

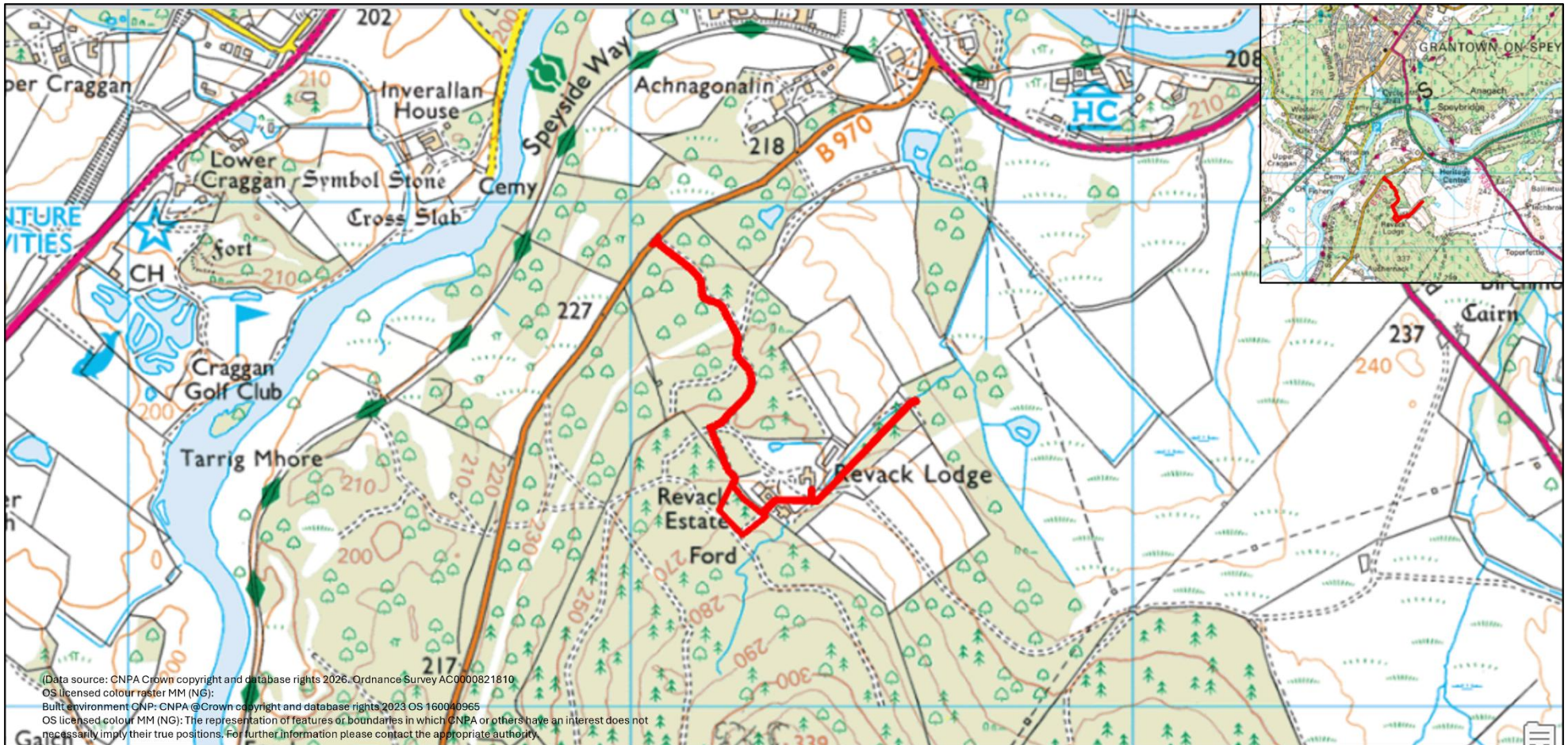


# Committee report

## Development proposed:

Erection of Agricultural Storage Shed (retrospective) at Land 31M SW Of No 1 Keepers Cottage, Revack, Grantown on Spey

<b>Reference:</b>	2025/0229/DET
<b>Applicant:</b>	Revack Estate
<b>Date called-in:</b>	15 September 2025
<b>Recommendation:</b>	Approve subject to conditions
<b>Case officer:</b>	Katie Crerar, Planning Officer



This map has been produced to aid in the statutory process of dealing with planning applications. The map is to help identify the site and its surroundings and to aid Planning Officers, Committee Members and the Public in the determination of the proposal. Maps shown in the Planning Committee Report can only be used for the purposes of the Planning Committee. Any other use risks infringing Crown Copyright and may lead to prosecution or civil proceedings. Maps produced within this Planning Committee Report can only be reproduced with the express permission of the Cairngorms National Park Authority and other Copyright holders. This permission must be granted in advance.



## Site description, proposal and history

### Site description

1. The application site lies approximately 100 metres southwest of Revack Lodge on Revack Estate, approximately 2km south of Grantown-on-Spey. It is accessed via an existing private track which connects to the B970 approximately 620 metres to the northwest of the site.
2. The site was previously predominantly Plantation on Ancient Woodland Site (PAWS) woodland on a northeast facing slope with an existing track running around the western boundary. The existing track connects to another track running along the southeastern edge of the site.
3. The PAWS woodland on the site has since been felled, and the site has been levelled in the centre to create a large flat area on which a large agricultural shed has been built.

