Agenda item 6

Appendix 4c

2026/0122/DET

Representations - objections

Comments for Planning Application 2026/0122/DET

Application Summary
Application Number: 2026/0122/DET
Address: Braemar Lodge 6 Glenshee Road Braemar Aberdeenshire
Proposal: Erection of 13 serviced apartments installation of air source heat pump and associated infrastructure
Case Officer: Katherine Donnachie

Customer Details
Name: Mr Bruce Luffman
Address: [redacted]

Comment Details
Commenter Type: Member of Public
Stance: Customer objects to the Planning Application
Comment Reasons:
Comment:Planning Application 2026/0122/DET

Erection of thirteen serviced apartments, installation of air source heat pump and associated infrastructure.

Background

The site held the former Braemar Lodge Hotel which was a listed building on Glenshee Road, Braemar, which was demolished in 2022 following a severe fire.

The site is within the Braemar Conservation Area and was originally classified a Category C listed building. Historic Environment Scotland controversially removed the Listing after the site owners demolished the building without prior authorisation in 2022, which was a significant Breach of Planning and a criminal act.

The proposed development site occupies a prominent position on the main A93 near the entrance to the village and has been a poorly maintained site since 2022.

Objection to Planning Application 2026/0122/DET
Summary
1. Conflict with the Scottish Planning Policy 4 for this application in Braemar
A holiday accommodation development in Braemar could be significantly enhanced by incorporating residential and affordable housing and is central to the broader vision of sustainable development. More detailed points below

2. Conflict with the CNPA LDP for this application in Braemar
A holiday accommodation development in Braemar would be better served by the inclusion of residential and affordable housing in alignment with the Cairngorms National Park Authority (CNPA) Local Development Plan. This approach addresses critical issues like housing affordability, workforce stability, and community resilience, while also respecting the environmental integrity of the National Park. More detailed points below.
3. Poor balance of housing infrastructure

Poor balance of second homes and holiday lets compared to permanent residential housing with 42% of homes operating as second and holiday homes. A block of serviced accommodation apartments would not address local housing needs under the National and Park planning policies whereas a mixed development would have merit.

4. Lack of sufficient Infrastructure to support more visitors
The loss of the 80 seat restaurant that the Braemar Lodge provided has stretched the hospitality capacity in Braemar. There is really only one restaurant with the closure of the Bistro and two cafes which are open only through the day as well as only one small retail provision for household provisions. Public transport is also limited.
Increasing visitor numbers would place additional strain on already fragile health and emergency services.
5. Poor layout, mass and alignment
The proposed building will be visually intrusive because of its mass and is unlikely to be in-keeping with surrounding properties. Its alignment to its boundaries would block sunlight from the community bowling green and the effectiveness of the surface of the bowling green..
Granite sourcing is also unclear and with local pale granite no longer available; it will likely cause a poor comparison. The provision of granite as per design must be Conditioned should permission be granted.
6. Lack of parking provision and intrusive noise issues
There needs to be more parking spaces available and further avoid the risk of chalet users using them'
Contrary to planning policy there is inadequate provision for active travel or cycle storage.
The impact of a large air-source heat pump is likely to be unacceptable to neighbouring residents., particularly the neighbouring bungalow
7. Community-Preferred Alternatives
Residents would prefer a development that meets local needs, such as affordable residential housing, a restaurant, or staff accommodation.
Conclusion
The proposal is not appropriate and not compatible within its setting and surroundings, and does not support sustainable community growth. It places further pressure on already overstretched infrastructure and fails to meet key LDP and Partnership Plan requirements.
It is respectfully requested that the Cairngorms National Park Authority REFUSE Planning Application 2026/0122/DET and the applicant is persuaded to bring forward a more appropriate

proposal which incorporates residential and affordable housing within a holiday accommodation development.

1. Conflict with Scottish Planning Policy 4 (SPP4) in Braemar
Incorporating residential and affordable housing into a holiday accommodation development in Braemar, within the Cairngorms National Park, could bring significant benefits to the local community, economy, and environment. Under the principles of Scottish Planning Policy 4 (SPP4), such a development would better serve the area in the following ways:
a) Meeting Local Housing Demand and Affordable Housing Needs
- Braemar is a small village with limited housing supply, and like many rural areas, it faces significant affordable housing shortages. This issue is particularly pressing in tourist areas where holiday accommodation often pushes up property prices and rents for locals, making it hard for residents, particularly young people and families, to stay in the area.
- SPP4 emphasises the need for developments to meet local housing needs, especially in areas where there is high demand for affordable housing. By incorporating affordable housing into a holiday accommodation development, the project could contribute directly to reducing local housing pressure. This would support local workers, including those employed in the tourism industry, and help ensure that the local population can continue to live and work in Braemar.
b) Supporting a Sustainable Community
- A mixed-use development that combines holiday accommodation with residential and affordable housing could help create a more sustainable and balanced community. Braemar's economy heavily relies on tourism, but this seasonal nature can create fluctuations in the local population and a lack of stability in the workforce. Having year-round residents who live and work in the area could create a more stable community and help sustain local services, shops, school, and healthcare facilities.
- Residential housing would ensure that workers, including those in hospitality and tourism, have access to affordable homes. This would also prevent local displacement due to rising property prices from short-term holiday lets and second homes, which can often lead to a transient, less cohesive community.
c) Social and Economic Integration
- Integrating affordable housing into a holiday accommodation development would promote social integration, ensuring that the local community and visitors can coexist in a balanced environment. This integration helps prevent the creation of a "two-tier" society, where residents are priced out of their own community by second homes or seasonal holiday rentals.
- The development would align with SPP4's goal of promoting inclusive growth by ensuring that those who work in the tourism and hospitality sector can also afford to live in the area. This would also provide housing for key workers like teachers, healthcare workers, and emergency services personnel who may otherwise struggle to find suitable accommodation in Braemar.
d) Economic Resilience and Local Workforce Support
- Braemar's economy is heavily dependent on tourism, which can be unpredictable and subject to seasonal fluctuations. By creating a mixed-use development, it would help to diversify the local economy. The availability of affordable housing would encourage workers to stay in the area year-

