



Cairngorms
National Park Authority

Ùghdarras Pàirc Nàiseanta a'
Mhonaidh Ruaidh

Formal Board Paper 1 Annex 1.3

13 March 2026

Paper 1

Annex 1.3



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Overarching topics

Schedule 3: Site assessment methodology

Cairngorms National Park Local Development Plan: Evidence Report

March 2026





Schedule 3: Site assessment methodology

March 2026

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Requirements addressed in this schedule

Table 1 Information required by the Town and Country Planning (Scotland) Act 1997 (CNPA003), as amended, regarding the issue addressed in this schedule.

| Section | Requirement |
|-------------------|--|
| Section 16B(4)(c) | The evidence report is also to include a statement on the extent to which the views expressed under paragraphs (a) and (b) have been taken into account in the report. |
| Section 264A | In the exercise, with respect to any land in a National Park, of any power under the planning Acts, special attention shall be paid to the desirability of exercising the power consistently with the National Park Plan as adopted under section 12(7)(a) of the National Parks (Scotland) Act 2000 (asp 10). |

Links to evidence

Legislation

- CNPA003 - Town and Country Planning (Scotland) Act 1997
- CNPA004 - National Park (Scotland) Act 2000
- CNPA946 - Environmental Assessment (Scotland) Act 2005
- CNPA226 - The Conservation (Natural Habitats, &c.) Regulations 1994
- CNPA684 - The Town and Country Planning (Development Planning) (Scotland) Regulations 2023

National documents

- CNPA004 - National Park (Scotland) Act 2000
- CNPA008 - National Planning Framework 4
- CNPA009 - Local Development Planning Guidance 2023
- CNPA234 - Updated Scottish Government policy on protecting Ramsar sites
- CNPA947 - The Deliverability of Site Allocations in Local Development Plans (February 2020)

Key agency documents

- CNPA206 - Joint Local Development Plan Site Assessment and Strategic Environmental Assessment Checklist (February 2024)
- CNPA207 - Guidance on Key Agency engagement with local development plan site appraisals (March 2025)



- CNPA948 - Historic Environment Scotland engagement in LDP site appraisal and assessment
- CNPA208 - Scottish Environment Protection Agency Planning Advice Note for Planning Authorities: Scottish Environment Protection Agency engagement in local development plan site appraisal and assessment (May 2025)
- CNPA949 - NatureScot Planning and Development: standing advice and guidance documents - Development Planning (website)
- CNPA1391 – NatureScot guidance note – the handling of mitigation in Habitats Regulations appraisal – the People Over Wind CJEU judgement

National Park Authority documents

- CNPA010 - Cairngorms National Park Partnership Plan 2022 – 2027
- CNPA097 - Cairngorms National Park Local Development Plan 3: Strategic Flood Risk Assessment 2024
- CNPA1261 – Cairngorms National Park Local Development Plan 3: Site assessment template
- CNPA210 - Draft site assessment template (engagement version) - August 2025
- CNPA211 – Cairngorms National Park Local Development Plan 3 Strategic Environmental Assessment Scoping Report
- CNPA1343 - Topic: Site assessment methodology - engagement version

Consultation material

- CNPA338 - 01954 - Scoping - Cairngorms National Park Authority - Cairngorms National Park Local Development Plan 3 - HES response - 15 September 2025
- CNPA339 - 01954 - Scoping - Cairngorms National Park Authority - Cairngorms National Park Local Development Plan 3 - NatureScot Response - 18 September 2025
- CNPA340 - 01954 - Scoping - Cairngorms National Park Authority - Cairngorms National Park Local Development Plan 3 - SEPA response - 22 September 2025
- CNPA1340 - Evidence report engagement responses
- CNPA1034 - SEPA Response to Site assessment methodology
- CNPA1421 - Scottish Forestry response to consultation 24 Sept 2025



Summary of evidence

Policy context

National Planning Framework 4

National Planning Framework 4 (CNPA008) came into force in February 2023 and is the long term National Spatial Strategy for Scotland. For the first time it contains a set of planning policies that form part of the statutory development plan.

Scotland's national spatial strategy is divided into three parts which are sustainable places, liveable places and productive places, each with two spatial principles, national developments and policies. This overarching, integrated strategy should form the basis of the local development plan's site selection and assessment methodology and is therefore set in **Error! Reference source not found..**

Table 2 National Planning Framework 4 – National spatial strategy, spatial principles and what it means for sustainable, liveable and productive places

| Sustainable places |
|---|
| National spatial strategy 'Scotland's future places will be net zero, nature-positive places that are designed to reduce emissions and adapt to the impacts of climate change, whilst protecting, recovering and restoring our environment.' |
| Spatial principles <ul style="list-style-type: none"> • Just transition – empowering people to shape their places and ensure the transition to net zero is fair and inclusive. • Conserving and recycling assets – making productive use of existing buildings, places, infrastructure and services, locking in carbon, minimising waste, and building a circular economy. |
| What it means for site selection and assessment <ul style="list-style-type: none"> • Ensuring the right development happens in the right place. • Development that is accessible by sustainable travel. • Using land wisely including through a renewed focus on reusing vacant and derelict land to help limit the new land that we build on. • Protecting and enhancing our historic environment. |
| Liveable places |
| National spatial strategy 'Scotland's future places will have homes and neighbourhoods that are healthier, affordable and vibrant places to live.' |



| |
|---|
| <p>Spatial principles</p> <ul style="list-style-type: none">• Local living – supporting local liveability and improve community health and wellbeing by ensuring people can easily access services, greenspace, learning, work and leisure locally.• Compact urban growth – limiting urban expansion so we can optimise the use of land to provide services and resources, including carbon storage, flood risk management, blue and green infrastructure and biodiversity. |
| <p>What it means for site selection and assessment</p> <ul style="list-style-type: none">• Creating communities that are inclusive, empowered, resilient, safe and provide opportunities for learning – local living shaped by local context.• Homes served by local facilities and services – enough land in the right locations to meet future needs and aspirations.• Higher density development to sustain public transport and support local living.• Virtual connectivity and investment in active travel links.• Green infrastructure to connect people with nature. |
| <p>Productive places</p> |
| <p>National spatial strategy</p> <p>‘Our future places will attract new investment, build business confidence, stimulate GDP (Gross Domestic Product), export growth and entrepreneurship, and facilitate future ways of working.’</p> |
| <p>Spatial principles</p> <ul style="list-style-type: none">• Rebalanced development – targeting development to create opportunities for communities and investment in areas of past decline and managing development sustainably in areas of high demand.• Rural revitalisation. Encouraging sustainable development in rural areas, recognising the need to grow and support urban and rural communities together. |
| <p>What it means for site selection and assessment</p> <ul style="list-style-type: none">• Diversification of town and commercial centres.• Distributing development, investment and infrastructure strategically by enabling rural development. |