### Proposal

4. The drawings and documents associated with this application are listed below and are available on the Cairngorms National Park Authority website unless noted otherwise:  
[2025/0229/DET | Erection of Agricultural Storage Shed \(retrospective\) | Land 31M SW Of No 1 Keepers Cottage Revack Grantown On Spey](#)

Title	Drawing number	Date on plan*	Date received
Plan – Site Location Plan	05 - Rev A	01/08/25	15/09/25
Plan – Site Layout Plan	04 - Rev A	01/08/25	15/09/25
Plan - Elevations	02	01/06/25	15/09/25
Plan – Ground Floor Plan	01	01/06/25	08/01/26
Plan – Site Levels Plan	06	01/06/2025	15/09/25
Plan – Section Plan	03	01/06/25	15/09/25
Plan – Site Levels Sections	07	01/06/25	15/09/25
Plan – Map of Revack Estate			08/01/26



Plan – Original Topo Overlay		01/10/23	13/04/26
Plan – Native Woodland Compensatory Planting		16/04/26	17/04/26
Other – Supporting Statement		06/01/26	06/01/26
Other – Compensatory Planting Proposals		14/04/26	17/04/26
Other – Ecological and Environmental Survey / Biodiversity Enhancement Plan		17/04/26	17/04/26

\*Where no specific day of month has been provided on the plan, the system defaults to the first of the month.

5. This application seeks retrospective planning permission for the erection of a steel framed agricultural storage shed which has also involved the removal of PAWS woodland, substantial reprofiling of the development site and creation of an area of hardstanding.
6. The building is steel framed with concrete walling to the base. It is rectangular in form, extending to 30.29 metres long by 18.56 metres wide and has a pitched roof with a ridge height of 9.56 metres. The exterior walls are clad in Plasticol coated profile sheeting in Juniper Green and the roof is finished in cement fibre roof panels with skylights (see elevations in **Appendix 1**).
7. Internally, the building is divided into three separate spaces; a biomass boiler room, a wood chip store, and a tractor and storage shed. The biomass boiler room houses a biomass boiler and wood chip bin feeding it, as well as a hot water tank. The biomass system provides heating for the properties on the Estate, and the wood chip store is used for storing the material needed to feed the boiler. The tractor and storage area comprises a large open space with a smaller storage room within it and a separate boot room. The building has been connected to the existing private water supply and surface water soakaway on the estate.
8. Each of the three spaces in the building have their own vehicle access and adjacent pedestrian door. There is a single 5.8 metre wide vehicle access with adjacent pedestrian door on the northern elevation of the building which leads into the wood



chip store. On the northeastern elevation there are two further vehicle accesses with roller shutter doors – one (5.8 metre wide) leading into the tractor and storage area and another (4 metre wide) into the biomass boiler room, each with adjacent pedestrian door.

9. The development site was previously predominantly Plantation on Ancient Woodland Site (PAWS) woodland, with an existing track running from the northern corner of the site around the western edge before connecting to another track running along the southeastern boundary of the site. The central part of the development site was wooded on a northeast facing slope. The woodland on the slope has been felled and the area excavated and reprofiled to create a levelled area of hardstanding with steep surrounding edges which connect with the existing track above. The storage building is located in the centre of the levelled area with a large area of hardstanding extending to the northwest where the access track comes in. There is also hardstanding around the western and southern sides of the building.
10. Compensatory planting plans have been submitted which propose to compensate for the woodland lost to the development through off-site planting of 2,760 native tree saplings (Silver Birch, Oak, Scots Pine, Rowan, Bird Cherry, Holly and Aspen) across 1.65 hectares of improved grassland next to existing woodland (5m buffer from existing woodland edge). The off-site planting location is within 150m of the development site.

## History

11. There is no recent planning history on the site or around Revack Lodge.

## Habitats Regulations Appraisal

12. A Habitats Regulations Appraisal (HRA) has been undertaken to consider the potential effects of the development upon the conservation objectives of the European sites listed within the HRA document, which is attached as **Appendix 2**. The European sites in this case are the River Spey Special Area of Conservation (SAC) which is designated for its otter, freshwater pearl mussel, sea lamprey and Atlantic salmon interests, and Craigmore Woods Special Protection Area (SPA)



and Anagach Woods SPA which are both designated for their capercaillie interests.

13. The HRA considers that there will be no likely significant effect on the River Spey SAC due to the distance of the development site to the river and the locations where excavated materials were stored and utilised.
14. However, there is potential for disturbance to capercaillie moving between known leks in Anagach Woods and Craigmore Woods, and the development is within the boundary of Wood H – Craigmore Woods (see Annex II of HRA). As a result of the development, there has been a permanent loss of ancient woodland (which is suitable capercaillie habitat within a capercaillie woodland), and there is likely to be a slight increase in the level of human activity close to the development site which may result in some increased risk of disturbance to capercaillie using these woods. However, considering the scale and location of the development, it has been ascertained that it will not have a significant impact on the integrity of the Craigmore Woods SPA or Anagach Woods SPA. NatureScot have confirmed agreement with the contents of the HRA and its conclusions.

