



Topic: Local Development Plan 2021 – policy monitoring

Engagement version – September 2025

Requirements addressed in this section

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

Section	Requirement
Section 16(1)	A planning authority are, as soon as practicable after the coming into force of section 2 of the Planning Act and thereafter – (i) whenever required to do so by the Scottish Ministers, or (ii) subject to sub-paragraph (i), at intervals of no more than 10 years, to prepare local development plans for all parts of their district, and to keep under review the plans so prepared.
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 adopted National Park Plan.

Links to evidence

- National Planning Framework 4
<https://www.gov.scot/publications/national-planning-framework-4/documents/>
- Local Development Planning Guidance 2023
<https://www.gov.scot/publications/local-development-planning-guidance/documents/>
- Cairngorms National Park Partnership Plan 2022 – 2027
https://cairngorms.co.uk/uploads/documents/Local-Development-Plan-Evidence-Report/Supporting-Documents/CNPA010-Cairngorms-National-Park-Partnership-Plan-2022-_2027.pdf



- Cairngorms National Park Partnership Plan 2017 – 2022
<https://cairngorms.co.uk/uploads/documents/Local-Development-Plan-Evidence-Report/Supporting-Documents/CNPA332-CD002-Cairngorms-National-Park-Partnership-Plan-2017.pdf>
- National Park Partnership Plan Annual Update 2024
<https://cairngorms.co.uk/uploads/documents/240913Paper2NPPPAAnnualUpdate.pdf>
- Cairngorms National Park Local Development Plan 2021
<https://cairngorms.co.uk/planning-development/ldp-2021/>
- Cairngorms National Park Local Development Plan 2021 – Delivery Programme 2025
<https://cairngorms.co.uk/uploads/documents/Local-Development-Plan-Evidence-Report/Supporting-Documents/CNPA334-Delivery-Programme-2025-final.pdf>
- Cairngorms National Park Employment Land Audit 2025
<https://cairngorms.co.uk/uploads/documents/Local-Development-Plan-Evidence-Report/Supporting-Documents/CNPA335-Cairngorms-National-Park-Employment-Land-Audit-2025.pdf>



Summary of evidence

Policy context

National Planning Framework 4

National Planning Framework 4 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.

Local Development Planning Guidance 2023

Paragraph 93 of the guidance advises that, as part of the preparation of the evidence report, the planning authority should:

- Evaluate whether the previous plan has delivered its outcomes and allocations.
- Identify any lessons learnt for the preparation of the new plan.
- Consider the appropriateness of the previous spatial strategy.

The purpose of this topic paper is to demonstrate how the evidence report meets these requirements.

Cairngorms National Park Partnership Plan (2017 – 2022 and 2022 – 2027)

The Partnership Plan is the management plan for the National Park. It has been approved by Scottish Ministers. It sets out the vision and over-arching strategy for managing the Park, as well as identifying priorities for action and an overall strategic policy framework.

Guidance in Scottish Planning Policy states that Local Development Plans for National Parks should be consistent with the National Park Partnership Plan. The Partnership Plan therefore provides the strategic context for the Local Development Plan, and the Local Development Plan helps to deliver a number of the Partnership Plan's policies and priorities.

Partnership Plan 2017 – 2022

The Partnership Plan 2017 – 2022 provided the strategic context and spatial strategy for the adopted Cairngorms National Park Local Development Plan 2021. It helps to deliver the long-term outcomes, priorities and policies of the Partnership Plan 2017 – 2022.



It sets out three long-term outcomes for the National Park:

- Conservation – a special place for people and nature with natural and cultural heritage enhanced.
- Visitor experience – people enjoying the National Park through outstanding visitor and learning experiences.
- Rural development – a sustainable economy supporting thriving businesses and communities.

To deliver these three outcomes, the partnership plan contains nine priorities and sixteen policies.

Partnership Plan 2022 – 2027

The Partnership Plan 2022 – has superseded the 2017 plan. The Partnership Plan 2022 – 2027 contains sets of objectives and policies under three themes: Nature, People and Place.

The overall outcome for nature is a carbon negative and biodiversity rich National Park with better functioning, better connected and more resilient ecosystems. Policy A4 is to conserve and enhance the special landscape qualities of the National Park with a particular focus on:

- a) Wildness qualities.
- b) Maintaining and promoting dark skies.
- c) Supporting woodland expansion that maximises opportunities for long-term enhancement of landscape and wildness qualities.
- d) Delivering enhancements that also provide habitat improvements.
- e) Enhancing opportunities to enjoy and experience the landscapes of the National Park.
- f) Applying a presumption against new constructed tracks in open moorland and, where agreed, ensuring new tracks are constructed to a high standard.

Policy A5(g) is to support off-site mitigation from development that contributes to ecological networks.

The overall outcome for place is a place that people want to live in, work in and visit that works for all. Objective C2 New housing is to deliver new housing in the National Park and ensure as much as possible is secured for key workers and / or to resolve affordability issues. Its target is that by 2030, 75% of new housing is for social rental, mid-market rental or other affordable categories that provide affordability in perpetuity.



Actions include using the next Local Development Plan to identify further locations where more than 25% affordable housing is required and bring this up to 75% overall.

Policy C3 is to enhance the design and sense of place in new development and existing settlements, in particular:

- a) Enabling new development which contributes positively to the sense of place
- b) Promoting a high standard of sustainable design, energy efficiency, sustainably-sourced materials and construction in new development.
- c) Supporting the retention and enhancement of local character.
- d) Facilitating the rehabilitation of redundant rural buildings and recycling of resources.
- e) Ensuring road upgrades and improvements respond to local landscape character.
- f) Promoting active travel and public transport provision and reducing the reliance on private motor vehicles.

Policy C4(a) is to ensure high-quality facilities and infrastructure are designed to manage the effects of visitor pressures on the natural heritage and communities and Policy C4(b) is to ensure that the upgrading or refurbishment of visitor hubs improves accessibility for all potential users and incorporates disabled access toilets and Changing Places facilities where possible.

National Park Partnership Plan Annual Update 2024

This report, presented to the Cairngorms National Park board on 27 September 2024, summarises what work has been done to achieve the outcomes set out in the National Park Partnership Plan 2022 – 2027. The plan contains many goals under the three outcomes, not all of which are related to the policies in the Local Development Plan. The following achievements under the place outcome are relevant:

- Short Term Let Licensing and Control Area implemented by Highland Council in Badenoch and Strathspey.
- Delivery of affordable and mid-market rent housing in Carrbridge, Dulnain Bridge, Kincaig and Kingussie via Highland Council's affordable housing delivery programme.
- Active travel and path improvement projects progressed on the Speyside Way and Aviemore Orbital route with further projects getting the go ahead.



Cairngorms National Park Local Development Plan 2021

Adopted in March 2021, this is the adopted local development plan for the Cairngorms National Park. The Local Development Plan 2021 shares its vision with the Partnership Plan 2017 – 2022, which is:

‘An outstanding National Park, enjoyed and valued by everyone, where nature and people thrive together.’

The Local Development Plan 2021 contains eleven policies to help to deliver the partnership plan’s long-term outcomes by making sure that:

- The special qualities of the National Park are protected from development that would significantly erode or harm them and are enhanced by new development where possible.
- New development helps to reinforce the valued built heritage of the National Park and the communities within it.
- New or improved visitor infrastructure is supported where appropriate and integrated with other visitor sites, services and communities.
- New development is well connected to core paths and other off-road routes, as well as creating attractive places to live and visit.
- There is sufficient land for housing to meet identified need and demand, including for inward migration of workers.
- More affordable housing is provided to support growth in the working age population and help address the housing pressures faced by young people.
- The necessary land and support for business development and diversification is provided.
- There are sites for future development that support attractive, vibrant communities and that minimise the need to use energy.
- There is clear guidance on where, when and how the best development will be supported.



Table 2 and Table 3, respectively, show the relationship between the Local Development Plan 2021's eleven policies and the Partnership Plan 2017 – 2022's nine priorities and sixteen policies.

Table 2 Relationship between policies within in the Cairngorms National Park Local Development Plan 2021 policies and priorities within the Cairngorms National Park Partnership Plan 2017 – 2022.

Local Development Plan 2021 – policies		Partnership Plan - priorities								
		Conservation			Visitor experience			Rural development		
		Landscape scale collaboration	Deer management	Moorland management	Visitor infrastructure and information	Active Cairngorms	Learning and inclusion	Housing	Community capacity and empowerment	Economic development
		1	2	3	4	5	6	7	8	9
1	New housing development	-	-	-	-	-	-	✓	-	-
2	Supporting economic growth	-	-	-	✓	-	-	-	-	✓
3	Design and placemaking	-	-	-	-	-	-	✓	-	✓
4	Natural heritage	✓	-	-	-	-	-	-	-	-
5	Landscape	✓	-	✓	-	-	-	-	-	-
6	Digital communications	-	-	-	-	-	-	-	✓	✓
7	Renewable energy	-	-	-	-	-	-	-	-	✓
8	Open space and recreation	-	-	-	-	✓	-	-	✓	-
9	Cultural heritage	✓	-	-	-	-	-	-	-	-

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Local Development Plan 2021 – policies		Partnership Plan 2017 – 2022 – policies															
		Conservation							Visitor experience				Rural development				
		Land management	Habitat, species and land use resilience	Special landscape qualities	Habitat quality and connectivity	Species conservation	Collaboration across ownerships	Cultural heritage	High quality experience	Sustainable tourism management	Access and recreation	Inspiration, learning and understanding	Economic growth	Sustainable settlements development	Low carbon economy	Supporting communities	Design and sense of place
		1.1	1.2	1.3	1.4	1.5	1.6	1.7	2.1	2.2	2.3	2.4	3.1	3.2	3.3	3.4	3.5
11	Developer obligations	-	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓



Cairngorms National Park Local Development Plan 2021 – Delivery Programme 2025

The aim of the Delivery Programme is to achieve the intended outcomes of the Cairngorms National Park Local Development Plan 2021.

As an update and replacement for the Action Programme 2022, it introduces a colour-coded 'delivery pipeline' (section 2); provides details on affordable housing and financial contributions secured through planning permissions (section 3) and provides a greater level of detail on the planning history of each allocated site in each settlement (section 6). A draft version was the subject of consultation with internal officers and key stakeholders (local authorities, landowners, developers and key agencies).

Baseline of policy monitoring matters

This section evaluates whether the adopted Local Development Plan 2021 has delivered on its outcomes and allocations; identifies any lessons learnt and considers the appropriateness of the previous spatial strategy, as required by Paragraph 93 of the Local Development Planning Guidance (2023).

It also considers the relationship between the Local Development Plan 2021 policies, and the National Planning Framework 4 policies to identify the effect of its publication on the use of the Local Development Plan policies.

It covers the following issues:

- Analysis of Local Development Plan 2021 policy usage in planning decisions
- Summary of delivery of allocations
- Lessons learnt
- Spatial strategy
- Relationships between Cairngorms National Park Local Development Plan 2021 and National Planning Framework 4 policies.

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

Analysis of Local Development Plan 2021 policy usage in planning decisions

In the Cairngorms National Park, arguably more than in any other part of Scotland, there is a partnership approach to planning. The Cairngorms National Park Authority and the five relevant local authorities – Aberdeenshire Council, Angus Council, Moray Council,



Perth and Kinross Council and The Highland Council – all play a key role in making the planning system work effectively.

The Cairngorms National Park sets the planning policy framework through the Cairngorms National Park Partnership Plan and the Local Development Plan and all planning applications in the National Park are determined in line with this policy framework.

However, planning applications are submitted in the first instance to the relevant local authority. The Cairngorms National Park then 'calls in' and determines the most significant planning applications for the National Park (generally around 10% of all applications), leaving the remainder to be determined by the local authorities.

The type of applications that the Cairngorms National Park Authority are highly likely to call-in are:

- All 'major' applications as defined in planning legislation.
- Private ways, which require Environmental Impact Assessments and those which could have a potential impact upon important natural and cultural heritage interests and/or sites of particular landscape sensitivities.
- Wind turbines, hydro schemes or large solar panel farms.
- Minerals applications.
- Housing – five or more residential units within a settlement.
- Housing – three or more residential units outside a settlement.
- More than 250m² gross floor area, or 0.25ha, of employment space outside settlements.
- Applications which would require Environmental Impact Assessment.
- Listed building consent applications that involve major external or internal changes or are otherwise linked to an application type in this list.
- Conservation area consent applications linked to another application type in this list.

The types of applications that are unlikely to be called in include householder development, small housing schemes, small scale extensions, alterations and changes of use and other applications such as advertisement and heritage consents.

The officer reports of all planning applications determined by the Cairngorms National Park Authority and the five local planning authorities since the Cairngorms National Park Local Development Plan was adopted in March 2021¹ have been analysed to help

¹ All planning applications determined between 1 April 2021 and 31 March 2025.



to assess whether the outcomes of the National Park's partnership plan and local development plan have been delivered.

Local Development Plan 2021 – overall policy use

1,266 planning applications have been determined since the Cairngorms National Park Local Development Plan 2021 was adopted. 94% of those have been determined by the constituent local planning authorities and only 6% determined by the Cairngorms National Park. 57% have been determined by The Highland Council. Figure 1 indicates the number and proportions determined by each authority.

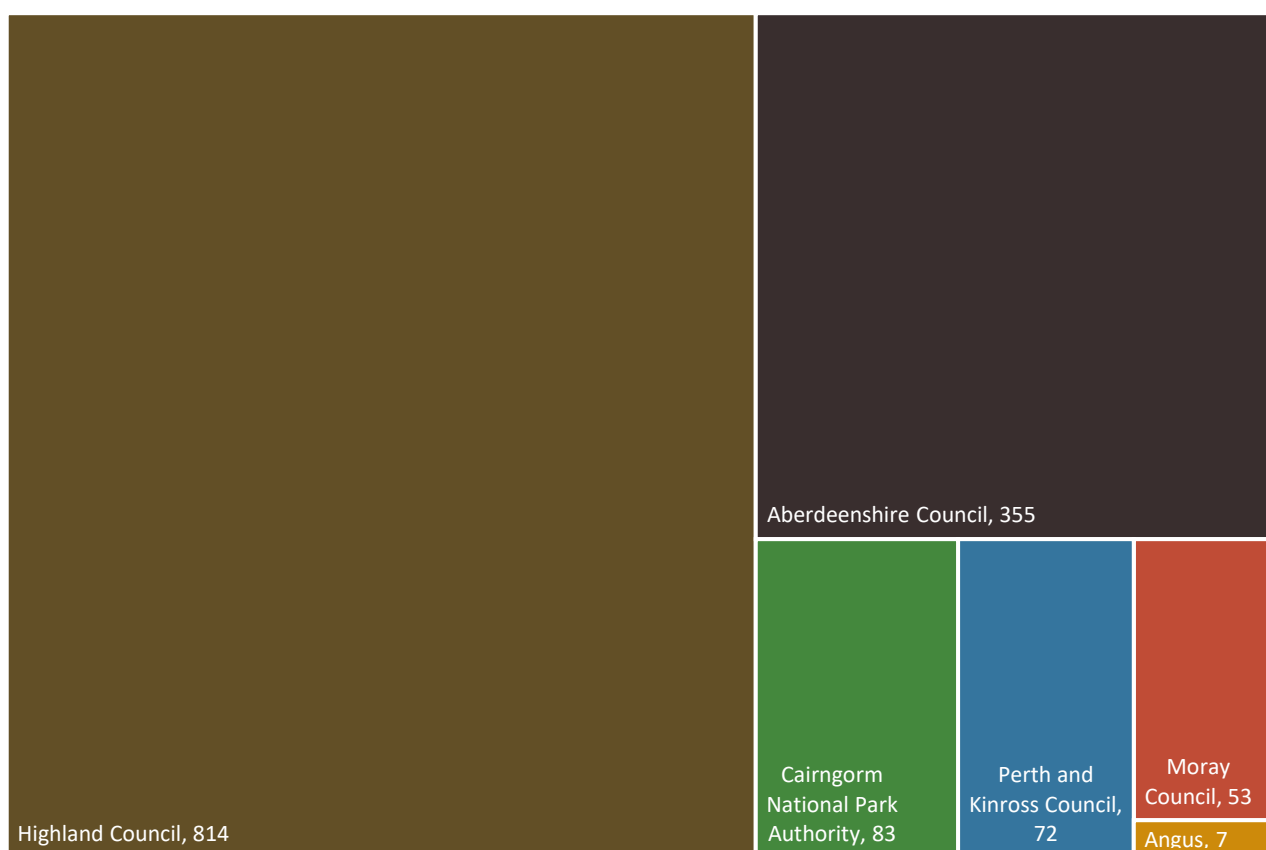


Figure 1 Number of planning applications determined by each local planning authority April 2021 – March 2025.

The 11 local development plan policies are used to determine applications across the Cairngorms National Park (alongside the National Planning Framework 4's policies since its publication in February 2023). Figure 2 Cairngorms National Park Local Development Plan policies referred to in planning applications approved by the Cairngorms National Park Authority and by each constituent planning authority between April 2021 and March 2025. indicates the proportion of approved applications decided using each policy by each local authority. It highlights that each



authority has quite a similar pattern of policy usage. While the National Park sometimes differs, this is likely due to the different types of applications. In further graphs and analysis, we will look further into the policy use of the Cairngorms National Park vs all other local authorities and on which they differ significantly. This graph also starts to introduce which policies are most used and least used across the park.

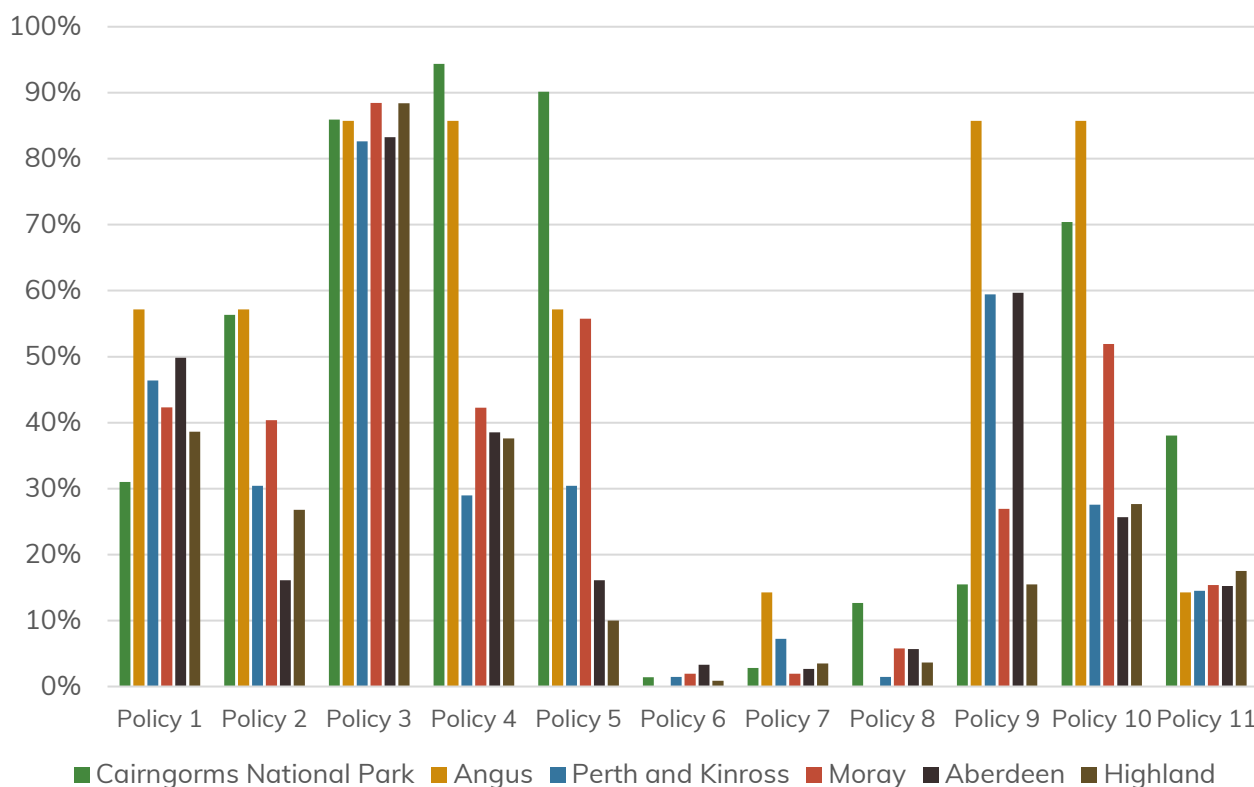


Figure 2 Cairngorms National Park Local Development Plan policies referred to in planning applications approved by the Cairngorms National Park Authority and by each constituent planning authority between April 2021 and March 2025.

