



Committee report

Development proposed:

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 at Invercauld Caravan Park, Glenshee Road, Braemar, AB35 5YQ

Reference: 2025/0242/DET

Applicant: Invercauld Estate

Date called-in: 29 September 2025

Recommendation: Approve subject to conditions

Case officer: Katie Crerar, Planning Officer



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Site description, proposal and history

Site description

1. The majority of the application site lies within the settlement boundary of Braemar. It adjoins the southern boundary of Braemar Caravan Park and extends along the western edge of the Caravan Park before extending outwith the settlement boundary to connect with Balnellan Road to the north west. Both the existing Caravan Park and the main part of the application site are allocated within the Local Development Plan for Tourism (T1).
2. The main part of the application site forms an oblong extension to the southern boundary of the Caravan Park and is currently an open field with post and wire fencing. The application site then extends northwards along the internal edge of the western boundary of the Caravan Park before crossing a small burn and open area of grassland to connect with Balnellan Place to the north.
3. The application site is accessed via the existing Caravan Park entrance.

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:
<https://www.eplanningcnpa.co.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=T2ZF6SSI0CP00>

Title	Drawing number	Date on plan*	Date received
Location Plan	n/a		24/09/2025
Existing Site Plan - North	n/a		24/09/2025
Existing Site Plan - South	n/a		24/09/2025
Levels Plan	Nr2503-UP-XX-XX-DR-L-005	09/07/2025	24/09/2025
Proposed Site Plan North			24/09/2025



Proposed Site Plan South (Rev B)			22/12/2025
Proposed Road levels	24.1507-NAR-XX-XX-DR-S-11004 – Rev D	07/08/2025	18/12/2025
Fire Tender Vehicle – Swept Path	21.1507-NAR-XX-XX-DR-S-11003	07/08/2025	24/09/2025
Plan, Elevations and Section (Fog house caravans)	INV-SK01 – Rev A	27/05/2025	24/09/2025
Boardwalk elevations	24.1507-NAR-XX-XX-DR-S-11001	12/10/2024	24/09/2024
Boardwalk Options	24.1507-NAR-XX-XX-DR-S-11002		
Structural details (Boardwalk)	24.1507-NAR-XX-XX-DR-S-30001	01/10/2024	24/09/2025
Landscape Layout	Nr2503-UP-XX-XX-DR-L-001 RevP03	09/07/2025	12/01/2026
Planting Wider Landscape	Nr2503-UP-XX-XX-DR-L-004	09/07/2025	05/01/2025
Planting Plan and Biodiversity Improvements	Nr2503-UP-XX-XX-DR-L-003	09/07/2025	23/12/2025
Surface and Foul Water Drainage Proposals	24.1507-NAR-XX-XX-DR-S-11005	07/08/2025	24/09/2025
Arboricultural Impact Plan 1 (North)		21/08/2025	24/09/2025
Arboricultural Impact Plan 2 (South)		21/08/2025	24/09/2025
Tree Constraints Plan 1 (North)		21/08/2025	24/09/2025



Tree Constraints Plan 2 (South)		21/08/2025	24/09/2025
Tree Protection Plan 1 (North)		21/08/2025	24/09/2025
Tree Protection Plan 2 (South)		21/08/2025	24/09/2025
Tree Survey, Arboricultural Impact Assessment, and Tree Protection Plan 1 (North)		21/08/2025	
Tree Survey, Arboricultural Impact Assessment, and Tree Protection Plan 2 (South)		21/08/2025	
Planning Statement		01/08/2025	24/09/2025
Design and Access Statement - Landscape		08/08/2025	24/09/2025
Biodiversity Enhancement Plan	Rev A	06/01/2025	08/01/2026
Flood Risk Assessment – Part 1		19/08/2025	24/09/2025
Flood Risk Assessment – Part 2		19/08/2025	24/09/2025
Flood Risk Assessment – Part 3		19/08/2025	24/09/2025

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

5. This proposal seeks planning permission for an extension to the immediate south of Braemar Caravan Park for 18 additional touring caravan pitches and six 'fog house caravans' along with a timber boardwalk connecting the Caravan Park to an existing path to the northwest and associated works and landscaping.
6. A new access will be created into the development site from the existing internal road network within the Caravan Park to the north. The new 3.7m wide road will lead southwards into the site and then form a rectangular loop / route around the application site itself. The new road will be tarmacked for the first section (where it connects to the existing road) and then a compacted local grey sub-base/quarry dust for the circular route.
7. The 18 caravan pitches will be located in the largely north and western part of the application site, positioned around the rectangular track. These pitches will be hard standing caravan spaces, each measuring 6.2m by 9.8m and will be finished with a compacted self-draining gravel surface.