Relevant National Planning Framework 4 policies

Policy 1 Tackling the climate and nature crisis requires significant weight to be given to the global climate and nature crises in the consideration of all development proposals. This includes by ensuring that the local development plan’s spatial strategy will reduce emissions and adapt to current and future risks of climate change by promoting nature



recovery and restoration in the area. Site allocations will be a key part of the spatial strategy¹.

This is reinforced by Policy 2 Climate mitigation and adaptation which requires local development plans to guide development to, and create, sustainable locations based on the six spatial principles, informed by an understanding of the proposals on greenhouse gas emissions².

Within the context of Policies 1 and 2, the key policies relating to site selection and assessment are Policy 16 Quality Homes and Policy 26 Business and industry.

Policy 16 advises that deliverable land should be allocated to meet the ten year Local Housing Land Requirement in locations that create quality places for people to live. The location of new home allocations should be consistent with local living including, where relevant, 20 minute neighbourhoods and an infrastructure first approach³.

Policy 26 requires local development plans to allocate sufficient land for business and industry, in particular ensuring that there is a suitable range of sites that meet current market demand, location, size and quality in terms of accessibility and services. The allocations should take account of local economic strategies and support objectives of delivering a low carbon and net zero economic recovery, and a fairer and more inclusive wellbeing economy⁴.

The following policies place requirements on the local development plan, which will be important considerations for site selection and assessment.

Policy 4 Natural Places requires local development plans to protect locally, regionally, nationally and internationally important natural assets. When allocating land, the spatial strategy should safeguard them and consider the objectives and level of their protected status⁵.

¹ Matters relating to Policy 1 are covered in a range of schedules including Schedule 4: Climate change, Schedule 5: Natural heritage: Schedule 8: Land use, soil and resources and Schedule 19: Flood risk and water management.

² Matters relating to climate change are covered in a range of schedules. An overview is in Schedule 4: Climate change.

³ Matters relating to housing are covered in Schedule 13: Housing.

⁴ Matters relating to business and industry are covered in Schedule 21: Economic development.

⁵ Matters relating to natural places are covered in Schedule 5: Natural heritage, Schedule 6: Landscape, Schedule 7: Historic and cultural heritage and Schedule 8: Land use, soil and resources.



Policy 5 Soils requires local development plans to protect locally, regionally, nationally and internationally valued soils. This means limiting development on prime agricultural land (or land of lesser quality that is culturally or locally important for primary use), peatland, carbon rich soils and priority peatland habitat to a series of exceptions (and subject to the more detailed policy wording) relating to essential infrastructure only where there is a specific locational need; small scale development directly linked to a rural business, farm or croft; production and processing facilities associated with the land; the generation of energy from renewable sources or the extraction of minerals. Note that there is no prime agricultural land in the National Park.

Policy 9 Brownfield, vacant and derelict land and empty buildings aims to maximise the use of existing land and buildings and minimise additional land take. Policy 9(b) states that proposals on greenfield sites will not be supported unless the site has been allocated for development or the proposal is explicitly supported by policies in the local development plan. The site selection and assessment methodology therefore need to carefully consider and justify any proposals for greenfield development in the context of brownfield land availability⁶.

Policy 12 Zero waste requires local development plans to identify appropriate locations for new waste management infrastructure to support the circular economy and meet identified needs⁷.

Policy 13 Sustainable transport requires local development plans to prioritise locations for future development that can be accessed by sustainable modes. It also requires best use to be made of existing infrastructure and services. This means allocating land well served by existing or committed infrastructure in line with National Transport Strategy 2⁸.

Policy 14 Design, quality and place requires local development plans to be place-based and created in line with the place principle⁹.

⁶ Matters relating to soils and brownfield, vacant and derelict land and empty buildings are covered in Schedule 8: Land use, soil and resources.

⁷ Matters relating to zero waste are covered in Schedule 10: Zero waste.

⁸ Matters relating to sustainable transport are covered in Schedule 11: Sustainable transport.

⁹ Matters relating to design, quality and place are covered in all topic papers, with Schedule 12: Local living and 20 minute neighbourhoods, Schedule 13: Housing, Schedule 17: Play, sport and recreation and Schedule 22: Town centres and retail being particularly relevant.



Policy 15 Local living and 20 minute neighbourhoods requires local development plans to support local living through the spatial strategy, including, within settlements, 20 minute neighbourhoods. The preparation of the spatial strategy and identification of land allocations should support local living and 20 minute neighbourhoods.¹⁰

Policy 18 Infrastructure first requires local development plans to be based on an integrated infrastructure first approach. The site selection and assessment methodology therefore need to consider infrastructure capacity¹¹.

Policy 19 Heat and cooling requires the spatial strategy to consider areas of heat network potential¹².

Policy 22 Flood risk and water management requires local development plans to avoid development in areas at flood risk as a first principle. This should be supported by managing the need to bring previously used sites in built up areas into positive use¹³.

Policy 27 City, town, local and commercial centres requires local development plans to provide a proportion of their local housing land requirement in city or town centres and be proactive in identifying opportunities to support residential development.

Policy 28 Retail advises that when local development plans are allocating sites for housing, that they consider the need for further retail provision to both meet the need for neighbourhood shopping and to support local living¹⁴.

¹⁰ Matters relating to Local living and 20 minute neighbourhoods are covered in Schedule 12: Local living and 20 minute neighbourhoods.

¹¹ Matters relating to the provision and capacity of infrastructure are covered in the following evidence papers:

- Schedule 10: Zero waste
- Schedule 11: Sustainable transport
- Schedule 14: Education
- Schedule 18: Health and safety
- Schedule 19: Flood risk and water management
- Schedule 20: Digital infrastructure

¹² Matters relating heat and cooling are covered in Schedule 15: Heating and cooling.