To help show the overall picture of main policy use, Figure 3 shows the proportion of policy usage in all decisions made by all authorities. This gives us a clear picture of the most used policies which are:

- Policy 3 (design and Placemaking) used in 87% of all decisions.
- Policy 1 (new housing development) used in 42% of all decisions.
- Policy 4 (natural heritage) used in 42% of all decisions.

It also helps us to understand which policies were used the least:

- Policy 6 (the siting and design of digital communications equipment) used in 2% of all decisions.
- Policy 7 (renewable energy) used in 3% of all decisions.
- Policy 8 (open space, sport and recreation) used in 5% of all decisions.

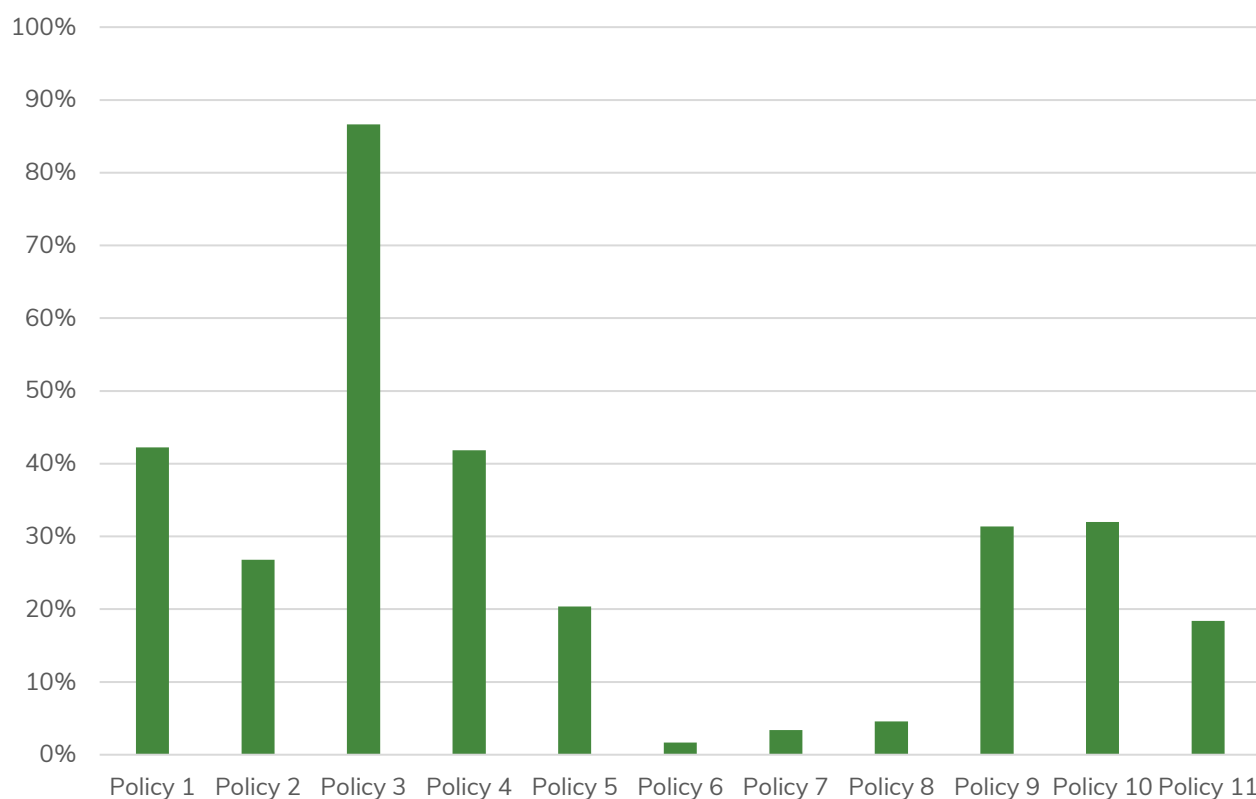


Figure 3 Percentage of all planning decisions where each Cairngorms National Park Local Development Plan policy was referred to between April 2021 and March 2025.

Leading on from the overall picture, Figure 4 shows proportionate policy use by the Cairngorms National Park Authority when approving and refusing applications. This can then be compared to Figure 5 which shows policy use by the combined local authorities in decision-making. From this we can see that there are policies which have been used more by the Cairngorms National Park in their decision making, than by the other local authorities. These are:

- Policy 5 (landscape) used in 90% of application decisions by the National Park compared to in 16% of application decisions by the local authorities.
- Policy 4 (natural heritage) has been used 94% of application decisions compared to 39%.
- Policy 10 (resources) has been used in 73% of application decisions compared to 29%.

Policies which are use more by all other local authorities compared to the Cairngorms National Park are:



- Policy 1 (new housing development) which has been used in 43% of application decisions by the constituent local authorities, compared to in 29% of application decisions by the National Park.
- Policy 9 (cultural heritage) 32% of applications compared to 18%.

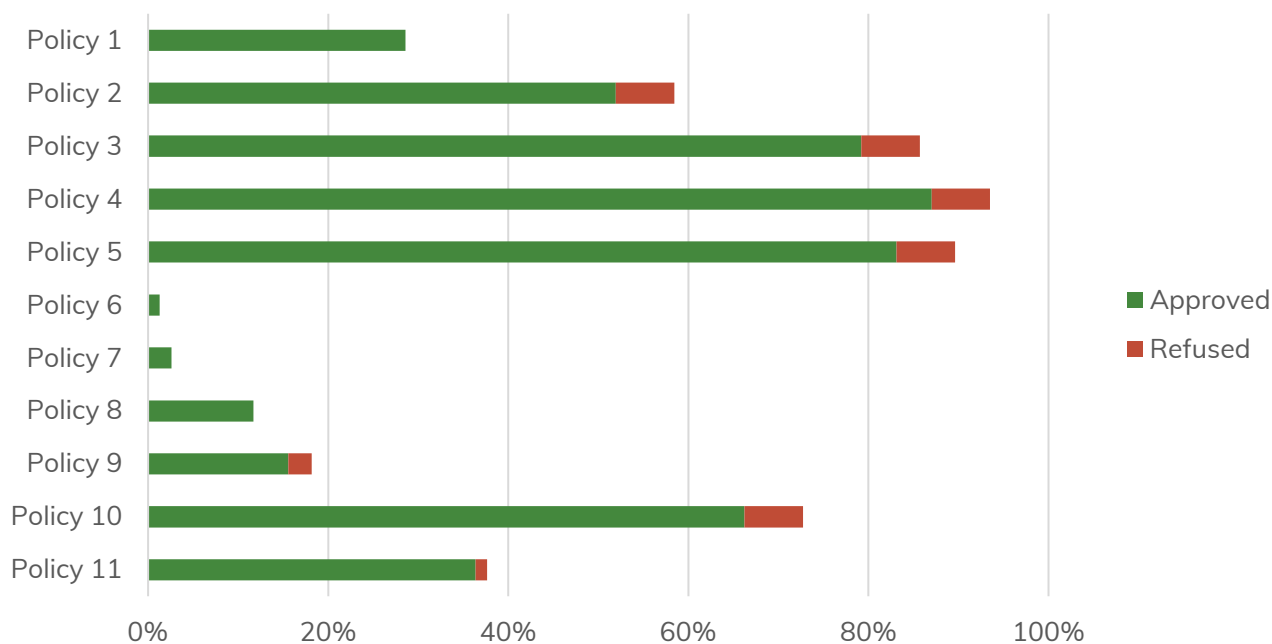


Figure 4 Proportion of planning applications that each Cairngorms National Park Local Development Plan policy was referred to in officer reports on planning applications decided by the Cairngorms National Park Authority between April 2021 and March 2025.

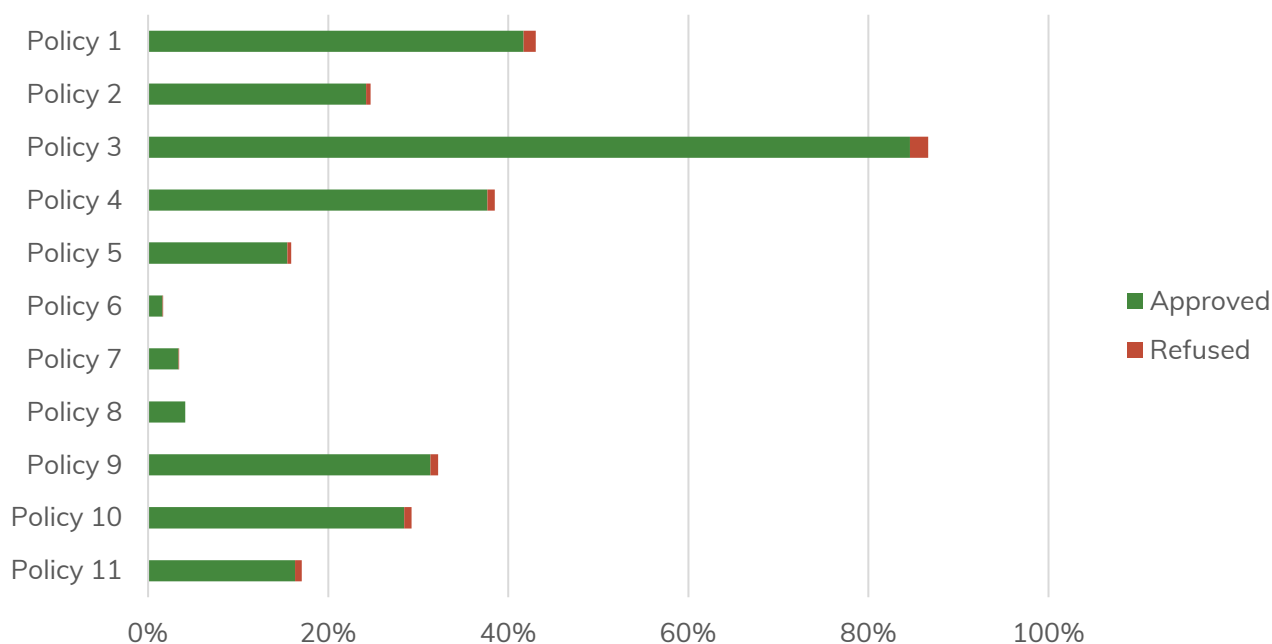




Figure 5 Proportion of planning applications that each Cairngorms National Park Local Development Plan policy was referred to in officer reports on planning applications decided by the constituent local authorities between April 2021 and March 2025.

Local Development Plan 2021 – overall sub-policy use

Most of the policies in the local development plan have sub-policies, which often covering a diverse range of issues under the policy topic.

It should be noted that not every local authority writes their reports in the same manner. While officer reports within the local planning authorities of Aberdeenshire, Moray and Perth and Kinross Councils specifically state which policies and sub-policies they will be referring to throughout their reports, Angus Council, Highland Council and Cairngorms National Park Authority reports often refer to the policies more broadly whether that be just referring to the main policy or echoing the wording of parts of the sub-policies. All planning reports have been reviewed and sub-policy usage identified where possible, even if not explicitly stated. As a result, the evidence gathered with regards to sub-policy use may not be complete.

Overall, there are a few sub-policies which have not been mentioned in any reports:

- 1.10 – Housing for gypsies, travellers and travelling show people
- 3.2 – Major developments
- 7.2 – Hydropower
- 7.3 – Wind energy
- 7.5 – Energy from waste
- 7.6 – Heat networks
- 10.5 – Landfill
- 10.6 – Minerals

Some of these were quite unexpected such as Policy 3.2 on major developments whereas most of the other policies in this list tend to be quite specific and so would only be required on very particular applications. Table 4 lists the eight most used and least used sub-policies.

The most used sub-policies come as less of a surprise than the lesser used ones with sustainable design and placemaking being the most used sub-policies. On the other hand, protecting existing economic activity is one which, it would be presumed, would be used more often.

Table 4 Most used and least used sub-policies from April 2021 to March 2025.



Most used sub-policies	Least used sub-policies (less than 1% of the time)
3.3 – Sustainable design (48%)	1.6 – Affordable housing exception sites
3.1 – Placemaking (20%)	2.5 – Protecting existing economic activity
1.7 – Alterations to existing houses (16%)	5.2 – Private roads and ways
4.4 – Protected Species (16%)	7.4 – Biomass
5.1 – Special landscape qualities (14%)	8.2 – Redevelopment of outdoor sport facilities
9.3 – Conservation areas (13%)	8.3 – Redevelopment of other open space
9.1 – Listed buildings (12%)	10.6 - Minerals
10.1 – Water resources (12%)	10.7 – Carbon sinks and stores

Local Development Plan 2021 – individual policy use

This section analyses the use of each policy, and its sub-policies, in all planning application decision-making within the National Park's boundary.

It should be noted that Angus Council only had seven applications determined in total across the whole time period and so the proportion graphs will sometimes look disproportionate. This is particularly true when comparing Angus Council to The Highland Council who dealt with over 100 times that amount and over 50% of all applications at 716 in total.

We are still able to look at patterns and make some conclusions based on the data collected, however. To aid this consideration, Figure 6 shows the total number of applications determined since the Cairngorms National Park Local Development Plan 2021 was adopted and Figure 7 shows the number of applications determined by each planning authority. Overall, the number of applications determined has fallen from its peak in 2021 / 2022, with indications of return towards those levels in 2023 / 2024. The total number of applications determined over the four year is 1,266.

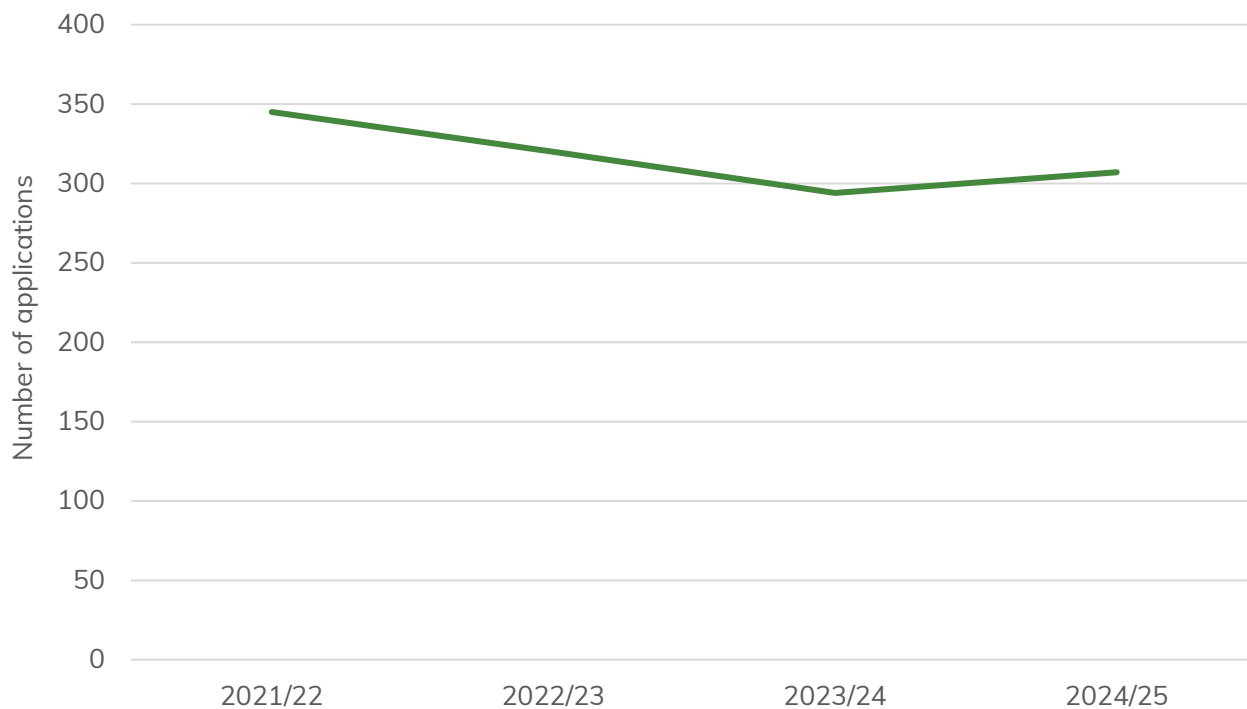


Figure 6 Total number of applications determined each year in the Cairngorms National Park area from April 2021 to March 2025.

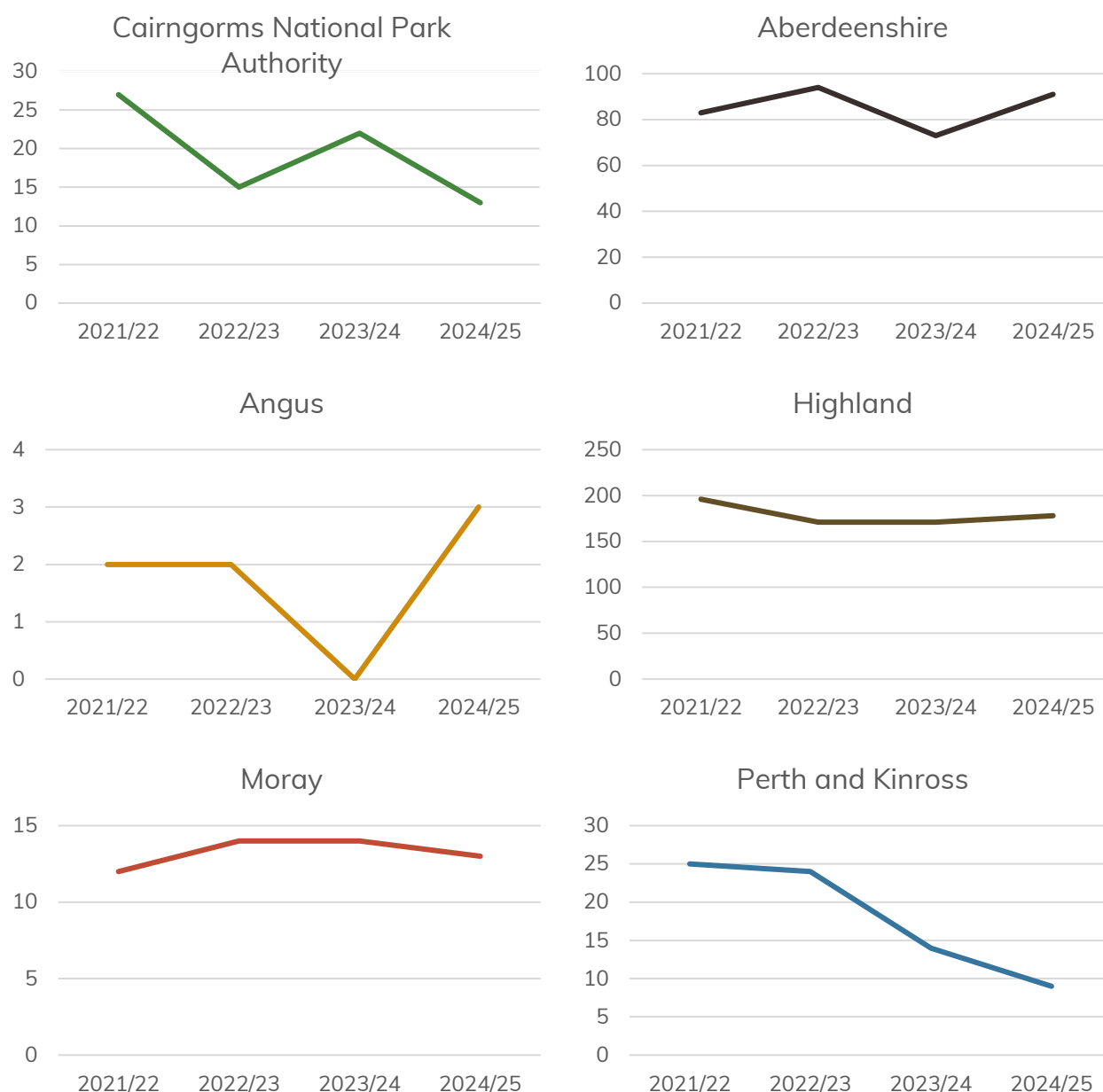


Figure 7 Number of applications determined each year by each local planning authority in the Cairngorms National Park area from April 2021 to March 2025.

Understanding these timelines also helps us to understand, when we analyse the use of the Local Development Plan policies since March 2021, whether the introduction of National Planning Framework 4, in February 2023, affected the use of the Local Development Plan policies.

Policy 1 – New housing development

Policy 1 covers a wide range of housing-related policy which help achieve the Cairngorms National Park Partnership Plan's long-term outcome for rural development which is 'a sustainable economy supporting thriving businesses and communities'.

Table 5 Relationship of Policy 1 with the Cairngorms National Park Partnership Plan 2017 – 2022.

