amenity status of the fields between Station Road and Golf Course Road.
- Beneficial from a scenic point of view
- Concern that the fields between Golf Course road and Station Road will be rezoned to the status of white belt and will not remain as green belt.
- Wish the two fields between Station Road and Golf Course Road to remain a designated environmental area.
- Support the decision to preserve the environmental amenity status of the fields between Station

Road and Golf Course Road.

- Maintain a sense of village
- Provide splendid view to the Cairngorms
- Often grazed by ponies providing pleasure for locals and tourists
- This is particularly important in view of the plan to fill the field on the other side of the road opposite the Chef's Grill, with up to 90 houses.
- Wish the two fields between Station Road and Golf Course Road to remain a designated environmental area.
- Scenic reasons
- Need to retain green space.

Community Council Area	**Newtonmore Drop in Session**
Meeting & Date	Proposed Local Plan, 7.30, 14.06.05
Staff/Facilitators present	Norman Brockie, Anna Barton
Attendees	10
Demographic Profile	35-44 M x 1 35-44 F x 4 45-65 M x 3 45-64 F x 2

Issue	**Comments** (and location, if applicable)	No. of similar comments
Business		
	No comments	
Community		
	Agreed with all the yellow areas	
Environmental	See comment re landscaping under Housing above	
	Agreed with all the green areas	
Housing	Can landscaping and screening be erected before housing developments begin to protect views for tourist-led businesses?	
	How early can we get an idea of housing density and guarantees of planning reassurances that new developments will reflect traditional housing character?	
	Can developments be smaller, i.e. 3 or 4 houses?	
	No big housing estates	
Tourism		
	No comments	
Other	Will extra housing lend weight to regular appeals for serious traffic-calming measurers on A86 especially – there is no footpath provision?	
	Reroute A86 and detrunk road through village	
	Footpath needed to Calder Bridge	
	Cycle path leads onto main road – can an off-road route be created?	
	Long term provision of water / sewage infrastructure to be clarified	
	Can the LP be shown on a fully up-to-date map?	
Comments compiled by:	Anna Barton	

Rothiemurchus

PUBLIC BODIES

- **H2** – incongruous to the existing settlement, may have impact on Ancient Woodland Inventory site. Suggest quarry and burrow pit adjacent to **LA1** more suitable
- **FH1** – Concern over prominent position, possible effects on NSA, contradictory to landscape capacity study. Recommend the site be reduced in size and number of houses.
- Title of statement and map should match.
- Suggest having a settlement boundary for Glenmore.

GENERAL ORGANISATIONS

- **Rothiemurchus** – **H2** needs more investigation.

ESTATES, LANDOWNERS & DEVELOPERS

- Glenmore Forest Park is not mentioned in the character of the area, despite it being a major tourist destination.
- **H5** – support the development of the two affordable housing units on the old campsite shower block.
- **FH1** – generally supportive of further affordable housing sites at Glenmore, but would question whether this is the only or best site. Sewerage issues and traffic implications.
- Tourism – Would welcome a statement similar to the one regarding Coylumbridge caravan site, for the larger Glenmore camping and caravan site.
- Access – would like to see a specific statement of support for completion of the Aviemore-Glenmore Cycle Route.
- **Rothiemurchus and Glenmore, Sawmill site – Proposal Site H2 (Aviemore Settlement Statement)**
- Support the development of low cost (not affordable) housing on this site.

COMMUNITY GROUPS

- Need a more accurate description of where these communities are located.
- Loch Morlich comes under General policy 3, which discourages development, however Policy 28 encourages diversification/enhancement of large outdoor recreation centres.
- Glenmore lodge and the Centre at Badaguish faces similar ambiguity as above.
- Therefore it is not clear if the activities and infrastructure provided by these facilities are encouraged or discouraged by the CNPA.
- At time the general policies appear unclear and difficult to read.
- General Policy 3 feels like a “catch all” policy.
- General policy overview map should be clearer and easier to read, perhaps split into sections and a larger scale.

INDIVIDUALS

- Oppose the inclusion of the area **H2**.
- Object to proposed housing development on south side of Ski Road opposite Dellmhor at Inverdruie for reasons of safety, changing the rural outlook, other alternative sites available.

Community Council Area	**Rothiemurchus & Glenmore Drop in Session**
Meeting & Date	3 November 2005
Staff/Facilitators present	Gavin Miles, Anna Barton, Bob Grant, Mary Ferguson
Attendance:	37

Issue	**Comments** (and location, if applicable)	No. of similar comments
Housing		
Cambusmore	This would be OK, but needs a road bridge too.	
Cambusmore	Don't want Cambusmore – absolutely no need for any more houses.	1
Cambusmore	Cambusmore development is much bigger than envisaged. Feel the area proposed is too big, especially when compared to residential area of Aviemore.	2
Cambusmore	Does the Aviemore community have priority over that of Rothiemurchus and Glenmore when Cambusmore is being considered? If ACC wants it, perhaps they will push for a vehicular bridge to really integrate the new town as an extension to Aviemore town.	
Cambusmore	If we have a vehicular bridge, it will just be a suburb of Aviemore and we will lose the opportunity to have a planned community.	
H2	Housing here.	
H2	Sawmill site far better for residents than to be buried in a quarry. Sawmill is not a designated area.	2
Housing need	When the assessment of required housing for B&S was carried out, were the 100+ houses in Boat and Carr-bridge included?	
Business		
	No comments.	
Tourism		
Cambusmore	How would the visual impact of a new town sprawled over the foothills of the Cairngorms affect the tourism industry on which this area largely depends?	
Environment		
Cambusmore	If developed, it would be a great area for outdoor pursuits, walks, biking, football pitches, cycle tracks, running tracks, etc.	2
Zoning	There is a paucity of environmental zoning around Inverdruie.	
Trees	Please protect the old trees which add to the visual amenity even if they are not truly native species.	1
Community		
St John's Hall	Should be encouraged and built.	1
St John's Church Hall	Should be built as it will provide a community centre which is lacking in this area.	
	R&G is geographically part of the Aviemore CC area, but is separate and has its own independent community association.	
Cambusmore	To which settlement would Cambusmore be attached?	
Community	R&G is part of the Aviemore CC area – the map doesn't show	

