



Agenda item 5

Appendix 2

2025/0242/DET

Habitats regulations appraisal

HABITATS REGULATIONS APPRAISAL

Planning reference and proposal information	2025/0242/DET Change of use of land to form extension to existing caravan site including formation of 18 motorhome pitches and 6 static caravan pitches, timber boardwalk to connect with existing path and associated works and landscaping. Invercauld Caravan Park Glenshee Road Braemar AB35 5YQ
Appraised by	Scott Shanks, Ecological Advice Officer (Planning)
Date	21 November 2025
Checked by	Fiona Mutch NatureScot Operations Officer - North
Date	05 December 2025

INFORMATION

European site details

Name of European site(s) potentially affected

1) River Dee SAC (adjacent to proposed development)

2) Ballochbuie SPA (approximately 1.25km from proposed development)

Elements of the proposed development are within 1.25 km of the **Cairngorms Massif SPA**, which is designated for golden eagle. However, the habitats present within the development site are unsuitable for golden eagle, and **so this site has been scoped out**.

Elements of the proposed development are within 1.25 km of the **Ballochbuie SAC** which is designated for Blanket bog, Bog woodland, Plants in crevices on base-rich rocks, Caledonian forest, Dry heaths, Otter, Wet heathland with cross-leaved heath and Plants in crevices on acid rocks. However, it is considered that there is no connectivity between the qualifying habitat features of the SAC and the project site, and **so this site has been scoped out**. Otter is considered in the River Dee SAC appraisal.

Elements of the proposed development are within 700m of **Morrone Birkwood SAC** which is designated for base-rich fens, alpine and subalpine heaths, high-altitude plant communities associated with areas of water seepage, juniper on heaths or calcareous grasslands, hard-water springs depositing lime, dry grasslands and scrublands on chalk or limestone, and Greyer's whorl snail. However, it is considered that there is no connectivity between the qualifying features of the SAC and the project site, and **so this site has been scoped out**.

Qualifying interest(s)

1) River Dee SAC

- Otter
- Freshwater pearl mussel
- Atlantic salmon

2) Ballochbuie SPA

- Capercaillie
- Scottish Crossbill (Breeding)

Conservation objectives for qualifying interests

1) River Dee SAC

Conservation Objective 2. To ensure that the integrity of River Dee SAC is restored by meeting objectives 2a, 2b and 2c for each qualifying features (and 2d for freshwater pearl mussel)

- 2b. Restore the distribution of **freshwater pearl mussel** throughout the site
- 2c. Restore the habitats supporting **freshwater pearl mussel** within the site and availability of food

2d. Restore the distribution and viability of **freshwater pearl mussel** host species and their supporting habitats

2a. Restore the population of **freshwater pearl mussel** as a viable component of the site

2b. Restore the distribution of **Atlantic salmon** throughout the site

2c. Restore the habitats supporting **Atlantic salmon** within the site and availability of food

2a. Restore the population of **Atlantic salmon**, including range of genetic types, as a viable component of the site

2b. Maintain the distribution of **otter** throughout the site

2c. Maintain the habitats supporting **otter** within the site and availability of food

2a. Maintain the population of **otter** as a viable component of the site

Conservation Objective 1. To ensure that the qualifying features of the River Dee SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status

2) Ballochbuie SPA

To avoid deterioration of the habitats of the **qualifying species (capercaillie and Scottish crossbill)** or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained;

AND

To ensure for the qualifying species that the following are maintained in the long term:

-Population of the species as a viable component of the site

-Distribution of the species within site

-Distribution and extent of habitats supporting the species

-Structure, function and supporting processes of habitats supporting the species

-No significant disturbance of the species

APPRAISAL

STAGE 1:

What is the plan or project?

Relevant summary details of proposal (including location, timing, methods, etc)

Change of use of land to form extension to existing caravan site including formation of 18 motorhome pitches and 6 static caravan pitches. The proposal also includes installation of a timber boardwalk to connect with an existing path along with associated works and landscaping.

The location is semi-improved neutral grassland adjacent to Invercauld Caravan Park, Glenshee Road, Braemar, AB35 5YQ.

The proposal will include the felling of 9 mature trees on site to be mitigated with extensive compensatory planting of native trees within the development and the surrounding land.

STAGE 2:

Is the plan or project directly connected with or necessary for the management of the European site for nature conservation?

1) River Dee SAC

No, this project is not directly connected with or necessary for the management of the European site for nature conservation

2) Ballochbuie SPA

No, this project is not directly connected with or necessary for the management of the European site for nature conservation.