Outcomes	Rural development
Priorities	Housing
Policies	3.1 – Economic growth 3.2 – Sustainable settlements 3.4 – Supporting communities

Policy 1 is referenced in 42% of all planning officer reports, the second most referenced policy highlighting the importance of housing policy to development management. As shown in Figure 8, the vast majority of planning application officer reports which refer to Policy 1 are granted, with only 16 applications refused. It could be inferred that the policy effectively enables proposals for housing development to be supported.

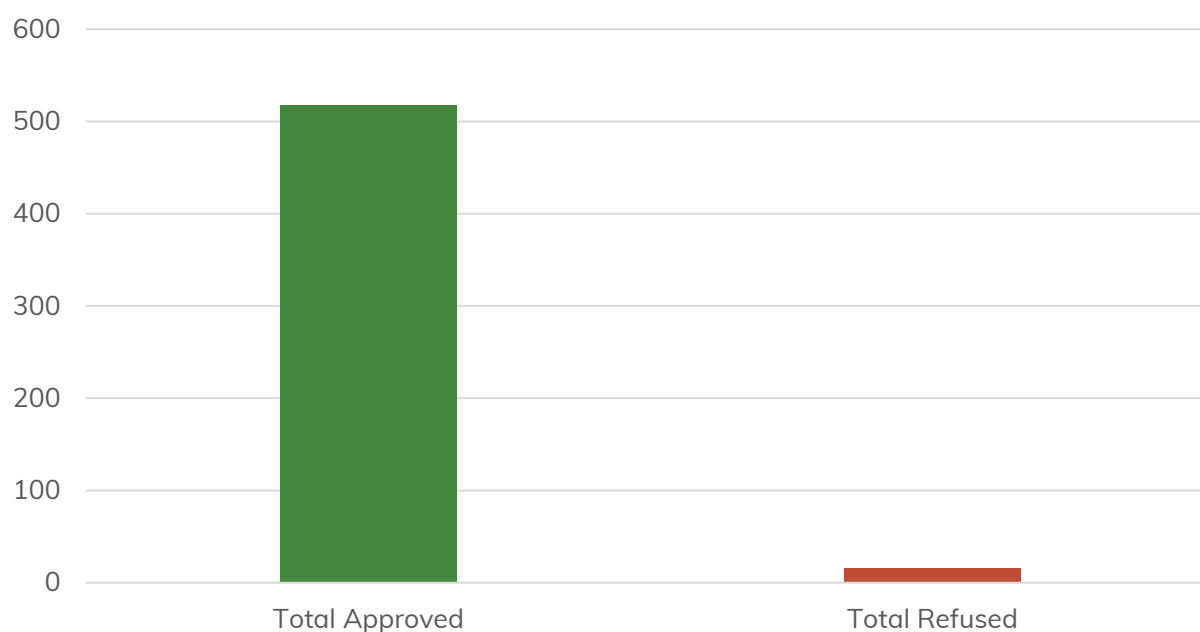


Figure 8 Total number of planning applications that Policy 1 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications determined between April 2021 and March 2025 by the Cairngorms National Park Authority and all local planning authorities.

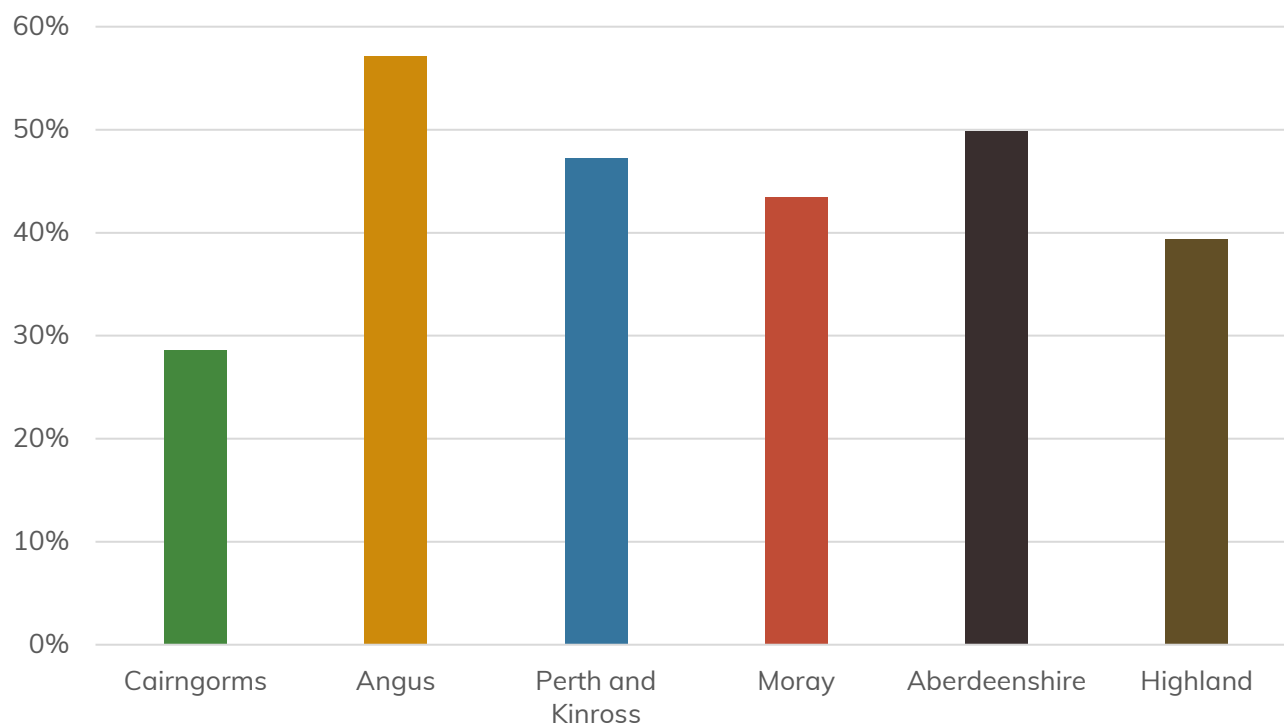


Figure 9 Percentage of planning applications that Policy 1 of the Cairngorms National Park Local Development Plan was referred to in officer reports determined between April 2021 and March 2025 by Cairngorms National Park Authority and each local planning authority.

Table 6 Policy 1 sub-policies (Cairngorms National Park Local Development Plan 2021).

1.1	Housing delivery in settlements
1.2	Housing development in existing rural groups
1.3	Other housing in the countryside
1.4	Designing for affordability and specialist needs
1.5	Affordable housing
1.6	Affordable housing exception sites
1.7	Alterations to existing houses
1.8	Conversions
1.9	Replacement houses
1.10.	Housing for gypsies, travellers and travelling show people

It is evident from Figure 10 below that sub-policy 1.7 relating to alterations to existing houses is the most used of the sub-policies under Policy 1.

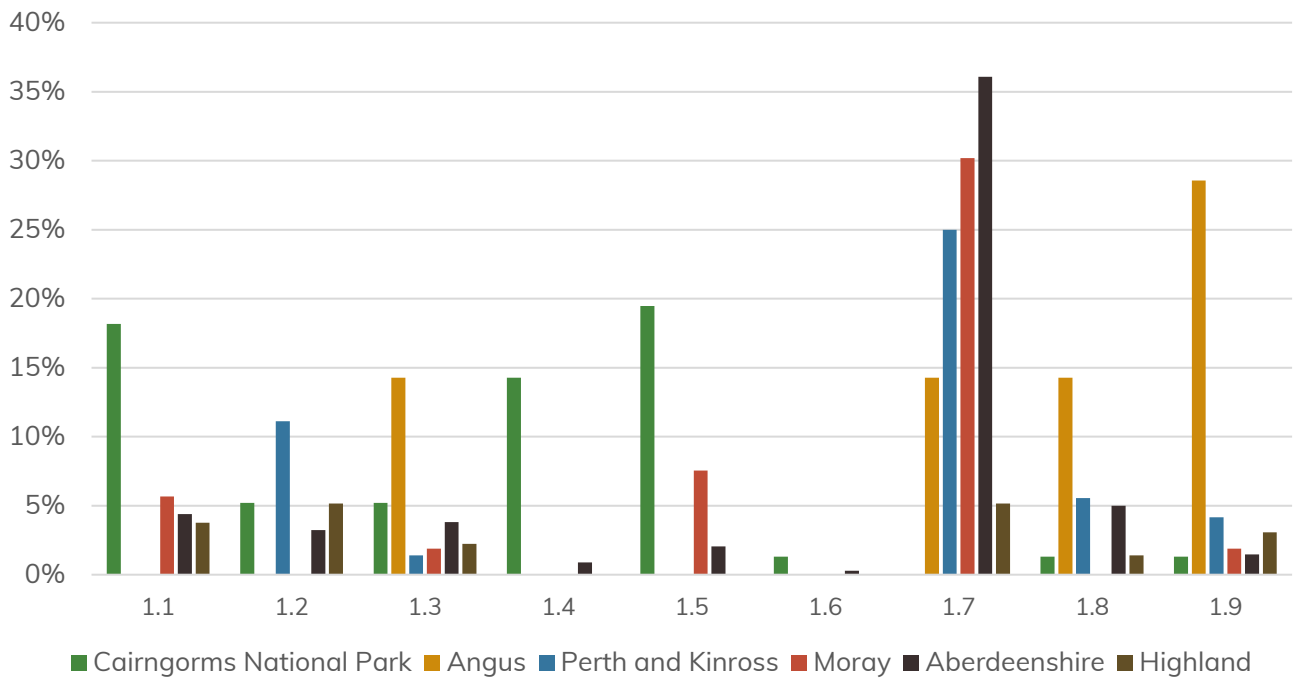


Figure 10 Proportion of planning applications each sub-policy of Policy 1 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications decided by the constituent local authorities and the Cairngorms National Park Authority between April 2021 and March 2025.

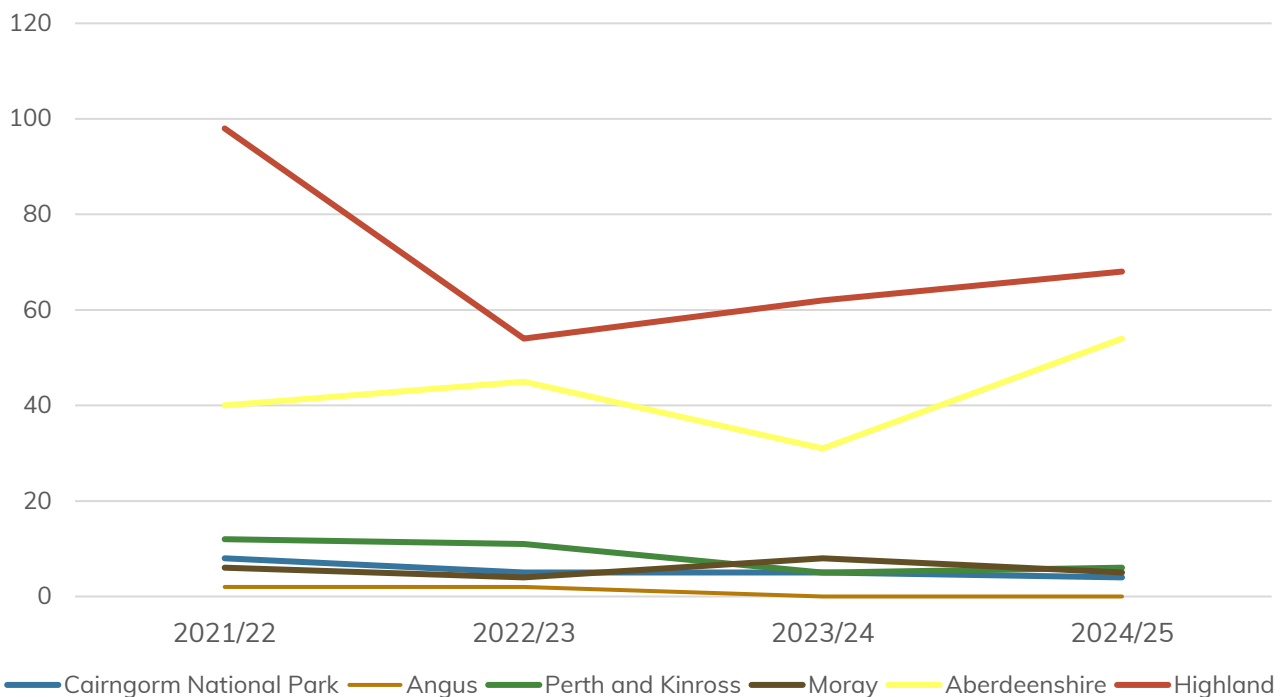


Figure 11 Number of applications determined each year by each authority which referenced Policy 1 from April 2021 to March 2025.

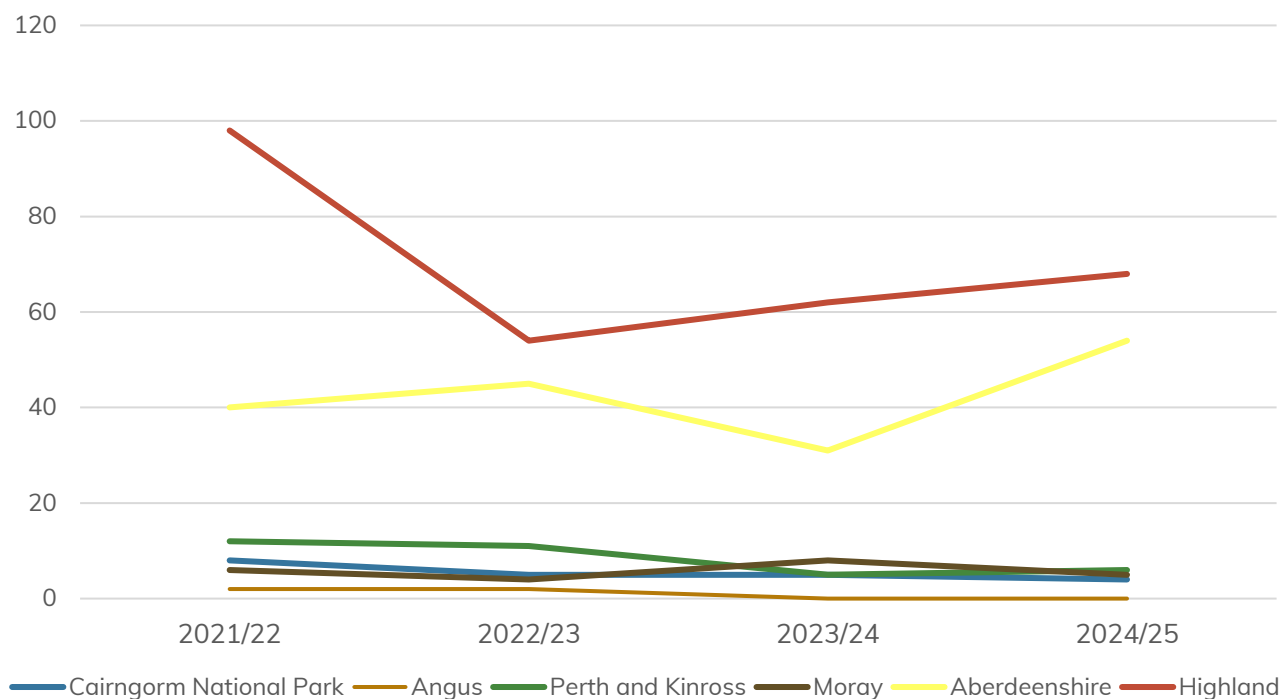


Figure 11 indicates that use of the policy has broadly remained consistent over the time period, indicating that the publication of National Planning Framework 4 did not affect use of this policy.



Use of Policy 1.2

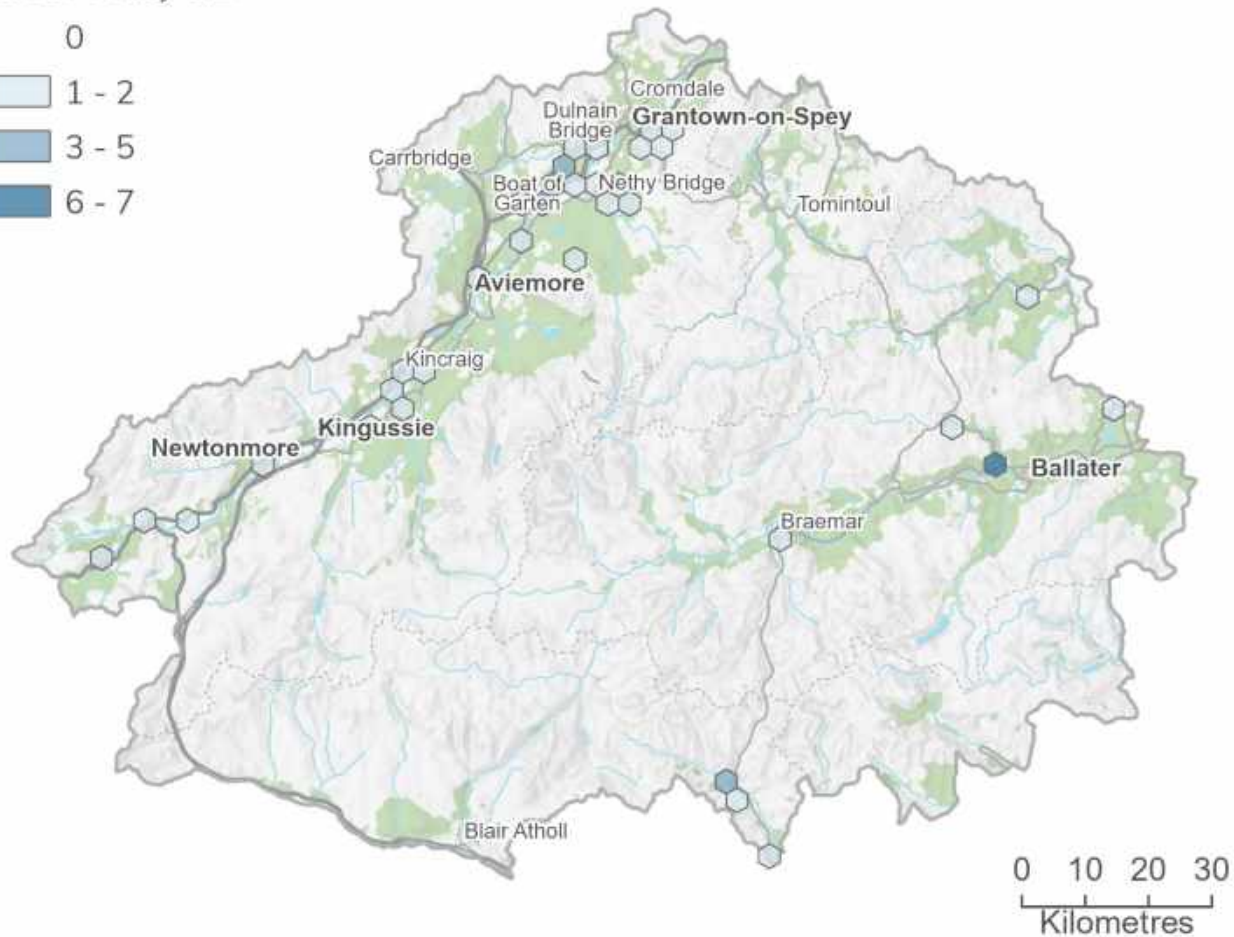
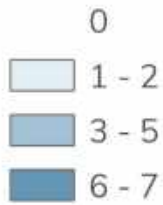


Figure 12 Location of planning applications where consideration of Policy 1.2 (housing development in existing rural groups) was a factor. Cairngorms National Park Authority © Crown copyright and database rights 2025 Ordnance Survey AC0000821810.

Figure 12 shows the distribution of applications which referenced sub-policy 1.2 spatially. It shows that rural groups tend to be located and added to most with the surrounding area of existing settlements.

