



For Decision

Title: Local Development Plan 3 – Evidence Report 2025

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Purpose

This paper seeks approval of the Evidence Report, as set out in Annex 1, for submission to Scottish Ministers for its Gatecheck review by the Division for Planning and Environmental Appeals (DPEA).

Recommendations

The Board is asked to:

- a) Approve the Evidence Report for submission to Scottish Ministers for its Gatecheck review via the Scottish Government (SG) DPEA.
- b) Delegate authority to the Head of Planning and Chief Planning Officer to respond to any request for further information or amendment as a result of the Gatecheck process.

Strategic context

1. The Planning (Scotland) Act 2019 has brought numerous reforms to Scotland's development plan system. It has confirmed that the National Planning Framework is a part of the statutory Development Plan and sets out a new way of preparing local development plans. Major changes to development planning include:
 - a) The requirement to prepare an Evidence Report to inform the new Local Development Plan (LDP).
 - b) The introduction of a Gatecheck review process to evaluate 'sufficiency' of the information in the Evidence Report.
 - c) Main issues reports no longer form part of the plan making process.

The Evidence Report

2. The Evidence Report has been prepared in accordance with the Town and Country Planning (Scotland) Act 1997, as amended, and the Town and Country Planning (Development Planning) (Scotland) Regulations 2023.



3. The purpose of the Evidence Report is to inform the preparation of the Proposed Plan. The Evidence Report reflects the initial stage of information and evidence gathering, shaped by early consultation and stakeholder engagement. The Evidence Report does not include site specific proposals or set out detailed planning policies and associated requirements. These will be developed during the subsequent Proposed Plan stage. Instead, the report outlines key considerations and actions to be addressed in the preparation of the Proposed Plan. In accordance with relevant guidance, the Evidence Report does not contain all the detail of evidence but focuses on a summary of the evidence and what it means for the Proposed Plan.

4. Evidence is presented on a topic basis, with the Evidence Report comprising a series of topic-based schedules broadly arranged according to the policy themes set out in National Planning Framework 4 (NPF4) – sustainable places, liveable places, and productive places. Where possible, the Park Authority has sought to gather information and evidence in a place-based manner. Each schedule within the Evidence Report contains a summary of:
 - a) The legislative requirements addressed within it.
 - b) The policy requirements and considerations addressed within it.
 - c) A summary of the baseline evidence to inform the Proposed Plan.
 - d) Any identified evidence gaps.
 - e) The implications for the Proposed Plan.
 - f) The engagement undertaken to inform it.
 - g) Any statements of agreement and outstanding dispute arising from the engagement.

Summary of key implications for Proposed Plan

5. This section provides a summary of the main implications for the Proposed Plan based on the information in the Evidence Report. Please note that this is not an exhaustive list of all considerations and implications – the implications are set out in full within each of the schedules in the Evidence Report.

Overarching topics

6. The Proposed Plan needs to be prepared in accordance with:



- a) The four aims of the National Park as set out in the National Parks (Scotland) Act 2000, as to be amended by the Natural Environment (Scotland) Bill.
 - b) 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.
 - c) The spatial strategy and principles of NPF4.
7. In accordance with Section 14 of the National Parks (Scotland) Act 2000, as to be amended by the Natural Environment (Scotland) Bill, public bodies have a duty to facilitate the implementation of the National Park Partnership Plan (NPPP). Therefore, the Proposed Plan should:
- a) Align with the NPPP and adopt its vision and three overarching outcomes for nature, people, and place.
 - b) Align with the NPPP's spatial strategy, which supports an infrastructure first approach.
8. The Proposed Plan should take account of the priorities and actions of any:
- a) Published community action plans – there are currently eighteen community action plans within the National Park.
 - b) Registered local place plans – there are currently no registered local place plans in the National Park.