round, reducing the high turnover often seen in tourism-related businesses.
- Affordable housing would also attract people with a wider range of skills (e.g., teachers, tradespeople, healthcare professionals) who are essential for maintaining the infrastructure and services that sustain Braemar year-round. These workers could help ensure that essential services continue to operate during the off-peak seasons when tourism is quieter.
e) Promoting Sustainable Development
- Under SPP4, sustainable development is a core objective, which includes economic, environmental, and social sustainability. Holiday accommodation typically generates a lot of economic activity during peak tourist seasons, but it also often contributes to pressures on local infrastructure, housing, and services. By incorporating residential housing, the development could contribute to reducing the imbalance by providing housing that supports a stable, year-round community, which in turn creates a more sustainable local economy.
- The development could also use sustainable building materials which is particularly important in sensitive areas like the Cairngorms National Park with its well established cultural heritage and buildings. This would align with national and local environmental policies aiming to preserve the natural beauty, architectural and ecological health of the region.
f) Infrastructure and Service Sustainability
- SPP4 encourages the development of infrastructure that supports both tourism and residential needs, ensuring that areas like Braemar have the services and infrastructure they need to thrive. The addition of affordable housing within a tourism development would help maintain a year-round population to support local services (e.g., schools, healthcare, public transport).
- Affordable housing could also reduce pressure on existing rental stock, providing long-term, affordable living options for people who work in Braemar and need stable accommodation. This is particularly important in Braemar where people struggle to find appropriate housing.
g) Environmental and Heritage Considerations
- The Cairngorms National Park is a highly sensitive area with a rich natural and cultural heritage. SPP4 stresses that development in such areas must be carefully considered, ensuring that it does not have adverse environmental impacts. A holistic approach to development-combining both holiday accommodation and affordable housing-could be designed with sustainability in mind. The design of this proposal could be changed to a more suitable arrangement of the building on the site.
- Furthermore, integrating these types of housing into a broader tourism-related development could avoid the overuse of land and natural resources, which often happens when second homes or holiday accommodation are developed in isolation.
h) Leveraging Local Economic Opportunities
- Holiday accommodation can offer seasonal employment, but integrating residential housing into the development ensures that more people are able to stay in the area long-term, providing a more stable workforce. This would also contribute to local businesses, as permanent residents typically spend more on local goods and services than seasonal tourists.
- With an affordable housing component, the development could cater to a variety of income levels and social groups, thus promoting social cohesion and reducing reliance on second homes or short-term rentals which can contribute to a sense of impermanence in small communities like

Braemar.

Conclusion

A holiday accommodation development in Braemar could be significantly enhanced by incorporating residential and affordable housing and is central to the broader vision of sustainable development in line with the goals of SPP4. This integration would help address local housing shortages, promote a stable and diverse community, and ensure that the needs of year-round residents are met, while also supporting the local economy by providing stable housing for workers and professionals.

Moreover, by carefully considering environmental impact and ensuring the development is sustainable, this mixed-use approach could contribute to long-term social, economic, and environmental sustainability in the Cairngorms National Park.

2. Conflict in Braemar with Cairngorms Local Development Plan 2021

a) Addressing Housing Shortages and Supporting Local Communities

- Braemar, as part of the Cairngorms National Park, is a rural community where the availability of affordable housing is a significant issue. The CNPA LDP places strong emphasis on meeting local housing needs and supporting sustainable communities, which is often a challenge in rural areas with high demand for seasonal and second homes. By incorporating residential and affordable housing into the holiday accommodation development, it would help mitigate housing shortages for local families, key workers, and long-term residents.
- The CNPA LDP specifically encourages the development of affordable housing in appropriate locations, particularly in settlements like Braemar, where there is high demand and limited supply. This would help ensure that people who work in tourism, public services, and other local industries have access to homes they can afford.

b) Promoting Sustainable and Mixed-Use Development

- The CNPA LDP supports mixed-use developments that contribute to the long-term sustainability of communities within the park. A mixed-use holiday accommodation and residential development could provide economic and social benefits by attracting both tourism-related businesses and permanent residents, helping the community thrive year-round rather than relying on seasonal tourism alone.
- By integrating affordable housing, the development could reduce the demand for second homes and holiday lets, which can contribute to housing market volatility and the erosion of local communities. This approach would align with the CNPA's policy to support sustainable development that contributes to the economic resilience of the area, ensuring that residents and visitors can coexist without compromising the quality of life for local people.
- Affordable means that the price is manageable for local would be residents while providing a profit for the developer.

c) Supporting Local Economy and Workforce Stability

- The CNPA LDP highlights the need to support local economies through initiatives that enhance infrastructure and provide affordable housing. For a holiday accommodation development in