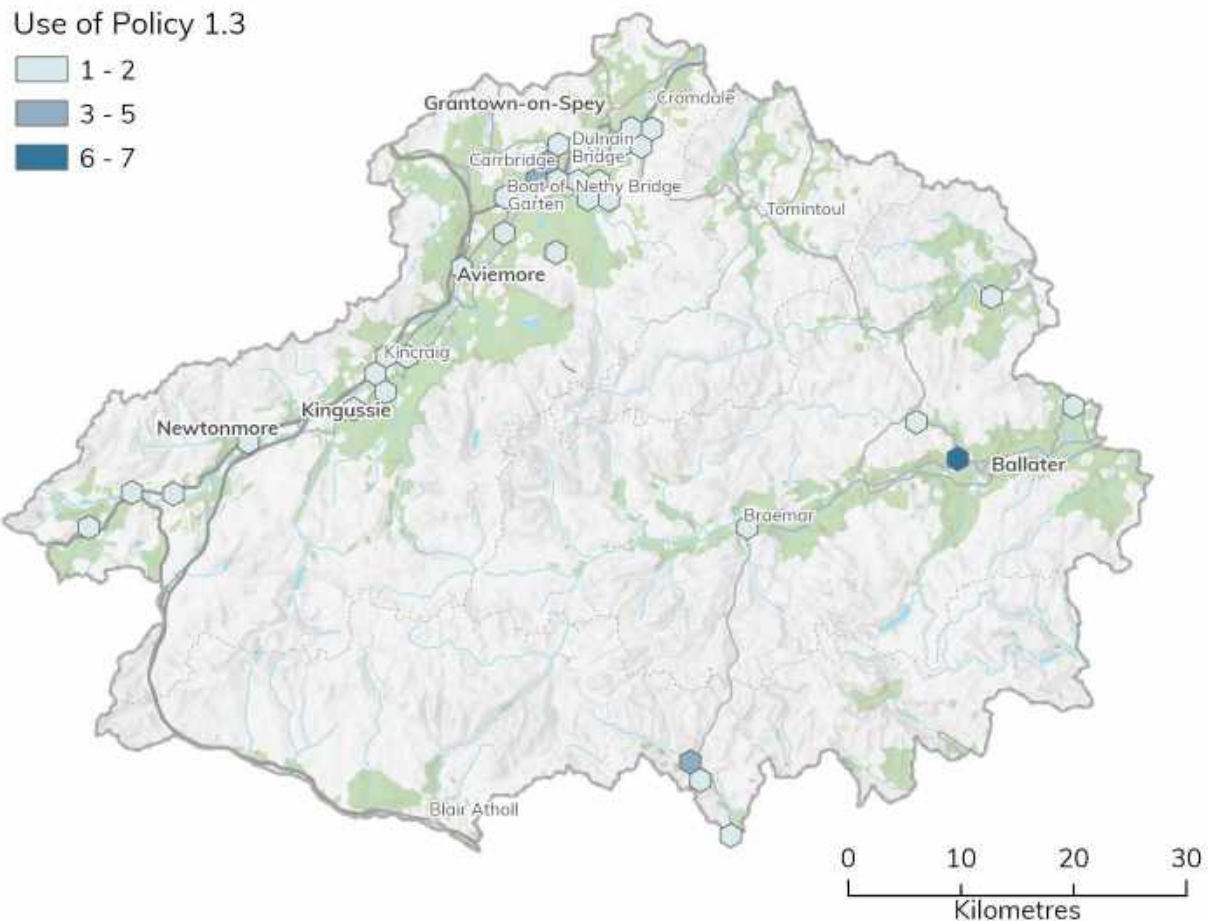


Figure 13 Location of planning applications where consideration of Policy 1.3 (other houses in the countryside) was a factor. Cairngorms National Park Authority © Crown copyright and database rights 2025 Ordnance Survey AC0000821810.

Figure 13 above shows the spatial distribution of application decided which reference sub-policy 1.3. It shows that additional housing in the countryside which meet one of the exceptions laid out in the policy, also tend to be located on the outskirts of existing settlements although the distribution is slightly more scattered than sub-policy 1.2.



Policy 2 – Supporting economic growth

Policy 2 aims to enable and encourage appropriate economic development. It helps achieve the Cairngorms National Park Partnership Plan's long-term outcomes for:

- Visitor infrastructure and information ('people enjoying the National Park through outstanding visitor and learning experiences').
- Rural development ('a sustainable economy supporting thriving businesses and communities').

Table 7 Relationship of Policy 1 with the Cairngorms National Park Partnership Plan 2017 – 2022.

Outcomes	Visitor experience Rural development
Priorities	Visitor infrastructure and information Economic development
Policies	2.1 – High quality experience
	2.2 – Sustainable tourism management
	2.3 – Access and recreation
	3.1 – Economic growth
	3.4 – Supporting communities

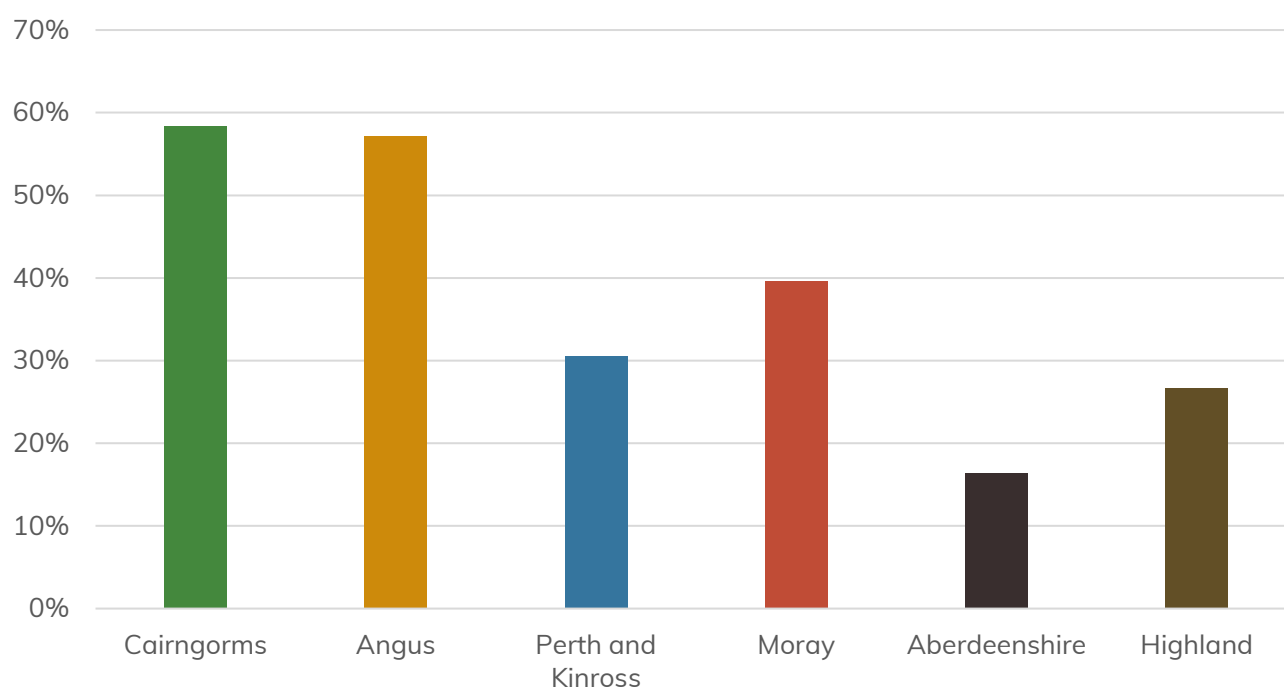


Figure 14 Percentage of planning applications that Policy 2 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications determined between April 2021 and March 2025 by the Cairngorms National Park Authority and each local planning authority.



Table 8 Policy 2 sub-policies (Cairngorms National Park Local Development Plan 2021).

2.1	Town centres first
2.2	Tourist accommodation
2.3	Other tourism and leisure developments
2.4	Other economic development
2.5	Protecting existing economic activity

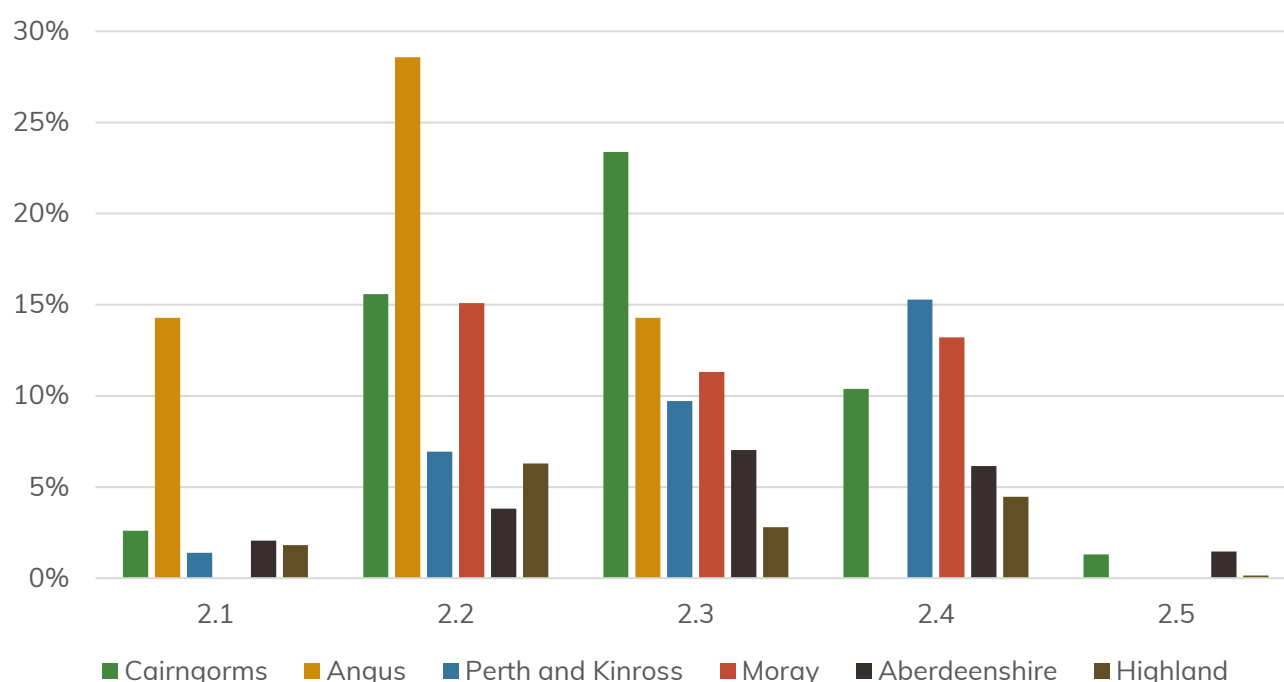


Figure 15 Percentage of planning applications each sub-policy of Policy 2 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications decided by the Cairngorms National Park Authority and each local planning authority.

Although Figure 15 shows that The Highland Council has a fairly low proportion of applications which referenced sub-policy 2.2 (tourist accommodation), when we look at the number of planning applications, as per Figure 16, the picture is quite different. Highland used this policy significantly more than other authorities. This is likely due to the new Short Term Let Control Area which was introduced for Badenoch and Strathspey which came into force on 4 March 2024.

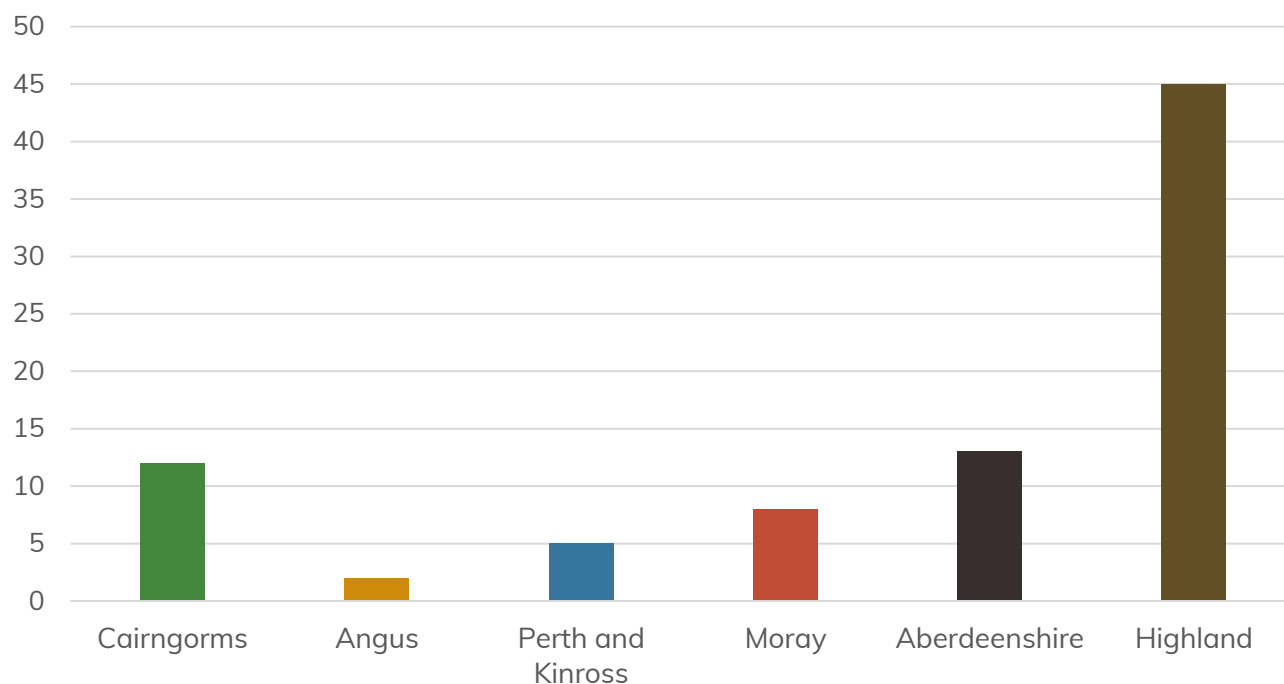


Figure 16 Number of applications where sub-policy 2.2 was referenced by the Cairngorms National Park Authority and each local planning authority between April 2021 to March 2025

Policy 3 – Design and placemaking

Policy 3 aims to ensure that all development, not just the expensive or iconic, delivers high standards of design and placemaking and contributes to the National Park's special sense of place.

Table 9 Relationship of Policy 3 with the Cairngorms National Park Partnership Plan 2017 – 2022.

Outcomes	Rural development
Priorities	Housing Economic development
Policies	3.1 - Economic growth
	3.2 – Sustainable settlements
	3.3 – Low carbon economy
	3.5 – Design and sense of place

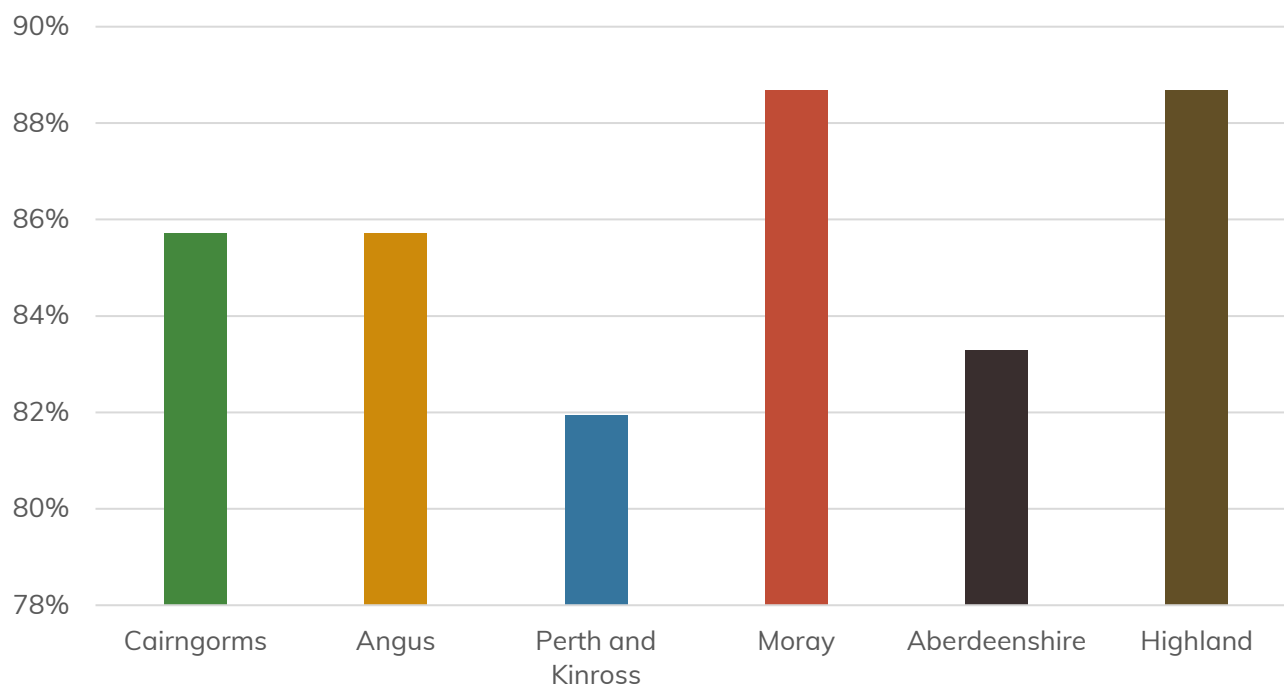


Figure 17 Percentage of planning applications that Policy 3 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications determined between April 2021 and March 2025 by the Cairngorms National Park Authority and each local planning authority.

Table 10 Policy 3 sub-policies (Cairngorms National Park Local Development Plan 2021).

3.1	Placemaking
3.2	Major developments
3.3	Sustainable design
3.4	Replacing existing building stock
3.5	Converting existing building stock
3.6	Alterations to existing building stock

Policy 3 overall is the most used policy in the Local Development Plan, referenced in 87% of all applications. It gives in-depth information on design and placemaking which is important for every planning application that is submitted. It is clear in Figure 17 above that the policy is very well used across all authorities with over 80% of officer reports in every authority area mentioning this policy.

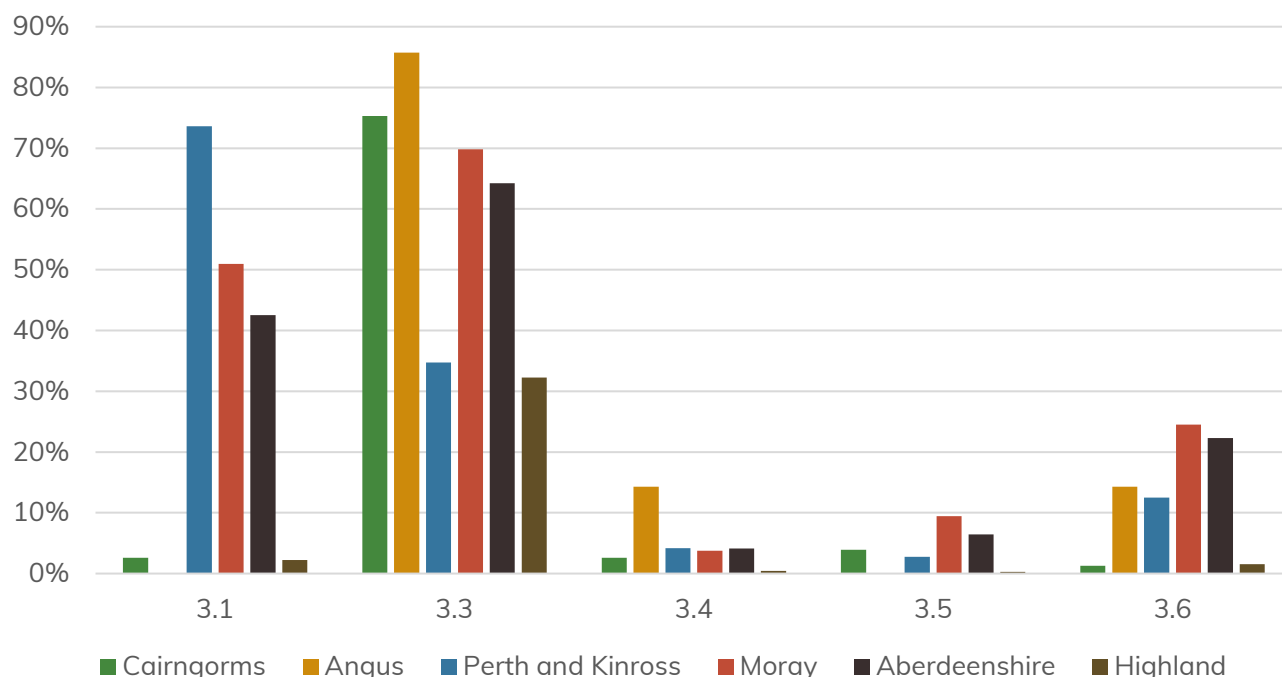


Figure 18 Percentage of planning applications each sub-policy of Policy 3 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications determined between April 2021 and March 2025 by the Cairngorms National Park Authority and each local planning authority.

Figure 18 above shows the sub-policies and how they were used by each authority. Relating to policy 3.1 and 3.3, we would assume that all authorities would use these policies in a similar manner with placemaking and sustainable design requiring consideration for most, if not all, applications. It is insightful that Cairngorms, Angus and Highland have used policy 3.1 significantly less than the rest of the authorities if at all. Also, Highland and Perth and Kinross have used policy 3.3 less than the other authorities.

Policy 3.2 has not been referenced in any application reports which seems unusual as it is likely that major applications have been determined within the 4 year period of the plan.