Council map	this clearly.	
Other Issues		
Infrastructure	Where does the water supply for such a large development come from?	1
New town	What socio-economic/educational impact would a new town in Badenoch and Strathspey have on the other settlements, which probably rightly expect the CNPA to secure the sustainability of all of these issues?	
Cycle track	Great idea, but who built it? Not a biker – who wants to stop every 25 m? Gravel infill a disaster.	2
Cycle track	Gravel infill between cycle path and road is dangerous – needs a kerb instead.	7
Cycle track	Bump in middle of road unnecessary – ridges on either side to slow cars would be better.	2
Light pollution	Unnecessary street lights in Inverdruie.	6
Map & Statement	Numbering of housing zones does not tally.	
Map	Track marked on map opposite Cambusmore (house) does not exist.	
Attendance		

Age	Male	Female
0 - 4	1	1
5 – 15	1	1
16 - 24	1	1
25 – 34	2	1
35 - 44	1	2
45 - 64	7	11
65 - 84	4	3
85+	0	0
Totals	17	20
TOTAL	37	

Comments collated by:	Anna Barton

Tomintoul

PUBLIC BODIES

- **H1 & H4** – Concern over prominent position and would be contrary to the characteristic surroundings. Consider the Cairngorms Landscape Study.
- Consider **T2** most appropriate site for formal campsite facilities.

H1

- No house building until road widened to 5.5m with a 1.8m footway on the side of the development.
- Road to be finished to base course prior to house building commencement, unless a Road Bond is provided. Road to be constructed to an adoptable standard.
- A SUDS Scheme should be designed and agreed with the Director of Planning.
- Developer must give attention to a safe route to school.
- New roads and road works will require an application to be made for Road Construction Consent within and outwith the site, designed to TMC specifications.

H2, H3, & H4

- As for **H1**.
- Type of road to be agreed with the Transportation Manager

GENERAL ORGANISATIONS

- Need more associations of the eastern gateway linking to Cockbridge/Strathdon and Ballater.
- Should consider opportunities to develop the Lecht and Tomintoul as a tourism draw.

ESTATES, LANDOWNERS & DEVELOPERS

- **Chapeltown/Knockandu/Minmore/Castleton -** Consider additional areas to be included in the boundary – shown on attached map.
- **Tomnavoulin** – could form useful infill sites.
- **Tomintoul** – the location of a campsite at **T1** is queried as this would be an appropriate site for further business uses. Suggest redrawing the boundary as shown on attached map.

COMMUNITY GROUPS

- No comments received on this settlement.

INDIVIDUALS

- No comments were received on this settlement.

Community Council Area	**Tomintoul Drop in Session**
Meeting & Date	7th October 2005
Staff/Facilitators present	Jean Henretty, Norman Brockie, Eleanor McIntosh, Sheila Thomson
Attendance:	23

Issue	**Comments** (and location, if applicable)	No. of similar comments
	A small Park centre in Tomintoul would kick-start a lot of visitor/activities/business; while promoting the four aims of the Park	
	Loss of view	
	How is it that while everyone else is constrained by having to apply for planning consent the Crown can erect a building for whatever purpose over a popular right of way, the Green Lane?	
	No development on agricultural land	
	What provision in the housing blocks has been made for affordable housing?	
	The square E1. it is very difficult to get any improvements made in the square because the Council says it is the Crown and vice versa.	
	I agree wholeheartedly with the policy of protecting commercial sites from being used as housing. Is there a possibility of developing a small retail/countryside centre on the outside of Tomintoul seeing that commercial sites on the main street are now housing except the school and filling station.	
	Camping and caravan site – possible site adjacent to the Speyside way car park north of the village.	
	Possible building land for housing – existing woodland opposite E5 – help alleviate use of farm land	
	Recommendations R2 – this should also include sewage pipe work within village – existing too small.	
	The forest at the Lecht end of the village looks neglected, can it not e cleaned up and proper walks set up for tourists, locals etc.	
	Site on Lecht side of E5 road would be a better site for housing to also improve the entry to the village and would save farming land being used up all the time.	
	T1 chalets with caravans at the rear would be a good impression as well.	
	Consistency of building design within the settlement without making all buildings identical.	
	Concern about community use of C1 being against use and if same facilities C8 would no longer be required. All facilities for community in C8.	
	New housing plots should follow pattern and size of existing plots.	
	My main concern is loss of view to house development. The	

	use of land for house when it could still be used for farming. All the new development should be in one area and not spread all around the village to upset so many people. Why do we need a camp site when there is a field that is only used once a year? This land could be better used for houses. This land and area is where the houses should be sited. In an area where trees are grown to make paper you hold them above farm land that has more benefit to local people. The water and sewage of this area has to be upgraded to ensure this view of the development can meet all the controls for today and the future. No extra doctors/fire services/police. Why has a small area by T2 not been set aside for development as other land has been. Development should be in one area at the back of B2 where people know that they have no interference of other people of the village. 60% of village will be affected by houses being developed to block the view of others. No development on farm land. Loss of view of people who already live/own houses in the area. Road around the village needs to be upgraded for extra vehicles.	
Attendance		

Age	Male	Female
0 - 4		
5 - 15		1
16 - 24		
25 - 34		1
35 - 44	1	2
45 - 64	6	9
65 - 84	1	2
85+		
Totals	8	15
TOTAL	23	

Comments collated by:	Jean Henretty

COMMENTS ON THE STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

PUBLIC BODIES

- Comments separate from initial Local Plan responses

GENERAL ORGANISATIONS

- Feel that the SEA is inadequate in that it has not detected potentially serious deleterious effects on the aims of the Park due to deficiencies in policy drafting.
- Design statement should be used as part of the assessment of the potentially harmful effects of the developments highlighted in paragraph 1.10 of the SEA Non-technical Summary.

ESTATES, LANDOWNERS & DEVELOPERS

The Process

- Believe that environmental problems be considered in balance with other issues including economic, social and cultural considerations.
- To say that developments must fit in with all policies is unreasonably restrictive.

Baseline Information

- Concern over the Sate of the Park Report being used as the environmental baseline for the SEA.

Baseline Facts and Trends

- Concern at the absence of any economic key baseline facts.
- Consider land use changes to be the dominant trend which in turn dictate changes in biodiversity, population structure and landscape.