Braemar, integrating affordable housing would provide homes for key workers who serve the local economy, including those in tourism, hospitality, and public services.
- With year-round affordable housing, local workers would be more likely to stay in the community for extended periods, reducing the high turnover of staff often seen in the tourism industry. This workforce stability would support local businesses, including those that cater to both tourists and permanent residents, enhancing the economic resilience of Braemar.
d) Protecting the Character and Heritage of Braemar
- The CNPA LDP emphasizes the need to protect the natural and cultural heritage of the National Park while accommodating development. A mixed-use holiday accommodation and residential development could be designed with respect for Braemar's distinctive built heritage and landscape.
- The proposed design is recommending a granite exterior which is to be welcomed so long as the colour of the granite is not too much in conflict with the neighbouring buildings

e) Encouraging Housing for Local Workers and Families
- A major challenge in rural areas like Braemar is the affordability of housing for local families and workers, particularly when tourism drives up housing costs. The CNPA LDP's housing policies seek to promote the provision of affordable housing for locals, particularly in areas where tourism has led to price inflation.
- By including affordable housing in the development, the project would directly contribute to the LDP's objective of ensuring that local families and key workers can live in the area. It would also support younger people who may be priced out of the market and might otherwise have to leave the community in search of affordable accommodation elsewhere.
f) Reducing Pressure on Existing Housing Stock
- The holiday accommodation development in Braemar might otherwise compete with local residents for the available housing stock, driving up prices and potentially making housing unaffordable for long-term residents. By introducing affordable housing within the same development, this would help diversify the housing mix and reduce the impact of short-term rental pressures on the local housing market.
- This approach would be in line with the CNPA's strategy to improve the affordability of housing for both permanent and seasonal workers in the area. By ensuring there is housing for people working year-round in the community, it would reduce reliance on second homes and short-term holiday rentals that may not contribute to the long-term sustainability of the local economy.
g) Contributing to the Sustainability of Braemar and the Cairngorms Region
- The CNPA LDP is focused on promoting sustainable development and ensuring that growth in the park occurs in a way that benefits both the environment and the local community. A development that combines holiday accommodation with affordable housing would help balance the needs of tourism with the long-term sustainability of Braemar's infrastructure and community.

h) Aligning with Local Development Plan Policies
- The CNPA Local Development Plan outlines specific policies and zoning regulations for areas like Braemar, which could allow for a holiday accommodation development that includes

residential components. The CNPA LDP prioritises development within settlements to avoid harmful encroachment into sensitive areas of the Park, and a mixed-use development could serve as a model for integrating tourism and residential housing without compromising the Park's integrity.
- Furthermore, the CNPA LDP encourages community involvement in the planning process, and the inclusion of affordable housing would respond directly to local needs, helping to gain community support for the development.
i) Promoting Social Inclusion and Community Cohesion
- The CNPA LDP recognizes the importance of community cohesion in planning. A mixed-use development that provides affordable housing alongside holiday accommodation would contribute to building a diverse, inclusive community that integrates both permanent residents and seasonal visitors.
- This would prevent the kind of social stratification that can arise when tourism and holiday accommodation displace local residents. By fostering a sense of belonging and community ownership, such a development would enhance the social fabric of Braemar.
Conclusion
A holiday accommodation development in Braemar would be significantly better served by the inclusion of residential and affordable housing in alignment with the Cairngorms National Park Authority (CNPA) Local Development Plan. This approach addresses critical issues like housing affordability, workforce stability, and community resilience, while also respecting the environmental integrity of the National Park. It would contribute to a more sustainable, integrated community in Braemar, supporting both the tourism sector and the broader needs of local residents. By incorporating these elements, the development would help meet the CNPA's goals for balanced growth, fostering long-term sustainability and social inclusivity within the Cairngorms National Park.

3. Poor balance of housing infrastructure

In a place like Braemar-a small village inside the Cairngorms National Park-a high proportion of holiday and second homes is generally considered quite detrimental once it passes a 20% threshold and Braemar is at 42%.
Braemar is a prime example of where effects are felt most strongly and there is clear local evidence that shows demand for holiday homes has reduced affordable housing supply for local working people and permanent residents.
House prices get pushed up and younger people leave Braemar and thereby increasing the difficulty of local recruitment. This proposed development does nothing for the issue of local housing provision whereas a mixed development could be advantageous with inclusion of affordable and residential accommodation.
This could increase the prospect of local labour provision and not the boom and bust economy that can occur in seasonal tourism places like Braemar. There is also the considerable advantage of maintaining the local school and supporting medical provision in Braemar

4. Insufficient Infrastructure to Support More Visitors

The loss of the Braemar Lodge Hotel meant that the 80 seat restaurant was also lost and that provision has never been replaced in Braemar. The Bistro was also closed and that left just one eating place for evenings beyond the Fife Hotel which is catering primarily to its patrons.

A couple of day time cafes operate but are not open in the evenings and there is also a limited retail provision of Greens, local butcher and a part time bakery.

The Braemar Caravan Park has and is providing more short term holiday provision so there is no identified need for this proposed development. The Youth Hostel is also now providing lower cost holiday accommodation and the Invercauld Arms is poised to become self catering holiday flats.

The ongoing issue with medical and emergency provision for such a remote rural community is of great concern and the drift is to a lesser service which can be impacted by new and numerous visitors each week to this proposed development.

5. Poor layout, mass and alignment

The proposed building is overbearing, visually intrusive, and out of keeping with surrounding properties. The original hotel was multi angled around the plot with its orientation running along the Northern and Western boundary and the restaurant extension was on the North side as a single storey.