¹³ Matters relating Flood risk and water management are covered in Schedule 19: Flood risk and water management.

¹⁴ Matters relating to the city, town, local and commercial centres and retail are covered in Schedule 12: Local living and 20minute neighbourhoods, Schedule 13: Housing and Schedule 22: Town centres and retail.



Policies 3 Biodiversity, 7 Historic assets and places, 11 Energy, 13 Sustainable transport, 24 Digital infrastructure, and 33 Minerals require the cumulative impacts, in combination with other development, to be considered. In the context of the strategic transport network, the effect on the operational performance of transport networks of a number of developments in combination may mean that different mitigation is needed compared to when considered individually.

Legislation and national documents

National Park (Scotland) Act 2000

The National Park has four distinct aims as set out in The National Parks (Scotland) Act 2000 (CNPA004). As outlined in Schedule 1: Plan outcomes, the four aims will be amended by the Natural Environment Scotland (Scotland) Bill (CNPA634) once enacted. The aims, once amended, will be:

- To conserve and enhance the area's natural and cultural heritage.
- To promote sustainable management and use of the area's natural resources.
- To promote public understanding and enjoyment of the area's natural and cultural heritage.
- To promote sustainable economic, social and cultural development of the area's communities.

All of the aims are relevant to the matters discussed in this schedule. The aims are all to be pursued collectively. However, if there is conflict between the first aim and any of the others, greater weight is given to the first aim (as set out in Section 9(6) of the 2000 Act).

The Deliverability of Site Allocations in Local Development Plans 2020

Published in February 2020 by the Scottish Government the document (CNPA947) summarises a survey of the 32 Scottish local planning authorities and the two Scottish national parks. It explores the types of information provided by site promoters to demonstrate a development site's deliverability and how that information is used by planning authorities. The research and report were prepared by Ryden LLP, with assistance from Neil Collar of Brodies LLP.

It concludes that the focus of site assessment, at that time, was on the initial deliverability of development land through assessment of constraints, and not upon the subsequent deliverability of development.



It identified 'a major and consistent gap' between site assessment information requirements and the information typically provided by site promoters. It noted that information on physical constraints is 'usually' or 'seldom' provided, and market information 'seldom'. It found that small towns and rural planning authorities receive less applicant information on site constraints than other authorities.

It found that site assessments by planning authorities share similar criteria, but the sieve order and weighting – by market factors, physical capacity / constraints, or spatial plan priorities – are not consistent and could potentially influence the short listing and thus the allocation of sites. In addition, it noted that weaker market areas can end up with a very limited choice of sites, so that the 'best promoted' sites are favoured.

The report advises that the concept of viability within deliverability is valid, but its application must be treated with caution. It highlights that many market sectors and locations in Scotland will struggle to fully fund all land assembly, site works, infrastructure, policy requirements and development on a 'day one' assessment and that seeking funding solutions and value engineering during and post allocation are normal activities.

It advises that the site allocation process should embed market realities but should not inadvertently place these ahead of spatial planning considerations. It advises that this will be particularly important as action / delivery programmes are bound more tightly into the process of land releases.

The research proposes a proportionate framework for assessing the deliverability of site allocations. It seeks to improve confidence in deliverability across different site types, uses, geographies, and through the planning system from local development plan allocation onwards.

It proposes a staged and scaled site assessment which applies as a site progresses through the planning system and is proportionate to different sites. This is illustrated in Table 3.



Table 3 Staged and scaled sites assessment (Figure 1 of the deliverability of site allocations in local development plans report). Note that the 'future approach' identified in this diagram differs from the approach set out Scottish Government's Local Development Planning Guidance and The Town and Country Planning (Development Planning) (Scotland) Regulations 2023 (CNPA684).

| | | |
|---|--|---|
| Current approach: Calls for Sites → Main Issues Report → Proposed Plan → Local Development Plan | | |
| Future approach: Call for Sites and spatial plan → Gatecheck → Local Development Plan | | |
| Stage 1 | Stage 1 information | Stages 1 and 2 information |
|  | Stage 2 | |
| |  | Stage 3 |
| Local, small, early, rural, passive / patient sites | Major sites | Strategic sites: high impact, complex delivery |

The first stage is intended to provide sufficient information to conduct a sieve of sites, including sites submitted through a call for sites, existing allocations and unbuilt sites with planning permission. It would include site information, land use proposals, descriptions and distances to facilities as well as an initial indication of issues relating to natural heritage and the environment, historic environment or other potential constraints. This first sieve would also be subject to a spatial planning approach to determine whether the site would be in broad accordance with the emerging local development plan.

The report highlights that deferring or demoting spatial planning considerations during the site allocation process risks skewing development planning towards a more market led process, however it does recognise that viability and funding are the lynchpin of deliverability, when the site is acceptable in broad policy terms, and therefore stage 1 should consider whether there is:

- A willing landowner.
- A willing developer or a note of market potential.
- Awareness of policy requirements and the infrastructure context.
- Confirmation that, in these contexts, the site is believed to be viable (or if not that there is a potential deficit funding solution).



Stage 1 will yield three types of outcomes:

- Sites not suitable for development plan allocation.
- Sites suitable for allocation without further information being sought. In the interest of transparency and best information there may be some minor further dialogue with promoters or other organisations. These sites could proceed straight to proposed allocation.
- Sites where further information is required via a Stage 2 assessment.

Stage 2 is intended for major sites (greater than 50 houses / 2 hectares) which are being promoted for development plan allocation. While stage 1 seeks information and land promoter awareness of factors affecting deliverability, stage 2 seeks evidence. This is likely to include requirements for layout plans, development mix and phasing, community engagement and site conditions. Evidence of development viability and target markets would be required for housing uses and target markets for employment and commercial uses.

The report also suggests a stage 3 site assessment for very large strategic sites, which, it advises, demands a much higher hurdle than local or major sites.

The report recommends that data is captured via spreadsheets that include some functionality, for instance with hyperlinks to policies, maps and infrastructure information and forms with minimal open-ended questions and free text (where possible yes / no fields or numerical answers).