## Development plan context

### Policies

<b>National policy</b>	<b>National Planning Framework 4 (NPF4)</b> (Policies relevant to the assessment of this application are marked with a cross (x))	
Policy 1	Tackling the climate and nature crises	X
Policy 2	Climate mitigation and adaptation	X
Policy 3	Biodiversity	X
Policy 4	Natural places	X
Policy 5	Soils	
Policy 6	Forestry, woodland and trees	X
Policy 7	Historic assets and places	
Policy 8	Green belts	
Policy 9	Brownfield, vacant and derelict land, and empty buildings	



Policy 11	Energy	X
Policy 12	Zero waste	
Policy 13	Sustainable transport	X
Policy 14	Design, quality and place	X
Policy 15	Local living and 20 minute neighbourhoods	
Policy 16	Quality homes	
Policy 17	Rural homes	
Policy 18	Infrastructure first	
Policy 19	Heating and cooling	
Policy 20	Blue and green infrastructure	
Policy 21	Play, recreation and sport	
Policy 22	Flood risk and water management	
Policy 23	Health and safety	
Policy 24	Digital infrastructure	
Policy 25	Community wealth building	
Policy 26	Business and industry	
Policy 27	City, town, local and commercial centres	
Policy 28	Retail	
Policy 29	Rural development	X
Policy 30	Tourism	
Policy 31	Culture and creativity	
Policy 32	Aquaculture	
Policy 33	Minerals	

<b>Strategic policy</b>	<b>Cairngorms National Park Partnership Plan 2022 – 2027</b>	
<b>Local plan policy</b>	<b>Cairngorms National Park Local Development Plan (2021)</b> (Policies relevant to the assessment of this application are marked with a cross (x))	
Policy 1	New housing development	
Policy 2	Supporting economic growth	X
Policy 3	Design and placemaking	X
Policy 4	Natural heritage	X
Policy 5	Landscape	X



Policy 6	The siting and design of digital communications equipment	
Policy 7	Renewable energy	X
Policy 8	Open space, sport and recreation	
Policy 9	Cultural heritage	X
Policy 10	Resources	
Policy 11	Developer obligations	

15. All new development proposals require to be assessed in relation to policies contained in the adopted Development Plan which comprises National Planning Framework 4 (NPF4) and the Cairngorms National Park Local Development Plan 2021 (LDP). The full wording of policies can be found at:

<https://www.gov.scot/publications/national-planning-framework-4/documents/>

and at:

<https://cairngorms.co.uk/wp-content/uploads/2021/03/CNPA-LDP-2021-web.pdf>

## Planning guidance

16. Supplementary guidance also supports the Local Development Plan and provides more details about how to comply with its policies. Guidance that is relevant to this application is marked with a cross (x).

Policy 1	Housing supplementary guidance	
Policy 2	Supporting economic growth non-statutory guidance	X
Policy 3	Design and placemaking non-statutory guidance	X
Policy 4	Natural heritage non-statutory guidance	X
Policy 5	Landscape non-statutory guidance	X
Policy 7	Renewable energy non-statutory guidance	X
Policy 8	Open space, sport and recreation non-statutory guidance	
Policy 9	Cultural heritage non-statutory guidance	X
Policy 10	Resources non-statutory guidance	
Policy 11	Developer obligations supplementary guidance	



## Consultations

17. A summary of the main issues raised by consultees now follows:
18. **Scottish Forestry** set out that the felling of the site should have been consented through the planning process. They confirm that the woodland area subject of the retrospective planning application was recorded on the Ancient Woodland Inventory (AWI) as Ancient (of semi-natural origin) ref ANSO-1750. It is also recorded as a Plantation on Ancient Woodland Site (PAWS). Scottish Forestry state that they only consent the felling of trees for the purpose of sustainable forest management that complies with the UK Forest Standard. This generally requires a restocking obligation on any felled areas.
19. A felling licence was issued for the selective thinning of Scots Pine and European Larch for an area which included the development site (FPA-11784, issued 4th August 2024 and expires on 4th August 2028). The felling undertaken for the development was not a thinning operation or permitted under this felling licence.
20. Scottish Forestry state that if the Park Authority are minded to approve the proposal, the Control of Woodland Removal Policy should be taken into account and conditions need to consider compensatory planting and the Forestry EIA regulations (afforestation). Standard broadleaved stocking to establish a woodland is 1,600 stems per hectare and as a minimum, 0.63 hectares of compensatory planting would be required for the total loss of two areas of woodland removal (which includes the development site and a separate area of woodland removed). They stated that the initial compensatory planting proposed would not be suitable to compensate for the felled areas (this has since been increased), and whilst there is no metric for this calculation, they advise that similar cases should be considered to establish the appropriate amount of compensatory planting.
21. **Highland Council's Forestry Officer** confirms that the site is recorded in the Native Woodland Survey of Scotland as Plantation on Ancient Woodland Site (PAWS) and the site is regarded as ancient even though the trees are not necessarily ancient. They demonstrate via an aerial photograph from 2021 that, despite the applicant's claims, the site was almost entirely woodland and the applicant has provided no evidence of windblow as is claimed. They further note that attempts



appear to have been made by the applicant to downplay the quality of the woodland.