Sustainable places

9. The Proposed Plan should:
- a) Safeguard the habitats and species protected by international and national designations from the potentially adverse effects of development, including through the site assessment, Habitats Regulations Appraisal and Strategic Environment Assessment process.
 - b) Make the most efficient use of development land to ensure that development meets the needs of the present without compromising the ability of future generations to meet their own needs. Not only is this to ensure that protected sites are safeguarded, but it also aims to ensure that development land is available in the future to meet long term needs.
 - c) Contribute to establishing and supporting the delivery of nature networks.
 - d) Protect and enhance the Special Landscape Qualities of the National Park.



Liveable places

10. Housing need within the National Park has been determined from a range of sources, including the housing need and demand assessments of the five local authorities covering the National Park. On the basis of this evidence, the Proposed Plan should identify sufficient deliverable land to meet an indicative ten-year local housing land requirement of around 889 new homes, in accordance with the spatial strategy set out in the Partnership Plan. This figure:
 - a) Complies with the requirement to exceed NPF4's minimum all tenure housing land requirement of 850 new homes.
 - b) Has been benchmarked against past delivery rates and is considered to be realistic and achievable.
 - c) Has been benchmarked against the existing effective housing land supply, as set out within the housing land audits of the local authorities covering the National Park. This demonstrates that there is capacity to deliver 797 new homes between April 2024 and March 2039 on sites allocated for development in the current LDP and / or with existing planning permission. A proportion of this existing land supply will be carried forward into the Proposed Plan, with the exact amount dependent on the outcome of the site assessment process.
 - d) Has been considered in relation to the capacity and condition of infrastructure within the National Park and is considered to be deliverable in line with infrastructure first principles.
11. The Proposed Plan should also:
 - a) Ensure that both current and future needs can be met by making an efficient use of land to maximise the amount of affordable housing delivered on allocated sites.
 - b) Facilitate the implementation of the overall Partnership Plan target that 75% of new housing is for social rental, mid-market rental or other affordable categories.
12. There are no significant constraints to the education, healthcare, water or digital infrastructure serving the residents of the National Park which would otherwise prejudice the delivery of spatial strategy, indicative housing land requirement or the infrastructure first approach. However, to ensure that the Proposed Plan is prepared in accordance with infrastructure first principles, the Park Authority will



continue to work in partnership with the local authorities, NHS boards, and other relevant infrastructure providers to determine the level of developer contributions, if any, to be levied for this infrastructure and the triggers for determining when developer contributions are needed.

Liveable places

13. The Proposed Plan should:

- a) Identify and allocate land for economic development, giving consideration to the location of any new economic allocations in relation to communities, access to services and all forms of travel and transport services.
- b) Safeguard the locations of important community assets, reflect the community wealth building priorities for the Plan area set out by the local authorities' community wealth building strategies and plans, and take account of areas of economic disadvantage and inequality.
- c) Conduct a review of town centre boundaries to better reflect the NPF4 definition of a town centre use.
- d) Support the viability of existing tourist infrastructure and identify land for new sustainable tourism development that supports the visitor economy while also protecting local communities from potentially adverse effects.
- e) Support sustainable tourism development that also manages tourism pressures on the natural environment and promotes responsible access where relevant.

Engagement

14. The Park Authority has undertaken a wide range of online and direct engagement throughout the preparation of the Evidence Report. A summary of this is provided on pages 50 – 71 of Annex 1.0.

Gatecheck

15. The purpose of the Gatecheck is to provide an independent assessment of whether the planning authority has sufficient evidence to prepare a LDP. It will be carried out by a reporter from the DPEA. The target date for completing the Gatecheck review is three months from the DPEA's receipt of the Evidence Report.



16. The reporter may decide there is sufficient information, and, on being so notified, the Park Authority may then move to prepare and publish the Proposed Plan. Alternatively, the reporter may consider there is not sufficient information and provide recommendations for improving the Evidence Report. If the reporter determines that the information is not sufficient, then the Park Authority will need to amend the Evidence Report and resubmit it to the DPEA for another Gatecheck review.

Strategic policy consideration

17. The Park Authority has a statutory duty to prepare a LDP, which should be adopted by May 2028. The Evidence Report is the first major step in this process.