STAGE 3:

Is the plan or project (either alone or in-combination with other plans or projects) likely to have a significant effect on the site(s)?

1) River Dee SAC

Freshwater pearl mussel and Atlantic salmon: **YES, there will be a LSE.** The application proposes a new crossing over a tributary of the Clunie Water which is part the River Dee SAC and has the potential to lead to a pollution event e.g. silt or fuels entering the watercourse which has the potential to impact on populations of salmon and mussels. Potential short-term effects could rise from the changes in water quality or longer-term impacts from smothering of juvenile FWPMmussels and suitable breeding habitats downstream of the works.

Otter: **Yes, there will be a LSE** from short-term effects arising during construction activity. It is unlikely that there.

2) Ballochbuie SPA

Capercaillie: **Yes, LSE.** While the habitats present within the proposed development site are

unsuitable for capercaillie, the development will increase capacity for visitors to the area. There is potential for increased disturbance from use of the existing path network to access the western edge of Ballochbuie SPA for recreation.

Scottish crossbill: No LSE, as the habitats present within the development site are unsuitable for Scottish crossbill there is no connectivity between this qualifying feature and the project site, and so **this qualifying interest has been scoped out from further consideration.**

STAGE 4:

Undertake an Appropriate Assessment of the implications for the site(s) in view of the(ir) conservation objectives

I) River Dee SAC

Conservation Objective 2. To ensure that the integrity of River Dee SAC is restored by meeting objectives 2a, 2b and 2c for each qualifying features (and 2d for freshwater pearl mussel)

2b. Restore the distribution of Atlantic salmon and freshwater pearl mussel throughout the site

No works are proposed within the channel of the Clunie Water or its tributaries (part of the River Dee SAC), so there will be no direct loss of suitable habitat for these species within the River Dee SAC. Therefore, the current and potential distribution of these species would not be directly impacted upon.

However, construction activity is proposed on the banks of a designated tributary of the Clunie Water, including the translocation/ installation of a crossing point to connect with a new board. Therefore there is potential for indirect impacts from construction activities, e.g., sediment or fuels entering the watercourse. These potential pollution events could cause a change in the distribution to change due to changes in water quality (temporary) and, if significant amounts of sediment reach the watercourse, through smothering of habitats which are used by Atlantic salmon for spawning/juveniles and habitats suitable for supporting FWPM (long term).

Timing of works to avoid the key Atlantic salmon spawning period (mid-October to end of February) would reduce the risk of pollution or sediment impacting Atlantic salmon during this sensitive time.

A pollution prevention plan is recommended through condition. The pollution prevention plan should include standard good practice, such as maintaining a minimum 30 m buffer for storing chemicals/wash out or any other potential polluting activity (SEPA WAT-SG-75). Other relevant Guidance for Pollution Documents should also be referred to and implemented on site (i.e. GPP5, GPP8, GPP21, GPP22¹) If a pollution prevention plan is conditioned and implemented - this conservation objective would be met.

If a pollution prevention plan is conditioned and implemented this conservation objective would be met.

¹ [Guidance for Pollution Prevention \(GPP\) documents | NetRegs | Environmental guidance for your business in Northern Ireland & Scotland](#)

2c. Restore the habitats supporting Atlantic salmon and freshwater pearl mussel within the site and availability of food

The current distribution of habitats supporting Atlantic salmon and FWPM within the SAC would not be directly affected as no development will occur within the watercourse. The potential for restoring habitats supporting Atlantic salmon and freshwater pearl mussel would not be directly affected by this development. However, pollution from construction activities next to a tributary of the Clunie Water could potentially affect supporting habitats if significant amounts of sediment are mobilised and cause smothering of habitats, reducing the distribution and extent of habitat suitable for salmon spawning and juvenile salmon, and habitats suitable for FWPM (long term).

However, mitigation measures identified for 2b above would reduce the risk of pollution reaching the watercourse to a minimal level and so this conservation objective would be met.

2d. Restore the distribution and viability of freshwater pearl mussel host species and their supporting habitats

The distribution and viability of FWPM host species (Atlantic salmon and other salmonids) would not be directly affected, as no work will be undertaken within the channel of the Clunie Water and its tributaries. However, as discussed in 2b & 2c, there is potential for pollution from construction activities to indirectly affect the habitats supporting these species which may in turn lead to a change in distribution or in change in health of FWPM host species. However, with the implementation of the mitigation measures mentioned in 2b the risk of pollution events therefore the development would not hinder the distribution or vitality of the host species.