The proposed design is much more blocky with an overbearing mass as it is aligned along the Northern boundary only. This arrangement overshadows the bowling green from any sunlight from the South. It also overshadows the unadopted 'track' that runs along the Northern boundary and will not receive any sunshine to melt the ice on the track in Winter. This is very different to the previous building orientation.

There is also the on going issue of the surface flooding which has taken place and poorly ameliorated by a drainage channel which will be covered over by the development which will continue to cause flooding to the neighbour on the Western boundary as well as surface water being dispersed towards the chalets on the Southern and Western boundary of the site which then flows into a drainage down to the River Clunie and into the River Dee Special Area of Conservation.

The granite that is proposed on the exterior of the building is welcomed and must be Conditioned if permission were to be granted. Too often, developers come back with a new application with a reduced specification and no granite eg New Kinrara application.

Granite sourcing is also unclear; local pale granite is no longer available, risking a mismatched appearance. This should not have been the case but the applicant demolished the Hotel without authorization and saved very little of the down-takings in the clandestine process of demolition.

6. Lack of parking provision and intrusive noise issues

Parking provision is inadequate and will compete with existing cabin users because only 16 car spaces are shown on the application and that is insufficient. The orientation of the building makes the parking provision both tight and messy.

No provision for active travel or cycle storage, contrary to Policy 3.

The potential noise impact from the air-source heat pump on vulnerable neighbouring residents is a very real issue in that the sound levels have still not been sufficiently reduced in these pumps particularly when one uses the low ambient noise levels in Braemar for comparison.

No thought appears to have been given to the neighbour to the North in a bungalow who has been subjected to fire damage, flooding and an untidy unsupervised site.

7. Community-Preferred Alternatives

The proposed holiday accommodation development in Braemar could be significantly enhanced by incorporating residential and affordable housing and is central to the broader vision of sustainable development. This solution is evidently suitable to the local circumstances of Braemar.

Conclusion

The proposal is not compatible with its surroundings and does not support sustainable community growth. It places further pressure on an already overstretched infrastructure and fails to meet key NPP4; CNPA LDP and Partnership Plan policy requirements. We therefore respectfully request that the Cairngorms National Park Authority REFUSE Planning Application 2026/0122/DET and seek a more appropriate proposal from the applicant.

Objection to Planning Application 2026/0122/DET – Summary

Thirteen serviced apartments, air-source heat pump and associated infrastructure
Former Braemar Lodge Hotel Site, Glenshee Road, Braemar

We wish to register our objection to the above application on the following grounds.

1. Conflict with Conservation Area and Local Development Plan
The site occupies a highly prominent position on the main A93 near the village entrance within the Braemar Conservation Area.

- The proposal does not conserve or enhance the area's distinctive built heritage, nor does it reinforce local character as required by the LDP and National Park Partnership Plan.

2. Overprovision of Visitor Accommodation
Braemar already has 42% of homes operating as second homes or holiday lets, alongside extensive existing and upcoming visitor accommodation.

- Additional serviced apartments are unnecessary and do not address local housing needs which are a priority

3. Insufficient Infrastructure to Support More Visitors

- Hospitality capacity is already stretched: limited restaurants, closure of the Bistro, and loss of the 80-seat Braemar Lodge Hotel restaurant to the fire on this site
- Limited retail food provision
- Public transport is poor, making car use unavoidable.

4. Pressure on Health and Emergency Services

- Increasing visitor numbers will place additional strain on progressively fragile services.

5. Inappropriate Design, Scale, and Orientation

- The proposed building is visually intrusive, and out of keeping with surrounding properties.
- Its orientation would block sunlight from the lane running to the north and the community bowling green, reducing usability.
- Granite sourcing is unclear; local pale granite is no longer available, risking a mismatched appearance

6. Parking, Transport, and Amenity Concerns

- Parking provision is inadequate and will compete with existing cabin users

- No provision for active travel or cycle storage, contrary to **Policy 3**.
- Potential noise impact from the air-source heat pump on vulnerable neighbouring resident.

Planning Application 2026/0122/DET – Erection of thirteen serviced apartments, installation of air source heat pump and associated infrastructure.

The Braemar Lodge Hotel, a former C listed building on Glenshee Road, Braemar, was demolished in 2022 following a severe fire.

Though historically significant and originally listed (ID: LB6275) for its late-19th-century architecture, the site was cleared for safety, leaving a vacant plot often described as a "lunar landscape". The building was demolished after the March 2022 fire, causing controversy due to its listed status and lack of prior demolition consent.

The site occupies a prominent position on the main A93 near the entrance to the village from the south and is an important part of the Braemar Conservation Area.

Page 145 of the **2021 Cairngorms Local Development Plan** (LDP) contains the Braemar Settlement objectives which include:

- Conserve and enhance Braemar's distinctive built heritage and the integrity of its Conservation Area
- Deliver housing to meet local needs particularly affordable housing

2.3 of the LDP Vision states:

- "the special qualities of the Park are protected from development that would significantly erode or harm them, and are enhanced by new development where possible;
- new development helps to reinforce the valued built heritage of the Park and the communities within it;
- new or improved visitor infrastructure is supported where appropriate and integrated with other visitor sites, services and communities;

- new development is well connected to core paths and other off-road routes, as well as creating attractive places to live and visit;
- there is sufficient land for housing to meet identified need and demand, including for inward migration of workers;
- more affordable housing is provided to support growth in the working age population and help address the housing pressures faced by young people"

It is against the backdrop of the above that we jointly submit this objection to the application.