8. The six fog house caravans (mobile structures that will be delivered to the site) are located in the southeastern part of the application site, also positioned around the track route. The caravans are simple timber cabins with a pitched roof measuring approximately 11.7m by 4.3m with a 25m² deck. The caravans have pitched roofs with a ridge height of 3.6m and will be clad in natural untreated Scottish larch in a board-on-board style and a terracotta-coloured corrugated roof sheeting. The window and door frames will be coloured anthracite grey and each caravan will have black plastic rainwater guttering and pipes. The caravans will each have a side access with steps and a northwest facing deck with steps and handrails, all of which will be finished in natural untreated Scottish larch.
9. Each caravan will have a short driveway and parking area next to it (extending to approximately 75m²) which will be finished in a compacted gravel surface. The plots have been positioned to meet the existing contours of the site as far as possible but some areas of reprofiling will be required along the southern boundary of the development site to meet existing ground levels. Gradients would be no steeper than 1:2 with locally sourced boulders retaining the steeper slopes.
10. In addition, picnic benches are proposed to be placed centrally with power points (which will also have subtle lighting on top) placed periodically across the site for the caravan pitches. Lighting would be directional and comprise low bollards and units mounted on the gable ends of the cabins to minimise light spill. The site will be bound by post and wire fences and informal pedestrian access across the site will be marked by mown grass paths.
11. In addition, a new access path is proposed from the northwestern corner of the main part of the development site, which will lead up the western side of the Caravan Park before crossing a small burn and area of open grassland to connect with an existing pedestrian access on Balnellan Road. Part of this proposed path will comprise a raised board walk which would provide an alternative route of egress during any flood events.
12. The full path extends to approximately 300m, with the boardwalk comprising approximately 125m of this. The boardwalk section of the path will be constructed



in wood, measuring 1.2m wide with timber 1.1m high handrails. The non-boardwalk path sections will be finished in compacted stone.

13. In terms of drainage, the development site will have a surface water filter strip running around the internal edge of the new access road around the site. Foul drainage for the fog house caravans will be provided via 100mm foul pipes under the new track which will be connected to the existing site sewerage system.
14. There is proposed landscaping both within and outwith the development site. Within the site, nine existing trees will be removed and 101 new trees are proposed comprising a mixed age structure, canopy height and a variety of species. In addition, a 90m hedge is proposed long the northern edge of the site between the existing Caravan Park and proposed extension. Much of the development site will be seeded in grass (using an Amenity Grass Mix) along with areas of wildflower (Upland Hay Meadow Mix) around the edges (see Planting Plan).
15. Further landscaping is proposed outwith the site (on land that is within the control of the applicant) to screen and filter the wider views to the proposal. This will include planting 800 trees in groups (as whips) which would provide screening closer to the road and a 210m hedge along the A93 to the east of the site (see Wider Landscaping Plan).
16. In addition to the above proposed tree planting, hedgerow creation and wildflower seeding, nine bat boxes and 15 bird boxes are proposed to further support biodiversity enhancement.

History

17. There is no recent history on the application site itself. There has been the following application at the Caravan Park:
 - a) APP/2016/1148 - Erection of 6 holiday chalets – Approved by Aberdeenshire Council.



Habitats Regulations Appraisal

18. 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 Dee Special Area of Conservation (SAC) which is designated for its Atlantic salmon and freshwater pearl mussel interests and Ballochbuie Special Protection Area (SPA) which is designated for its Capercaillie habitat.
19. The HRA concludes that there will not be an adverse effect on the site integrity for the River Dee SAC provided the mitigation measures are implemented which include conditions for a pre-construction protected species survey prior to any works, avoiding any works during the Atlantic salmon spawning season. In addition, the mitigation set out in the Design Method Statement should be implemented in full which includes pollution prevention and control measures to prevent silt and sediment entering the River Dee during construction.
20. The HRA also concludes that there will not be an adverse effect on the integrity of Ballochbuie SPA as a result of the development and no mitigation measures are required. Naturescot have confirmed agreement with the contents of the HRA and its conclusions.