22. The officer concludes that the proposal does not accord with NPF4 Policy 6 as it has resulted in the loss of ancient woodland and the applicant has not demonstrated what significant and clearly defined additional public benefits are associated with the development.
23. They recommended that if the Park Authority is minded to approve the application, conditions should be attached to secure a detailed compensatory planting plan and a woodland management plan for the surrounding area.
24. **The Park Authority's Access Team** do not object to the proposal as there are no core paths or public rights of way within the site.
25. **The Park Authority's Landscape Advisor** states that the storage building is incongruous in scale and nature in relation to the smaller traditional style adjacent steading and Revack Lodge itself. They observe that the building appears to be sunk down on a platform excavated from the sloping ground which is surrounded by woodland on three sides, highlighting that the cutting is raw with little work done to grade the steep slopes or provide shrub and tree planting to minimise soil erosion and soften the felled edges of the woodland.
26. The screening provided by rising ground and coniferous woodland on three sides of the building limits visual intrusion, although views from the north-east would be more open but still screened from wider public view by existing woodland. The building is unlikely to be visible from the B970 and is not close to any recreational routes so there are unlikely to be any impacts on visual amenity from publicly accessible places.
27. Overall, the Park Authority's Landscape Advisor considers that the building is unlikely to result in any significant adverse landscape impacts on publicly accessible areas. There are potential impacts on the setting of Revack Lodge (which is not listed) and it is recommended that compensatory planting is



undertaken along with additional landscaping around the building itself to soften the woodland edges and cuttings around the building.

28. **The Park Authority's Ecological Advice Officer** highlights the proximity of the development to the River Spey Site of Special Scientific Interest (SSSI) / SAC which is designated for its otter, freshwater pearl mussel, sea lamprey and Atlantic salmon interests, and Craigmore Woods and Anagach Woods SPAs which are both designated for their capercaillie interests.
29. The location of the development avoids direct impacts on the River Spey SSSI / SAC, but indirect impacts from construction site run-off are possible and a pollution prevention plan would ordinarily have been required to mitigate this. While a Pollution Prevention Plan has not been provided, there does not appear to be watercourse connectivity between the development site with the River Spey. Therefore, it is considered that there would potentially be lower risk to the River Spey SSSI / SAC.
30. The officer highlights that the development has resulted in the permanent removal of 0.33 hectares of PAWS woodland which would not be supported by Scottish Government or Park Authority policies, and that the significance of permanent removal of PAWS woodland is very large. Where the removal of woodland can be justified there is a requirement for compensatory tree planting, which in the case of PAWS woodland should exceed the area of woodland removed.
31. As the entire development site has been cleared and the soils excavated, the officer notes that restoration and restocking of the development site with young native trees would not restore the ancient woodland / PAWS status. Without additional compensatory planting, the restocking of the development site would not deliver a sufficient area of planting to compensate for the loss of biodiversity associated with the permanent removal of soils and seed bank etc. The Compensatory Planting Plan provided by the applicant proposes off-site planting of 2,760 native tree saplings across 1.65 hectares of improved grassland next to the existing woodland, which equates to a compensatory planting ratio of approximately 1:5. Therefore, while ancient woodland is irreplaceable, if the proposed compensatory



planting plan is fully implemented it may deliver a suitable level of compensatory planting.

32. In addition, the officer notes that no ecological surveys or assessments for protected species or birds were undertaken prior to site clearance or development. The two post-construction ecological survey reports that have been prepared do not provide sufficient information to inform an assessment of the baseline ecological conditions of the site or a robust assessment of the presence of protected species. The officer highlights a number of deficiencies in the ecological information provided, including that they were not undertaken in suitable conditions, did not follow standard methodologies or include existing biological records, and the experience, qualifications and licences held by the surveyor are not provided. Therefore, a Preliminary Ecological Appraisal (PEA) of the habitats surrounding the development site will be required (including as a minimum a Phase 1 habitat survey, protected species survey, assessment of the proximity to designated sites, presence of priority species, and a search for existing biological data relevant to the site and surrounding habitats). Habitats and evidence of protected species / potential dens / dreys and roost sites should be recorded with a 250m buffer zone of the development site.
33. Finally, the officer notes that the Biodiversity Enhancement Plan submitted by the applicant only proposes biodiversity enhancements outwith the development site boundary. Therefore, an updated landscaping and biodiversity enhancement plan covering the development site and based on the updated ecological baseline data is recommended.
34. **Nethy Bridge Community Council** were consulted but did not respond.

## Representations

35. There were no representations to this application.

## Appraisal

36. Section 25 of the 1997 Act as amended requires applications to be determined in accordance with the Development Plan. This comprises National Planning Framework 4 (NPF4) and the Cairngorms National Park Local Development Plan



2021 (LDP). Where there is conflict between policies, NPF4 policies take precedence.

37. The main planning considerations in this case are: the principle of development; landscape and design; environmental impacts; renewable energy; and access. These are considered in detail below.