Whilst we accept that on paper this application may support the principles of **Policy 2: Supporting Economic Growth**, in practice it just doesn't work and is not appropriate.

Why not? Braemar has a considerable number of short term let properties – 42% of the housing is either second homes or holiday houses (the majority of which are large granite houses not suitable and too expensive for young families) , the Braemar Youth Hostel is back up and running, Invercauld Caravan Park has recently had planning permission granted, by CNPA, for added pods and caravans, work has begun on the Invercauld Arms Hotel (serviced flats), there are three B&Bs, a bunk house, more accommodation at Mar Lodge and of course the Fife Arms Hotel attracts high end visitors.

To cater for all these 'beds', we have: a chip shop, Farquharson's Bar, The Fife Arms' Clunie Dining Room and the Flying Stag and during the day, Gordons' Tea Room and the Bothy. The Bistro has closed and now houses the Chocolate Shop. With the fire at Braemar Lodge Hotel, we lost an 80-seater (very popular) restaurant. The village simply does not have the facilities to cater for the visitors we already have, let alone the additional twenty-six people this application proposes to bring to the village.

Allowing more self-catering visitor beds will certainly not achieve the Partnership Plan's high quality visitor experience ambition – we already hear complaints from visitors about the lack of restaurants in the immediate vicinity.

This very remote, rural community has a butcher, a part-time (weekend) bakery and a fairly basic food shop (Greens). People on holiday do not always want to cook in unfamiliar kitchens without their wished for ingredients that aren't available in the village shop, they want (at least some of the time) to eat food cooked by someone else and have fun.

The outcome for 'Place' in the Partnership Plan is "A place that people want to live in, work in and visit that works for all" and for visitors that means "Visitors choose to stay longer and travel at different times of year, supported by improved infrastructure". If they can't find places to eat out and have to rely on basic self-catering, why should they stay longer? If they bring their food with them or have a supermarket delivery, that does not contribute to the local economy.

The nearest ambulance is in Ballater and when available (and adequately crewed) has to travel seventeen miles up to Braemar (a 27-minute journey), stabilise the patient and then double back on itself to commence the sixty-mile (one and a quarter hour) journey to Aberdeen Royal Infirmary. Long waits for ambulance responses are certainly not unknown here. Our GP is on-call from Monday 8am to Wednesday 6pm, thereafter we are at the mercy of NHS24, and our GP is expected to announce his retirement in the not-too-distant future; the future of primary care here where we have an aging demographic is of utmost concern.

Public transport is poor and expensive.

While the National Park Partnership Plan's objective is "to stabilise visitor numbers in the peak season, focusing growth on quieter months" Braemar is at capacity and is not an area that has "the infrastructure and capacity to accommodate additional visitors". In short, our infrastructure is under considerable strain, particularly when potentially adding even more over-night visitors.

This application is not needed to contribute "to the provision of a wider range of accommodation options within the" village, as it replicates what we already have without alleviating existing pressures **(4.35)**

4.30 states: All proposals must be appropriate and compatible with their surroundings and contribute to supporting a year-round economy."

4.42 "Proposals must be compatible or complementary to existing businesses in the area, and it should be demonstrated how this will be achieved. Proposals must also support the vitality and viability of the local and wider economy."

We will comment on appropriateness and compatibility under the next Policy but fail to see how the proposal supports a year-round economy in any meaningful way in a community with over-night visitor resources already stretched.

Policy 3: Design and Placemaking: The assertion made in the Design Statement that "The proposal will largely occupy the footprint of the previous lodge building, and will be orientated in the same manner, addressing the lane to the north and the access from Glenshee Road to the east, with the formal front facade overlooking the central green space" is somewhat disingenuous.

The old hotel (three doubles, two twins and two singles = 12 visitors), was not a large, severe barrack/prison style building providing beds for 26 visitors. A former Victorian Sporting Lodge, it was a hotel of considerable character and charm, with a family air that welcomed everyone.

Description

Late 19th century. Large 2-storey irregular plan lodge with later additions. Former shooting lodge now in use as hotel. Set in own grounds on main approach to village from S. Squared and pinned granite. Overhanging eaves, plain bargeboards. S (principal) elevation comprising advanced central gabled projection with canted angles corbelled to square gablehead. Canted bay window to left, single window to gable above. Projecting 2-storey angled bay to right and with bipartite windows to ground floor. Large 20th century gabled addition to N.

Timber sash and case windows, predominantly multi-pane to ground floor, 4-pane to 1st floor. Deep eaves with projecting rafters. Grey slate, gable stacks with octagonal chimney cans.

INTERIOR: admission not possible at time of site visit (December 2005).

Statement of Special Interest

One of the larger buildings in the village, the building has interesting architectural features, notably corbelling to the square gable, and the projecting angled bays. The lodge displays traditional architectural characteristics of the area, such as the use of granite, timber and slate. The building has retained its unusual external appearance despite later additions to the W and N.

Historic Scotland



South elevation of the Hotel



South Elevation (Front) NTS

The proposed building

The very popular 80-seat singe storey restaurant addition, that received planning permission from the CNPA, ran down the side of the lane on the north of the site (see below) but did not dominate as the scale of this proposed design threatens to do.