Note that this research, and its recommendations, were produced prior to the adoption of National Planning Framework 4.

Local development planning guidance 2023

The guidance (CNPA009) sets out the Scottish Ministers' expectations for new style local development plans. It advises that it should be considered together with National Planning Framework 4 and relevant legislation to give a full understanding of all requirements and expectations for local development plans. It replaces and repeals Scottish Government Planning Circular 6/2013 and the guidance states that it should be given the same weight as the repealed circular.

It is intended to assist and support planning authorities and others with an interest, rather than creating requirements in addition to those in legislation.



Planning authorities are expected to consider how the guidance can be applied in a proportionate and place based way and to use their discretion in deciding which components of the advice are relevant to their plan preparation.

In relation to site selection, the guidance highlights National Planning Framework 4's infrastructure first approach and advises that, in preparing local development plans, infrastructure considerations should inform site selection and the evolution of the spatial strategy, not be a by product of it (paragraph 41).

The guidance (figure 5, page 18) sets out the key stages and assessments of the local development plan process. At the time of writing, the Cairngorms National Park is within the first stage, evidence gathering, where the focus is on establishing the evidence baseline through collation of evidence and seeking the views of key agencies, children and young people, and the public at large. Following the gate check, plan preparation commences. This includes preparing a spatial strategy, early engagement, for instance through a 'Call for Ideas', and site assessment.

Paragraph 108 advises that 'detailed policies and site proposals should not be included in the evidence report. Detailed site appraisal will not be appropriate at the evidence report stage, but the authority could usefully establish a site appraisal methodology that will be used to appraise sites and inform allocations for the proposed plan. This could also be linked or ideally integrated with the approach to Strategic Environmental Assessment'.

Paragraphs 141 – 190 provide a step by step guide to preparing proposed plans and advice on taking account of National Planning Framework 4 policies. While preparing the proposed plan is the next stage, following the approval of the evidence report, the guidance provides helpful guidance on how to establish a site appraisal methodology.

Paragraph 152 advises that all sites should be assessed using the site appraisal methodology agreed in the evidence report. This includes sites allocated in an existing local development plan; sites proposed through any call for ideas and any other sites the planning authority considers may have potential.

Paragraph 153 advises that the site appraisal process and the Strategic Environmental Assessment requirements can be helpfully linked as they cover similar environmental topics. It also notes that all 'potential' sites should be covered by the Strategic Environmental Assessment, so that if, at examination, it is considered that additional sites need to be identified, these have already been assessed.



Paragraph 154 advises that no site should automatically roll forward from one plan to the next without being assessed. All sites proposed to be allocated for development in plans should have been assessed for their deliverability through the site appraisal process.

The document provides guidance on relevant parts of the national planning framework 4 in relation to each stage of local development plan preparation. In relation to Policy 16 Quality homes, it confirms that the location of homes should be in line with the plan's spatial strategy and informed by engagement with public, private and community interests. It advises that use of the Place Standard, consideration of local place plans and guidance on local living and 20 minute neighbourhoods can inform allocation choices.

In relation to Policy 26 Business and Industry, the guidance advises that all sites under consideration for allocation should be assessed for their ability to meet current needs and market expectations and that flexibility and resilience for business and industry should be built into site allocations. It advises that where existing business sites are underused, for example where there has been an increase in vacancy rates, reallocation to enable a wider range of viable businesses or alternative uses may be considered, taking careful account of the potential impacts on existing businesses on the site.

It also advises that 'local development plans should encourage, including by use of the spatial strategy and site allocations, opportunities for homeworking, live-work units, micro-businesses and community hubs. In the past industrial and business areas have tended to be located at a distance from residential areas. As our economy continues to evolve, there may be scope for greater integration of work and living as inter-related land uses which will also support our ambition for net zero. This can help to tackle inequalities by providing more accessible, local job opportunities which reduce the need to travel'.

In relation to Strategic Environmental Assessment, paragraph 184 recognises that, if a planning authority undertakes a call for ideas stage, any site may be submitted. It advises that 'it is legitimate for the authority to assess each site through the broad principles of the spatial strategy prepared as part of the work on the proposed plan'.

Paragraph 185 continues on this theme, advising that the place based approach to plans (for example on a settlement / neighbourhood basis), 'allows the opportunity to reflect the broad environmental impacts and benefits of the policies and proposals



rather than impacts of individual sites, which can support proportionality in terms of reporting and potentially a more engaging report as a consequence'.

Strategic Environmental Assessment

Strategic Environmental Assessment is a statutory requirement that aims to ensure the environment is a primary consideration in the preparation of qualifying public plans, programmes and strategies. The Environmental Assessment (Scotland) Act 2005 (CNPA946) requires those preparing qualifying plans, including the local development plans, to undertake a Strategic Environmental Assessment. Strategic Environmental Assessment can also benefit the preparation of a local development plan, supporting better understanding of its environmental context and setting out steps to avoid, mitigate or reduce significant adverse effects, where possible, or enhance positive ones. Improving the consultation process lies at the heart of Strategic Environmental Assessment, ensuring the public and those who will be consulted are provided with the relevant environmental information relating to the plan to allow them to make informed choices.

The Strategic Environmental Assessment process is divided into five main stages which are:

- Stage A: Setting the context and objectives, establishing the baseline, and deciding on the scope.
- Stage B: Developing and refining alternatives and assessing effects.
- Stage C: Preparing the Environmental Report.
- Stage D: Consulting on the Environmental Report.
- Stage E: Monitoring implementation of the Local Development Plan.

The Consultation Authorities, who are NatureScot, Scottish Environment Protection Agency and Historic Environment Scotland, must be engaged on at each stage of the Strategic Environmental Assessment process. The assessment process will align and form a key part of the site assessment process. The approach to this is set out within this schedule.

The Park Authority has already prepared and undertaken engagement on the Strategic Environment Assessment Scoping Report (Stage A) (CNPA211). Consultation responses have been received from NatureScot (CNPA339), Scottish Environment Protection Agency (CNPA340) and Historic Environment Scotland (CNPA338) and these will inform the preparation of the Environmental Report (Stage C).