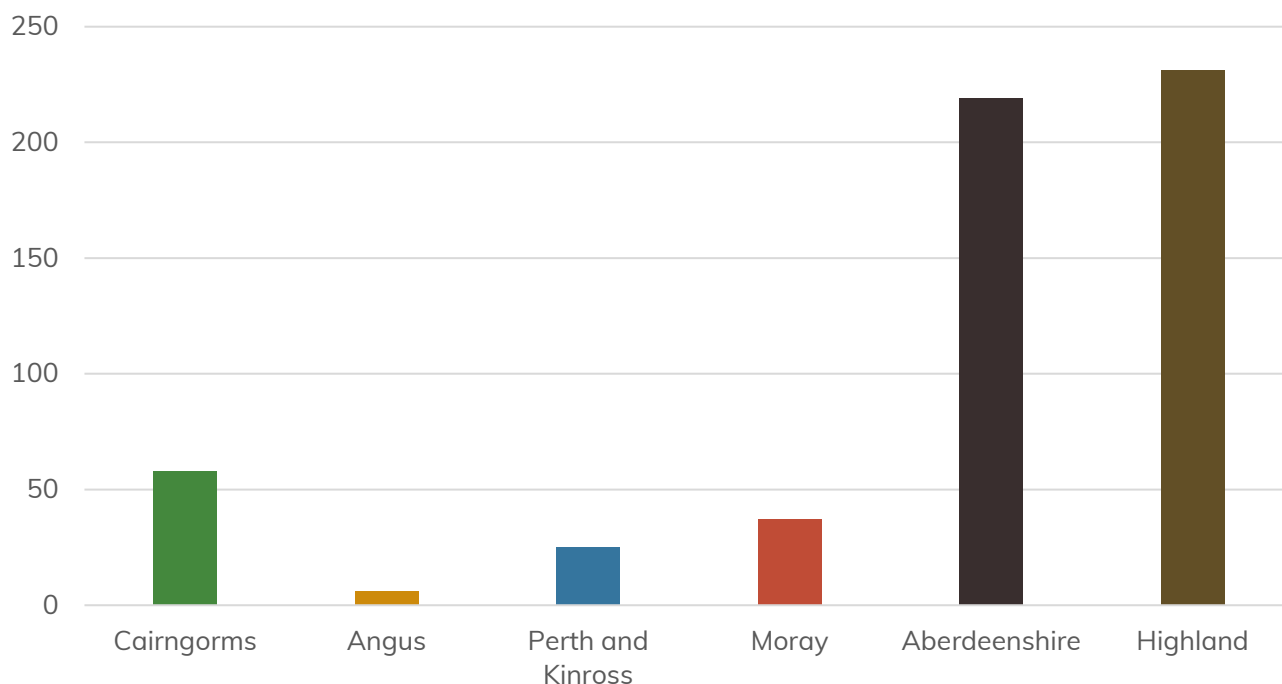


Figure 19 Number of applications where sub-policy 3.3 was referenced by the Cairngorms National Park Authority and each local planning authority between April 2021 to March 2025.

Sub-policy 3.3 is the most used of all development plan sub-policies. In total, 518 reports mentioned policy 3.3 specifically out of 1,266 total applications.

Policy 4 – Natural Heritage

Policy 4 aims to protect the range and quality of natural heritage in the Cairngorms National Park which is unique in the UK and is internationally valued.

Table 11 Relationship of Policy 4 with the Cairngorms National Park Partnership Plan 2017 – 2022.

Outcomes	Conservation
Priorities	Landscape scale collaboration
Policies	Policy 1.1 – Land management
	Policy 1.2 – Habitats, species and land use
	Policy 1.4 – Habitat quality and connectivity
	Policy 1.5 – Conserve and enhance important species
	Policy 1.6 – Collaboration across ownerships

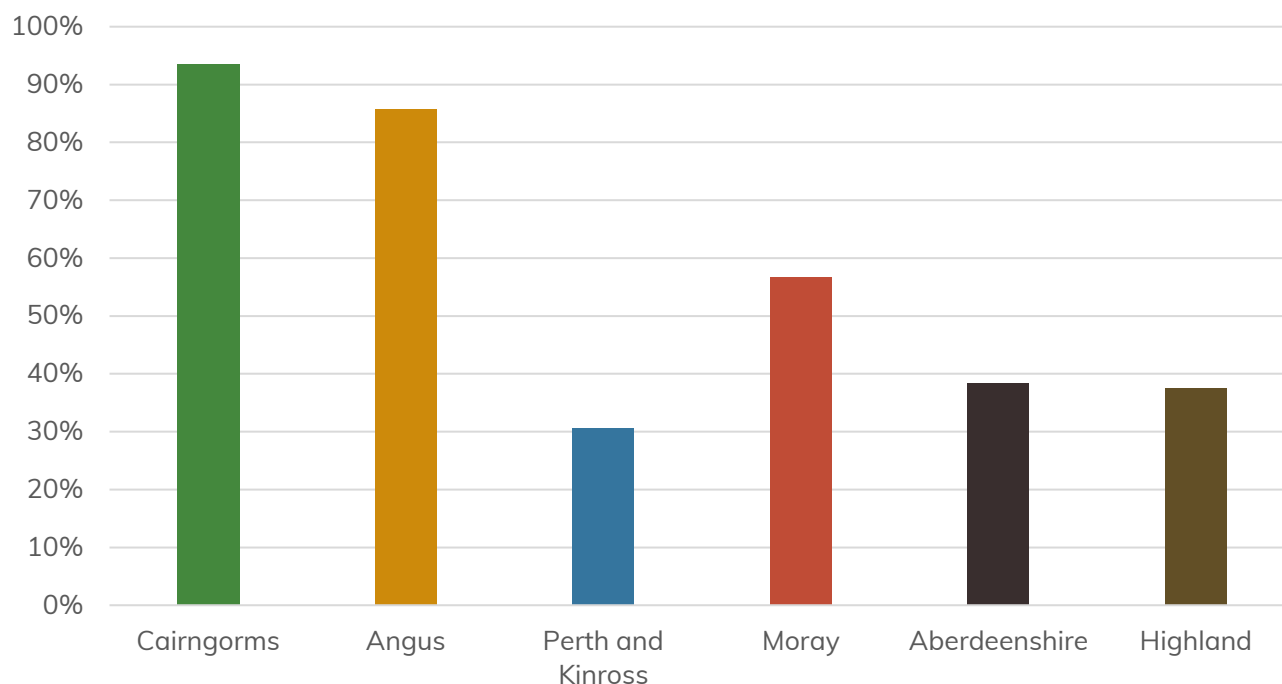


Figure 20 Percentage of planning applications that Policy 4 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications determined between April 2021 and March 2025 by the Cairngorms National Park Authority and each local planning authority.

Table 12 Policy 4 sub-policies (Cairngorms National Park Local Development Plan 2021).

4.1	International designations
4.2	National designations
4.3	Woodlands
4.4	Protected species
4.5	Other biodiversity
4.6	All development

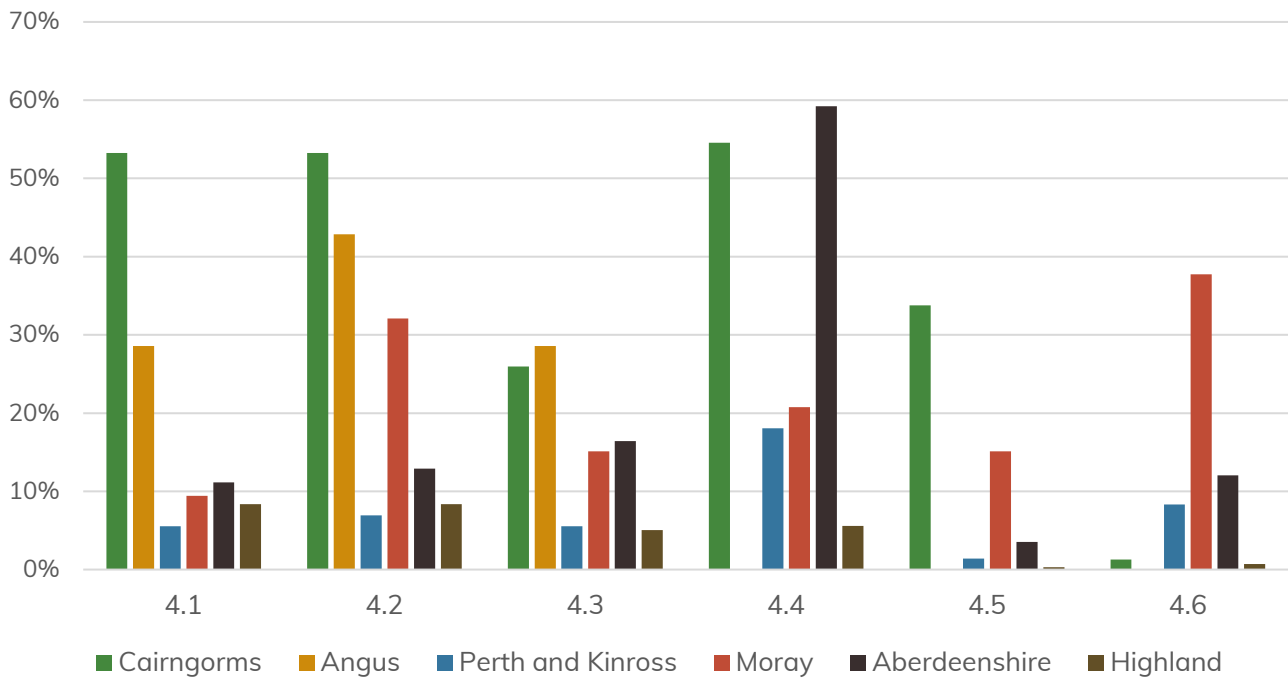


Figure 21 Percentage of planning applications each sub-policy of Policy 4 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications decided by the Cairngorms National Park Authority and each local planning authority.

Cairngorms National Park Authority planning reports referred to sub-policies 4.1 and 4.2 more than the constituent local planning authorities. Sub-policy 4.4 is also well used in reports by both Cairngorms National Park Authority and Aberdeenshire Council. While it is very likely that natural heritage is being considered by all authorities, particularly when it directly impacts an application site, it may be the case that the Cairngorms National Park Authority consider impacts more broadly as opposed to only when it impacts a designated site or species specifically.

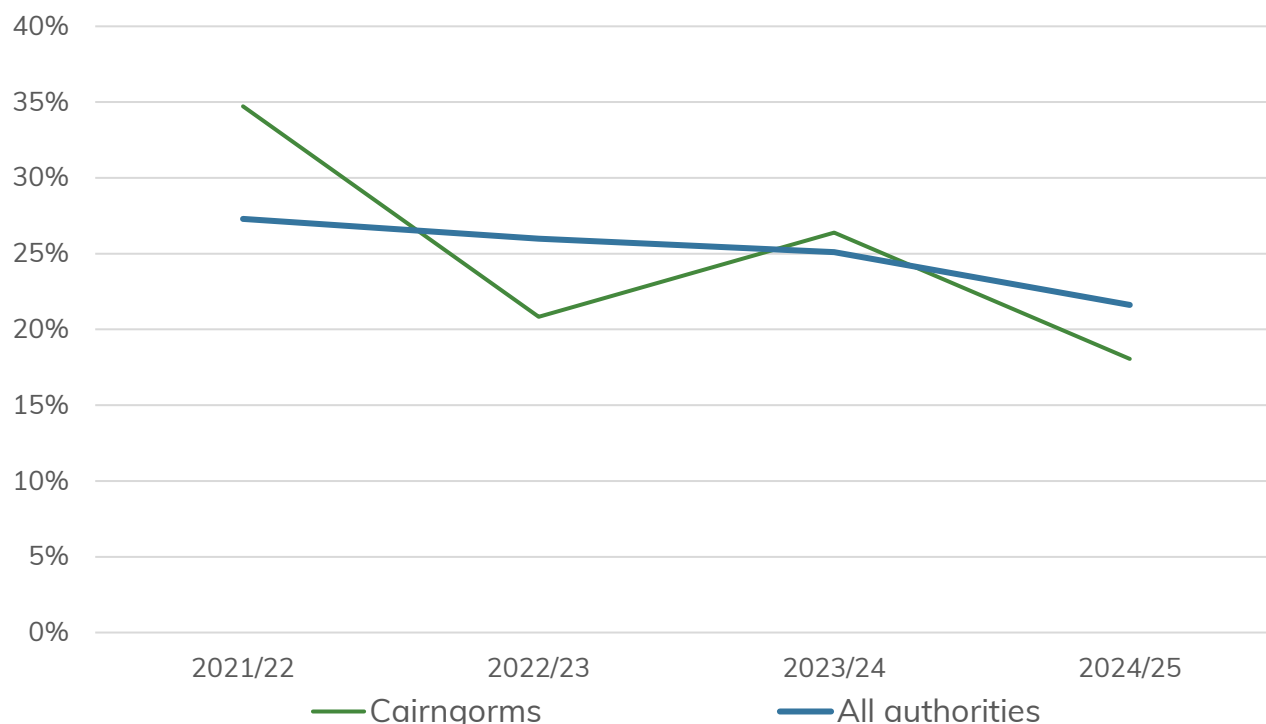


Figure 22 Proportion of applications decided which referenced Policy 4 each year from April 2021 to March 2025 comparing the Cairngorm National Park Authority to all other authorities.

Figure 22 shows that Policy 4 has been referred to less proportionately each year over the first four-years of the plan period by all authorities including the Cairngorm National Park Authority. National Planning Framework 4 came into force in February 2023. Natural Heritage is a topic which National Planning Framework 4 covers in great detail through Policy 4 and so it may be possible that Local Development Plan Policy 4 is referenced less.

Policy 5 – Landscape

Policy 5 sets out a presumption against any development that does not conserve or enhance the landscape character and special landscape qualities of the Cairngorms National Park and a presumption against new private roads and ways in open moorland, unless specific criteria are met.

Table 13 Relationship of Policy 5 with the Cairngorms National Park Partnership Plan 2017 – 2022.

Outcomes	Conservation
Priorities	Landscape scale collaboration Moorland management
Policies	Policy 1.3 - Special landscape qualities

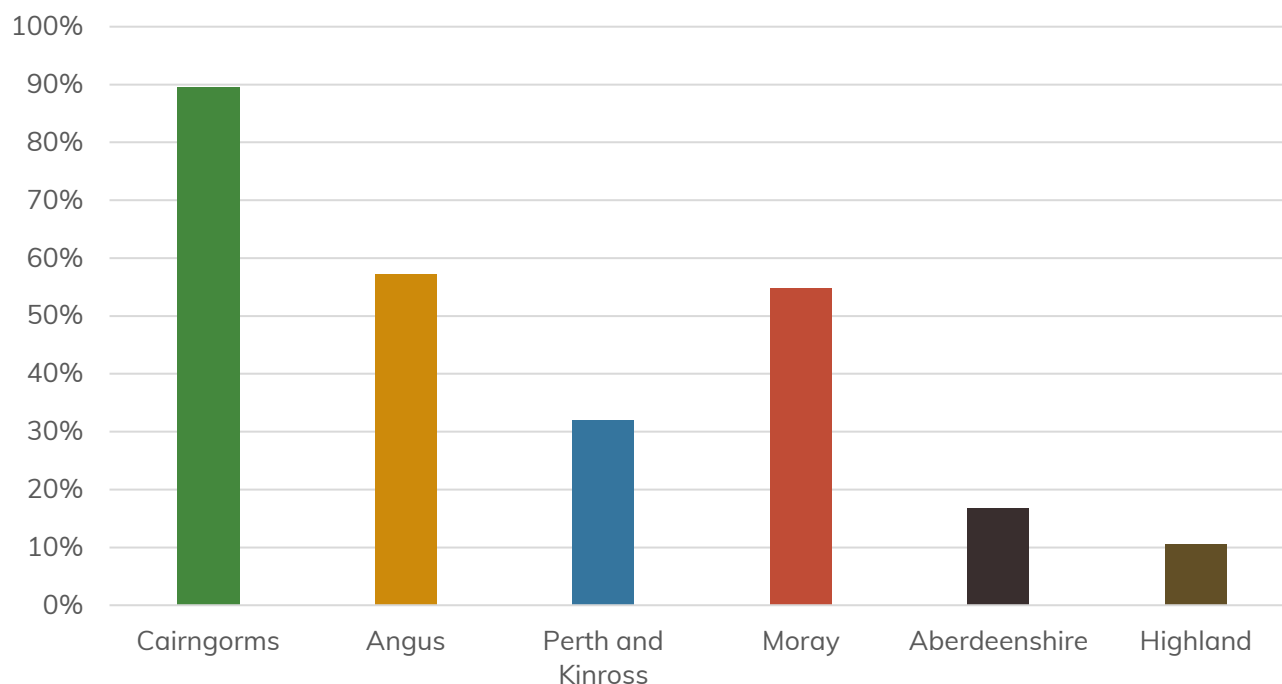


Figure 23 Percentage of planning applications that Policy 5 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications determined between April 2021 and March 2025 by the Cairngorms National Park Authority and each local planning authority.

Table 14 Policy 5 sub-policies (Cairngorms National Park Local Development Plan 2021).

5.1	Special landscape qualities
5.2	Private roads and ways

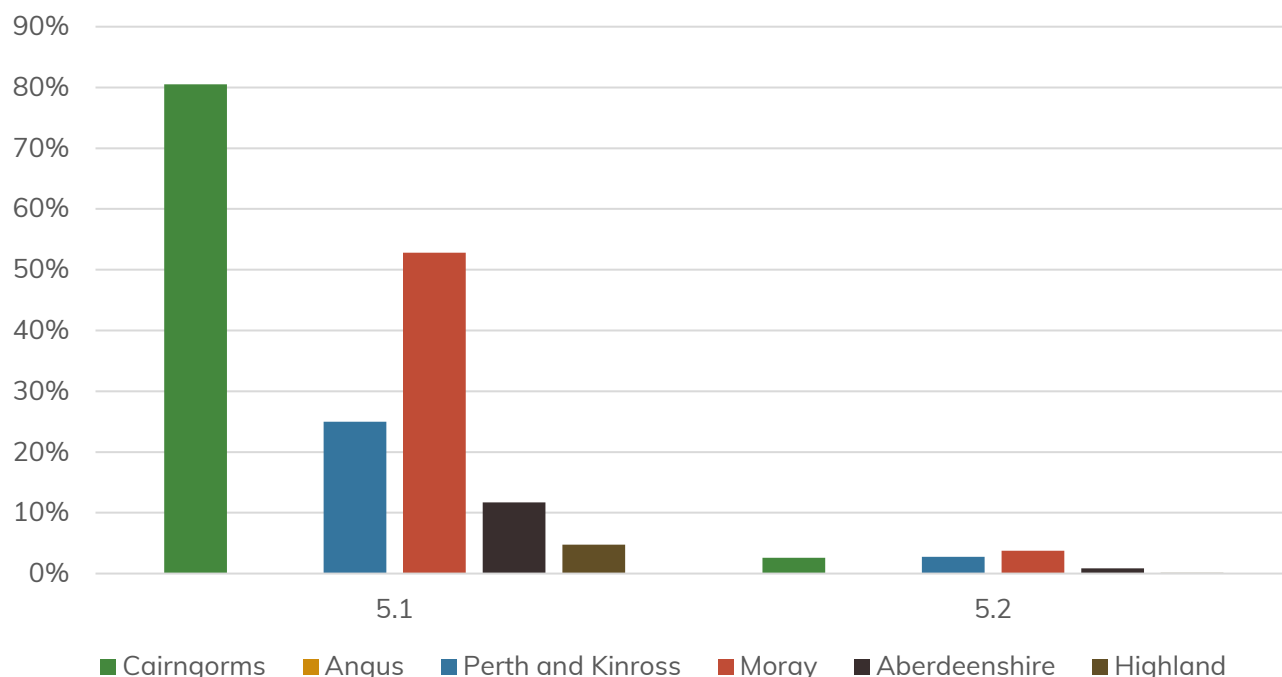


Figure 24 Percentage of planning applications each sub-policy of Policy 5 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications decided by the Cairngorms National Park Authority and each local planning authority.

Looking at Figure 24, it again seems unusual that Policy 5.1 would not be used more frequently, if not for all applications. The Highland, Aberdeenshire and Angus Councils appear to have used this policy minimally particularly compared to the Cairngorms National Park Authority. It may be that when considering minor applications within existing settlements that the need for landscape considerations are less relevant.

Policy 6 – The siting and design of digital communications equipment

Policy 6 requires proposals for new digital infrastructure installations to meet a set of criteria in order to be permitted.