Development plan context

Policies

National policy	National Planning Framework 4 (NPF4) Scotland 2045	
	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 10	Coastal development	
Policy 11	Energy	
Policy 12	Zero waste	
Policy 13	Sustainable transport	
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	Heat and cooling	
Policy 20	Blue and green infrastructure	
Policy 21	Play, recreation and sport	
Policy 22	Flood risk and water management	X
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	
Policy 30	Tourism	X
Policy 31	Culture and creativity	
Policy 32	Aquaculture	
Policy 33	Minerals	



Strategic policy	Cairngorms National Park Partnership Plan 2022 – 2027	
Local plan policy	Cairngorms National Park Local Development Plan (2021) (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	
Policy 8	Open space, sport and recreation	
Policy 9	Cultural heritage	
Policy 10	Resources	X
Policy 11	Developer obligations	

21. 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

22. Supplementary guidance also supports the Local Development Plan and provides more details about how to comply with the 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	
Policy 8	Open space, sport and recreation non-statutory guidance	
Policy 9	Cultural heritage non-statutory guidance	
Policy 10	Resources non-statutory guidance	X
Policy 11	Developer obligations supplementary guidance	

Consultations

23. A summary of the main issues raised by consultees now follows:

24. **Scottish Environment Protection Agency (SEPA)** do not object to the application. They acknowledge that the site lies on elevated ground lying outwith, but surrounded by, an area at risk of flooding based on SEPA's Future Flood Maps. Taking into account the Flood Risk Assessment (FRA) provided with the application, SEPA are satisfied that the application site is not at fluvial flood risk, will not reduce the floodplain capacity, will not increase flood risk to others, provides a flood free pedestrian access route, and provides considerable betterment in the provision of an access/egress route for the existing caravan park.

25. SEPA however have recommended the following to reduce vulnerability to future flood risk:

- Signage is installed at the new development to warn occupants of the potential flood risk. Signs should clearly present the evacuation procedure via the flood free boardwalk during a flood event;



- b) The operators of the caravan park have a clear evacuation plan / procedure during times of flooding; and
- c) The operators of the caravan park sign up for the SEPA flood warning service.

26. **Naturescot** were consulted on the Habitat Regulations Appraisal that was undertaken and they agree with its conclusions that there will not be an adverse effect on the integrity of either the River Dee Special Area of Conservation or Ballochbuie Special Protection Area provided that the mitigation set out in the HRA is conditioned and implemented.

27. **Scottish Water** does not object to this application and notes that there is currently sufficient capacity at Braemar Water Treatment Works. A formal application must be submitted to Scottish Water for this. In respect of waste water capacity, a Pre-Development Enquiry Form must be submitted directly to Scottish Water.

28. **Aberdeenshire Council's Roads Department** have no objections to the proposal. They are satisfied that the proposed extension takes access from the existing site access which has suitable visibility and capacity for the increased usage. They note that the private path will increase connectivity to Braemar.

29. **Aberdeenshire Council's Environmental Health Team** do not object to the application. The Caravan Park holds a caravan site licence, and this should be updated if planning is approved.

30. **Aberdeenshire South Access Panel** requested that one of the fog house caravans is made accessible using a ramp to BS8300 and installing an accessible bathroom.

31. **Cairngorms National Park Authority's Ecological Advice Officer** highlights potential construction-phase impacts on European Species including bats, water vole, red squirrel and otter. A pre-commencement survey will be required to assess the use of the site by protected species. Depending on the results of the survey, a Species Protection Plan (SPP) may be required detailing mitigation measures to prevent disturbance to these species. This should be submitted to the National Park Authority for approval prior to works commencing.



32. In addition, undertaking the proposed works between March and mid-August would have a large effect on nesting birds. It is therefore recommended that a condition is included to ensure that no works should commence during the bird breeding season. If this cannot be avoided, works should proceed under supervision of an experienced ecologist, who will conduct surveys to identify all active nests and produce a species protection plan for nesting species. The SPP (Breeding Birds) should be submitted to the National Park Authority prior to works commencing for approval.
33. Construction phase impacts on the water environment from movement of sediment or pollution incidents such as fuel spills or oil leaks would have a large/very large impact on the environment due to the connectivity of this site with River Dee SAC. Therefore, a Construction Environmental Management Plan (CEMP) should be submitted to and agreed with the Park Authority prior to construction commencing on site. The CEMP should include a detailed, site-specific pollution prevention plan.
34. The Park Authority's Ecological Advice Officer also highlights that the majority of trees surrounding the site are to be retained, whilst nine trees have been identified for removal. Tree protection details have been submitted and the methodology in the Tree Protection Plans should be implemented to ensure that the trees and their root zones are protected.
35. The application includes compensatory planting for the proposed nine trees to be removed and to enhance biodiversity as set out in a Biodiversity Enhancement Plan. The Park Authority's Ecological Advice Officer is satisfied that 'the proposed compensatory planting and biodiversity enhancement measures should deliver a significant biodiversity enhancement for the area. The native tree planting within the development and the surrounding landscape will expand and enhance local woodland nature networks. The creation of small areas of species rich grassland will support pollinators and other wildlife, and the native hedgerows will support a wide range of species and provide linear habitat to help species move across the landscape'.
36. **Cairngorms National Park Authority's Landscape Advisor** highlights that the proposed caravan park extension is sensitive due to its location on the outer