2a. Restore the population of Atlantic salmon and freshwater pearl mussel as a viable component of the site

As the other conservation objectives can be met for Atlantic salmon and FWPM with mitigation, the proposed development would not hinder or prevent the restoration of the population of Atlantic salmon or FWPM as viable components of site. However, the proposed development will not have an impact on the genetic types of salmon. Therefore, this conservation objective would be met.

2b. Maintain the distribution of otter throughout the site

Construction activities are proposed next to a tributary of the Clunie Water, which is designated tributary of the River Dee SAC. The Clunie Water and surrounding watercourses are known to support otter ([Lutra lutra : Otter | NBN Atlas](#)). An Extended Phase I and Protected Species Ecology Survey was undertaken by Tay Ecology in July and August 2024. No otters, otter signs, holts or couches were detected within a 250m buffer around the proposed development. The lack of suitable otter resting areas and otter signs within 250m of the development boundary would suggest that this is not a priority area for otter, however, foraging otter may occasionally use this

site.

During the construction phase, otter may be temporarily inhibited from foraging close to the site. Otters can have very large home ranges of around 32km for males and 20km for females ([Otter | NatureScot](#)), and therefore temporary construction work at this location is unlikely to result in significant impact on foraging otter. Due to the proximity of the proposed works to suitable otter habitat, mitigation measures for this species should be considered in a species protection plan as part of a Construction Environmental Management Plan. A number of suitable mitigation measures for otter have been suggested in the Extended Phase I and Protected Species Ecology Survey report (Tay Ecology, August 2024).

If a species protection plan is conditioned and implemented, this conservation objective would be met.

2c. Maintain the habitats supporting otter within the site and availability of food

No holts or resting areas were detected during a protected species survey in 2024 (Ref: Tay Ecology, August 2024), but otters may forage within the Clunie Water tributary close to the development. No construction activities are proposed within the tributary of the Clunie Water, so there should be no direct loss of habitats supporting otter within the site.

Implementation of mitigation measures discussed for Atlantic salmon and freshwater pearl mussel to minimise the construction-phase risks of disturbance to spawning Atlantic salmon (otter prey species), and the mobilisation of sediment and pollution, and the spread of disease that could impact otter prey species will ensure that this conservation objective would be met.

2a. Maintain the population of otter as a viable component of the site

As the other conservation objectives can be met for otter with the mitigation included in the proposal, the proposed development would not hinder or prevent the maintenance of the population of otter as a viable component of site.

Conservation Objective 1. To ensure that the qualifying features of the River Dee SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status

As all the other conservation objectives would be met, the proposed development would not prevent or hinder the condition or conservation status of the qualifying interests of the SAC, and so this conservation objective would be met.

In conclusion, the proposed mitigation measures (timing of the works to avoid the Atlantic salmon spawning season and the inclusion of sediment and pollution management measures in Pollution Prevention Plan (PPP) as part of a Construction Environment Management Plan (CEMP), combined with pre-construction checks for protected species including otter should reduce the potential effects to a minimal level, so that all the conservation objectives can be met for the River Dee SAC.

2) Ballochbuie SPA

To avoid deterioration of the habitats of the **capercaillie** (Note: Scottish crossbill was scoped out of further consideration at Stage 3) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained;

AND

Distribution of the species within site

The proposed development is not expected to increase any off-path activity throughout the site, therefore the distribution of the species is not expected to be impacted upon. It is considered likely that this conservation objective will be met. **See Annex I for full assessment.**

Distribution and extent of habitats supporting the species

There will be no development within the SPA. The proposed development is approximately 1.25 km from the western edge of the SPA, and does not contain habitat suitable for capercaillie. Therefore, there will be no direct impacts from this development on the distribution and extent of habitats supporting Capercaillie within and surrounding the SPA. Therefore, it is considered likely that this conservation objective will be met.

Structure, function and supporting processes of habitats supporting the species

The proposed development is approximately 1.25 km from the western edge of the SPA, with no direct connectivity with the SPA. There will be no impacts on the structure, function and supporting processes of habitats associated with the site as a result of this development. Therefore, it is considered likely that this conservation objective will be met.

No significant disturbance of the species

The proposed development is unlikely to lead to a significant increase in disturbance of capercaillie within Ballochbuie SPA. **See assessment in Annex I.** Therefore, it is considered likely that this conservation objective will be met.

Population of the species as a viable component of the site

As the other conservation objectives will be met, the population of capercaillie should not be adversely affected therefore this conservation objective will be met.