Habitats Regulations Appraisal

Those preparing a local development plan must also undertake a Habitats Regulations Appraisal in accordance with The Conservation (Natural Habitats, &c.) Regulations 1994 (CNPA226), if the plan is capable of having an adverse effect on a European site(s), either alone or in combination with other plans or projects. European sites are Special Areas of Conservation and Special Protection Areas. As of 9 July 2025 (CNPA234), Ramsar sites are also to be treated as if they were European sites for the purposes of land use change decision making.

In this situation the planning authority would have to undertake an 'Appropriate Assessment' of the implications for any designation(s) in view of the site's conservation objectives, in order to avoid any adverse impacts, before the plan can be adopted. Where an appropriate assessment is required, the competent authority must consult NatureScot.

The Habitats Regulations Appraisal process sits alongside the Strategic Environmental Assessment and site assessment process. Further information on the considerations for Habitats Regulations Appraisal is set out within Schedule 5: Natural heritage.

Key agency documents

The Joint Local Development Plan Site Assessment and Strategic Environmental Assessment Checklist produced by the Government Key Agencies (February 2024)

The Scottish government key agencies group distributed their assessment checklist (CNPA206) in February 2024. The Key Agencies are: Scottish Natural Heritage; Scottish Environment Protection Agency; Historic Environment Scotland; Transport Scotland; Scottish Water; and Architecture and Design Scotland. The document covers the topics:

- Water
- Biodiversity, flora and fauna
- Climate factors
- Air quality
- Population and human health
- Soils
- Landscape
- Cultural heritage
- Material assets – deliverability / sustainability constraints.

These broadly follow the issues, listed in Schedule 3 paragraph 6(a) of the Environmental Assessment (Scotland) Act 2005 (CNPA946), on which development



proposals (referred to as plans or programmes in the Act) are likely to have 'significant effects on the environment'.

It asks open ended questions, linking these back to National Planning Framework 4 (CNPA008) policies. It requires scoring pre-mitigation, then details of mitigation and enhancement before requiring a second post-mitigation score, with a final column for comments / conclusions.

It highlights that there are many scoring techniques and gives the example of a coloured significantly positive (++) to significantly negative (--) system. It also includes an explanation of the key Strategic Environmental Assessment topics.

Guidance on Key Agency engagement with local development plan site appraisals (March 2025)

This guidance (CNPA207) sets out high level principles aimed at getting the best out of the key agencies in supporting the site appraisal process. The principles facilitate timely and effective responses that add most value to the local development plan preparation process and ultimately support the smooth delivery of sites. They are framed around where and how key agencies are best involved in the process.

To maximise value from the key agencies, the guidance states that following the initial sifting process key agencies should be consulted on sites that:

- Are preferred or a reasonable alternative and align with your spatial strategy and associated infrastructure first approach; and,
- Relate to issues or opportunities that fall within the remit of the relevant key agency where further bespoke advice is required to support delivery. Some agencies may want to review all the preferred and alternative sites due to potential cumulative effects and will advise the planning authority accordingly.

It is not required to consult the key agencies on all sites that are proposed for development.

The key agencies request that sites submitted to them should be:

- Supported by a summary of the reason for requesting key agency input.
- Grouped in one batch - repeated individual requests undermine the advice provided and may not enable agencies to provide robust advice on cumulative impacts.
- Supplied with a Geographic Information Systems shapefile.
- Accompanied by the initial site assessment findings (and indicative or draft Strategic Environmental Assessment site assessment findings for Consultation Authorities).



- Presented in an easy to understand and clear format, for example, preferred / alternative sites and different site use classes could be colour coded and/or clearly categorised.

A minimum consultation period of six weeks is requested, however more time may be required depending on the number and complexity of the sites involved.

The Park Authority will follow the key agencies' guidance when engaging them on sites.

Historic Environment Scotland engagement in local development plan site appraisal and assessment

The guidance (CNPA947) sets out a proportionate approach aimed at getting the best out of Historic Environment Scotland engagement in the site appraisal process. It also sets out in detail what Historic Environment Scotland will consider when reviewing sites. The aim of the guidance is to facilitate timely and effective responses that add most value to the local development plan preparation process and ultimately support the smooth delivery of sites.

The approach aligns with the Guidance on Key Agency Engagement with Local Development Plan Site Appraisals.

Historic Environment Scotland advises that following the initial sifting process, they should be consulted on all sites that are:

- Considered to be a preferred site or reasonable alternative.
- Align with the spatial strategy and associated infrastructure first approach.

This approach enables Historic Environment Scotland to focus their resources on sites where they can add most value. They advise that there may be exceptional circumstances at a later stage in the plan preparation process, where a third party is challenging the exclusion of a site, and a planning authority consider that input from a key agency would be useful. In such circumstances they may be able to provide a view on the site if the reason for the consultation is clearly outlined including why the view of the agency is considered necessary.

To help Historic Environment Scotland use their time most effectively, sites submitted to Historic Environment Scotland should be:

- Supported by a summary of the reason for requesting key agency input.
- Grouped in one batch - repeated individual requests undermine the advice provided and may not enable agencies to provide robust advice on cumulative impacts.



- Supplied with a Geographic Information System shapefile.
- Accompanied by the initial site assessment findings and indicative or draft Strategic Environmental Assessment site assessment findings.
- Presented in an easy to understand and clear format for example, preferred or alternative sites and different site classes could be colour coded and / or clearly categorised.

A minimum consultation period of six weeks is required however more time may be required depending on the number and complexity of the sites involved.

The focus of our review will be on sites where Historic Environment Scotland would have a role in the planning process. They will focus on:

- a) Site allocations which may affect:
 - A category A listed building or its setting
 - A scheduled monument or its setting
 - A site included on the Inventory of gardens and designed landscapes in Scotland
 - An Inventory battlefield
 - A World Heritage Site
 - The preservation objectives of a historic marine protected area
- b) Site allocations which may require other consents (for example Scheduled Monument Consent, Conservation Area Consent or Listed Building Consent). They will focus on potential for reuse, demolition or major works.
- c) Any issue related to specific information provided by Historic Environment Scotland as part of their Historic Environment Scotland Evidence Report submission or relevant information identified post submission.
- d) Site allocations where Historic Environment Scotland would be a delivery partner.