Table 15 Relationship of Policy 6 with the Cairngorms National Park Partnership Plan 2017 – 2022.

Outcomes	Rural development
Priorities	Community capacity and empowerment Economic development
Policies	3.2 – Sustainable settlements

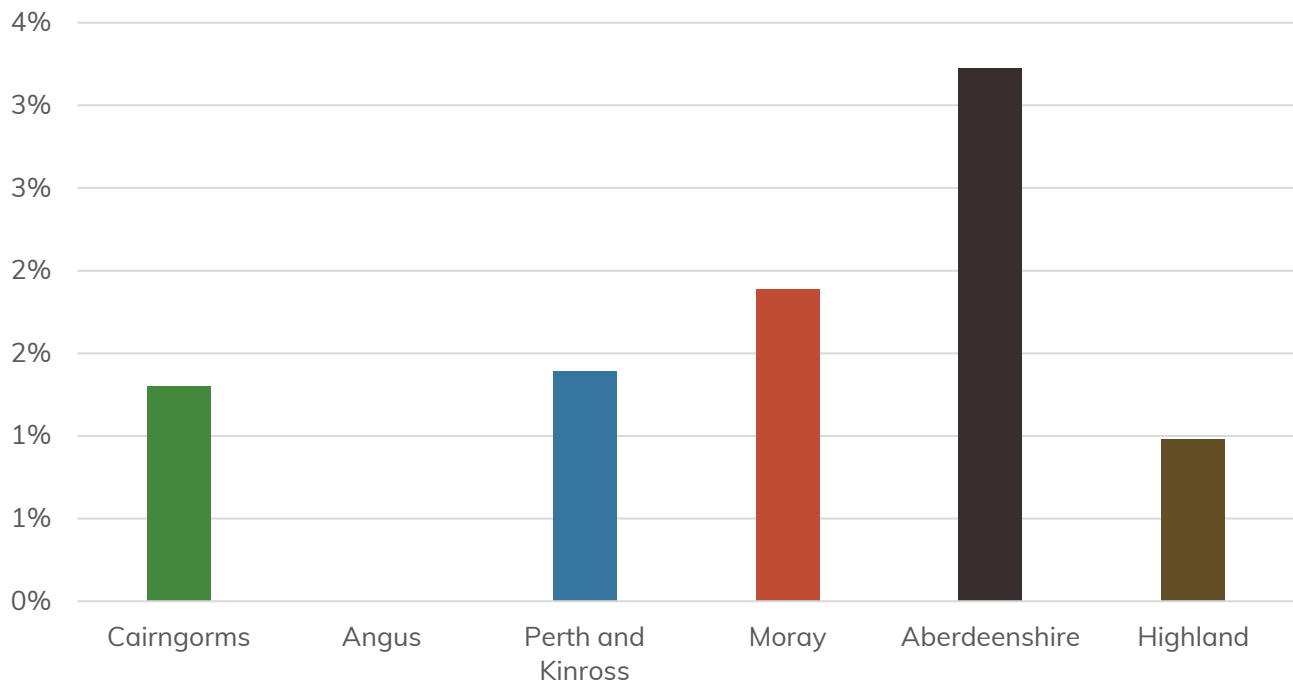


Figure 25 Percentage of planning applications that Policy 6 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications determined between April 2021 and March 2025 by the Cairngorms National Park Authority and each local planning authority.

Figure 25 indicates the use of this policy is low and broadly similar across the local planning authorities. There are no sub-policies listed under this policy.

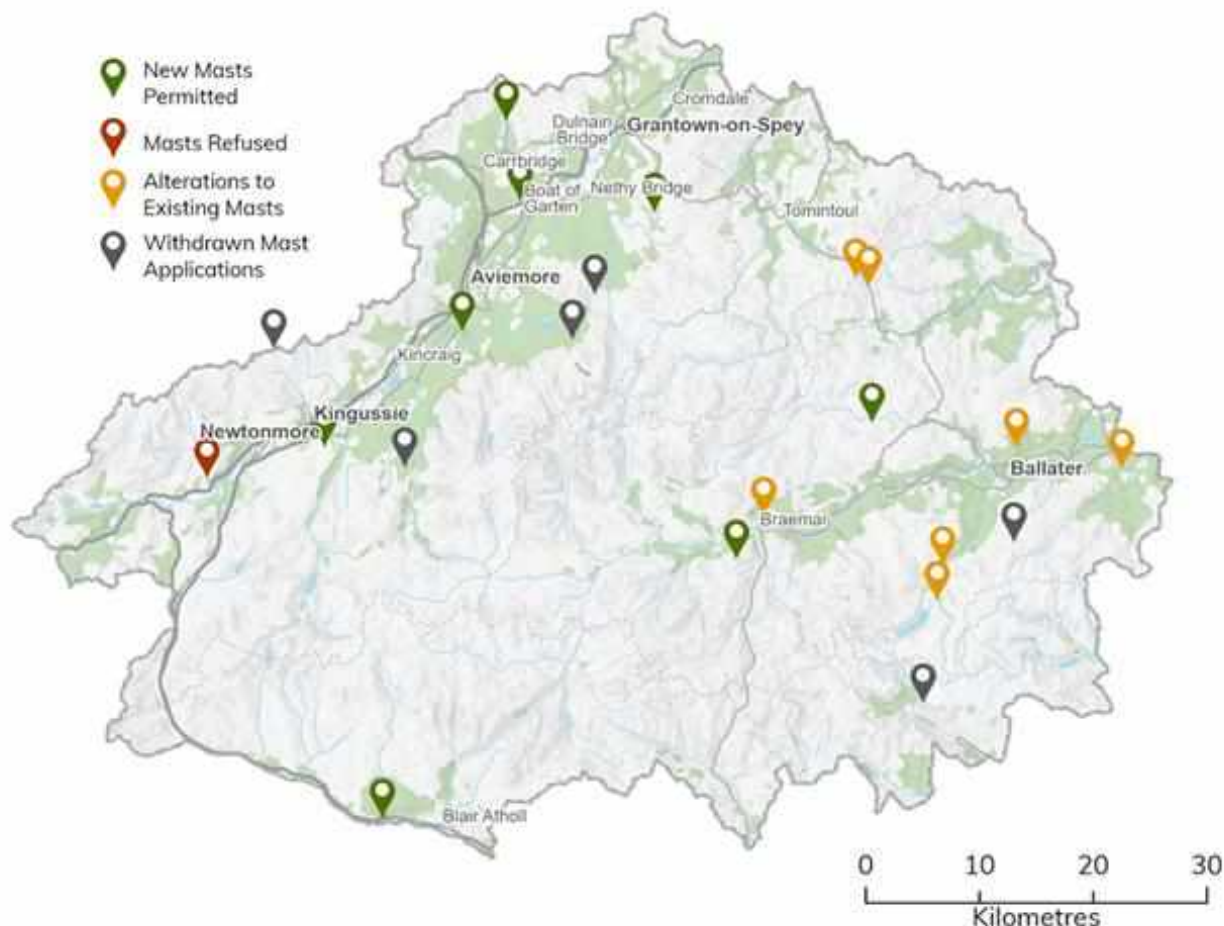


Figure 26 Digital Communications mast applications submitted from April 2021 to March 2025 and how they were determined. Cairngorms National Park Authority © Crown copyright and database rights 2025 Ordnance Survey AC0000821810.

Figure 26 shows a spatial representation of all applications relating to telecommunications masts. Due to the difficulty of balancing the need for these masts with the visual and environmental impact that is associated with them, the map shows that although there a number have been approved, there are more that were either refused or where the application was withdrawn. Alterations to a number of masts have been approved.

Policy 7 – Renewable energy

Policy 7 aims to enable appropriate renewable energy generation by harnessing the National Park's natural resources in a way that achieves the collective delivery of the four aims of the National Park.

Table 16 Relationship of Policy 7 with the Cairngorms National Park Partnership Plan 2017 – 2022



Outcomes	Rural development
Priorities	Economic development
Policies	3.2 – Sustainable settlements
	3.3 – Low carbon economy
	3.4 – Supporting communities

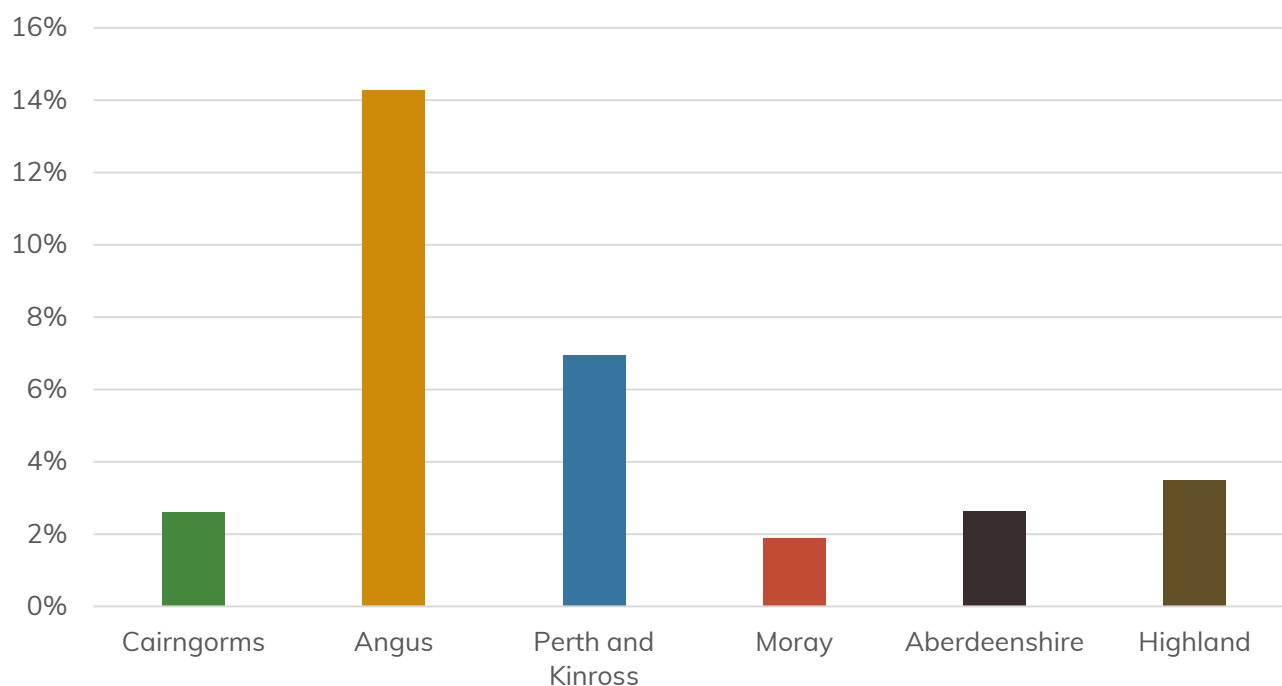


Figure 27 Percentage of planning applications that Policy 7 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications determined between April 2021 and March 2025 by the Cairngorms National Park Authority and each local planning authority.

Table 17 Policy 7 sub-policies (Cairngorms National Park Local Development Plan 2021).

7.1	All renewable energy developments
7.2	Hydropower
7.3	Wind energy
7.4	Biomass
7.5	Energy from waste
7.6	Heat networks

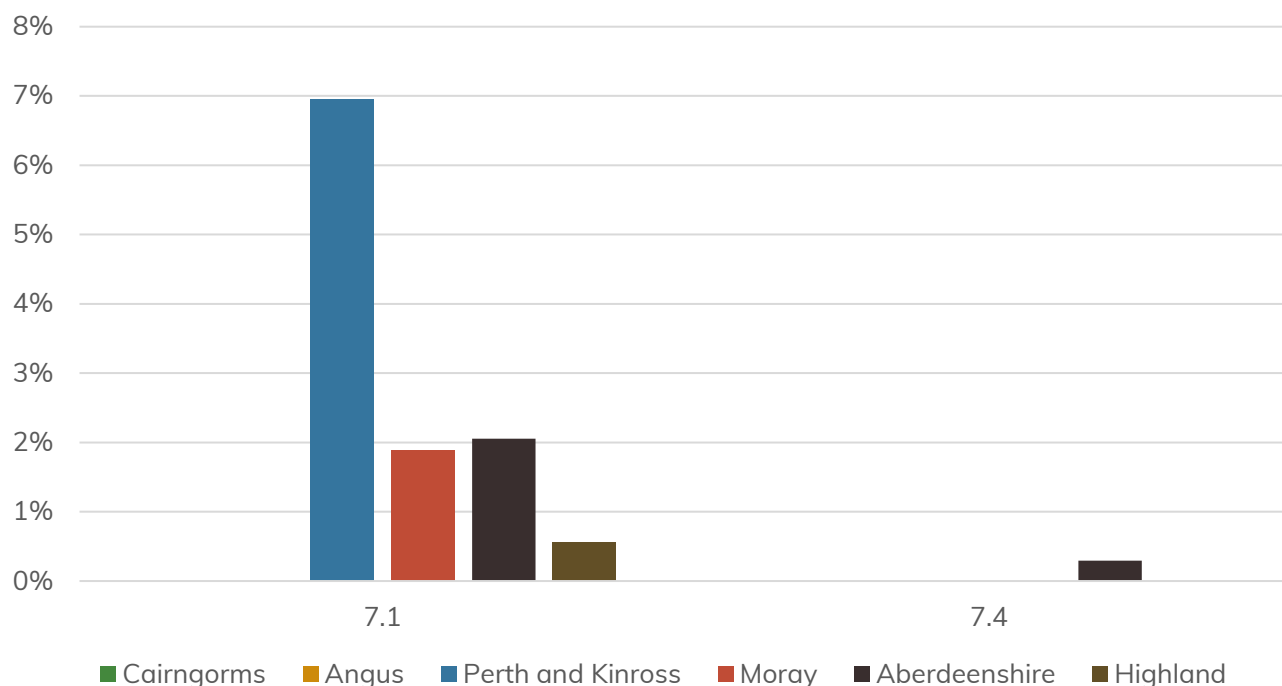


Figure 28 Percentage of planning applications in which each sub-policy of Policy 7 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications decided by the Cairngorms National Park Authority and each local planning authority.

Figure 28 shows that sub-policy 7.1 (all renewable energy developments) was by far the most used of Policy 7's sub-policies. This does mean that the type-specific sub-policies were not important for setting out the National Park's policy criteria.

Policy 8 – Open space, sport and recreation

Policy 8 aims to ensure that the needs of local communities and visitors for recreational space and facilities are accommodated, and existing facilities protected.

Table 18 Relationship of Policy 8 with the Cairngorms National Park Partnership Plan 2017 – 2022.

Outcomes	Visitor experience
Priorities	Active Cairngorms Community capacity and empowerment
Policies	2.3 – Access and recreation

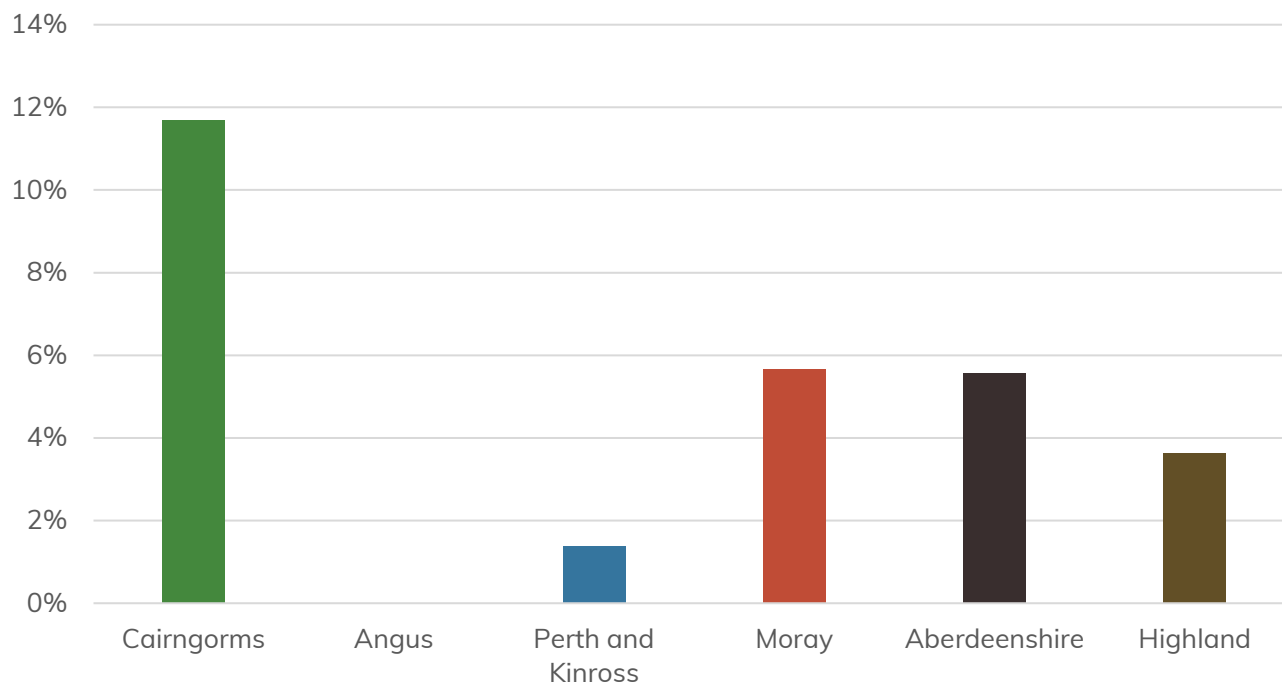


Figure 29 Percentage of planning applications that Policy 8 of the Cairngorms National Park Local Development Plan was referred to in officer reports determined between April 2021 and March 2025 by Cairngorms National Park Authority and each local planning authority.

Table 19 Policy 8 sub-policies (Cairngorms National Park Local Development Plan 2021).

8.1	New development
8.2	Redevelopment of outdoor sports facilities
8.3	Redevelopment of other outdoor space

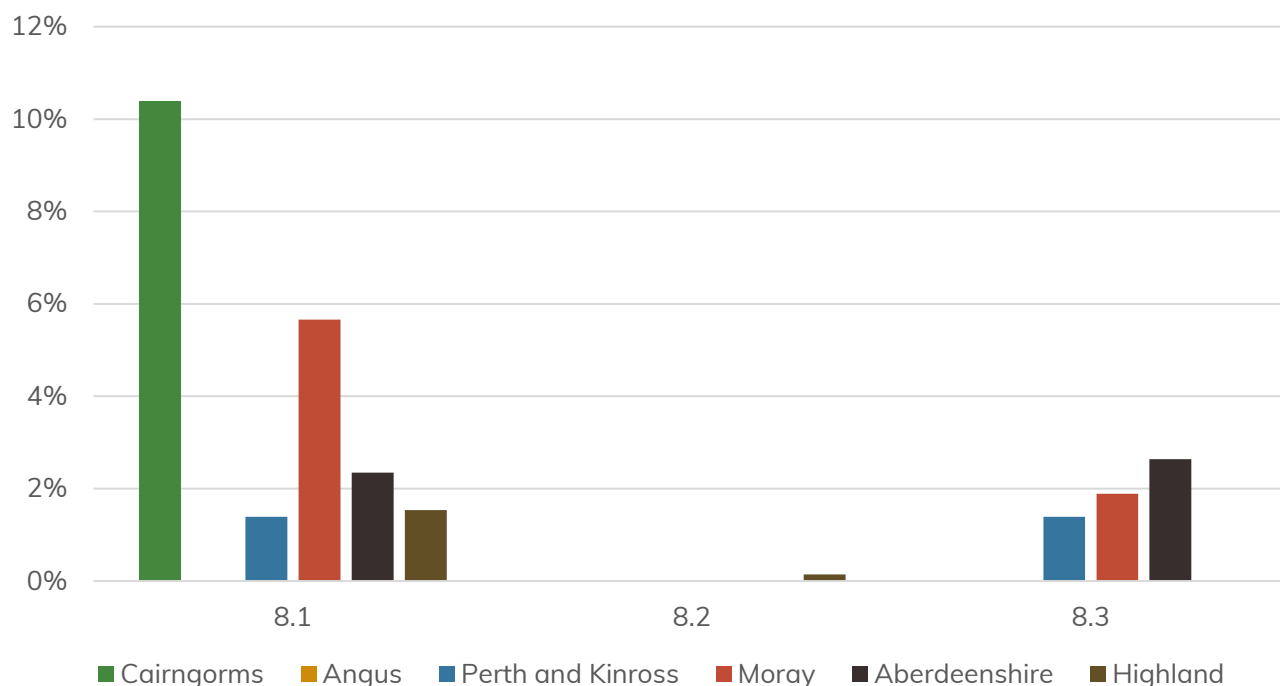


Figure 30 Proportion of planning applications within which each sub-policy of Policy 8 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications decided by the constituent local authorities and the Cairngorms National Park.