Objectives, Indicators and Targets

- Concern over potential conflicts between objectives at different levels of jurisdiction over the land.
- Absence of an economic objective in the SEA, without an economic objective the SEA cannot assess the 4th aim of the Park.
- There is also an absence of a cultural objective, question therefore whether the SEA can competently assess the 1st aim of the Park.
- The SEA criteria as stated in **6.2** are largely irrelevant to conserving and enhancing the diversity of species and diversity of habitats, should be more than just “priority”.
- It must be considered that to maintain catchment processes and hydrological systems it is inevitable that there will be “interference with natural fluvial processes”.
- Consider **Figure 6.3** to be flawed.

Housing

- Each proposal for housing should be considered on its own merits.

Assessment of Plan Proposals

Semi Natural Habitats

- PAWS are not ancient woodland therefore consider it unreasonably restrictive to restrict housing development of these sites.

Identifying Sites for New Housing

- Sites should have been identified with reference to land owners and residents.
- Suggest lifting the presumption against new housing in the countryside

A Scottish Water providing water and sewerage facility is only one option.

- Little or no reference to woodland
- Paragraph 2.8 does not accord with paragraph 29 of SPP15.
- Paragraph 3.4 – the clear legal relationship between the draft Local Plan and the Structure Plan needs to be explained.
- Paragraph 4.1 and 4.3 – it is important that the guidance used is actually referenced.
- It is clear from paragraph 4.3 that Circular 2/04 and Schedule 2 to Regulation 16 has not been complied with.
- Paragraph 4.3 does not include identify any existing environmental problems which are relevant to the plan as is required by Schedule 2.
- Table 5.2 seems to equate issues to problems without any explanation.
- Paragraph 5.5 to 5.7 makes an unsupported assertion about existing planning policy and explains nothing so the reader has no way of knowing if the new policies are any different in environmental effect from the existing policies.
- It is impossible to know whether Tables 6.1 and 6.2 intend to follow what is required in Schedule 2 para 5.

- The terms 'Positive and negative' effects should be used instead of terms like 'harmful' as set out in the Regulations.
- Para 4.15 is wrong according to the Regulations with confusion over impacts and effects.
- Use of the term 'issues' in the Local Plan deviates from the way this term is used in the Regulations.
- Paragraph 4.15 does not define the 5 categories as is required by good practice.
- It is essential that the categorisation and equation to significant is transparent otherwise the assessment conclusions in terms of significance are cast into doubt, as it is in this assessment.
- The explanations in **4.14**, **4.15**, **8.6** and **8.7** are completely insufficient in terms of good practice.
- The standard methods of assessing the significance of effects does not seem to have been followed, therefore seriously calling into question the results of the assessment.

In Conclusion

- The SEA does not comply with the Environmental Assessment of Plans and Programmes (Scotland) Regs 2004 or with Planning Circular 2/04 on good practise
- The SEA lacks a suitable methodological basis and is difficult to follow. The basis is not transparent and makes a number of unsupported assertions.
- As a result no reliance can be placed on Chapter 7, 8 or 9.
- Disappointing that more account was not taken to the studies supporting the Cambusmore development.

COMMUNITY GROUPS

- **9.21** – Fails to indicate where the wetland it refers to is situated.
- **9.22 –** This area should be zoned for later development (5 – 10 years out) if at all. Concern regarding the validity of the area designated as ancient woodland (see comment in relation to general policies) as this could affect the zoning outcome.
- Comments on Appendix 2 Policies 2, 3, 4, 5, 6.

Aviemore Housing Proposals

- 1 - Should also look at North Dalfaber, which was going to remove a lot of trees – Negative
- 5 – Hydrological systems should be negative
- 7 – Is not correct because **H3** will result in a total loss of informal access opportunities and is currently well used. – Negative
- 8 – Most of the developments in **H2** in Aviemore have already got planning permission. **H3** designation with number 8 should be a negative. Air quality is flawed as coal fires and oil CH can only exacerbate the problem especially during winter. Should be negative not neutral.
- 9 – used as a local amenity – negative not neutral.
- 11 – it will not sustain a healthy population, as in the case of H2, the infrastructure required increases the price of housing taking it outwith the scheme for locals – neutral rather than negative.

Aviemore, Business, Tourism, Community & Environmental Proposals

- B2 & B4 should be negative.
- Objective 2 - B2 & B4 should be negative, cannot be both.
- Ecosystems should be negative.
- 6 – should be negative
- 7 – should be negative
- 8 – should be 'not known'
- 9 – should be neutral
- 11 – should be positive
- 12 – should be positive
- 13 & 14 – should be question marks

Cambusmore

- 8 – same as air quality, should be negative
- 10 – should be question mark
- 12 - should be a question mark only
- 13 & 14 – should be positive because it is to be done to support this objective to comply with the polices in the Local Plan

Rothiemurchus and Glenmore H2

- 7 – Should be negative because they are taking something away. Removing access opportunity is negative.
- 9 – Should be negative because it is taking something away.
- 10 – should be positive
- 11 – should be positive
- 12 – should be positive

- 13 – should be positive
  - Been very difficult project and expresses appreciation for work done.
  - Conflict of Aims make it impossible to come to mutually agreeable policy conclusions.
  - Policy 2 – Protected wild species is n/a – what about common ones?
  - Deer Culling and whitears – says does not actively improve conditions.
  - Policy 3 – Landscape character – need to read recent Geomorphology? technical term? Enhance historic environment? Does this mean mown grass and notices?
  - 3a – Soils – a wake up call but survey not a full one
  - Policy 4 – Concentrate developments in towns and villages
  - Policy 5 – objectives and alternatives Sustainable Design Guide – scoring? is this objective?
  - Policy 6 – Natura 2000 and Ramsar Sites – why so many n/a?

INDIVIDUALS

- Feel that the word "responsible" should be dropped when talking about access.
- The first aim of the park should take priority over the other aims.
- Paragraph 1.9 of the non-technical summary – if this is the case and such harmful effects cannot be avoided then there should be other actions created which have a positive environmental effect to offset them. This might be by creating 2nd teir conservation sites, such as Local Nature Reserves and footpath networks.
- The 1st and 2nd objectives of the draft SEA – This should be the first consideration in the Local Plan, and in this case applied to proposed zone **H2** in the Boat of Garten Local Plan. **Mitigation measures 9.34** should be applied and **H2** removed from the Local Plan for housing.
  - A major omission is zoning for developments or activities other than buildings, e.g. sensitivity of different areas to developments such as tree plantations, vehicle tracks and others, it is fundamental to most National Parks.