As a Strategic Environmental Assessment Consultation Authority, Historic Environment Scotland has an interest in the whole historic environment. In addition to the sites covered by a, b, and c above, they may also comment on other sites. For instance, where there is a non-designated historic building, a building at risk or archaeological feature on the site which has not been identified in the assessment.

For sites where there are likely to be significant effects and it is considered that specific mitigation would be required, they will indicate whether they:

- Are content with the allocation in principle, subject to mitigation measures as per the mitigation hierarchy (for example, alteration of the allocation boundary or specific requirements to be included in place briefs or delivery programme).



- Consider that further information from an appropriate appraisal is needed including where the appraisal fails to include sufficient consideration of how, when and by whom any mitigation is delivered,
- Recommend that the allocation should be removed or altered because adequate mitigation is not possible.

Where they are content that the potential impact of a site can be mitigated at the development management stage they may not comment. An exception could be where there are key considerations to support deliverability that are important to convey to the planning authority.

Their Strategic Environmental Assessment comments will focus on inadequacies or inconsistencies in the environmental assessment as well as supporting findings where we agree. We may also identify opportunities for enhancement or mitigation.

NatureScot Planning and Development: standing advice and guidance documents - Development Planning

The note (CNPA949) sets out NatureScot's approach to their duty to cooperate with planning authorities in preparing the Proposed Plan.

They advise that the site assessment methodology put forward by the planning authority (and as agreed in their Evidence Report) should be utilised to sift through the sites (both existing and proposed) to identify implications for the natural environment.

They advise that the initial assessment should be carried out by the planning authority with input from their biodiversity and natural heritage specialists. The implications of proposals on both the protected and undesignated natural environment should be taken into consideration.

NatureScot will review relevant sifted sites and expect the planning authority to carry out the initial assessment of existing and proposed sites before sending the sifted sites to NatureScot for their input.

They advise that they will engage with site review requests that:

- Are sent to NatureScot after the planning authority have made its own assessments and sifted out non-viable sites.
- Are grouped in a way that avoids repeated individual requests, in other words, in one batch.
- Are supplied with a Geographic Information Systems shapefile.



- Are accompanied by indicative or draft Strategic Environmental Assessment, Habitats Regulations Assessments, and Site assessment findings.
- Include a summary of the reason for requesting our input.

The focus will be on sites where there are opportunities or issues for the natural heritage. Their aim is to provide advice early in the planning process, but this does not mean that they will comment on all the sites sent to us, even following initial sifting by the planning authority.

Sites that they are unlikely to want to comment on and can be sifted out include:

- Site history - if it is already allocated in the current local development plan and there are no changes, or if it has planning permission.
- Current use - if it is redevelopment (unless it is a sizeable site and / or has connectivity to a protected area, then they may comment).
- Location – if it is a site within a settlement (unless there may be connectivity to a protected area, then they may comment).
- Size - very small sites (below 1ha as a guide) (unless there is connectivity to a protected area, then we may comment).

Over and above the previous list, they will likely want to comment on the following: -

- Any issue related to specific information provided by NatureScot as part of their NatureScot Evidence Report submission.
- Any site brought forward from the current local development plan that was previously screened out of Habitats Regulations Assessment but would now be screened in because of the People Over Wind Court of Justice of the European Union judgement, which NatureScot provides advice on (CNPA1391).
- Site allocations where the Delivery Programme identifies NatureScot as a delivery partner.

For sites where there are likely to be significant environmental effects and they consider that specific mitigation would be required, they will indicate whether:

1. They are content with the allocation in principle, subject to mitigation measures (for example, specific requirements to be included in development briefs / delivery programme, or alteration of the allocation boundary),
- or
2. They recommend that the allocation should be removed or altered, because adequate mitigation is not possible.



Their Strategic Environmental Assessment or Habitats Regulations Assessment comments will focus on the sufficiency of the assessments as well as supporting findings where they agree. This applies to sites that have been through the sifting process and forwarded to NatureScot for comment.

They request a minimum consultation period of 6 weeks for site review. They may need more time than this depending on the number and complexity of the sites involved. If more time is needed, they will contact the planning authority to agree a suitable deadline.

Scottish Environment Protection Agency Planning Advice Note for Planning Authorities: Scottish Environment Protection Agency engagement in local development plan site appraisal and assessment (May 2025)

The guidance (CNPA208) aligns with the key agency guidance that the Park Authority will follow in engaging with the key agencies. The Scottish Environment Protection Agency advice note also outlines specific evidence related to their area of interest that should be used for the initial stages of the site appraisal and when Scottish Environment Protection Agency may need to be consulted later in the process.

In particular, the advice note highlights the importance of strategic flood risk assessment outputs for the site assessment process. The Park Authority has prepared a Strategic Flood Risk Assessment (CNPA097), which has been found sufficient by Scottish Environment Protection Agency:

- <https://cairngorms.co.uk/uploads/documents/Local-Development-Plan-Evidence-Report/Supporting-Documents/CNPA097-Cairngorms-Strategic-Flood-Risk-Assessment-2024.pdf>

The outputs of the strategic flood risk assessment will form part of the site assessment process. Further information on these matters is presented in Schedule 19: Flood risk and water management.

The Park Authority will follow Scottish Environment Protection Agency's advice note when engaging them on sites.



National Park Authority documents

Cairngorms National Park Partnership Plan 2022 – 2027

The Cairngorms National Park Partnership Plan (CNPA010) is the overarching land use management plan for the National Park and sets out how all those responsible for it will coordinate their work to tackle the most important issues. It also provides the strategic direction for key strategies and plans, including the Local Development Plan. This includes a spatial strategy, which identifies strategic developments and a settlement hierarchy.

The Local Development Plan will need to align with the Partnership Plan. The outcomes for the Cairngorms National Park Local Development Plan are therefore those of the National Park Partnership Plan. This is explained further in Schedule 1: Plan outcomes.

The Partnership Plan provides strategic direction for a number of Park Authority plans and strategies, including the Local Development Plan. This includes a spatial strategy, which identifies strategic developments and a settlement hierarchy (See Schedule 1 Figure 4). The Local Development Plan will therefore need to align with the Partnership Plan. The outcomes for the Cairngorms National Park Local Development Plan are therefore those of the National Park Partnership Plan.