boundary of the settlement of Braemar and its potential to contrast with the distinct landscape character and Special Landscape Qualities (SLQs) of the National Park and Lochnagar National Scenic Area. However, the proposal incorporates the character of the adjacent caravan park and open landscape to the south of the village.

37. The existing caravan park is well integrated within the surrounding landscape and is not prominent on the approach to Braemar due to the existing surrounding woodland and structure planting. The proposed extension would however extend the character of the existing caravan park further south potentially increasing prominence and would be visible in longer views from the elevated slopes of Carn nan Sgliat to the east, the main path on Morven to the south-west and a couple of core paths. However, the sloping topography to the south of the site, proposed boundary treatment, hedge along the A93 and tree groups around the proposed extension would help soften and mostly screen these views (although they may be more open during the first few years until the hedge establishes).
38. The landscaping for the development site relies on planting across a relatively large area located beyond the red planning application boundary to screen and filter views to the proposal. It is important that the applicant is responsible for the planting and management regime employed for both within and outwith the development site.
39. The Park Authority's Landscape Advisor recommends the following to be secured via conditions:
 - a) Further details of the position, type and intensity of lighting, bin stores and signage;
 - b) A Landscape Management and Maintenance Plan for all areas including all new planting, landscaping and SuDS within hard surface areas and the information contained in the Tree Survey, Arboricultural Impact Assessment, and Tree Protection Plan;
 - c) Details of proposed passing places on the proposed boardwalk;
 - d) Construction Method Statement is required which includes information on the method of groundworks, soil excavation and storage, root protection and ground and vegetation restoration. In addition, visual information is required



showing the ground modelling once it is complete and this should be in the form of photographs or notification giving time for a site visit by the National Park Authority.

40. **Cairngorm National Park Authority's Outdoor Access Team** support the application but would like to see passing places on the boardwalk and a maintenance plan for the path and boardwalk with a commitment from Invercauld Estate to maintain both for a minimum of 20 years.
41. **Braemar Community Council** are supportive of the principle of the proposed development as it will add to the accommodation available within the village which is reliant of tourism.

Representations

42. There were no representations to this application.

Appraisal

43. 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 will be used.
44. The main planning considerations in this case are the principle of development, flood risk, ecological impacts, landscape, design and access which are considered in detail below.

Principle of development

45. This application relates to Braemar Caravan Park, which is an established tourism business located on the southern edge of Braemar. This proposal seeks to increase the amount of visitor accommodation available by developing 18 new touring caravan pitches and six fog house timber caravans and associated infrastructure and landscaping.



46. **NPF4 Policy 30: Tourism** part a) supports 'proposals for new or extended tourist facilities or accommodation including caravan and camping sites, in locations identified in the Local Development Plan'.
47. In addition, part b) of Policy 30 requires proposals to consider the contribution they will make to the local economy, their compatibility with the surrounding area, impacts on communities, opportunities for sustainable travel, accessibility for disabled people, minimising carbon emissions and provision of access to the natural environment.
48. **LDP Policy 2: Supporting economic growth**, part 2.2 (Tourist Accommodation) supports proposals for tourist related accommodation where they have no adverse environmental or amenity impacts; contribute to providing a wide range of visitor accommodation including low-cost options and support a year-round economy.
49. The majority of the application site lies within the settlement boundary of Braemar and forms part of Braemar Caravan Park's allocation for tourism (T1). The **LDP's settlement specific guidance** states that within the allocation 'there may be capacity for further development in the southern part of the site' which must be for tourism uses and compatible with the existing operational business. In this respect, the proposal fully meets these requirements as it will extend the existing operation of the Caravan Park. In addition, the new path and boardwalk - which whilst extend outwith the settlement boundary to the northwest - connect the Caravan Park to the village centre and will improve active travel opportunities and accessibility to and from the site.
50. Overall, the principle of this proposal is supported. The majority of the development is located on a site allocated for the proposed use and will make a positive contribution to Braemar and the local economy. It is compatible with the existing operation of the Caravan Park and there are no likely amenity impacts for the existing business or surrounding area. Therefore, this application complies with Policy 30 of NPF4 and the relevant provisions of Policy 2 of the LDP. In addition, the proposal is consistent with Braemar's Settlement Statement in the LDP and specifically the requirements for this site.