  - Suggest the following:

  - Rewording on para 1.8 page ii
  - Rewording on para 1.9, 1.10 page iii
  - Grammar para 3.4 page 5
  - Rewording & grammar para 4, 4.4, 4.5 page 11
  - Rewording and grammar para 4.6, 4.9 page 12
  - Rewording para 4.25 page 15
  - Rewording Figure 5.1 page 17 & 18
  - Discrepancy Map 5.7 Page 22
  - Rewording Figure 5.2 page 23
  - Rewording and grammar para 5.4 page 24
  - Grammar Para 5.7 page 25
  - Rewording Figure 6.1 page 27
  - Grammar and rewording figure 6.2 page 28 & 29
  - Clarification and word insertion figure 6.3 page 30
  - Rewording para 7.6 page 35
  - Grammar and rewording para 9.7, 9.9, 9.10 page 44
  - Points to consider , rewording & grammar table 9.1, para 9.12, 9.15, 9.17 page 46
  - Grammar para 9.18 page47
  - Word order para 9.363 page 48
  - Clarification para 9.35 page 49
  - Use of term para 9.37 page 49
  - Word substitution and order para 9.38 page 49
  - Use of words para 9.46 page 50
  - Rewording para 10.2 & 10.4 page 53
  - Grammar, word clarification appendix 1 page 1
  - Points to consider, grammar appendix 1 page 2
  - Rewording appendix 1 page 7
  - Points to consider appendix 1 page 8
  - Grammar appendix 1 page 11
  - Nothing on advertisement signs within Appendix 1.

- Points to consider appendix 2 page 5 – General Policy 1
- Points to consider appendix 2 page 8 – General Policy 2
- Rewording & grammar appendix 2 page 12 – General Policy 4
- Clarification and word use appendix 2 page 13 – General Policy 5
- Word use appendix 2 page 14 – General Policy 5
- Word use appendix 2 page 15 – Policy 1
- Points to consider appendix 2 page 19 – Policy 3
- Points to consider & rewording appendix 2 page 21 – Policy 3a (RM9)
- Rewording appendix 2 page 22 - Policy 3a (RM9)
- Grammar wording appendix 2 page 43 – Policy 14
- Grammar appendix 2 page 49 – Policy 17
- Points to consider & grammar – appendix 2 page 50 – Policy 17
- Clarification & points to consider appendix 2 page 63 – Policy 23
- Points to consider and word use appendix 2 page 65 – Policy 24
- Points to consider appendix 2 Policy 24
- Word use appendix 2 page 73 – Policy 28
- Clarification & point to consider appendix 2 page 75 – Policy 29
- Points to consider, grammar appendix 2 page 106 – Proposal 1
- Grammar appendix 2 page 113 – 1a
- Points to consider & word use/order appendix 2 page 119 – 1c
- Word use appendix 2 page 120 – 1c
- Word order appendix 2 page 121 – 1c
- Word use & grammar appendix 2 page 122 – Boat of Garten
- Grammar appendix 2 page 123 – Boat of Garten
- Grammar & points to consider appendix 2 page 125 – Carrbridge
- Word use & points to consider appendix 2 page 126 – Carrbridge
- Grammar & word use appendix 2 page 131 – Dulnain Bridge
- Word use and repetition appendix 2 page 133 – Grantown
- Word use appendix 2 page 134 – Dulnain Bridge
- Word use appendix 2 page 144 – Nethybridge

Rewording appendix 2 page 161 - 18a

Summary of additional specific comments on the SEA Report.

Scottish Natural Heritage(SNH)

- **Section 1** – non tech summary is clear and useful
- **3.16 – 4.32** – clear explanation of approaches and methods used and difficulties encountered is helpful.
- **Section 4** – Practical interactions between SEA and Natura should be explained in this section. Noting should SEA identify any likely significant effects on Natura or European Protected Species an appropriate assessment will be required at Local Plan stage.
- Useful to state explicitly in Sections 8 & 9 whether any such effects have been identified in this assessment and if so, where appropriate assessments can be found. Note that from responses to SEA and Local Plan that SNH consider wording of policies/settlement allocations could lead to significant effects on Natura interests or EPS. Can be sometimes be addressed by altering policies / allocations in line with SNH recommendations to mitigate / avoid likely significant effects.
- **Para 4.16** – Some future sites for housing (FH1 Glenmore) and some sites subject to live applications (LA1 & LA2 Nethy Bridge) do not appear to have been assessed in Section 9 and Appendix 2. Would be useful to assess at this stage. Also useful to state in this paragraph whether or not they have been assessed.
- **Section 5** – Disappointed previous comments on Figures 5.1 and 5.2 have not been incorporated.
- **Figure 6.2** – Welcome incorporation of almost all previous comments into draft SEA objectives and criteria. Note that the need to protect and enhance wild land has not been included. Strongly recommend that wild land is explicitly incorporated within Objective 6.
- **Figure 6.3** – Note the draft indicators and targets and that further work is proposed. Guidance on developing appropriate monitoring arrangements in various sources of best practice guidance on SEA is available.
  - Useful to assess increases/decreases in disturbance to species and damage to habitats in addition to loss of both.
  - More meaningful to assess changes in habitat condition, or possibly area under habitat enhancement works, rather than increased management of habitats.
  - Recommend inclusion of target for no loss or damage to important geological and geomorphological features.
  - Welcome inclusion of wild land in indicators and targets.
- **Section 7** – Approach seems sensible and accept in practice that few strategic alternatives were considered as a result of strong policy context created by NP. Were any alternatives considered to Policy 20A?
- **Para 7.6** – Text could be revised to make clearer that it is not simply the presence or absence of a designation that makes a site suitable/unsuitable for development.
- **Section 8 – General Comments -**
  - a) Assessments are clearly presented and generally well reasoned, although suggest improvements as detailed below.
  - b)Accept general rational for the judgements of significance. May be reasonable to predict some specific policies, particularly those concerning housing. Useful to consider cumulative effects of housing related policies. Useful to clarify that the definition ‘significant’ used here for SEA purposes seems to be different to that used for Natura purposes. Advise that any effects on Natura qualifying features or EPS identified through SEA should be considered for ‘likely significant effects’ that would trigger need for appropriate assessment under Conservation Regulations.
  - c) Assessment of policies do not seem to incorporate the SEA criterion about conserving geodiversity under Objective 6. Policies 3a, 10 & 14 – 17 could have effects on geodiversity which have not been identified. Several policy assessments don’t seem to have used the criterion under Objective 6 re: allocating sites for

development with the greatest capacity to absorb it. Expected policies 26, 28, 29, 30, 31e, 35d & 39 to be assessed for negative effects against this. Recommend that both these criteria are used in assessments in next version of Environmental Report.