Sub-policy 8.1 has been the most used sub-policy. It is relevant to any applications relating to sport and recreation facilities including extensions and other changes.

Policy 9 – Cultural Heritage

Table 20 Relationship of Policy 9 with the Cairngorms National Park Partnership Plan 2017 – 2022.

Outcomes	Conservation
Priorities	Landscape scale collaboration
Policies	Policy 1.7 Cultural Heritage

Policy 9 aims to preserve and enhance the rich cultural heritage of the Cairngorms National Park by ensuring all development makes a positive contribution to its conservation and enhancement.

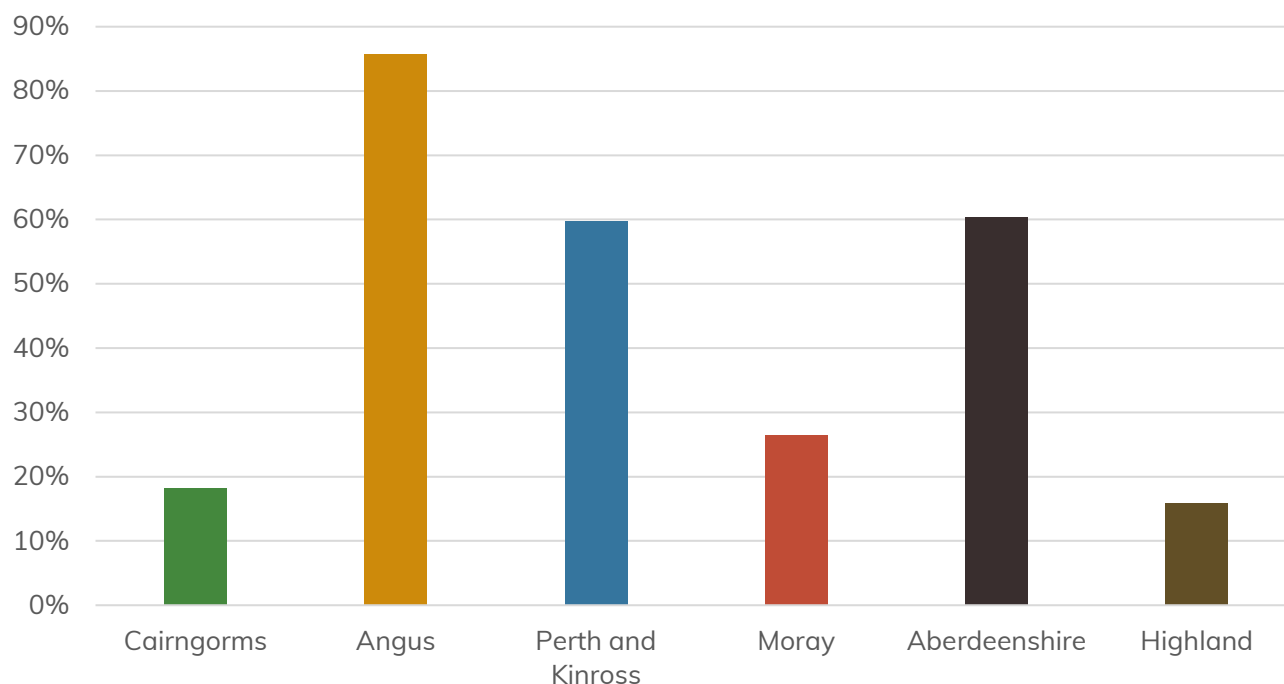


Figure 31 Percentage of planning applications where Policy 9 of the Cairngorms National Park Local Development Plan was referred to in officer reports determined between April 2021 and March 2025 by Cairngorms National Park Authority and each local planning authority.

Policy 9 is only relevant to applications affecting heritage assets and is therefore used less often than broader policies. Use of this policy is highly dependent on application type and location which is variable.

Table 21 Policy 9 sub-policies (Cairngorms National Park Local Development Plan 2021).

9.1	Listed buildings
9.2	Cultural and historic designations
9.3	Conservation areas
9.4	Other cultural heritage

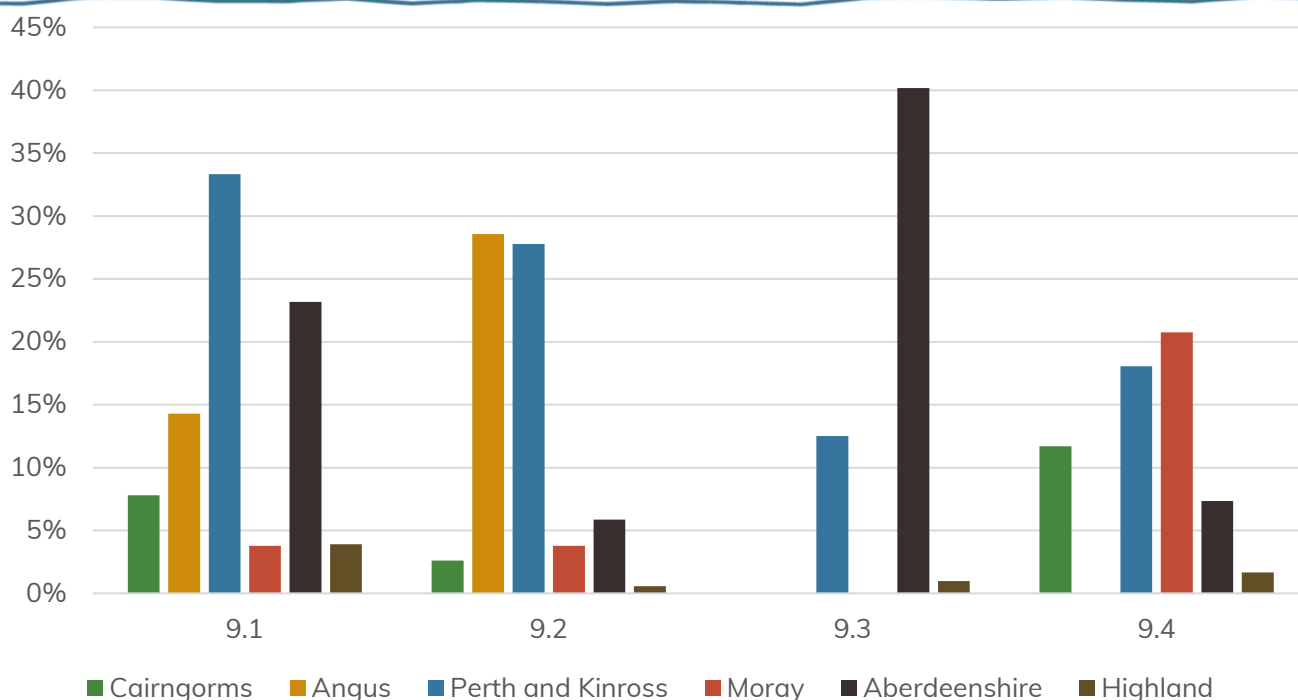


Figure 32 Proportion of planning applications within which each sub-policy of Policy 9 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications decided by the constituent local authorities and the Cairngorms National Park

Within the Cairngorms National Park there are approximately 753 buildings or structures which are listed. Policy 9.1 would only need to be considered if an application site was involving one of these building or structure or its surroundings.

Grantown-on-Spey is the only conservation area within The Highland Council part of the National Park. Blair Atholl is the only one within the Perth and Kinross Council part of the National Park. In the Aberdeenshire Council part of the National Park, there are three conservation areas, Inverey, Braemar and Ballater. There are none in the Moray or Angus Council parts. This begins to explain the results of Figure 32 above with regards to sub-policy 9.3.

Policy 10 – Resources

Policy 10 aims to reduce the overall resource use footprint of the National Park, protect resources where appropriate and ensure natural resources are used and managed in an effective way.

Table 22 Relationship of Policy 10 with the Cairngorms National Park Partnership Plan 2017 – 2022.

Outcomes	Conservation Rural development
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Priorities	Landscape scale collaboration Economic development
Policies	1.1 – Land management
	1.2 – Habitat, species and land use
	1.4 – Habitat quality and connectivity
	3.3 – Low carbon economy

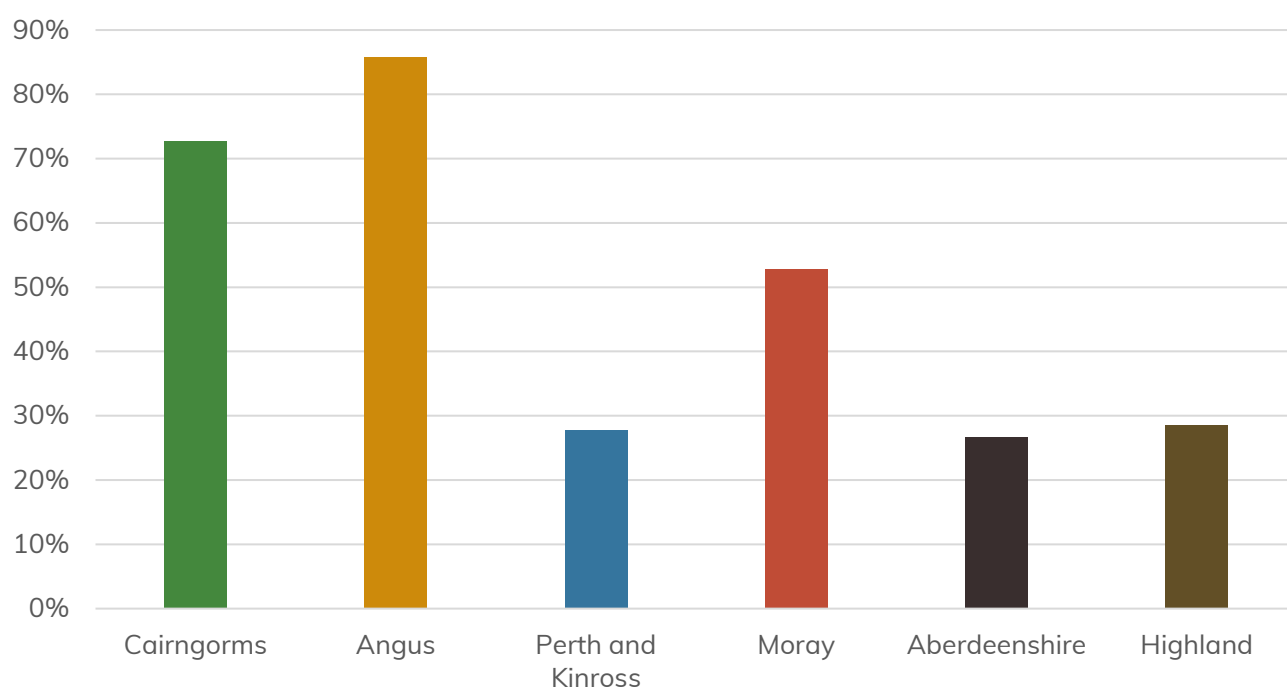


Figure 33 Percentage of planning applications within which Policy 10 of the Cairngorms National Park Local Development Plan was referred to in officer reports determined between April 2021 and March 2025 by Cairngorms National Park Authority and each local planning authority.

Policy 10 is well used across all authorities. It is, in general, another policy which is used based on an application's location and circumstances.



Table 23 Policy 10 sub-policies (Cairngorms National Park Local Development Plan 2021).

10.1	Water resources
10.2	Flooding
10.3	Connections to sewerage
10.4	Waste management and minimisation
10.5	Landfill
10.6	Minerals
10.7	Carbon sinks and stores
10.8	Contaminated land

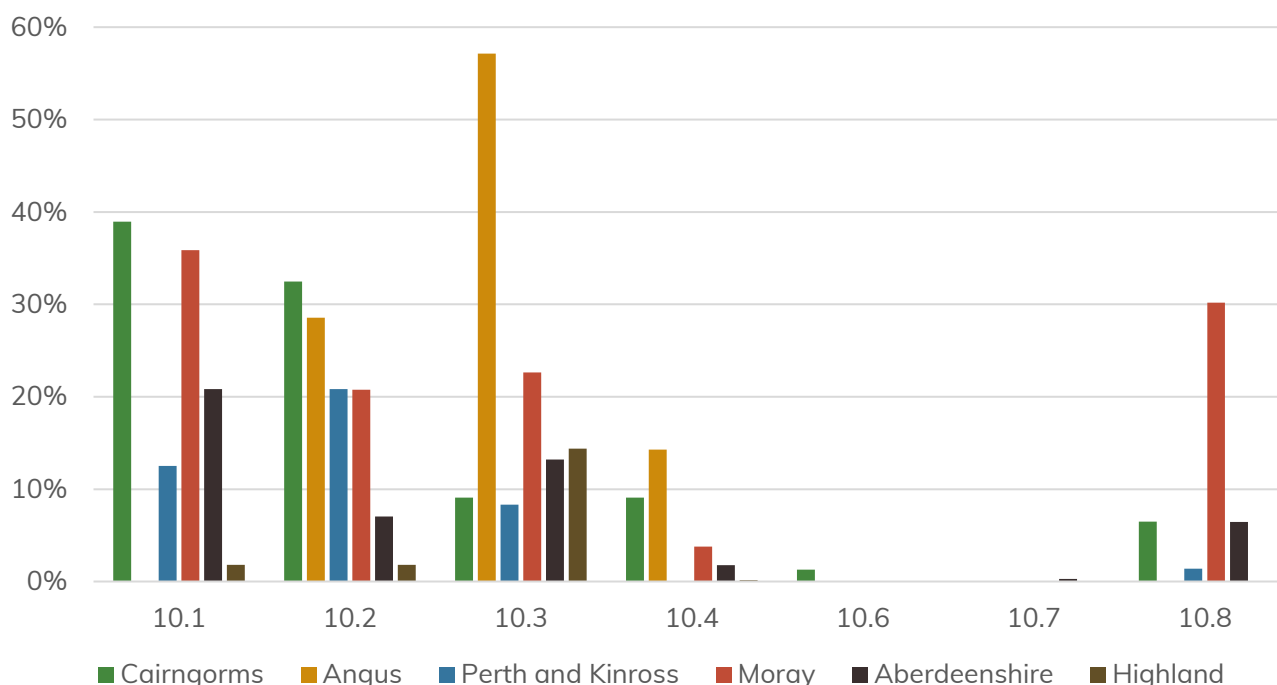


Figure 34 Proportion of planning applications where each sub-policy of Policy 10 of the Cairngorms National Park Local Development Plan was referred to in officer reports on planning applications decided by the constituent local authorities and the Cairngorms National Park.

Sub-policies 10.5, 10.6 and 10.7 are very rarely referenced in reports. This is likely because of the limited number of specific types of application which would reference these policies.

Policy 11 – Developer obligations

This policy aims to ensure that new developments make an appropriate contribution to addressing and managing the impacts of development on the surrounding infrastructure and local services.

Table 24 Relationship of Policy 11 with the Cairngorms National Park Partnership Plan 2017 – 2022.

Outcomes	Rural development
Priorities	Housing Community capacity and empowerment Economic development
Policies	3.2 – Sustainable settlements
	3.5 – Design and sense of place

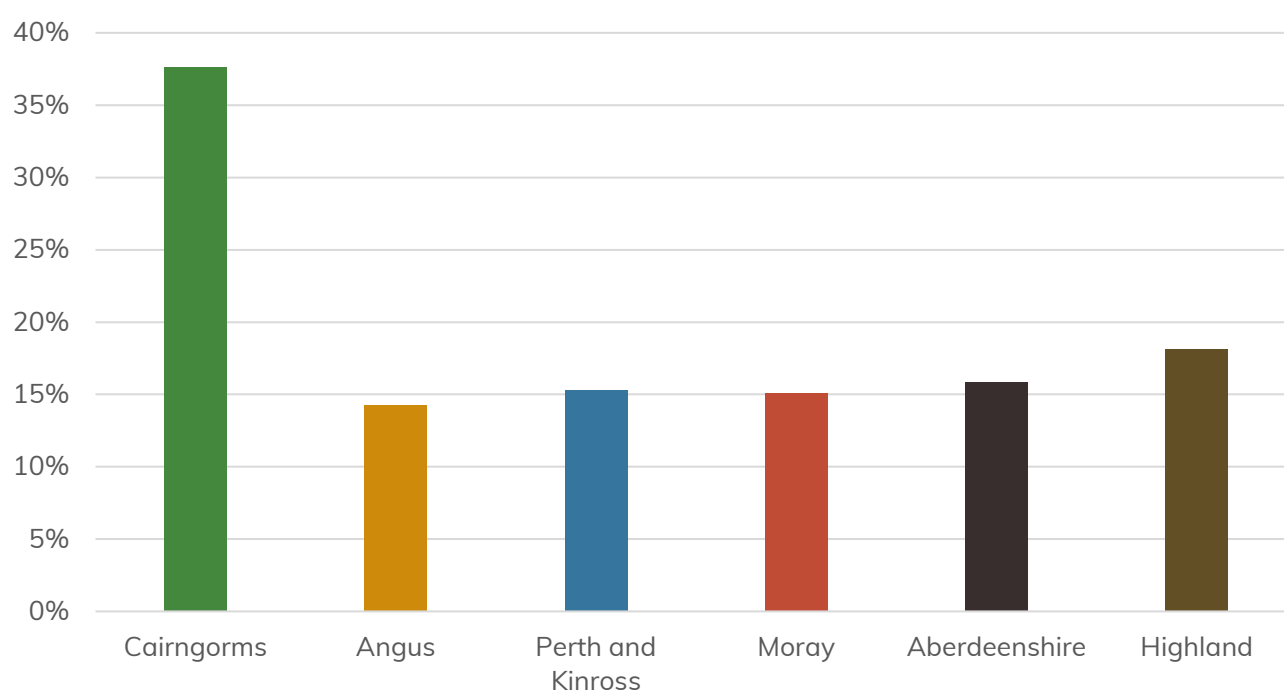


Figure 35 Percentage of planning applications that Policy 11 of the Cairngorms National Park local development plan was referred to in officer reports determined between April 2021 and March 2025 by Cairngorms National Park Authority and each local planning authority.

The Cairngorms National Park Authority uses Policy 11 more than the constituent local planning authorities. It is likely that applications determined by the Cairngorms National Park are larger scale developments and so developer obligations would be required more often. There are no sub-policies listed under this policy.



Summary of sub-policy use

Overall, there are many reasons why policy use varies so much across the different authorities. Some of these are more obvious than others. For example, The Highland Council deals with the highest number of housing applications due to them having the largest number of settlements within their authority area.

There are at least three sub-policies which you would assume would be used or referenced when considering most applications. These are Policy 3.1 Placemaking; Policy 3.3 Sustainable design; and Policy 5.1 Special landscape qualities. It is unclear why these have not been referenced more often.

Policies, 6, 7 and 8 may be used less often, because they reference more specific and infrequent application types but this does not mean that they are less important or have not helped to deliver the intended outcomes of the Local Development Plan.

It is clear from the varied use of the policies and sub-policies, that different authorities are using the adopted Local Development Plan in different ways. Even with the policies being used and referenced in different ways, it can be shown that the overall use of the local development plan appears to be successful, due to the very small number of applications which have been refused (3% of all applications).

Assessment of delivery of outcomes

The Cairngorms National Park Local Development Plan 2021 identifies nine ways in which it could help to deliver the long-term outcomes of the Cairngorms National Park Partnership Plan (2017 – 2002). These are set out on page 6 of this paper. This section considers whether these intentions have been met:

Table 25 Assessment of delivery of outcomes.