Flood Risk

51. **NPF4 Policy 22: Flood risk and water management** creates a presumption against all development at risk from flooding unless they meet one of four exception criteria set out in part a) of the policy.
52. In addition, **LDP Policy 10: Resources** requires all development to (amongst other things) ensure there is no detrimental impacts on the water environment (10.1), be free from Medium to High risk of flooding from all sources taking into account climate change, not increase the risk of flooding elsewhere, or affect the ability of the functional floodplain to store or move flood waters (10.2).
53. Braemar's settlement statement in the LDP also includes site specific guidance for allocation T1 within which the development site is located. It acknowledges that Medium to High probability flood risk exists adjacent to the site and that there is also a small watercourse running through the existing caravan park. It requires a Flood Risk Assessment (FRA) in the event of any proposed increase in accommodation.
54. An FRA has been undertaken for the site which concludes that the proposed extension is outwith the 0.5% AEP (1 in 200 year) flood extent with appropriate allowance for climate change. However, the FRA states that 'to facilitate the proposed extension, there is a need to provide adequate access and egress that provides the free movement of people of all abilities that is free from flooding during the design flood event'. As such, the proposal has incorporated a Disability Discrimination Act (DDA) compliant boardwalk elevated above the 0.5% AEP plus climate change water levels (plus freeboard) to provide flood free access and egress for the existing caravan park and extension during a flood event. The FRA states that 'the boardwalk is proposed to be located at the narrowest extent of flooding that would facilitate a direct connection between the proposed development and wider flood free access routes'.
55. SEPA accept this approach, and do not object to the application on the grounds of flood risk. They acknowledge that the site is on elevated ground outwith but surrounded by an area at risk of flooding (as per SEPA Future Flood Maps) and are satisfied that the application will provide a flood free pedestrian access route



which is 'considerable betterment in the provision of an access/egress route for the existing caravan park'.

56. SEPA have recommended that signage is installed at the new development to warn of potential flood risk and indicate the evacuation procedure and route in such an event. In addition, it is recommended that the Caravan Park operators have a clear evacuation plan for flooding events and that they sign up for the SEPA flood warning service. A condition will be attached to any planning permission granted that an evacuation plan along with proposed signage is submitted to and approved by the Park Authority acting as planning authority.
57. The development site does not lie within a flood risk area. On account of the surrounding flood risk, a DDA compliant boardwalk providing flood free access/egress is proposed which, along with the proposed condition, meets the relevant requirements of NPF4, the LDP and SEPA's guidance in relation to flood risk.

Ecology

58. **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.
59. As set out above, the development site itself is not located within a flood risk area, however due to surrounding flood risk, appropriate mitigation has been included within the proposal by way of the DDA compliant boardwalk (with 600mm freeboard) to provide flood free access and egress for all abilities in the event of a flood. This will enable the Caravan Park to adapt to the current and future risks of climate change and as such complies with the provisions of NPF4 Policies 1 and 2.
60. **NPF4 Policy 3: Biodiversity** requires development proposals to contribute to the enhancement of biodiversity and **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 including Special Areas of Conservation.



61. This is also reflected in **LDP Policy 4: Natural heritage** which requires new development to not adversely affect the integrity of designated sites, the National Park or protected species or habitats.
62. The development site lies to the east of the Clunie Water which forms part of the River Dee SAC, and the proposed boardwalk will cross a tributary of it. This creates the potential for construction phase impacts on the water environment which could result in impacts on the River Dee SAC. Therefore, as advised by the Park Authority's Ecological Advice Officer, a Construction Environmental Management Plan (CEMP) will be conditioned to ensure that the water environment and SAC are appropriately protected during the construction phase.
63. Whilst no protected species were recorded during the surveys, there is the potential for bats, water vole, red squirrel and otter around the site and therefore pre-commencement checks for protected species will also be conditioned. There is also potential for the construction to impact on breeding birds and a condition on the timing of works will therefore also be included.
64. The proposal includes the removal of nine trees, however the majority of the trees around the site will be retained. Compensatory planting comprising 101 native trees is proposed, along with an additional 800 native trees outwith the application site. The tree planting will not only enhance biodiversity, but also provide screening and landscaping, which will support the integration of the proposal into the wider landscape and environment.
65. In addition to the proposed tree planting, additional measures have been included to support biodiversity enhancement. These include the planting of a 90m native species-rich hedgerow along the northern boundary of the development site and a 210m hedgerow along the edge of the A93 to the east. Within the site, there are proposed areas of wildflower meadow planting as well as nine bat boxes and 15 bird boxes.
66. Taking into account the compensatory planting within the site and also the wider planting and biodiversity enhancement measures which extend beyond the



application sites boundaries, these measures will make a positive contribution to biodiversity enhancement in compliance with NPF4 Policy 3. In addition, conditions will be used to ensure that the construction of the proposal will have no adverse impacts on protected species and birds. As such, it is considered that this proposal complies with NPF4 Policy 4 and also LDP Policy 4.