- d) Strongly recommend that there are clear statements early in the Local Plan about the need for development proposals to comply with all relevant policies and about which policies take precedence in cases of conflict. Assumed that cross-compliance is required for individual proposals but any likely cumulative effects on SEA criteria from repeated application of policy need to be assessed in the Environmental Report.
- e) There are few policies predicted to have a positive effect on SEA Objective 7 (responsible access for all)– consider rewording some policies to have positive effect on this objective. eg. policies 26, 28, 29, 37 – 39.
- f) The potential for cumulative negative effects on Objectives 1 – 7 from repeated application of the 'enabling' policies such as 26, 28, 29, 39 in parts of the Park covered by General Policy 1 has been under-estimated in the Report.

- **Section 8 – Specific Comments** –
- **General Policy 1** – Policy appears to create presumption in favour of development in the areas it covers and outlines circumstances in which adverse impacts on the Park will be deemed acceptable, countered to some extent by the criteria in Table 2.1. It seems as though the repeated application of the caveated presumption in favour of development could be predicted to result in cumulative negative effects on most SEA objectives and criteria. Negative effects could be reduced by rewording the policy in line with our response to the Local Plan consultation.
- **General Policy 4** – Second paragraph provides a basis for development outwith settlement boundaries, caveated by need to comply with other plan policies and consideration of the overall merit of the proposal. Seems as though repeated application of policy could result in cumulative negative effects on most SEA objectives and criteria. Negative effects could be reduced by rewording the policy in line with our response to the Local Plan consultation.
- **General Policy 5** - As worded policy is unclear about the extent to which different types of developments must comply with which sustainable principles and consequences of non compliance with some of the principles for development control decisions. The assessment is too positive. Policy could be brought in to line with the assessment by following alterations in our response to the Local Plan consultation.
- **Policy 4 & Para 8.26** – Strongly support draft Local Plan policy as written, and do not support proposal in the Environmental Report for modifying the policy.
- **Policy 12** – Concerned about potential for this policy re: cumulative negative impacts on water quality. No potential negative effects have been identified in the assessment. Negative effects could be mitigated by amending policy to indicate that private sewage treatment facilities will only be permitted in exceptional circumstances. Note related comments on settlements Dinnet, Braemar and Para 9.45.
- **Policy 20A** – Policy is worded to not allow for any alternatives to undergrounding. Not clear what solution should be if undergrounding may create more damage to Parks special qualities than overhead lines. Due to lack of clarity there is potential for this policy to have negative effects on several Objectives eg. 1-6.
- **Policy 21** – Unclear why several of natural heritage related objectives scored as '/'.Could be positive effects from presumption against commercial renewables and possible cumulative negative effects if there were a large number of small scale renewables or biomass plants – points to an overall score of '=' or '-/+'. Presumption against commercial renewables has a wider negative effect beyond the Park on criterion to reduce fossil fuel consumption in Objective 9 and should be scored accordingly.
- **Policy 22** – Unclear why several of natural heritage related objectives scored as '/'.Pat c of policy could have negative effects on several objectivesbut part d could have positive effects on objective 6.Negative effects could be tackled by clarifying need for compliance with all relevant policies and need to consider and avoid cumulative negative effects.
- **Policy 23, 26, 28 & 29** – All policies seem to have presumption to certain types of

development. Could all have cumulative negative effects on a number of criteria under objectives 1-7. Negative effects could be reduced and positive effects increased if policies reworded in line with our response to LP.

- **Policy 30** – Part c as worded could have negative effect on natural heritage objectives. These effects are not currently identified in the assessment. Could be reduced by modifying policy to have greater controls over location and design so Park qualities are not adversely affected.
- **Policy 31 part e and Policy 35 part d** – appear to have presumption in favour of retail/commercial and business developments outwith settlements that are for specific operation relative to the site. Could lead to negative effects on natural heritage objectives particularly landscape. These negative effects have not been identified in the assessments. Could be reduced by stating that retail/commercial and business developments outwith settlements will only be permitted in exceptional circumstances and outlining criteria with which they must comply, inc. no alternative site available within settlement, no significant adverse impacts on Parks special qualities, adherence to best practice in location design etc.
- **Policy 38** – Likely to have negative effects on open green space (Objcetive 7) and wildlife corridors within settlements(3) which have not been identified in this assessment.
- **Policy 39** – As written appears to allow anyone who has worked in area for 3 years and inadequately housed to build a house outwith a settlement – Could result in significant number of houses could have cumulative negative effect on a number of natural heritage objectives. These have not been identified in this assessment. Could be reduced by adopting alteration to policy as in our response to LP.
- **Policy 41** – Not clear whether criteria in policy 40 also applies to proposals in policy 41. If they do not, likely to be effect on Bats which will require appropriate assessment. Also likelihood of negative effects on objective 1.
- **Section 9** – Note approach taken to assessment of significance of effects and agree it seems reasonable.
- **Section 9** –**Aviemore business**. proposal B4 would have negative effects on ancient woodland and access (objectives 2, 3, 6 and possibly 1). These effects are not mentioned in Assessment appendix 2 – could be avoided by removing allocation.
- **Cromdale & Balmenach** – Allocations H1 & H3 are likely to have negative effect on objective 2 – could be mitigated by following our recommendation to LP.
- **Dalwhinnie** – Allocations H1, H2 & H7 would all have negative effects on objective 6. These have not been identified in the assessment and could be mitigated by following our recommendation to LP.
- **Kincraig** – Agree assessment H2 & 3 will have significant negative effects on objective 6 and note these allocations are contrary to finding in recent 'landscape capacity for housing' study. Recommend these allocations are reconsidered with a view to avoiding these effects. If allocations are retained need a justification of housing need in this area is required.
- **Newtonmore** – Agree with assessment that H1 & 2 will have significant negative effects on objective 6 note these allocations are contrary to finding in recent 'landscape capacity for housing' study. Do not agree that proposed mitigation would significantly reduce the adverse impacts of the loss of substantial and prominent areas of generally flat agricultural land in the Strath – this being a key component of local landscape character. Recommend allocations are significantly reduced/moved to areas located in housing capacity study. If allocations are retained need a justification of housing need in this area is required.
- **Tomintoul** – Allocations H1, H2, H3, H4, T1 & B2 will all have negative effects on objective 6. These are not identified in the assessment.Have included suggestions for mitigation and avoidance in response to LP.
- **Dinnet / Deeside & Cromar** – R1 could have negative effects to objectives 1 – 5. Possibility could have significant effect on River Dee SAC – especially regarding freshwater pearl mussels. Proposal could add to cumulative levels of phosphorus. Recommend CNPA consider whether an appropriate assessment is required at this stage and possible mitigation measures.
- **18 a Braemar** – Significance of negative effects of H2 on objective 6 have been