This would face the lane on the right of the picture blocking out sun

Siting this building parallel to the narrow lane would block (sun)light from the bowling green on the opposite side. The green is well used by the community, young and old. The lane itself is an unadopted ‘road’ and receives no winter maintenance from Aberdeenshire Council. Used by many as a short cut from the east and south of the village to Balnellan Road (and vice versa) by dog walkers, tourists and locals alike, there is a risk of falls during icy weather if sunlight is not able to permeate through. This is potentially contrary to the partnership plan objectives to encourage health and wellbeing improvement through access to nature and the outdoors.

As a neighbours to the burned-out site, we welcome that at last there is some indication that the on-site mess might be cleared up.

We say ‘might’ because previous attempt to sell off the part of the site on which the hotel stood at numerous auctions have proved fruitless and there are concerns that these plans are simply a ruse to make a sale more attractive.

The solid bulk of the design does not fit easily with other properties in the immediate location and does nothing to reinforce the built heritage of this village, particularly given that it seeks to replace a formally listed building of a design that sat comfortably in its surroundings, forming an important part of the Conservation Area **(Policy 9 Cultural Heritage 9.3)**

The number of parking spaces proposed within the site will compete with visitors to the cabins on the same site. Public transport is generally poor in the area and expensive, with no train station closer that Aberdeen or Perth. However much we would like to discourage car use, for the majority of visitors there is simply no alternative. Many families have large SUVs; the cabins also have cars arriving. Our surrounding streets are narrow and formalised parking spaces at a premium.

Policy 3 - 3.3f Sustainable Design: There is no mention in the application of – and indeed no space for - “promoting sustainable transport methods and active travel, including making provision for the storage of bicycles and reducing the need to travel” (Relevant partnership plan objectives: A1, B7, B9, B10, C4, C5, C6, C7 and C9 Active Communities.)

The design statements states that the building will be granite stone walling with lime mortar. Where will the granite be sourced? All the local 19th Century vernacular buildings are built with pale coloured local granite, which is no longer available, thus risking this new build standing out like a sore thumb both in terms of scale and colour/appearance. Some examples of the colour are shown below



Callater Lodge opposite the hotel site



School Road, Braemar



St. Margarets, Braemar



Castleton Hall, Braemar

All too frequently, the high-quality designs and materials promised by developers during the planning phase, are compromised by the time construction is finished. Given the continual rise in building costs, we are fearful that, if permission is granted, the final outcome for the village and our Conservation Area may prove to be even less satisfactory than currently proposed. We have already heard comments along the lines of “Victorian Correctional Institution’….

We have concerns about the siting of the heat pump and wonder whether Aberdeenshire Council’s Environmental Health Team might consider that vibrations and noise from such a necessarily large pump’s fans and compressors (or the low-frequency hum often produced by heat pumps) would cause annoyance to the elderly neighbour living right next door (west) to the proposed site (and to others beyond?). This may happen even when the headline noise level planning requirements have been met.

We would wish to point out that there is no mention in this application of the boundary wall between Ellendale on the west and the site in question which formed a considerable part of retrospective Planning Application APP/2023/2017. This is indicative of the apparent disregard shown by the applicant’s ‘team’ towards their immediate neighbour since the day of the fire when his home also caught fire and he was forced out for months, losing valued possessions.

Following the previous incident, this resident’s home suffered flooding as a direct result of unchecked activities on the applicant’s land, necessitating further retrospective planning and corrective measures. We are keen to avoid additional hardship and needless disturbance for this longstanding member of our community, whose quality of life is already at risk of being severely affected by ongoing construction. The guiding principle of the Partnership Plan advocates for creating places where people genuinely wish to reside—spaces that serve everyone’s needs. Yet, this proposal fails to consider the consequences of erecting a substantial building at a higher elevation than Ellendale, which would to some degree overlook his property with windows and the Manager’s main entrance in close proximity, further compromising his living environment.

Policy 3 - 4.48: “The distinctive character and identity of the Cairngorms National Park’s natural and built heritage and settlements contribute to the qualities that make it special. The contribution that built development makes to our sense of place and quality of life is important to those who live and

work in and visit the National Park. Good design and placemaking is key to achieving development fit for a National Park."

In our view this application does not meet that standard. It does not contribute positively to the sense of place or complement local features; it certainly does not support the retention and enhancement of local character and does nothing to encourage active travel.

We believe this proposal is unsuitable and fails to meet the required standards of design, nor does it promote sustainable economic development or maintain the vibrancy and sustainability of our community. Our existing infrastructure is already under strain, additional short-term let properties will only exacerbate these pressures.

Accordingly, we strongly urge the CNPA Planners to recommend the Planning Committee reject this application on the basis of the policy issues outlined above.

Simon Blackett *Tom Peggy* *Gareth Guy*

[redacted]

Annabel Blackett *Wayne & Heather* *David Rudge*

[redacted]

PS: We believe that a significant number of local residents would favour a proposal for a modest, affordable housing development, aimed at increasing our much-needed working age population. Ideally, such a scheme would be considerate of the site's size, aligning with **Objective C1 – Place** of the Park Authority's Partnership Plan.