Landscape and Design

67. **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 and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance. 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.
68. **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 Cairngorms 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.
69. **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.
70. In addition to the above, Braemar's settlement statement within the LDP contains specific guidance for the site which states that 'Landscaping and structure planting will be required to ensure integration of the development with the surrounding landscape'.



71. Due to the development site's position on the southern boundary of Braemar, careful landscaping is required to ensure that any development integrates well within the existing setting of Braemar and does not contrast with the Special Landscape Qualities of the National Park and the Deeside and Lochnagar National Scenic Area.
72. The proposal includes extensive tree and hedge planting both within the site itself (red line boundary) and to the south and southeast to minimise the views into the development site. As is set out in the Planting Plan, 101 trees will be planted within the site comprising a mix of species (including birch, pine, cherry, hazel, guelder, rose, alder, aspen and rowan) and canopy heights to create containment of the extension and integrate it with the wider setting of Braemar. In addition, 800 tree whips will be planted in groups beyond the red line boundary (but within the control of the applicant) which over time will provide further screening from the A93 and reflect the character of the existing tree groups to the west. A 90m hedge will also be planted on the northern side of the development site to provide some containment and screening between the extension and existing Caravan Park. Another 210m hedge will be planted outwith the development site to the east along the western edge of the A93 which will provide further screening from the road. In addition, the topography to the immediate south of the development site rises to a mound which also provides some natural screening to the south and southeast.
73. In respect of design, the landscaping and caravan pitches will reflect those already on the existing caravan park. The fog house caravans, whilst larger than the existing cabins on the Caravan Park, will also be clad in untreated larch with a terracotta coloured corrugated sheet roof in a traditional pitched roof cabin style. The design of the caravans is sympathetic to and reflective of design within the existing Caravan Park and, along with the proposed landscaping, will integrate well within its surroundings. Low key lighting is proposed on each power connection point, and above the front door of each fog house caravan. There would be some low intensity bollards to the west of the site matching those already on the Caravan Park. This approach is in keeping with the existing Caravan Park and should not result in any significant impacts however final details should be



confirmed via a condition along with details of refuse storage and any proposed signage.

74. The Park Authority's Landscape Advisor also highlighted that due to the levels on the site there will be a series of stepped rises to the south. The updated levels plan shows localised boulder retention in two places on the southern edge of the site to facilitate this level change without the requirement for protective barriers. However, it is possible that engineered slopes and / or retaining solutions may be required beyond the redline boundary and details of this should be included within the conditioned Construction Environment Management Plan.

75. In addition, it is important that the applicant takes full responsibility for the landscaping proposals both within and beyond the redline as they form an important part of the overall landscaping scheme. A Landscape Management and Maintenance Plan will be conditioned to ensure that both the landscaping proposals within the site (as set out in the Planting Plan) and outwith (Planting Wider Landscape Plan) are fully implemented and maintained along with the details set out in the drainage plan, Arboricultural Impact Assessment, Tree Survey and Tree Protection Plan.

76. Taking into account the proposed layout, design, tree planting and wider landscaping plans as well as the sloping topography to the south of the site, views into the Caravan Park extension will be mostly screened once the tree whips and hedgerows establish and the development site will integrate well within its setting. Therefore, it is considered that subject to the recommended conditions, the proposal meets the LDP requirement for the site to 'ensure integration of the development with the surrounding landscape' and complies with NPF4 Policies 4 and 14 and LDP Policies 3 and 5.

Access and accessibility

77. **NPF4 Policy 13: Sustainable transport** supports proposals that demonstrate they have properly considered the transport requirements in line with the sustainable travel and investment hierarchies and where appropriate provide safe links to local facilities via walking, wheeling and cycling networks, are accessible by public transport, provide electric charging points and secure cycling parking, are designed



to incorporate safe crossing for walking and wheeling and adequately mitigate any impact on local public access routes. In addition, **LDP Policy 3: Design and placemaking** also requires development to have an appropriate means of access, parking and promote sustainable transport methods and active travel.