Baseline site assessment methodology matters

This section summarises the Cairngorms National Park's site assessment methodology evidence which comprises the site assessment methodology and site assessment template.

There are links between this Schedule and all other policy areas.

Site assessment methodology

The legislation, guidance and advice outlined above can be summarised as follows:

- The local development plan's proposed spatial strategy, together with site selection, are tasks required as part of stage two – plan preparation.
- However, establishing a site assessment methodology at the Evidence Report stage is useful and can be linked or ideally integrated with the approach to Strategic Environmental Assessment and Strategic Flood Risk Assessment. In addition, the Cairngorms National Park's Partnership Plan (CNPA010) includes a spatial strategy, which identifies a settlement hierarchy.



- National Planning Framework 4 (CNPA008) sets out an integrated approach to bring together cross-cutting priorities and achieve sustainable development.
- The key agencies assessment methodology template sets out an approach that integrates with Strategic Environmental Assessment and responds to National Planning Framework 4's cross cutting policy approach. It asks open questions and includes deliverability issues within the material assets topic.
- The key agencies guidance, including the Scottish Environment Protection Agency's planning advice note (CNPA208), on engagement at the site assessment stage provides a framework for working with key agencies on the appraisal of sites.
- Statutory assessments, namely the Strategic Environmental Assessment and Habitats Regulations Appraisal, are integral to the assessment of sites and the three process should be aligned to deliver best outcomes.
- The Scottish Government research into the deliverability of site allocations (CNPA947) finds that sufficient and consistent information on site ownership and viability has not been known by local authorities in the past. It also advises that open questions are often asked, which does not provide clear and precise information. It provides a template for site assessment that takes a proportionate approach (based on development size) and seeks to integrate deliverability and environmental considerations.

In response, a bespoke site assessment template is proposed which incorporates the key agencies site assessment template; takes account of the deliverability of site allocations research; and integrates the assessment template with the Cairngorms National Park Authority's agreed approach to Strategic Environmental Assessment, the Strategic Flood Risk Assessment (CNPA097) and the Cairngorms National Park Partnership Plan's spatial strategy.

The site assessment template (CNPA1261) has been designed to identify, appraise and inform site selection for allocation in the local development plan. It enables existing allocations, other sites with planning permission and sites submitted through a Call for Ideas to be assessed and best deliver both the National Planning Framework's spatial principles and the Cairngorm National Park Partnership Plan's three overarching outcomes and spatial strategy. It will be used to consider all types of potential development sites including those for mixed use, housing, employment, retailing, tourism or other uses.

The site assessment template will form the basis for the request for information in response to the Call for Sites and Ideas invitation.



As set out in the template, a proportionate three stage process is proposed.

Stage one – initial assessment

This stage seeks to identify sites that should be excluded from development due to size; location within a designated biodiversity area; location in an identified flood risk area as identified in the Strategic Flood Risk Assessment; location on protected soils; and a location that does not accord with the Cairngorm National Park Partnership Plan's spatial strategy.

Sites would either progress to stage two or be rejected. This would include assessment of all existing site allocations in the Local Development Plan 2021.

Stage two – full initial assessment under Strategic Environmental Assessment topics

The template adapts the Key Agencies site assessment template, amending the questions so that they consider the potential of the site, rather than a specific site proposal.

In addition, they are amended to facilitate yes or no answers; respond to the National Park's specific natural and cultural heritage designations; to the National Park Partnership Plan's objectives and policies; and to add a deliverability section based on the outcomes of the Scottish Government's deliverability of site allocations research (CNPA947).

It requires both planning and Strategic Environmental Assessment overviews to be reached for each topic and for these to be summarised to provide overall planning and Strategic Environmental Assessment scores for each site.

At the end of each topic section, a planning overview and score and Strategic Environmental Assessment overview and score are required to ensure consistency and objectivity.

The site assessment template overview and score for each site will inform site selection and proposed site allocations in a consistent and transparent manner that meets the expectations of National Planning Framework 4 and the Cairngorms National Park Partnership Plan 2022 – 2027.



Stage three – engagement with key agencies

Once sites have been scored, the Park Authority will engage with key agencies according to the Key Agency Group site appraisal guidance and individual key agency advice notes on site appraisals.

The information provided by key agencies will be used to inform the overall assessment and finalise the identification of preferred sites and alternative sites that were initially identified at stage 2.

Preferred sites will form the basis for allocations identified within the Proposed Plan.

Site assessment template

The site assessment template (CNPA1261) sets out the considerations for each stage in the site assessment methodology.

Evidence gaps

There are no identified evidence gaps in this schedule.

Summary of stakeholder engagement

Public engagement on this schedule (see CNPA1343 for engagement version) and a draft site assessment template (CNPA210) was carried out from 15 August – 26 September 2025. Eight completed responses were received, all of which agree that the evidence presented is sufficient to inform the preparation of the Proposed Plan (CNPA1340).



Summary of implications for Proposed Plan

Based on the available evidence and engagement with key agencies and other interested parties, the Park Authority consider this schedule to provide a sufficient evidence base on which to prepare the Proposed Plan.

The Proposed Plan needs to be prepared in accordance with:

- The four aims of the National Park as set out in The National Parks (Scotland) Act 2000 (CNPA004), in particular the first aim 'to conserve and enhance the area's natural and cultural heritage'.
- Section 9(6) of the 2000 Act, which states that while the aims are to be pursued collectively, if there is conflict between the first aim and any of the others, greater weight is given to the first aim.
- The spatial strategy and principles of National Planning Framework 4 (CNPA008).

In its preparation the Proposed Plan should:

- Align with the Cairngorms National Park Partnership Plan 2022 – 2027 (CNPA010).
In particular, through:
 - Following the spatial strategy by consolidating the role of the strategic settlements as the most sustainable places for future growth and the focus for housing land supply and providing any additional flexibility in future land supply for housing at small sites around a wider range of settlements.
- Take account of the priorities of community action plans.
- Identify sufficient deliverable land to meet the ten year local housing land requirement in locations that create quality places for people to live.
- Identify sufficient land for business and industry, taking into account business and industry land audits, in particular ensuring that there is a suitable range of sites that meet current market demand, location, size and quality in terms of accessibility and services.
- Give significant weight to the global climate and nature crises in the consideration of site selection.
- Safeguard locally, regionally, nationally and internationally important natural assets when allocating land, by considering the objectives and level of their protected status.
- Protect locally, regionally, nationally and internationally valued soils by limiting development on land that is culturally or locally important for its primary use, peatland, carbon-rich soils and priority peatland habitat (there is no prime agricultural land in the National Park).