STAGE 5:

Can it be ascertained that there will not be an adverse effect on site integrity?

I) River Dee SAC

Yes, provided the mitigation measures included in the planning application are secured by condition and implemented, then the conservation objectives will be met and therefore there will not be an adverse effect on site integrity for the River Dee SAC. The mitigation measures that require to be secured by condition are:

- Prior to ground preparation or construction works, a pre-construction protected species survey of the proposed development site and surrounding area should be carried out by a suitably experienced surveyor following NatureScot guidance ([Planning and development: standing advice and guidance documents | NatureScot](#)). If evidence of any protected species is found a Species Protection Plan identifying appropriate mitigation measures based on the survey results such be submitted to CNPA for agreement in writing prior to works commencing. The reason for this measure is to minimise the risk of construction phase impacts on protected species.
- Timing of the works to avoid the Atlantic salmon spawning season (mid-October to February)- to minimise impacts on qualifying interests of the River Dee SAC.
- Mitigation measures detailed in the Design Method Statement (dated 19th May 2025) and the Species Protection Plan (dated 27th May 2025) should be implemented in full. In particular, the pollution prevention and control measures to prevent excess silt and sediment entering the River Dee during construction. The reason for this condition is to avoid pollution or mobilised sediments negatively impacting Atlantic salmon and the population of FWPM downstream of the site, within the River Dee SAC.

2) Ballochbuie SPA

Yes, it can be ascertained that there wil not be an adverse effect on the integrity of this site as a result of the development. No additional mitigation measures are required in relation to this site.

Annex I Capercaillie Assessment: 2025/0242/DET – Invercauld Caravan Park Extension, Braemar

<p>Q1. Is the proposed development likely to change levels of human activity or patterns of recreation around the proposed development/associated settlement?</p> <p><i>Q1: This and Q2 are included as screening questions to filter out any developments that aren't likely to have changed levels or patterns of recreation.</i></p>	<p>Yes, there may be a small increase in the levels of human activity on footpaths and routes closest to the development.</p> <p>The western edge of Ballochbuie SPA is located approximately 1.25km east of the proposed Invercauld caravan site extension. It is approximately 2km by foot or bike from the caravan park to the western edge of the SPA.</p> <p>There are a number of paths from Braemar up Corrie Feragie to Creag Choinnch on the western edge of Ballochbuie SPA, but there is limited connectivity with the rest of Ballochbuie Forest/Ballochbuie SPA via this route.</p> <p>The Cairngorms National Park Local Development Plan (2021) states that in 2020 Braemar had a population of 536. The LDP projected a -5% population decrease for Braemar by the end of 2029, down to 511.</p> <p>The proposal is to provide space for 18 campervans and 6 static caravans. Assuming that the proposed site is at full occupancy all year round with 2 people in each static caravan and campervan that could be an additional 48 people in the area. This would equate to an approximate increase of 8.9% on the 2020 population. Taking account of the projected population declines, this development would result in a 3.9% increase in population.</p> <p>The development is approximately 2km/ 30 minutes by foot from the SPA. It is considered unlikely that all users of the development would undertake regular recreational activity within Ballochbuie Forest/ Ballochbuie SPA, and therefore it is considered unlikely that there will be a detectable change in levels or patterns of recreation in the woodland as a result of the development.</p>
<p>Q2. Are capercaillie woods significantly more accessible from this development site than from other parts of the associated settlement?</p>	<p>No, Ballochbuie Forest/ Ballochbuie SPA is not significantly more accessible from this development site than from other parts of Braemar.</p>

<p><i>Q2: This is included to ensure the effect of otherwise small-scale development sites particularly close to capercaillie woods are adequately considered.</i></p> <p><i>Evidence from settlements in Strathspey where houses are adjacent to woodlands indicates that networks of informal paths and trails have developed within the woods linking back gardens with formal path networks and other popular local destinations (eg primary schools). Such paths are likely to be used by visitors.</i></p>	
<p>If Q1 & Q2 = No, conclusion is no significant disturbance to capercaillie and assessment ends here</p> <p>If Q1 or Q2 = Yes, continue to Q3</p>	
<p>Q3. Which capercaillie woods are likely to be used regularly for recreation by users of the development site at detectable levels? (list all)</p> <p><i>Q3: This is included to identify which capercaillie woods are likely to be used for recreation by users of non-housing development sites at levels that would be detectable. The answer will be assessed using professional judgement based on knowledge of existing patterns of recreation around settlements and in the local area, the relative appeal of the capercaillie woods concerned compared to other recreational opportunities in the area, the volume of recreational visits likely to be generated by the development site, and informed by national survey data (eg on the distances people travel for recreational visits).</i></p>	<p>Ballochbuie Forest/ Ballochbuie SPA is considered the closest woodland with capercaillie likely to be used for recreation by users of this development. However, it is considered unlikely that this would result in a detectable change in levels of use.</p>
<p>Continue to Q4</p>	
<p>Q4. Are residents / users of this development site predicted to undertake any off path</p>	<p>No off path recreational activities are expected.</p> <p>Visitors to established 'campsites' are considered more</p>