### Principle of development

38. This application seeks retrospective planning permission for the erection of an agricultural storage building which also houses a biomass heating system serving the wider estate.
39. **NPF4 Policy 29: Rural development** seeks to support development proposals that contribute to the viability, sustainability and diversity of rural communities and the rural economy. The policy explains that proposals in rural areas should be suitably scaled, sited and designed to be in keeping with the character of the area.
40. In addition, **LDP Policy 2: Supporting economic growth**, part 2.4 (other economic development), supports proposals that will help to extend the economy and enhance the range and quality of economic opportunities. Proposals should have no adverse environmental or amenity impacts, should be compatible with the existing business activity in the area and support the vitality and viability of the local economy.
41. The development site is located on Revack Estate, and the proposed storage building has been built to support estate operations. It is understood that the building was constructed to provide secure on-site storage for plant, equipment and materials for the extensive upgrading works required on the estate, and to house a new biomass boiler facility and associated wood pellet storage to provide sustainable heating for the estate buildings.
42. The storage building is compatible with the wider functions of the estate and is acceptable in principle subject to the detailed consideration of its impacts on landscape, ecology and other material considerations. As such, it complies with NPF4 Policy 29 and LDP Policy 2.



## Landscape and design

43. **NPF4 Policy 4: Natural places** sets out that development proposals which affect a National Park will only be supported where the objectives of designation and the overall integrity of the area will not be compromised. In addition, **NPF4 Policy 14: Design, quality and place** seeks proposals to be designed to improve the quality of an area and to be consistent with the six qualities of successful places.
44. **LDP Policy 5: Landscape** sets out that there will be a presumption against any development that does not conserve or enhance the landscape character or special landscape qualities of the National Park. Proposals that do not complement or enhance the landscape character of the National Park will only be permitted where they are outweighed by social, environmental or economic benefits of national importance and all adverse effects on the setting have been minimised and mitigated.
45. **LDP Policy 3: Design and placemaking** requires proposals to (amongst other things) use landscaping and materials that will complement the setting of the development, be sympathetic to the pattern and character of the surrounding area, and protect the amenity of neighbours.
46. **LDP Policy 9: Cultural heritage** requires that proposals affecting a site, feature or use of land of local or wider cultural or historic significance or its setting should conserve and enhance the feature and its setting and take reasonable measures to avoid, minimise and mitigate any adverse effects.
47. The development site forms an addition to a small group of buildings within the grounds and setting of Revack Lodge (a 19<sup>th</sup> century former shooting lodge). The agricultural storage building itself is large, rectangular in form, with a pitched roof and ridge height of 9.56 metres. There is levelled hardstanding around the building on three sides with bare reprofiled edges connecting the site to the existing track and woodland above. The northeastern side of the building faces an existing steading and Revack Lodge beyond.



48. The buildings at Revack are all set within a wider context of woodland and the Park Authority's Landscape Advisor is satisfied that this limits visual intrusion from out with the site.
49. However, the loss of woodland on the development site in conjunction with the erection of the 9.5 metre high agricultural building has created a localised impact on its immediate surroundings and the setting of the existing buildings. The storage building's simple rectangular design, materials and colour are characteristic of agricultural and estate buildings within this rural area and are generally acceptable. However, its height makes it appear incongruous next to the adjacent small traditional steading and it is visible from Revack Lodge, impacting its setting. This is compounded by the absence of any landscaping or planting around the building, which could help to soften the raw steep sides which have resulted from the reprofiling and reduce the prominence of the large area of hardstanding which makes the building appear more pronounced and prominent.
50. Overall, it is accepted that this proposal does not result in any significant adverse landscape and visual effects on the wider area or National Park. However, the more localised adverse impacts on the setting of the development site and Revack Lodge warrant further on-site native planting and landscaping to soften the felled woodland edges and better integrate the building with its immediate surroundings. This planting and landscaping could be secured through a condition if retrospective planning permission is approved.
51. Subject to the recommended landscaping condition, it is considered that the design of the building is broadly acceptable and complies with relevant development plan policies.

## Environmental impacts

52. **NPF4 Policy 1: Tackling the climate and nature crises** and **Policy 2: Climate mitigation and adaptation** require proposals to give weight to the global climate and nature crises and be designed to minimise emissions and adapt to current and future risks from climate change.



53. The application site is not at risk of flooding and lies close to the centre of Revack Estate's operations. The building is partially used to house a biomass boiler system which provides a resilient and sustainable source of heating for the whole estate. As such, it is considered to comply with NPF4 Policies 1 and 2.
54. **NPF4 Policy 3: Biodiversity** requires development proposals to contribute to the enhancement of biodiversity, and **NPF4 Policy 4: Natural places** to ensure that development will not have an unacceptable impact on the natural environment, or any significant effect on European Site designations.
55. **NPF4 Policy 6: Forestry, woodland and trees** supports proposals that enhance, expand and improve woodland and tree cover. Proposals resulting in the loss of ancient woodlands, adverse impacts on native woodlands or fragmenting woodland habitats without appropriate mitigation will not be supported. There is a presumption against woodland removal unless it will achieve a clearly defined public benefit and compensatory planting will be expected.
56. **LDP Policy 4: Natural heritage** states that new development should not adversely affect the integrity of designated sites, the National Park or protected species or habitats. Part 4.3 of the policy states that woodland removal for development will only be permitted where it complies with the Scottish Government's Policy on the Control of Woodland Removal. It adds that 'there is a strong presumption against removal of ancient semi-natural woodland, including sites in the Ancient Woodland Inventory'. Only in exceptional circumstances will it be permitted, which includes where it can be clearly demonstrated that the need for woodland removal outweighs the value of the woodland or the woodland has low ecological value. Where removal is deemed acceptable, compensation for the loss – through native planting – is required.
57. **The Scottish Government's Control of Woodland Removal Policy** states that there is a strong presumption against removing (amongst others) woodlands listed as Plantations on Ancient Woodland Sites (PAWS). It states that woodland removal should be conditional on achieving significant net public benefit. The associated Implementation Guidance highlights that where removal of such



woodland is justified, the compensatory planting area must exceed the area of woodland removed to compensate for the loss of environmental value.