- Aim to maximise the use of existing land and buildings and minimise additional land take, supporting any greenfield site through allocations or explicitly through policy.
- Prioritise locations for future development that can be accessed by sustainable modes.
- Support local living and 20 minute neighbourhoods, including use of the place standard tool and community engagement.
- Take an integrated infrastructure first approach to site selection, not be a by product of it.
- Consider heat network potential.
- Avoid development in areas at risk of flooding as a first principle.
- Seek to provide a proportion of the local housing land requirement in the National Park's town centres (Aviemore, Ballater, Grantown-on-Spey, Kingussie and Newtonmore).
- Consider the need for further retail provision when allocating housing sites to both meet the need for neighbourhood shopping and to support local living.
- Work with the Scottish government key agencies, taking account of their joint site selection and strategic environmental assessment checklist.

Statements of agreement

The following people / organisations agree that the evidence presented is sufficient to inform the preparation of the Proposed Plan:

- Historic Environment Scotland (C002)
- NatureScot (C004)
- Scottish Environment Protection Agency (C010)
- Scottish Forestry (C011)
- Transport Scotland (C014)
- SportScotland (C056)
- Perth and Kinross Council (C024)
- The House of Bruar, Atholl Estate and Dalhousie Estate (C060)

Historic Environment Scotland (C002)

Historic Environment Scotland welcomes the fact that the site assessment process proposed has embedded the Key Agency offer and utilised the site assessment proforma. They say that this should aid in the assessment of sites (including for the purposes of Strategic Environmental Assessment) and they look forward to supporting the Park Authority as part of this process. Historic Environment Scotland advises that



they have prepared specific assessment guidance, and they have provided it with their response.

Park Authority response

Historic Environment Scotland's specific site assessment guidance has now been added to the Links to evidence and Summary of evidence sections of this schedule.

NatureScot (C004)

NatureScot advises that they think that the evidence in this schedule is relevant for the Cairngorms National Park area. For example, it refers to the relevant National Planning Framework 4 policies, site assessment guidance, and to both Strategic Environmental Assessment and Habitats Regulations Appraisal.

They do, however, suggest including detail on NatureScot's guidance on engagement with local development plan site appraisals which supports the Key Agency Group guidance, already referred to within this schedule.

NatureScot advises that they are satisfied that the correct implications for the next Local Development Plan are relevant. For example, they welcome the implications to give significant weight to the global climate and nature crises, as well as safeguard and protect locally, regionally, nationally and internationally important natural assets. They would, however, suggest reflecting National Planning Framework 4 Policy 3, so that the implications also include opportunities to enhance natural assets.

Park Authority response

NatureScot's specific site appraisal guidance has now been added to the Links to evidence and Summary of evidence sections of this schedule. National Planning Framework 4 Policy 3 has been added to the relevant policy references in the climate factors section of the site assessment template.

Scottish Environment Protection Agency (C010)

Scottish Environment Protection Agency advises that they have recently commented on drafts of schedules and have been happy with the content. They have no further comment to make.



Transport Scotland (C014)

Transport Scotland asks if there are any other policies that can be considered at stage 1 to assess sites, such as National Planning Framework 4 or NTS2? NTS2 isn't mentioned anywhere in the document, and the sustainable travel and investment hierarchies are important in determining the suitability of sites and should be part of infrastructure first considerations.

Park Authority response

The Park Authority has added an additional question to stage 1 of the draft site assessment template (CNPA1261) to consider whether the allocation of the site being assessed would lead to the local development plan prioritising locations for future development that can be accessed by sustainable modes, in line with the sustainable travel hierarchy and sustainable investment hierarchy.

The Park Authority has also added an additional section to stage 2 to consider the cumulative impacts of development sites on issues including sustainable transport and a specific question relating to the effect on the operational performance of strategic transport networks. This reflects National Planning Framework 4 (CNPA008) Policy 13 and Annex F Glossary of definitions.

The transportation questions in the site assessment template will be informed by the transport appraisal. The requirements for the transport appraisal are discussed in Schedule 11: Sustainable transport.

National Planning Framework 4 refers to and takes account of National Transport Strategy 2 in its land use policies. It is therefore not necessary to refer directly to National Transport Strategy 2 in the site assessment.

Scottish Forestry (C011)

Scottish Forestry advises that matters that concern them are appropriately addressed in Schedule 5: Natural heritage and that the suite of evidence reports, including housing, actively reference this. Scottish Forestry have no further comments.

SportScotland (C056)

SportScotland confirms that they think that the evidence presented in this report is sufficient to inform the preparation of the next Local Development Plan. They make no further comment.



Perth and Kinross Council (C024)

Perth and Kinross Council advise that the evidence provides a clear, considered, and logical approach to the assessment of potential sites for inclusion within the next local development plan. They note the proposed use of the Key Agencies Joint Local Development Plan Site Assessment and Strategic Environmental Assessment Checklist.

They wonder if it would be useful as part of any assessment (particularly in respect of cumulative impacts) to consider any neighbouring authority local development plan proposals (draft or existing) which if developed could lead to cumulative impacts of a significant nature on the National Park. In addition, proposals for inclusion in the new Cairngorms National Park Local Development Plan could result in significant impacts in neighbouring local authority areas.

Park Authority response

The Park Authority has added a cumulative impacts section to the template to consider these issues including cumulative impacts both within and outwith the National Park.

The House of Bruar, Atholl Estate and Dalhousie Estate (C060)

Representations on behalf of The House of Bruar, Atholl Estate and Dalhousie Estate highlight that the ability to lodge a masterplan and design statement through the call for sites stage 1 and therefore reference to the proposal in the assessment template would be welcomed.

Park Authority response

A masterplan or design statement could be submitted through the call for sites stage 1. If it was, this would be listed in the supporting information on the template and utilised in the site assessment process.

Statements of dispute

There are no outstanding statements of dispute.