understated in the Environmental Report and do not consider the mitigation proposals would effective or appropriate. Agree with housing capacity study for Braemar. Note part H1 is located on ancient woodland and recommend negative effects are mitigated by protecting area as stated in our response to LP.

- **18 b Braemar** – Consider likely negative effects of T1 on objective 6 have been understated. Effects could be reduced by following recommendation as stated in our response to LP. Allocation could impact on qualifying features within River Dee SAC, particularly any otter. Proposals for site would need to be examined for managing effluent and potential effects on SAC. Recommend CNPA consider whether an appropriate assessment is required at this stage and possible mitigation measures.
- **Para 9.43 – 9.44 –** Support comments about potential cumulative effects of housing allocations on water abstraction from Loch Einich. Strategic appraisal of future water supply options for Badenoch & Strathspey would be welcome and could be supported in LP or Env Report.
- **Para 9.45** – as noted in comments on policy 12 concerned about potential for cumulative negative effects on objectives 4 & 5 and aquatic species and habitats covered by objectives 1, 2 & 3 from an increase in effluent discharge into watercourses as a result of both an additional 1400 homes and the proposed policy of permitting private waste water treatment facilities. Variety of negative effects are possible inc. biodiversity/ecosystems/River Dee & Spey SACs and could be discussed in this paragraph. Concern about even low level phosphorus affecting freshwater pearl mussel populations. Any such possible effects should be explicitly identified in assessments of proposals at Dinnet, Braemar and Ballater. Further research required to understand critical thresholds in phosphorus levels and relative significance of various possible sources, inc. effluent from sewage treatment infrastructure. Better understanding of effectiveness of possible solutions eg. different types of secondary treatment is required. Useful for LP to support secondary sewage treatment for developments close to these River SACs and tributaries. Support for research and incorporation into future Plans would be welcome. Recommend CNPA consider whether an appropriate assessment for cumulative impacts of additional housing and private waste water treatment infrastructure is required at this stage and possible mitigation measures.
- **Section 9 –** understand overall scale of allocations for housing will be subject to review before deposit of LP following receipt of housing needs analysis. Additional review is welcome as concerned about large scale allocations in current draft LP and potential for significant cumulative impacts on natural heriathe especially landscapes and habitats after 2 or 3 decades if this scale if housing growth was to be repeated over successive 5 year LP periods. At deposit stage would be useful to explain scale of allocations with respect to housing need a analysis and identify longer term trends and start to map out longer term strategy for catering for these needs.
- **Appendix 1** – This assessment of the extent to which the LP incorporates and reflects national and regional policy and legislation is useful. Also worth describing the outcome of this assessment within the main body of the report, indicating it will result in some changes to next draft of LP.

Scottish Environmental Protection Agency (SEPA)

- Consider that specific linkages could be made to the National Waste Strategy, the National Waste plan and relevant Local Authority Waste Plans or Strategies.

Baseline information

- Feel that the summary could be further improved by including information such as the current trends showing the situation to be getting better or worse.
- Table 5.1 could be refined with relevant data sued to support the assertion of "relatively low atmospheric pollution".
- Datasets have not been used to inform the assessment, (including groundwater issues, flooding, contaminated land, waste management etc) that these have not been incorporated into the Key Baseline Facts section.

SEA Criteria

- Consider that there is scope for further improvements particularly to targets and indicators set. E.g. Objective 4 – linked targets and indicators could be more specific in order to be more effective.
- Consider that the target of "all developments consented with SUDS" is not the only way for waterbody status to be maintained or improved, and reference could also be made to the need to minimise impacts from foul drainage systems and engineering works in or around waterbodies.
- Any targets or indicators incorporated into the Sustainable Design Guide should be precise and measurable and have clear linkages to relevant plans or programmes.
- Objective 8 would benefit from criteria which relate to sustainable waste management particularly if there area nor criteria or targets currently set relating to waste management.
- Further clarification is needed relating to how many targets will be achieved.

Assessment of Policies

- Policy 11 – does not consider that the policy as it stands provides folly for protection of the water environment and catchment and hydrological processes. The policy does not include any criteria with regard to the environmental impact of abstractions. Therefore as it stands the policy will at best have an unknown (?) effect or even a negative (-) effect on the water environment and hydrological systems.
- Policy 18 – regarding the potential effects of contaminated land on the water environment in terms of potential pollution of ground or surface waters, consider that this policy would have an unknown (?) or negative(-) effect on the water environment. In terms of Objective 4
- Policy 19 – regarding that the waste management hierarchy promotes the sustainable use of resources by reducing use of materials, reusing and recycling, consider that the assessment should be amended to reflect this interaction. Consider that this policy should have an uncertain (?) or positive (+) effect on the sustainable use of objective 9.

Policy Issues Not Addressed in the Plan

- No policy on air quality – the SEA is the most appropriate forum for consideration of this issue.
- There is minimum recognition of air quality in the wider context of policies considered in the SEA.

Assessment of Allocations

- There appear to be a few sites that are at risk of flooding that have not ben picked up in the SEA as having potential impact on catchment and hydrological systems, these are:
- Ballater – H1 & H2
- Rothiemurchus & Glenmore – H3
- Dalwhinnie – H5, H6, H7
- The recognition in section 9.43 -9.45 regarding uncertainty associated with the effect of housing allocations on water supply in terms of catchment processes and waterbody status, does not appear to be reflected in the detailed assessment matrices for the allocations.