## Woodland removal

58. This retrospective application has resulted in the permanent removal of approximately 0.33 hectares of PAWS woodland consisting of Scots Pine and Larch. Ancient woodland is regarded as an irreplaceable resource, and in this case the entire development site has been cleared and the soils excavated meaning that the restoration and restocking of the development site with native trees would not be able to restore the ancient woodland.
59. As set out above, there is a strong presumption against the removal of ancient woodland unless it will achieve a clearly defined public benefit. This application has not demonstrated any such public benefit. In addition, it has not been demonstrated that the need for the woodland removal outweighed the value of the woodland, and whilst the applicant's agent has asserted that the woodland was of low ecological value no tree surveys or adequate ecological evidence has been provided to demonstrate this. As such, the removal of the PAWS woodland on the application site does not meet the relevant local and national policy requirements.
60. However, as the PAWS woodland has been totally removed and cannot now be restored, consideration must be given to the need to achieve the best possible outcome that can compensate for the loss of the woodland.
61. In cases where the removal of ancient woodland is justifiable, there is a requirement for compensatory tree planting which should exceed the area of woodland removed. Plans for compensatory planting have been submitted with this application which propose off-site planting of 2,760 native tree saplings (Silver Birch, Oak, Scots Pine, Rowan, Bird Cherry, Holly and Aspen) across 1.65 hectares of improved grassland next to existing woodland (5m buffer from existing woodland edge). This proposed compensatory planting would achieve a planting ratio of approximately 1:5 (removed vs planted) which is considered to be acceptable.



62. Although the policy requirements for demonstrating wider public benefits have not been demonstrated in this case, the proposed native compensatory planting proposals are considered broadly acceptable as a means to achieve the best possible outcome to compensate for the loss of the PAWS woodland. A planning condition can be used to secure full implementation of the proposed compensatory planting and ensure it delivers the necessary benefits if retrospective planning permission is approved. Whilst the proposed Compensatory Planting Plan is generally acceptable, The Highland Council's Forestry Officer has requested additional details relating to the compensatory planting proposals. Therefore, an updated Compensatory Planting Plan will be conditioned to ensure that all necessary information is provided.
63. A woodland management plan was also requested by The Highland Council's Forestry Officer, however taking into account that an on-site Landscaping and Biodiversity Enhancement Plan will be conditioned if retrospective planning permission is granted along with full details of the compensatory planting, it is not considered that this is necessary.

## **Biodiversity**

64. The development site lies within 1.5km of the River Spey SSSI / SAC as well as Craigmores Woods and Anagach Woods SPAs.
65. No pre-construction checks or surveys for protected species or birds were undertaken prior to the site clearance or construction of the storage building. In addition, no credible information has been provided in respect of construction methods or pollution prevention. A 'Method Statement for Tree Felling' and 'Risk Assessment for Refuelling' was provided however these were prepared in October 2023, over a year before work commenced, so cannot be given weight in the assessment of this application.
66. While a site-specific Pollution Prevention Plan for this application has not been provided and indirect impacts from construction site run-off could have been possible, the Park Authority's Ecological Advice Officer is satisfied that there does not appear to be watercourse connectivity between the development site and the



River Spey. Therefore, it is considered that there would potentially be lower risk to the River Spey SSSI / SAC.

67. As well as being near Anagach Woods SPA and Craigmore Woods SPA, the development site and surrounding woodland in Revack Estate is within capercaillie Woodland H – Craigmore Woods (see Annex II of HRA). This is identified as important habitat for capercaillie and supports connectivity between two capercaillie woodland SPAs. In addition, based on the information available and the ground flora in the surrounding woodland, several protected species may have been present at the development site including bats, badger, red squirrel and pine marten and potentially a range of breeding bird species, which this development could have disturbed or destroyed. The application states, however, that the clearance and construction activity took place in November 2024, which would have avoided impacts on breeding birds.
68. In respect of capercaillie, the HRA notes that there has been a permanent loss of ancient woodland (which is suitable capercaillie habitat within a capercaillie woodland) and that there is likely to be a slight increase in the level of human activity close to the development site which may result in some increased risk of disturbance to capercaillie using these woods. However, considering the scale and the location of the development, it will not have a significant impact on the capercaillie population.
69. Two post-construction ecological survey reports have been prepared, however these reports do not provide sufficient information to inform an assessment of the baseline ecological conditions of the site or a robust assessment of the presence of protected species. The Park Authority's Ecological Advice Officer has identified a number of deficiencies in the ecological information provided. Therefore, a Preliminary Ecological Appraisal (PEA) of the habitats surrounding the development site will be required by condition and this will need to be carried out by a suitably qualified ecologist. This will provide an accurate ecological baseline for the development site which can then be used to inform the delivery of biodiversity enhancements.