Strategic risk management

18. While no risk is posed by the submission of the Evidence Report for its Gatecheck review itself, there are risks to the LDP's timetable for preparation if the Evidence Report is found to be insufficient.
19. In particular, there remain uncertainties around the volume and nature of information required for the Evidence Report to be considered sufficient by the DPEA during the Gatecheck review. At the time of writing this paper, DPEA had issued nineteen formal Gatecheck decisions on the evidence reports submitted by other planning authorities. Of these, nine (43%) evidence reports were found to be sufficient and 12 (57%) were found to be insufficient and returned to the relevant planning authorities for further work.
20. Where an evidence report is returned, the planning authority is required to carry out a range of tasks to bring it to sufficiency. This may include the need to redraft sections of the report, gather additional evidence, commission additional studies and carry out further engagement, as well as the statutory democratic processes. The revised version of the Evidence Report must then be resubmitted to the DPEA for a further Gatecheck. While the delay caused in the preparation of the LDP in such cases will depend on the specific circumstances, the delay caused in all cases is likely to be several months.



21. Park Authority Officers have sought to reduce the risk of the Evidence Report being found insufficient as far as possible. Emerging guidance and best practice have been taken into account, as have the outcomes of other Gatecheck reviews. Officers have also met with a reporter from the DPEA to discuss the content of key schedules covering the topics of housing and infrastructure. This process is reflected in the content and structure of the Evidence Report.
22. Any significant delay to the Park Authority's timetable for producing its next LDP is likely to present a risk to the ability to meet Scottish Ministers' expectations of having a new plan in place by May 2028. An internal programme board has been established to co-ordinate the development of the NPPP and the LDP. This will monitor and manage the above risks insofar as it is possible. The Board will be kept up to date on the progress of the LDP's preparation and the Development Plan Scheme will continue to be updated annually.

Success measures

23. The approval of the Evidence Report for submission to Scottish Ministers.

Next steps

24. Once the Board has approved the submission of the Evidence Report for its Gatecheck Review:
 - a) Final checks will be undertaken to ensure all formatting, document referencing and figure / table / page referencing meets DPEA requirements.
 - b) The Evidence Report and its supporting material will be submitted to Scottish Ministers via the DPEA.
 - c) The Evidence Report will be published on the Park Authority's website.

Supporting information

25. Annex 1 – Cairngorms National Park Local Development Plan: Evidence Report (March 2026)

Due to file size, the Evidence Report in Annex 1 is presented as a series of separate schedules / chapters, as follows:

- Annex 1.0 – Evidence Report - Introduction
- Annex 1.1 – Schedule 1: Plan outcomes



- Annex 1.2 – Schedule 2: Policy monitoring
- Annex 1.3 – Schedule 3: Site assessment methodology
- Annex 1.4 – Schedule 4: Climate change
- Annex 1.5 – Schedule 5: Natural heritage
- Annex 1.6 – Schedule 6: Landscape
- Annex 1.7 – Schedule 7: Historic and cultural heritage
- Annex 1.8 – Schedule 8: Land use, soil and resources
- Annex 1.9 – Schedule 9: Energy
- Annex 1.10 – Schedule 10: Zero waste
- Annex 1.11 – Schedule 11: Sustainable transport
- Annex 1.12 – Schedule 12: Living locally and 20 minute neighbourhoods
- Annex 1.13 – Schedule 13: Housing
- Annex 1.14 – Schedule 14: Education
- Annex 1.15 – Schedule 15: Heating and cooling
- Annex 1.16 – Schedule 16: Blue and green infrastructure
- Annex 1.17 – Schedule 17: Play, recreation and sport
- Annex 1.18 – Schedule 18: Health and safety
- Annex 1.19 – Schedule 19: Flood risk and water management
- Annex 1.20 – Schedule 20: Digital infrastructure
- Annex 1.21 – Schedule 21: Economic development
- Annex 1.22 – Schedule 22: Town centres and retail
- Annex 1.23 – Schedule 23: Tourism

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