<p>recreational activities in any of the woods identified at Q3 at detectable levels?</p> <p><i>Q4: This is included because any off path recreational use in capercaillie woods will result in significant disturbance and require mitigation.</i></p>	<p>likely to stick to established paths/tracks.</p>
<p>If Q4 = No for any woods, continue to Q5</p>	
<p>If Q4 = Yes for any woods, mitigation is needed. Note and continue to Q5.</p>	
<p>Q5: Are each of the woods identified at Q3 already established locations for recreation?</p> <p><i>Q5: This is included because if users of the development site are likely to access previously infrequently-visited capercaillie woods, or parts of these woods, for recreation, significant disturbance is likely and mitigation is needed. This will be answered on the basis of professional knowledge.</i></p>	<p>Yes. The footpaths from Braemar to the western edge of Ballochbuie SPA have an existing level of walking and cycling activity as evidenced by usage shown on Strava Maps Strava Maps (accessed 11/11/2025).</p>
<p>If Q5 = No for any woods, mitigation is needed. Note and continue to Q6.</p>	
<p>If Q5 = Yes for any woods, continue to Q6</p>	
<p>Q6: For each of the woods identified at Q3, are users of the development site predicted to have different temporal patterns of recreational use to any existing visitors, or to undertake a different profile of activities? (eg. more dog walking, or early morning use)</p> <p><i>Q6: This is included because some types of recreation are particularly disturbing to capercaillie; and increased levels of these types of recreation will cause significant disturbance and require mitigation. This will be answered on the basis of</i></p>	<p>No. It is considered likely that people staying in the proposed site will undertake similar activities to existing users. There is no reason to assume that visitors to the development will recreate at earlier or later times than what is currently existing within the woodland.</p> <p>The caravan park allows dogs. Considering the distance to the edge of the Ballochbuie SPA, it is reasonable to assume that any early morning/ late evening dog walks will take place within the immediate vicinity of the proposed development.</p>

professional knowledge on existing patterns of recreational use and whether each location is sufficiently close and/or convenient in relation to the development site and patterns of travel from there, to be used by users of the development for different recreational activities or at different times of day. For example, capercaillie woods with safe routes for dogs that are located close to development sites are likely to be used for early morning &/or after work dog walking.

If Q6 = yes for any woods, mitigation is needed. Note and continue to Q7

If Q6 = No for any woods, continue to Q7

Q7: For each of the woods identified at Q3, could the predicted level of use by residents / users of the development site significantly increase overall levels of recreational use?

Q7: This is included because a significant increase in recreational use could result in significant disturbance to capercaillie, even in situations where the capercaillie wood is already popular for recreation, and no changes to current recreational patterns / activities or off path activities are predicted. The answer was assessed on the basis of professional judgement of current levels of use and whether the increase is likely to be more than approximately 10%.

No the potential level of use would not significantly increase the overall levels of recreation within the woodland/SPA.

Based on the HRA for the LDP in 2020 the population of Braemar was estimated at 536 people with the population projected to decrease to 521 in 2024 and with a further decline to 511 in 2029 (based on the number of housing sites allocated within the LDP and predicted population changes). [LDP 2020 Habitats regulation Appraisal report](#)

Assuming that the campervans and static caravans are occupied by 2 people all year round there would be an additional 48 people in the local area. This equates to 8.95% of the 2020 population. Taking consideration of the projected population decline, an additional 48 people would result in a net increase in the population of approximately 23 people by 2029. This equates to a population increase of approximately 4.3% in relation to the 2020 population.

Given that the holiday properties are likely to be skewed to the associated tourist seasons, there are likely to be periods when they are not fully occupied.

If Q4-7 = No for all woods, conclusion is no significant disturbance to capercaillie and assessment ends here

If Q4, 5, 6 and/or 7 = Yes for any woods, mitigation is needed	
Conclusion: Is mitigation needed as a consequence of this development site in relation to each wood listed at Q3?	No. No mitigation is required.
Reasons mitigation needed:	N/A