70. As a result of the woodland removal, the ecological value of the development site is completely depleted and further onsite biodiversity enhancements and landscaping are required. The Biodiversity Enhancement Plan submitted as part of the application only proposes enhancements around the vicinity of the site, within the surrounding woodland, but not on the site itself. Therefore, an updated landscaping and biodiversity enhancement plan will be required by condition. This will need to cover the development site itself and be informed by the updated ecological baseline data.
71. In summary, it is recognised that this proposal has resulted in the permanent loss of PAWS woodland – the principle of which is not supported by policy – and that the value of the woodland loss cannot be restored. However, compensatory planting has been proposed as part of this application which is of an acceptable level to compensate for the woodland that has been lost in broad accordance with the Scottish Government’s Control of Woodland Removal Policy, NPF4 Policy 6: Forestry, woodland and trees, and LDP Policy 4: Natural heritage. In addition, conditioning a Preliminary Ecological Appraisal to accurately establish the ecological baseline of the site will help to inform a full landscaping and biodiversity enhancement plan for the site, which will not only improve the development from a landscape perspective but also enhance onsite biodiversity in accordance with NPF4 Policy 3: Biodiversity and LDP Policy 4: Natural heritage.

## **Renewable energy**

72. **NPF4 Policy 11: Energy** supports proposals for all forms of renewable, low-carbon and zero emissions technology.
73. **LDP Policy 7: Renewable energy** supports proposals for renewable energy where they minimise climate change, complement the sustainability of the development, conserve and enhance the special qualities of the National Park, include appropriate access and traffic management, minimise all cumulative effects and minimise any detrimental impacts on local air quality.
74. A substantial part of the storage building is used to house a biomass boiler, water tank and wood chip store which provides the source of heating for three buildings on the estate, including Revack Lodge. Biomass is a renewable source of heating



and it is not considered that the system has any impact on the special qualities of the National Park or will result in any cumulative effects. There is adequate access into both parts of the building that relate to the biomass system, and due to the isolated location of the development site from any neighbouring properties outside Revack Estate, there will be no detrimental impacts on air quality. Therefore, the proposal complies with NPF4 Policy 11 and LDP Policy 7.

## Access

75. **NPF4 Policy 13: Sustainable transport** supports proposals that demonstrate they have properly considered transport requirements in line with the sustainable travel and investment hierarchies. In addition, **LDP Policy 3: Design and placemaking** requires development to have an appropriate means of access, parking and promote sustainable transport methods and active travel.
76. The storage building is not accessible to the public and will not generate significant levels of traffic. There is an appropriate existing access to the site via a private track which directly connects to the B970. There is room for vehicle parking around the building and around the other adjacent buildings. As such, the access arrangements are acceptable and accord with the relevant provisions of NPF4 Policy 13 and LDP Policy 3.

## Conclusion

77. This proposal will support the ongoing maintenance operations of Revack Estate as well as accommodating the use of renewable energy from its biomass system. The principle of the storage building is compatible with the wider functions of the Estate and it meets the general principles of NPF4 Policy 29: Rural development as well as the relevant energy policies – NPF4 Policy 11: Energy and LDP Policy 7: Renewable energy.
78. This is however a retrospective application, and the development undertaken has resulted in the permanent loss of 0.33 hectares of PAWS woodland. This woodland removal is contrary to relevant development plan policy.
79. As the entire development site has been cleared and the soils excavated, the restoration and restocking of the development site with young native trees would



not restore its PAWS status. Therefore, careful consideration has been given to the need to achieve the best possible outcome to compensate for the loss of the PAWS woodland. The application includes a proposal for native compensatory tree planting of 1.65 hectares to offset the woodland removed. This is considered to represent an acceptable level of compensatory planting taking into account the broader requirements of NPF4 Policy 6: Forestry, woodland and trees, the Scottish Government's Control of Woodland Removal Policy (and its associated Implementation Guidance), and LDP Policy 4: Natural heritage.

80. In addition to securing the compensatory planting, conditions are recommended to improve on-site landscaping and biodiversity to better integrate the building within its woodland setting and to delivery biodiversity enhancement in compliance with relevant NPF4 and LDP policies.
81. On balance, it is considered that the application meets the relevant local and national development plan policies in the round and it is therefore recommended for approval subject to conditions.

## **Recommendation**

**That members of the committee support a recommendation to APPROVE the Erection of Agricultural Storage Shed (retrospective) at Land 31M SW Of No 1 Keepers Cottage Revack Grantown On Spey subject to the following conditions:**

## **Conditions**

1. Within three months of the date of planning permission, a Preliminary Ecological Appraisal (PEA) of the habitats surrounding the development site and the compensatory planting site shall be undertaken and submitted to the Cairngorms National Park Authority acting as Planning Authority for approval. The PEA shall include as a minimum:
  - a) phase 1 habitat survey;
  - b) protected species survey;
  - c) assessment of the proximity to designated sites;
  - d) presence of priority species; and



- e) a search for existing biological data relevant to the site and surrounding habitats. Habitats and evidence of protected species / potential dens / dreys and roost sites should be recorded with a 250m buffer zone of the development site.