Alternatively, suggestions for a restaurant that promotes and supports sustainable tourism would also be welcomed, though issues surrounding accommodation and staff recruitment would need to be addressed—perhaps by removing the neighbouring cabins and replacing them with suitably sized staff accommodation; supporting **Objective C4 - Place**

Outlook

serviced appartments, Braemar (Lodge Hotel) - APP/2026/0579 - called in by CNPA

From sandra geddes [redacted]
Date Wed 2026-04-22 14:09
To Planning <planning@aberdeenshire.gov.uk>

[redacted]

Dear Planning,

I wish you to know that locals in Braemar are NOT happy with the approval of serviced appartments where Braemar Lodge Hotel, Braemar used to be. The drawing of this plans looks like a Travel Lodge, is NOT inkeeping with the rest of the village. The Hotel WAS A
listed building, and as such the NEW building should have a frontage like the old.

Where are people going to EAT from these appartments. The Lodge used to have a 90 seat restaurant? The village has ONE restaurant in Farquharsons in evening & The Fife Arms Hotel.
People who are ON HOLIDAY, DO NOT WANT TO COOK.

Where are people going to PARK? We already have a parking problem ongoing!!

The pages to your objection is 40 long, you do not make it easy, but maybe thats the idea., hence this email.
yours Sandra Stewart, [redacted]

Outlook

Braemar Lodge: 2026/0122/DET [CJO-IMANAGECLOUD.FID43050]

From Mark Granger [redacted]
Date Fri 2026-05-01 14:50
To Planning <Planning@cairngorms.co.uk>

I write further to my conversation with Emma in the Planning Department, during which I advised her that I had completed an online Objection to the above application, but that when I had to register my name and other details, the Password part of the process wouldn't work and so it didn't allow me to submit my Objection. Emma suggested that I put the Objection into an email and it would then be posted by the Planning Department. The Objection is as follows:

Site: Braemar Lodge, 6 Glenshee Road, Braemar
Application Reference No.: 2026/0122/DET

My name is Mark Granger, and I am a Trustee owner of a property [redacted] that is a neighbouring property to the site of the former Braemar Lodge Hotel, the subject of the current planning application for thirteen apartments.

The owners of [redacted] Object to the planning application, and in so doing, support the Objection submitted by Mr Simon Blackett and others.

If you have any questions about this Objection, please do not hesitate to contact me.

Best wishes

Mark Granger.
Mark Granger FRICS
Consultant

Carter Jonas

T: 020 7518 3218 | M: 07801 375974 | **carterjonas.co.uk**
Regent House, 13-15 Albert Street, Harrogate, HG1 1JX



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Place of Registration: England and Wales
Registration Number: OC304417
Address of Registered Office: One Chapel Place, London, W1G 0BG.

Objection to Planning Application 2026/0122/DET
Thirteen serviced apartments, air-source heat pump and associated infrastructure on the site of the former Braemar Lodge Hotel Site, Glenshee Road, Braemar.

On behalf of the Cairngorms Campaign (Company No. SC179159) I wish to object to this application. Our grounds for our objection include:

1. The proposed development does not preserve or enhance the character or appearance of the Braemar Conservation Area. Reasons:
   - Although there is a token gesture or inclusion of one bay window in the design, the overall unimaginative long block shape and size of the building are not in context with surrounding buildings and would stand out like a 'sore thumb'. It needs to be recognised that this site is in a prominent position at the entrance to Braemar from the south. This building, as designed, will significantly detract from the character and appearance of the Braemar Conservation Area. Additionally, as has been stated by another objector, the height and position of the proposed building will shade the lane immediately to the north of the site and the village bowling green.
   - Although it is proposed to use granite in the elevations of the building, the source of granite has not been identified. Use of a different type/shade of granite from that used in neighbouring buildings would detract from the character of the Conservation Area. This has been pointed out in the Aberdeenshire Built Heritage response.

   This proposed development does not meet the requirements of NPF4 Policies 7 and 14 or CNPA LDP Policies 3 and 9.

2. The proposed development application claims to support economic growth, however, unless the problems of affordable accommodation and strains on local infrastructure are addressed, economic growth will be limited and an excellent opportunity to address the lack of affordable accommodation will be missed.

   It has been stated that 42% of existing housing is either second homes or holiday lets. More holiday accommodation in the local area is happening or in the pipeline with the growth of the local caravan park and the conversion of the currently closed Invercauld Arms Hotel into self-catering holiday lets. Local objectors are pointing out that the village infrastructure in shops and restaurants etc. is already strained. It is understood that affordable accommodation for local workers is very difficult and that even the Fife Arms has had to invest in purchasing local housing to accommodate and retain many of its staff.

   The CNPA recognises that, "The availability of housing, and in particular affordable housing, is one of the major issues faced by the communities of the Cairngorms National Park" and this is expected to be a key feature in the next LDP. This vacant site presents an ideal opportunity to address the local affordable housing issue by

accommodating a significant amount of protected affordable housing as part of any new development on this site.

Consequently, despite what the applicant claims in their Planning Statement, this application does not meet CNPA LDP Policy 2 as this development is not sustainable given the current economic pressures and constraints within Braemar (lack of affordable housing and support facilities).

The application also does not meet certain important aspects of NPF4 Policy 30, namely:
- Compatibility with the surrounding area in terms of the nature and scale of the activity and impacts of increased visitors
- Impacts on communities, for example by hindering the provision of homes and services for local people

Despite the provision of a manager's apartment within the proposed development, it is clear that approval of this application will be detrimental to Braemar by adding to the self-catering accommodation, without addressing the issues of affordable housing or lack of support facilities.

Lastly, the applicant claims in para 4.34 of their Planning Statement that there is an accompanying Economic Statement prepared by the Tourism Resources Company which addresses these issues, but no such document can be found. If such a document does exist, it needs to be published and, importantly, the public need an opportunity to comment on its contents before any decision on this application is made.