Monitoring of the Environmental Effects of the Local Plan

Consider that there is scope for the indicators to be made more specific to be more effective.

Historic Scotland

- **Non Technical Summary –** language used in NTS provides clear description of purpose of SEA and the steps undertaken throughout environmental assessment.
- **Methodology** – Noted the data limitations and difficulties encountered.
- **Predicted Baseline & Issues** – Content with baseline data for historic environment shown in Table 5.1 and maps 5.5, 5.6 & 5.7.
- **Table 5.2** – pleased to note some of the issues raised in HS response to scoping report have been incorporated. Content with trends and key issues identified for historic environment.
- **Table 5.1** – includes data for listed buildings however trend information in Table 5.2 describes decay of listed buildings as a trend for there built environment parameter. Table 5.1 data for Conservation Areas appears in both historic environmental and built heritage topics. Understand there will be some overlap however, would be helpful to give clearer explanation of the features that are considered for these parameters.
- **SEA Objectives, indicators and targets** –
- **Figure 6.2** – Assume 'archaeological sites' includes sites of national, regional and local importance. Also assumed effects on listed buildings are considered by the SEA objective for the built environment from the 'maintain character of settlements' and 'prevent loss of locally distinctive architecture' criteria, but would welcome clarification.
- **Figure 6.3** – 'archaeological sites of interest' could be further defined.
- **Figure 6.3** – an indicator that considers effects on listed buildings could be included (also maybe consider monitoring developments that have positive effects on listed buildings and their settings) A target for listed buildings could then be included.
- **Local Plan Strategic Alternatives –** Note that strategic options for housing and locations of housing will be in next draft LP as projection data for population is not yet available. Note this will be included in environmental assessment.
- **Assessment of Plan Policies** –
- Assessment matrix is thorough.
- **Policy 20A** – Impacts on archaeological sites can be mitigated through the careful planning and routing of underground cabling.
- **Policy 24** – Not clear if assessment has considered potential effects from the use and upgrade of existing tracks, as policy seems to focus on new tracks.
- **Policy 26** – Agree policy is unlikely to have significant effects on historic environment. However, may be links between agricultural diversification and potential to re-use redundant traditional farm buildings. This may have positive effects on the historic environment if their character is protected and this could be noted in the assessment.
- **Appendix 2** – Understanding from detailed assessment is that the application of all relevant LP policies to a development decision will mitigate any significant environmental effects that may arise from some Plan policies eg. 20A. 37, 38 & 39. Would be helpful to explain this assumption of cross-compliance more clearly in the Environmental Report.
- **Assessment of Plan Proposals** –
- Assessment of allocations is easy to follow and well presented. Detailed comments are helpful.
- **Braemar – allocation H3** – agree assessment of impacts on the built heritage is unknown. However as the site includes a Category V listed building (former Bluebird bus/GNER depot) and a non listed traditional row of workshops/cottages, the assessment could highlight the potential for sympathetic re-use of these buildings, which may have positive effects on the built heritage.
- **Braemar – allocation C2** – Assessment could note that this site includes a Category B listed building (Castleton Hall) and recognise the need to protect its character and garden setting.
- **Donside – allocation T1** – Have concerns that any development in this area could

significantly alter the setting of the Doune of Invernochty creating a suburban feel to its environs. It is our view that the allocation may have negative effects on the historic environment.

- **Glenlivet Minmore - community allocation** – area immediately adjacent to Blairfindy Castle zoned for community use – LP notes that areas have been identified to be protected from development as they make a positive contribution to the visual and recreational amenity of the village, we presume this applies to the community allocation. Clarification would be welcome on this point.
- Where mitigation measures have been suggested it will be important for the CNPA to ensure that these are taken forward at the appropriate stage.

North East Mountain Trust

- **General comments** – think could be improved by CNPA adopting zoning strategy. Would simplify any environmental assessment and easier to understand for lay readers.
- **Page 17** – High proportion of undisturbed soils (only 2% cultivated) – presumably this refers to present use. What about semi-disturbed soils?
- **Page 18** – Suggest more prominence given to the areas status in a UK context.
- Page 18 – this is quoted as the baseline section. Acid rain pollution now declining should baseline acknowledge this ongoing change? Should it be taken as before extensive acid rain pollution?
- **Page 23** – Key trend at moment is removal of NNR status – unfortunately this trend seems to be gathering momentum.
- **Page 23** – Soil erosion should also refer to impacts of forestry, agricultural and sporting practices. Soil erosion will also have effect on water courses casuing increased sediment in the run-off.
- **Page 24 – Section 5.4** – on Limitations Data seems overstated. Data has been collected to different standards in the past, but does this significantly affect our ability to use this data.
- **Page 27** – Need to be careful about setting "enhancing diversity of species and habitats" as objectives. Suggest emphasis given to conserving rather than enhancing.
- **Page 43** – Pleased to see reference to proposed zonings for development.
- **Page 46** – Any proposed new community would have significant consequences on NP as opposed to developments centred on existing communities. Te CNPA needs to work up a start position on this issue before it is proposed.
- **Appendix 1, Page 2** – Should only encourage "mix of tree species" if that mix is appropriate to that part of the NP. Some areas of NP are only suitable for one species.
- **Appendix 1, Page 7** – Should promote natural regeneration of woodland before new planting.
- **Appendix 1, Page 8** – Can't understand how promoting tourism development could lead to environmental improvement.
- **Appendix 2** – Add a policy on advertising signs.
- **Appendix 2, General Policy 1** – his policy would be enhanced and simplified by adopting some form of zoning.
- **Appendix 2, Policy 3** – Policy needs to be clearer that compensation of lost interests is inferior to preserving interests in the first place.
- **Appendix 2, Policy 24** – Needs to be strengthened in light of current pace of bulldozing footpaths to form new vehicle hill tracks.