Surveys should follow NatureScot Guidelines ([Planning and development: standing advice and guidance documents | NatureScot](#)). The PEA should take account of CEEIM guidance on Preliminary Ecological Appraisals ([Guidelines-for-Preliminary-Ecological-Appraisal-Jan2018-typo edit.pdf](#)).

**Reason:** To ensure the protection of protected species in accordance with National Planning Framework 4 Policy 3: Biodiversity, and Policy 4: Natural Heritage of the Cairngorms National Park Local Development Plan 2021.

- 2. Within six months of the date of planning permission, a Landscaping and Biodiversity Enhancement Plan shall be prepared and submitted to the Cairngorms National Park Authority acting as Planning Authority for approval. The Plan must be informed by the findings of the approved PEA and shall include, but not be limited to:
  - a) On-site planting of additional native trees, shrubs and grassland, particularly the bare excavated edges of the site; and
  - b) On-site biodiversity enhancements to support protected species, including (but not limited to):
    - I. 6x Swift nest boxes on the shed building at roof height / under eaves on the northeast or northwest elevations;
    - II. 8x hole fronted bird nest boxes suitable for crested tit and coal tit and 1x owl nest box in the surrounding woodland; and
    - III. 5x bat roost boxes on the shed building and surrounding trees.

**Reason:** To ensure the implementation and management of a satisfactory plan for landscaping and biodiversity enhancement in accordance with National Planning Framework 4 Policy 3: Biodiversity and Policy 4: Natural heritage, and Policy 4: Natural Heritage of the Cairngorms National Park Local Development Plan 2021.



3. Landscaping and biodiversity enhancements shall be implemented in full accordance with the approved Landscaping and Biodiversity Enhancement Plan required by Condition 2, in the first planting season following the date of planning permission (by April 2027).

The landscaping and biodiversity enhancements shall be maintained thereafter in accordance with the approved plans and details throughout the lifetime of the development hereby approved. Any landscaping and / or planting which, within a period of 5 years from the completion of the development, is not fully established shall be re-planted or replaced by trees or plants of similar size and species to those originally required.

**Reason:** In the interests of protecting the biodiversity and the environment in accordance with National Planning Framework 4 Policy 3: Biodiversity and Policy 4: Natural heritage of the Cairngorms National Park Local Development Plan 2021.

4. Within three months of the date of planning permission, an updated Compensatory Planting Plan shall be prepared and submitted to the Cairngorms National Park Authority acting as Planning Authority for approval, following consultation with Scottish Forestry and any other relevant stakeholders. The updated Compensatory Planting Plan shall:
  - a) Provide an area of compensatory planting of no less than 1.65 hectares in size.
  - b) Be in accordance with the process for preparing a woodland creation application, as set out in the Scottish Forestry publication: Woodland Creation Application Guidance;
  - c) Provide a detailed schedule of maintenance;
  - d) Be prepared by, and then implemented under the supervision of, a suitably qualified forestry consultant, first approved in writing by the Planning Authority;
  - e) Include a detailed schedule of supervision, with compliance monitoring reports to be issued at agreed stages, prepared by the appointed forestry consultant; and
  - f) Provide the planning authority with a GIS shapefile clearly identifying the approved area(s) of woodland removal and the associated area(s) of Compensatory Planting.



The woodland type of the compensatory planting should follow the National Vegetation Classification (NVC), and the new woodland should be directly connected to existing woodland of the same NVC woodland type. In all cases, due diligence must be undertaken to demonstrate that the proposed compensatory planting is a viable scheme.

**Reason:** In the interests of protecting and enhancing the woodland environment in accordance with National Planning Framework 4 Policy 3: Biodiversity and Policy 6: Forestry, woodland and trees and Policy 4: Natural heritage of the Cairngorms National Park Local Development Plan 2021.

5. Compensatory planting shall be implemented in accordance with the approved Compensatory Planting Plan in the first planting season following the date on which the permission is granted (by March 2027). The Compensatory Planting Plan should be implemented under the supervision of a suitably qualified forestry consultant, and the planted trees shall be maintained thereafter in accordance with the approved plans and details throughout the lifetime of the development hereby approved.

Any planting which, within a period of 5 years from the completion of the development, is not establishing shall be re-planted or replaced by trees of similar size and species to those originally required.

**Reason:** In the interests of protecting and enhancing the woodland environment in accordance with National Planning Framework 4 Policy 3: Biodiversity and Policy 6: Forestry, woodland and trees and Policy 4: Natural heritage of the Cairngorms National Park Local Development Plan 2021.

## Informatives

1. Following completion of the development, a notification of completion shall, as soon as practicable, be given to the Planning Authority. Attached to this decision notice is a Notice of Completion of Development for completion and submission. Submission of this form will assist the Cairngorms National Park Authority



Monitoring and Enforcement Officer in making a final inspection and checking compliance with the approved drawings and conditions. If the development hereby approved is to be carried out in phases, then a notice of completion should be submitted at the completion of each phase.