It is appreciated that this site currently does not have a housing use within the current LDP, and that this will be emphasised by the applicant. It needs to be recognised that the existing LDP is already well out of date and clearly could not have predicted the loss of the former hotel through fire. However, there are sufficient grounds for rejection of this application in its current form which should then open up a dialogue on a new mixed use application which would provide at least a mix of affordable housing (say a minimum of 50%) and the rest being self-catering apartments, in addition to addressing the objections on the out-of-character design of the building within the Conservation Area.

The Cairngorms Campaign request that this application be rejected and that a real dialogue, involving local people including the Community Counsil, be started to develop an acceptable proposal for the development of this important site in Braemar.

Important Addendum

The above objection focusses on the main technical reasons for rejecting this planning application. However, there is an important issue of local democracy which needs to be

emphasised and given real consideration by the CNPA Planning Committee. Although this proposed development is not a "major development" in planning terms, given the character and size of the village of Braemar, in local terms this is a major development and if the CNPA believes in local democracy, then the Planning Committee needs to consider not just the technical issues, but whether the local community has been involved enough in the development of this application.

From the evidence presented in the published planning documents, it is clear that there are numerous local objections to this application, including objections from very knowledgeable persons with experience and a clear objection from the Community Council. It would appear that the applicant made a token gesture appearance in front of the Community Council, and then totally ignored what the Community Council said to the applicant. What should have happened is that at the earliest opportunity, the applicant should have consulted the local community on the problems and issues and what they would like to see developed on this important site. That then should have been worked up into a draft proposal which met most of the viable ideas which then should have been taken to the planning authority for detailed discussion. Another problem which seems to have arisen in this case is that the consultation with the planning authority was in the main with Aberdeenshire Council and not with CNPA, despite it being a forgone conclusion that CNPA would call-in this application.

These are important procedural matters which are currently not mandatory, and thus the developer/applicant is likely to just carry out the minimum. If the CNPA wishes to be closer to the people of the National Park and support local democracy, then these issues should not just be considered by the Planning Committee, but with the CNPA Main Board and recommendations implemented within the LDP that is under development.

The Cairngorms Campaign request that this issue is highlighted in the planner's report to the Planning Committee with a recommendation that it is discussed when this application comes to Committee for decision.

Yours faithfully

[redacted]

Dr Gordon Bulloch

on behalf of the Cairngorms Campaign

Supplementary Objection to Planning Application 2026/0122/DET
Erection of 12 serviced apartments and a manager's apartment (13 apartments in total), installation of associated infrastructure at Braemar Lodge, 6 Glenshee Road, Braemar, Aberdeenshire.

On behalf of the Cairngorms Campaign (Company No. SC179159) I wish to object to this application. Firstly, I note that many of the words in the published version of my first objection (dated 11 May 2026 on the planning portal) appear to have been corrupted from the original that I submitted. I request that this is corrected.

Our grounds for this supplementary objection include:

1. Despite there being some movement on reducing the height and shape of the proposed building, this proposed building still presents a considerably large visual impact compared with the former building which was destroyed by fire. Consequently, our objection that the proposed development does not preserve or enhance the character or appearance of the Braemar Conservation Area still stand.
2. There does not seem to have been any attempt to answer the objection we and others had that this development does not address a key issue that CNPA recognises that, "The availability of housing, and in particular affordable housing, is one of the major issues faced by the communities of the Cairngorms National Park". This is a particular problem in Braemar. Thus, I repeat that despite what the applicant claims in their Planning Statement, this application does not meet CNPA LDP Policy 2 as this development is not sustainable given the current economic pressures and constraints within Braemar (lack of affordable housing and support facilities). The applicant claims in para 4.34 of their Planning Statement that there is an accompanying Economic Statement prepared by the Tourism Resources Company which addresses these issues, but despite the delays since May 2026, still no such document can be found. Does this document exist? If yes, why hasn't CNPA Planning insisted that it be published?
3. In our original objection, we commented that there seemed to be a lack of real dialogue with the local community about the impact of the proposed facilities. There is no evidence presented in the supplementary documents of any meaningful public consultation on the revised proposals. If this is the case, it is a real missed opportunity to listen and maybe further modify the application to meet and gain more local support.
4. In the notification received from CNPA Planning, it was stated that air source heat pumps as the form of heating had been removed. However, I cannot find any information as to why, and also what form of heating is now being proposed. Any new building should meet sustainable insultation and energy requirements. It is appreciated that much of this is usually covered by the Building Warrant, but as this change has been highlighted by CNPA in the planning process some information should be made available.

5. Concerning the new landscape proposals, we agree with the recommendations made by CNPA's own Planning Ecological Advice Officer report dated 7 September 2026. In addition, we also advise that some of the shrubs and herbaceous perennials will not be hardy enough for the cold winter temperatures experienced in Braemar. E.g Hydrangea Macrophylia will not flower, and Choysia Ternata, Kniphophia 'Royal Standard' and Hebe Sutherlandii are unlikely to survive. These are further reasons for not adopting the proposed new landscaping scheme and complying with the Planning Ecological Advice Officer report recommendations.

For these reasons, and the reasons listed in our original objection, the Cairngorms Campaign request that this application be rejected and that a real dialogue, involving local people including the Community Counsil, be started to develop an acceptable proposal for the development of this important site in Braemar.

Yours faithfully



Dr Gordon Bulloch

on behalf of the Cairngorms Campaign