78. The proposed development will utilise the access road currently serving the existing caravan park and there is parking provision for each caravan site and fog house caravan. Aberdeenshire Council's Roads team are satisfied that is adequate for the added traffic and, as such, there are no issues in respect of roads.
79. The proposal includes the provision of a new DDA compliant path / boardwalk that will lead from the northwestern corner of the extension, along the western edge of the existing caravan park to connect with Balnellan Road which provides a short, safe and accessible route for walking, wheeling and cycling into the centre of the village. This will help to encourage visitors staying at the Caravan Park to use more active travel methods during their stay.
80. However, it was highlighted by two consultees that there is a need for passing places on the boardwalk route which is agreed. An updated boardwalk plan showing passing places will be required to be submitted to and approved by the Park Authority prior to the commencement of development. A maintenance plan for the path will also be conditioned to ensure that it is maintained and can provide adequate access and egress at all times.
81. It was raised by Aberdeenshire South Access Panel that one of the fog house caravans should be accessible, with a ramp and accessible bathroom. Due to the tight parking space and internal layout of the caravans, it is not possible to make one accessible. However, the applicant has advised that one of the previously constructed 'fog pods' onsite was made wheelchair friendly and there is also a wheelchair accessible toilet on the site. As this provision has already been made, the proposed layout of the fog house caravans is considered acceptable.
82. Overall, this proposal provides suitable means of access, adequate parking and also incorporates a new DDA compliant path that will help to support accessibility



and encourage active travel to and from the development site. As such, it complies with the relevant provisions of NPF4 Policy 13 and LDP Policy 3.

Conclusion

83. NPF4 Policy 30: Tourism supports proposals for tourist facilities where they are allocated within the Local Development Plan. LDP Policy 2: Economic Development supports proposals for visitor accommodation where they have no adverse environmental or amenity impacts and contribute to providing a wide range of visitor accommodation including low-cost options.
84. The development site is currently allocated for tourism (T1) in the Local Development Plan and as such complies with NPF4 Policy 30. In addition, subject to the proposed conditions, there will be no adverse environmental impacts, and the extension will increase the available visitor accommodation within Braemar meeting the requirements of LDP Policy 2.
85. There is flood risk close to the site, however the development site itself is not at risk and SEPA have no objection to this proposal. Mitigation has been incorporated via the raised DDA compliant boardwalk and path which will not only provide a flood free means of access and egress, but also an active travel route for visitors.
86. Overall, this proposal seeks to extend an established Caravan Park on a site that is allocated for this use within the Local Development Plan. The proposal will form part of and enhance the operation of the existing Caravan Park as well as integrating well within its surroundings due to the proposed planting and landscaping. In addition, a number of biodiversity enhancements are proposed. Therefore, it is considered that the proposal meets the relevant policy provisions of NPF4 and the LDP and there are no material considerations which outweigh this conclusion. This application is therefore recommended for approval subject to conditions.



Recommendation

That members of the committee APPROVE permission for the 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 at Invercauld Caravan Park, Glenshee Road, Braemar, AB35 5YQ subject to the following conditions:

Conditions

Those conditions listed below in bold text are suspensive conditions, which require to be discharged prior to implementation of the development.

- 1.** The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

Reason: The time limit condition is imposed in order to comply with the requirements of section 58 of the Town and Country Planning (Scotland) Act 1997 as amended.

- 2.** **No development shall commence until a Construction Environmental Management Plan (CEMP) is submitted to and approved in writing by the Cairngorms National Park Authority acting as Planning Authority. The CEMP shall include but not be limited to:**
 - a) a detailed, site-specific pollution prevention plan (PPP) with measures to protect the Clunie Water and tributaries of the River Dee SAC and the water environment from all sources of pollution (sediment, oils, fuels etc);**
 - b) The approach to site preparation, groundworks / ground modelling, soil excavation and storage;**
 - c) Root protection and ground and vegetation restoration measures; and**
 - d) Reference to pre-construction ecology checks and subsequent species protection plans if required.**



All construction works on the site shall be carried out in strict accordance with the approved Construction Environmental Management Plan.

Reason: In the interests of protecting the biodiversity and the environment in accordance with NPF4 Policy 3: Biodiversity and Policy 4: Natural heritage and Policy 10: Resources of the Cairngorms National Park Local Development Plan 2021.

3. The development shall not operate until a Flood Evacuation Plan has been submitted to and approved in writing by the Cairngorms National Park Authority acting as Planning Authority. Details of proposed signage to warn occupants of the potential flood risk and evacuation procedure via the flood free boardwalk during a flood event shall also be provided.