Highland Council

- **General –**
- **Local Plan Strategic Alternatives –**
- Report acknowledges fact that key forecast do not yet underpin Local Plan – possibly as a result it's difficult to assimilate the SEA with a *strategic* assessment. The effect is a selective assessment of the land allocated and the impact of development on a site by site basis with little defernec to alternative strategies or choices at local level. Therefore does not appear to embrace structural impacts attaching to travel and accessibility for example which bear upon the environmental effects of the plan.
- **Assessment of local Plan Proposals –**
- Concern expressed in report about expansion of existing settlements but reluctance to embrace the necessity and effects of Cambusmore in mitigating the effects identified.
- Impacts identified in Boat of Garten, Carrbridge and Kincraig further emphasis the value of a new community in maintaining their ambience and character as well as the economic prospects.
- In local context SEA represents a critique of commitments made in the Adopted Local Plan; no deference to other land adjoining settlements where subject to physical factors/designations there may be choice for direction of growth.
- Avoiding loss of woodland inventory sites is a desirable objective only.
- In the round must be set against wider sustainability objectives re: Nethy Bridge sites H2 & 3 given permission.
- That the LP proposals have no significant positive effects is untenable.
- Table in 1.10 is founded on prejudiced view of visual impact of development. Effects are overstated and failure to appreciate the dynamics of development and opportunities available to the Planning Authority to control the rate at which land is taken up for building. Such measures are material to perceptions.
- Tenor and weight afforded to development carries a lack of appreciation of opportunities which development has for improving the appearance of settlements, setting and public access.
- Should be recognition of the overriding pattern of settlement; the arrangement of villages and infrastructure on the floor of the strath, below 300m and above the flood plain.
- **Predicted Environmental Baseline and Issues** -
- **Para 5.3 – Fig 5.2: Population** – Key Trends should refer to 'the loss of young people and the workforce' and Key Issues as 'implications for the economy and sustainable communities'. Built Environment should refer to 'economic growth and services' in addition to housing and 'the rate and scale of development and land availability/infrastructure' as Key Issues. Landscape should refer to flood plain. Access should refer to 'Trunk Road/other main roads/railway'.
- **Para 5.7** – Would dispute that the Adopted Local Plan is inconsistent with Aims of Park.
- **Policy 1 – Natura and Ramsar Sites** – these sites are protected under general polices 1 & 3. CNPA may wish to consider whether this policy is necessarily required.
- **Policy 2 Protected Species** – As policy 1 - If legal protection is in place CNPA may wish to consider the requirement for this policy. Second last box of this table refers to active promotion of improving the conditions of protected species. It is not in remit of LP, according to SPP1, to actively promote any improvement in the conditions for protected species. LP can conserve the habitat but SPP1 does not suggest active promotion.
- **Policy 4 Landscape** – Landscape policy in objective 11 says 'it is possible that development proposals that would provide housing or services would not be permitted' this must result in a negative effect rather than uncertain.
- **Policy 22 & 23: Integrated Transport Network and Roadside Facilities on the A9** – A policy that supports development of facilities must have the potential to have an

effect on species, habitats, ecosystems and landscape and cultural character of the Park. CNPA may wish to re-consider the effects these policies may have. Under objective 11 does the policy 'ensure' or 'imply' that access to services will be considered in planning decisions? Should be made clear.

- **Policy 29 & 30** – Potential to have some effect on the historic environment and the quality of the built environment. Also potential impacts on species, habitats, ecosystems and landscape and cultural character of the park: therefore should be scored **=** rather than **N/A.**
- **Policies 37 and 39** – if housing were to be built using local timber products then it could have a positive effect on **Objective 9.**
- **1a Aviemore Housing** – Part of **B2** is Brownfield site, development and landscaping on these areas could have a positive impact on landscape and habitat restoration.
- **1b Aviemore Business etc** – **B4** and its impacts appears to be afforded no assessment as part of the SEA. Deleting the allocation **B2** should be considered in this context.

1c Cambusmore

- Cambusmore should be seen as a balanced sustainable settlement with scope to contribute in strategic terms to the economy and related social needs.
- **Objective 5** – discharge of effluent will have to meet the standards of the Regulatory Authority, also the area identified in the adopted local plan does not carry a flood risk.
- **Objective 6** – a strategic development which accords in strategic terms with the established pattern of settlement.
- **Objective 7** .the association of development with Aviemore will be determined by many other factors including the flood plain and landform. Cambusmore must open up a major public access opportunity.
- **Objective 11** – there can be no doubt that Cambusmore is vital to maintaining a sustainable and healthy population.
- There is no explanation as to why Cambusmore is not subject to an assessment as other land allocations.

Boat of Garten

- There is insufficient land allocated in Boat of Garten if **LA1** and **H2** are deleted.
- The SEA should address the relative merits of alternatives.
- That the allocations are acknowledged as having no capacity is not accepted.
- The impact of a visible community in a middle distance view **(6-14)** can be addressed by design and possibly mitigating measures on intervening land. The capacity to see development in the landscape should not be given a negative rating.
- The admission that land allocated will affect "locally" important habitats needs a strategic reference as does the weight attached to "minor significant negative effects"
- How does this assessment lead to the conclusion that **H2** may need to be deleted?

Carrbridge

- **H1-H3** – it is not appropriate to conclude that a large part of Carrbridge's woodland setting will be lost **(6)**. This will continue to frame the community to the South and East.
- **Objective 7** - It is within the capacity of good design to embrace and improve public access and amenities.
- The connectivity of the proposals **H1** and **H2** with the village and their associations with **E2** whilst deferring to the planning permission – should be given further thought.

Kincraig

- The effect of **H4** on the wetland is not explained **(3/4)**
- The conclusion in Objective 6 that no sites have the capacity to absorb development cannot be justified. It is **H2** and **H3** that would cause detriment.

Kingussie

- **Objective 6** - There are inconsistencies in the outcomes for significant expansion of certain settlements. I.e. concern over impact of development at Boat of Garten and Newtonmore but not at Kingussie where building would be more elevated and exposed to view.
- The decision to dispense with land to the west of the village restricts choice and the opportunity to balance the community. The importance of such land as habitats needs a strategic context.

Nethybridge

- It is not accepted that sites **H1-H3** are likely to have significant effects on the local landscape or the settlement character. Both accord with the linear structure of the community and do not breach the woodland setting.

Newtonmore

- The impact of development on the west edge if Newtonmore **H1 & H2** should be differentiated.
- The option in the previous Local Plan of development in the fields north east of **H1** has not been assessed.
- The challenge in Newtonmore should be to design a compatible expansion – integrating trees within a layout enabling a good mix of accommodation and densities and securing early commitments to structural planting – **Objective 14**.

Coylumbridge

The large scale Brownfield site – The Quarry, Inverdruie – is omitted as an option. The adopted Local Plan identifies a strategic visitor role for this location at the gateway to Glenmore/Cairngorm.