Reason: To ensure that the site can be cleared in a timely manner when flooding is predicted and to comply with NPF4 Policy 22: Flood risk and water management and Local Development Plan Policy 10: Resources.

4. **No development shall commence on site until a pre-commencement survey for protected species has been undertaken in accordance with current NatureScot guidance by a suitably experienced and licensed ecological surveyor. Depending on the results, a Species Protection Plan (SPP) detailing appropriate mitigation measures shall be submitted as part of the Construction Environment Management Plan (CEMP). No development shall commence until the SPP has been submitted to and approved in writing by the Cairngorms National Park Authority acting as Planning Authority. Thereafter the plan will be implemented in full and overseen by a suitably qualified Ecological Clerk of Works.**

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.

5. **No development shall commence (including site clearance of vegetation or trees) during the breeding bird season. If this cannot be avoided, works shall proceed**



under supervision of an experienced ecologist, who will conduct surveys to identify all active nests and produce a Species Protection Plan (SPP) for nesting species. The SPP (Breeding Birds) shall be submitted to the Cairngorms National Park Authority for approval prior to works commencing.

Reason - To ensure the protection of protected species including breeding birds in accordance with Policy 4:~~(Natural Heritage)~~ of the Cairngorms National Park Local Development Plan 2021.

6. No development over or adjacent to the watercourse (including the watercourse itself, the boardwalk south of the crossing or bank reprofiling to the north) shall be undertaken during the Atlantic salmon spawning season (mid-October to February).

Reason: To minimise potential construction phase impacts on qualifying interests of the River Dee Special Area of Conservation and to ensure that there are no adverse effects on species in accordance with Policy 3: Biodiversity and Policy 4: Natural Places of the National Planning Framework 4 and Policy 4: Natural Heritage of the Cairngorms National Park Authority Local Development Plan 2021.

7. Planting, landscaping and biodiversity enhancements shall be implemented in accordance with the approved Biodiversity Enhancement Plan, Planting Plan and Wider Landscaping Plan in the first planting season following the commencement of the development hereby approved. The landscaping 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 revegetating shall be re-seeded or replaced by 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.

8. **No development shall commence on site until a Landscape Management and Maintenance Plan has been submitted to and approved in writing by the**



Cairngorms National Park Authority acting as Planning Authority. The Plan should include, but not be limited to, all new planting landscaping and communal areas and implement the relevant part of the Tree Survey, Arboricultural Impact Assessment and Tree Protection Plan.

Reason: To ensure the implementation and management of a satisfactory plan for the planting and landscaping in accordance with National Planning Framework 4 Policy 3: Biodiversity, and Policy 4: Natural heritage and Policy 5: Landscape of the Cairngorms National Park Local Development Plan 2021.

- 9. Prior to the commencement of development, a lighting plan (detailing the final position and intensity of the proposed lighting) and details of bin storage arrangements and proposed signage shall be submitted to and approved by the Cairngorms National Park Authority acting as Planning Authority.**

Reason: To ensure the lighting, bin storage and any signage complement the setting of the development in accordance with Policy 3: Design and Placemaking.

- 10. Prior to the commencement of development of the proposed path and board walk, an amended board walk plan and maintenance plan shall be submitted to and approved in writing by the Cairngorms National Park Authority acting as Planning Authority. The plan shall incorporate passing places on the boardwalk and the wider long-term maintenance proposals for this route. The development shall be completed in accordance with these approved plans.**

Reason: To ensure access between the Caravan Park and Balnellan Road is maintained at all times in accordance with Policy 3: Design and Placemaking.

Informatics

- 1. The person undertaking the development is required to give the Planning Authority prior written notification of the date which it is intended to commence the development. Attached to this decision notice is a Notice of Initiation of Development for completion and submission. Submission of this information assists the Cairngorms National Park Authority Monitoring and Enforcement Officer in monitoring active work within the area to ensure compliance with the approved**



details and to identify and correct any potential problems, as they arise, rather than later when it may be more difficult and more costly to rectify. Failure to give notice would constitute a breach of planning control which may result in enforcement action being taken.

2. 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.
3. The person undertaking the development should note the comments of Scottish Water which highlight that they are not able to reserve capacity at their treatment works and the developer will require to contact them to confirm that the development can be serviced. They also highlight that they will not accept surface water connections into their combined sewer system for reasons of sustainability and to protect customers from future sewer flooding. A pre-development inquiry form via their customer portal should be submitted to them. More detail in their consultation response.