Local Development Plan expectation	Assessment of delivery of outcome
The special qualities of the National Park are protected from development that would significantly erode or harm them and are enhanced by new development where possible.	<p>The spatial strategy focuses most development within the main settlements, with more modest local development in intermediate and rural settlements.</p> <p>Only limited development has been permitted outside of allocated sites, reducing potential impacts on the National Park's special landscape qualities.</p>



Local Development Plan expectation	Assessment of delivery of outcome
	<p>This is controlled through sub-policies 1.1, 1.2 and 1.3.</p> <p>Usage of Policy 5 (landscape) indicates that the vast majority of applications where landscape impacts have been relevant have been permitted.</p>
New development helps to reinforce the valued built heritage of the National Park and the communities within it.	<p>Policy 9 cultural heritage is a well-used policy overall which helps to protect historic buildings.</p> <p>There is ongoing work to help maintain conservation areas including a new Conservation area management plan for Grantown-on-Spey which was adopted by The Highland Council in 2023. This document discusses the current state of the area and where it could improve. Some of the opportunities for enhancement identified include: maintenance and repair, restoration and further sensitive development.</p>
New or improved visitor infrastructure is supported where appropriate and integrated with other visitor sites, services and communities.	<p>There have been a number of applications relating to visitor infrastructure which have been approved and constructed over the plan period.</p> <p>The Cairn Distillery was completed by a local company and is an example of how the local development plan has helped to encourage the growth of a business sector while drawing on the special qualities of the National Park as per the Cairngorms National Parks Partnership Plan 2022. The distillery officially opened in June 2023. It went through the whole planning process with pre-application having started in late 2018.</p> <p>Another example of improved visitor infrastructure is the Glenshee ski centre sip wire safari. Permission was granted in February 2021 for a series of zip wires proposed as part of an aim to offer year-round</p>



Local Development Plan expectation	Assessment of delivery of outcome
	facilities and respond to less reliable winter ski conditions.
New development is well connected to core paths and other off-road routes, as well as creating attractive places to live and visit.	<p>Allocated site Carr Road, in Carrbridge (Local Development Plan site H1) gained permission for 47 dwellings in October 2020. It is located directly next to a core path, which is also Sustran's cycle route 7. Two walking path connections and a cycle link were approved to integrate the development with the active travel route.</p> <p>Another example is in Aviemore on allocated site M1 which has permission for the construction of 140 dwellings. This site included the re-routing of a core path to integrate access into the development. The path, sits in a new landscaped setting, encouraging use.</p>
There is sufficient land for housing to meet identified need and demand, including for inward migration of workers.	<p>The Cairngorms National Park Delivery Programme 2025 provides an up-to-date position, for each settlement, on the development progress of each of the allocated sites in the Local Development Plan. It identifies that there are 11 sites currently under construction, seven which are fully constructed.</p> <p>The rate of new housing delivery is in line with the Local Development Plan housing land requirement target. The Delivery Programme indicates that there 14 allocated sites yet to be developed, providing a future land supply.</p>
More affordable housing is provided to support growth in the working age population and help address the housing pressures faced by young people.	Between 2020 and 2023, 400 new homes were delivered within the National Park, of those, approximately 30% were affordable. This includes new affordable flats and family homes in the listed Ballater Old School which were created by Grampian Housing Association. The old secondary school site in Tomintoul is now a community housing complex having previously sat vacant for two decades.



Local Development Plan expectation	Assessment of delivery of outcome
The necessary land and support for business development and diversification is provided.	<p>The Cairngorms National Park Employment Land Audit 2025² identifies the current employment land supply and the availability of this land. The total land allocated within the current Local Development Plan for business totals an estimated 55.8 ha.</p> <p>On top of this, two additional sites were surveyed creating a total land surveyed of 64.1 ha. 30% of the land in the audit is undeveloped and therefore potentially available for development in the future.</p> <p>An example of a site which has been developed for business use is Granish Farm Partnership's planning permission for the erection of 20 commercial letting units on land immediately north of Aviemore, which was granted in March 2023. This redevelopment of a brownfield site meets a strong demand from small and medium sized businesses.</p>
There are sites for future development that support attractive, vibrant communities and that minimise the need to use energy.	<p>Policy 3 (sustainable design and placemaking) is our most used policy in the development plan between the period April 2021 to March 2025 in the granting of planning permission for development, highlighting its role in creating vibrant communities.</p> <p>The Park Authority's recently created local living mapping provides an opportunity to test whether the Local Development Plans allocated sites support local living. It finds that:</p> <p>Around 90% of Aviemore Highland Resort (allocated site M1, where 128 dwellings are currently under construction) is in Aviemore's 'highly walkable' zone.</p>

² To view the Cairngorms National Park Employment Land Audit 2025 click here:
<https://cairngorms.co.uk/wp-content/uploads/2025/05/Cairngorms-National-Park-Employment-Land-Audit-2025.pdf>



Local Development Plan expectation	Assessment of delivery of outcome
	<p>All of the former school site in Ballater (allocated site C1, where 24 dwellings have been permitted and constructed) is within Ballater's 'very high level of walkable services' zone.</p> <p>Most of Carrbridge's Carr Road site (allocated site H1, where 47 dwellings have been constructed) is in Carrbridge's 'some walkable services' zone.</p> <p>All of Carrbridge's Crannich Park (allocated site H2 where 23 dwellings have been permitted) is within Carrbridge's 'some walkable services' zone.</p> <p>Almost all of Grantown on Spey's Beachen Court development (allocated site H1 where 58 dwellings are under construction) is within Grantown-on-Spey's 'highly walkable' zone.</p> <p>Tomintoul's former secondary school site has been redeveloped for 12 affordable dwellings is within Tomintoul's 'highly walkable' zone.</p> <p>All of Blair Atholl's development for 8 affordable dwellings (allocated site H3) is within Blair Atholl's 'highly walkable' zone.</p>
There is clear guidance on where, when and how the best development will be supported.	There is an adopted full suite of statutory and non-statutory guidance available which sits alongside the existing Local Development Plan and gives further depth and additional information on all of the policies in the plan.

Summary of delivery of allocations

A Delivery Programme was published in March 2025, providing an update on the allocations within the Cairngorms National Park Local Development Plan 2021.



The delivery pipeline presents the data available in each local authority's published housing land audit. A delivery pipeline summary table is provided as table 1 within the Delivery Programme 2025 and is reproduced below (Table 26).

The delivery pipeline includes Local Development Plan allocated sites as well as windfall sites (non-allocated sites which have planning permission) of four or more dwellings. The summary table shows that 260 dwellings have been built on these sites between April 2020 and April 2023 – the first three years of the Local Development Plan 2021.

This equates to an average of 87 dwellings per year. The Local Development Plan's housing land requirement is 484 dwellings for the five years from 2020 to 2024 and 335 dwellings from 2025 to 2029. This totals 819 dwellings over a 10-year period, or an average of 82 dwellings per year. Housing completions over the first three years of the Local Development Plan are therefore marginally above the requirements set out in the plan. There is also sufficient total site capacity to meet the 5-year and 10-year housing land requirement of the Local Development Plan 2021.

Table 26 Summary of the Cairngorms National Park Local Development Plan 2021 delivery pipeline (as published in the Delivery Programme 2025 as 'table 1')

Status	Total site capacity	All completions to 31 March 2023	Total dwellings remaining
Under construction	574	260	314
With permission	104		104
No permission	468		468
Totals	1,146	260	886

Lessons learnt

Park Authority officer engagement

On 12 June 2025 an internal meeting was held with development management planning officers within the Cairngorms national Park to present the policy monitoring findings. This resulted in a discussion on all the different policies and sub-policies. It was discussed how the policies were to use on a daily basis, what worked well and what did not overall, whether the policies were still required following the release of National Planning Framework 4 and if there was anything they felt was missing and therefore required in the next Local Development Plan.



The most prominent points which were raised on each policy in the meeting are summarised as follows:

Policy 1 – New housing development

- Policy 1.2 Housing development in existing rural groups should be kept in the next local development plan as it helps to deliver rural housing in a way specific to the National Park.
- Affordable housing and affordable housing exception sites will need detailed local policy.

Policy 2 – Supporting economic growth

- A policy protecting existing economic sites (Policy 2.5) will need to be covered in the new local development plan as there is not a similar policy in National Planning Framework 4.

Policy 3 – Design and placemaking

- Officers questioned the purpose of Policy 3.2 (major developments) as the terms 'masterplan or development brief' has too many definitions. If a policy is retained, this will need to be clarified.
- Policy 3.3 (sustainable design) is covered by a range of policies in National Planning Framework 4. It effectively acts as a checklist, drawing together a range of policy issues. Is this beneficial or too restrictive to an overall consideration of the sustainability of a proposal?

Policy 4 – Natural heritage

- There has been less usage of Policy 4 since the introduction of National Planning Framework 4 because Policy 4 in National Planning Framework 4 is so robust.
- Biodiversity enhancement may require a local policy in response to National Planning Framework 4 Policy 3.
- Nature networks and blue and green infrastructure may also need to be addressed in the local development plan. Also, policy regarding beavers maybe?

Policy 5 – Landscape

- It is surprising that this policy is not being used more frequently by all authorities – although it isn't surprising that the Cairngorms National Park Authority use it more. Officers felt it should be considered in most planning application decisions.
- We will definitely need a local policy to protect the National Park's special landscape qualities as it is not well covered in National Planning Framework 4.



Policy 7 – Renewable energy

- Single wind turbines may need a separate local policy.
- Energy transmission infrastructure is a bit of a gap in our policy. Solar is another one which may need a specific National Park context.

Policy 8 – Open space, sport and recreation

- National Planning Framework 4 Policy 21 on open space is stronger than our current Local Development Plan policy.

Policy 10 – Resources

- A bit unsure on what parts of this policy are actually within the National Park's control as opposed to other authorities such as Scottish Water, for example.
- New policy needed on mineral safeguarding.
- National Planning Framework 4 does not cover more complex interactions very well such as rural communities and distilleries, for example. with regards to water quality and water environment protection.

Policy 11 – Developer obligations

- Setting out the Cairngorms National Park's expectation for developer obligations is essential and is currently well covered by Policy 11 and the supplementary planning guidance. It will need to be set out in the new local development plan and accompanying delivery programme.

Developers Forum engagement

On 20 August 2025, the policy monitoring findings were presented at a Cairngorms National Park Developers Forum to again discuss the policies and how they considered that the policies performed from a developer's point of view. This meeting included housebuilders, planning consultants, representatives from local estates, planners from local authorities within the National Park as well as other businesses and organisations.

The most prominent points which were raised in the meeting are summarised as follows:

Policy 1 – New housing development

- Housing policy and affordable housing delivery are critical issues. There was an extensive discussion surrounding this topic, relating to allocating sufficient land to meet the local housing land requirement and affordable housing delivery and viability,



- There was consensus that there needs to be a clearer definition of what affordable housing means for the Cairngorms National Park Authority (in terms of tenure).
- To aid developers in the preparation of their planning applications, there was discussion around the need for the requirement for different kinds of affordable housing tenure (e.g. social housing, below-market rents, shared equity etc.) to be set out in the local development plan as part of the housing land requirement.
- There also needs to be close partnership between Park Authority planning officers and constituent Council housing authority officers to support developers' to deliver the affordable housing required by legal agreement.
- It was agreed that further meetings of the Developers Forum could support these goals.

Policy 2 – Economic development

- There was a request to consider the possibility of allocating housing specifically to meet local employment needs.
- The difficulty of finding accommodation for seasonal workers was noted.

Policy 4 – Natural heritage

- Concern was raised over requirements for biodiversity enhancement and that further clarity in local policy would be required.

Policy 11 – Developer obligations

- It was agreed that there needs to be a clear understanding of infrastructure costs and that developer's contributions need to be viable.

Local authority engagement

The constituent local planning authority development management teams were asked to comment on a draft version of this report.

Aberdeenshire Council officers have made the following points:

- Recommend that Aberdeenshire Council's historic environment team engage in this process of developing a local 'other cultural heritage' policy to help ensure consistency of approach between Aberdeenshire Council and the National Park, especially as the National Park does not have in-house expertise on the historic environment in this context.
- The development management team consider that the current Cairngorms National Park Local Development Plan and its policies work well and are easy to interpret and apply. They are useful in delivering the aims of the National Park and addressing the



pressures and type of development in the Aberdeenshire part. As such, there is a degree of concern about a potential approach of minimising Cairngorms National Park specific policies which in turn may fail to deliver on the wider aims of the National Park. We wonder if relying heavily on the policies of National Planning Framework 4 will ensure the delivery of key housing and tourism objectives. At this stage, we would take the general view that it would be preferable if there were to be tailored policies, using National Planning Framework 4 as the basis, to ensure that development can still be delivered in the rural Cairngorms National Park areas.

Highland Council officers have made the following points:

- The Development Plans Manager advises that their new local development plan will look to fill gaps, close loopholes, add Highland-circumstances-justified detail, correct logic and factual errors, and reconcile internal conflicts that exist within National Planning Framework 4. In their view, National Planning Framework 4 Policies 16, 17, 18, 20 and 27 need the most focus in Highland Council's new local development plan's general policies.

Moray Council officers have made the following points:

- General feedback from development management officers is that the Cairngorms National Park Local Development Plan works well when considering planning applications, but we are conscious this is applied to a limited range of generally small scale and uncontroversial applications.
- It is noted that there are discrepancies between authorities in terms of policy use. This may be influenced by subconscious policy approaches in the constituent council's local development plan - that should not be applied - and the role of consultees in the planning process (for example, Moray may give greater consideration to drainage because of quite stringent requirements in the Moray local development plan).
- Policy 4.2 (National designations) – wording is slightly contradictory and confusing. It states that 'development that would adversely affect the Cairngorms National Park or national designations will only be permitted where it does not adversely affect the integrity of the area or its qualities). If it does not affect the designations then do we apply it or not?
- The developer obligations supplementary guidance sets out that contributions required for education, healthcare, community and leisure facilities, and transport and related infrastructure are set out by the planning authority. We have had issues in the past where this was not followed for call-in applications. It is important that the published Supplementary Guidance is followed to ensure consistency.



- With the changes to how local development plans are prepared, information on developer obligations, including the methodology for contributions will need to be included within local development plan policies. In Moray, the delivery programme, will include information on rates for contributions sought. The current wording within the Cairngorm's Developer Obligations Supplementary Guidance should allow for contributions to continue to be sought but consideration will need to be given to wording in subsequent planning guidance or policies within the next Cairngorms National Park local development plan.

Spatial strategy

The Local Development Plan 2021 is based on an overall development strategy which focuses most development on the main settlements of the National Park – Aviemore, Ballater, Grantown-on-Spey, Kingussie and Newtonmore. These settlements are referred to as 'strategic settlements'.

The development strategy also identifies 'intermediate settlements' and 'rural settlements'. Intermediate settlements accommodate development to meet wider needs, albeit at a more modest scale than within the strategic settlements, while development in rural settlements is primarily aimed at meeting local need.

Outside of the defined settlements, the development strategy enables small-scale expansion of existing groups of buildings in rural areas, delivery of affordable housing and the development of new and diversified rural businesses.

The Planning (Scotland) Act 2019 introduced the requirement for Regional Spatial Strategies. The National Park Partnership Plan 2022 - 2027 is now the regional spatial strategy for the National Park.

It sets out a long-term spatial strategy to deliver the aims of the National Park in a collective and coordinated way. Figure 36 summarises the strategic developments that are required in the National Park in the future to contribute to the long-term vision for the National Park and the delivery of the long-term outcomes and objectives of the National Park Partnership Plan in each of the Nature, People and Place themes.

The Regional Spatial Strategy retains the settlement hierarchy from the Local Development Plan 2021. It also introduces 'Aviemore and Cairngorm' and 'digital connectivity' priority areas.

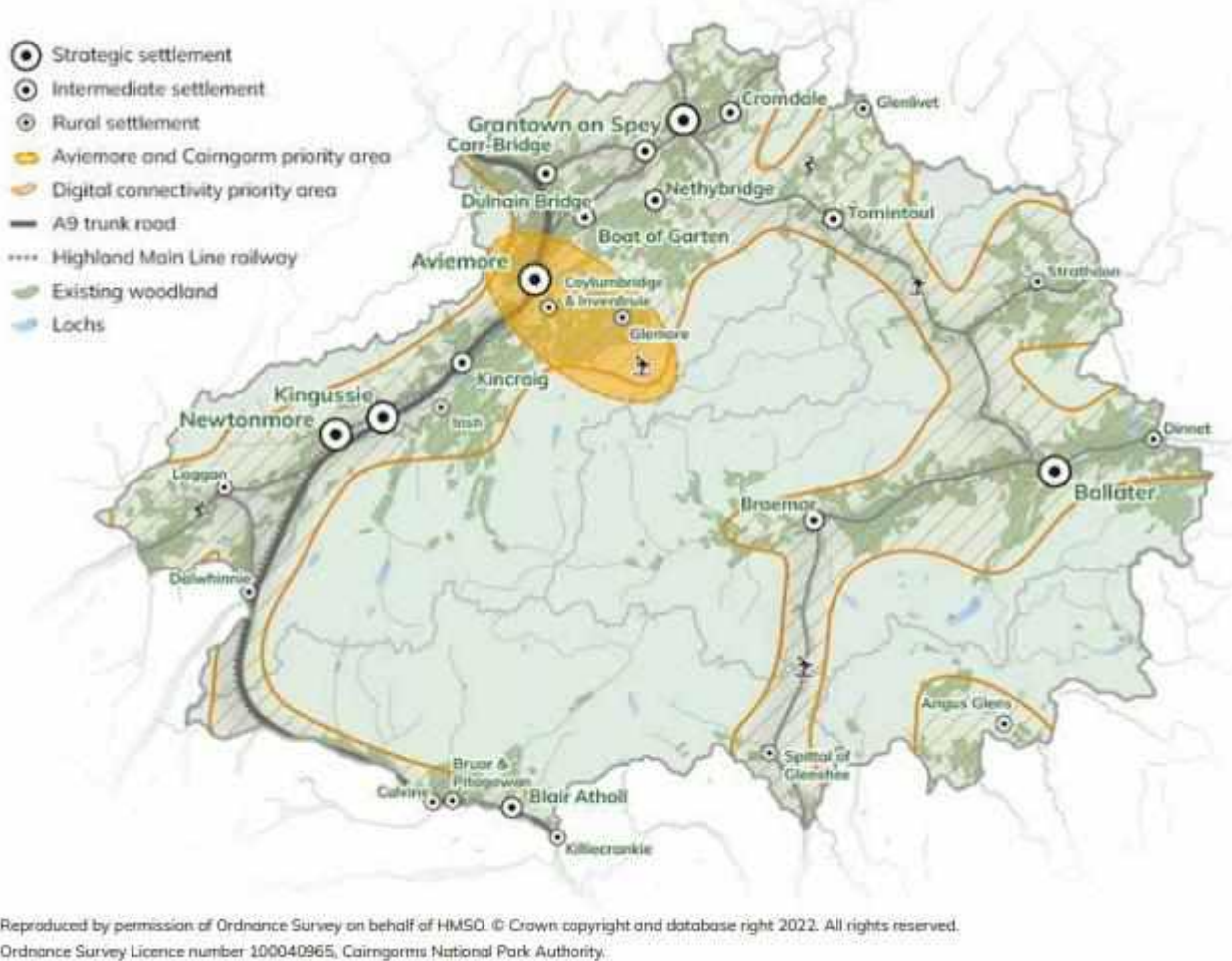


Figure 36 The Cairngorms National Park Partnership Plan's regional spatial strategy (figure 8 within the Cairngorms National Park Partnership Plan). Cairngorms National Park Authority © Crown copyright and database rights 2025 Ordnance Survey AC0000821810.

The retention of the spatial strategy from the adopted local development plan demonstrates its appropriateness. The Cairngorms National Park's new local development plan is required to accord with the regional spatial strategy in the Cairngorms National Park Partnership Plan 2022 – 2027.

Relationships between Cairngorms National Park Local Development Plan 2021 policies and National Planning Framework 4

Since the Cairngorms National Park Local Development Plan was adopted in 2021, National Planning Framework 4 has come into force. It contains planning policies that form part of the statutory development plan.



This means, as advised by the Scottish Government's Local Development Planning Guidance (2023), that each local development plan 'will have fewer thematic policies and written text than previously' (paragraph 17). Local development plans should instead focus on the spatial implications of national policy, including 'local policies that reflect local issues and context, where the planning authority considers this is required'.

Table 27 lists the National Planning Framework 4 policies which relate to each sub-policy within the adopted local development plan. While there may be differences in the policy wording between the two documents, which could require local policy clarification, this gives an initial understanding of where National Planning Framework 4 policies could replace existing local development plan policies.

Comments on where adopted local development policies may need to be retained and updated are set out below and summarised in the table. Full consideration of what policies are needed in the next local development plan will be undertaken following the Gateway Check, taking account of the requirements of National Planning Framework 4, relevant guidance and the local development plan evidence base.

Policy 1 – New housing development

- While National Planning Framework 4 Policies 16 (quality homes) and 17 (rural homes) provide clear policies on a wide range of housing issues relevant to the National Park, an affordable housing policy will be required to reflect the Cairngorms National Park Partnership Plan's Objective C2 which sets a target by 2030 for 75% of new housing to be affordable in perpetuity.
- Given the acute housing affordability issue in the National Park, there may be a requirement for a local policy on housing exception sites, to reflect the wording of adopted Policy 1.6.
- National Planning Framework 4 Policy 17c advises that development proposals for new homes in remote rural areas will be supported where the proposal:
 - i. Supports and sustains existing fragile communities.
 - ii. Supports identified local housing outcomes.
 - iii. Is suitable in terms of location, access, and environmental impact.

Local Development Plan Policy 1.2 has a similar intent but is specific to the context of the Cairngorms National Park, supporting new homes where they would add to an existing rural group of three or more buildings, add no more than one third to the existing number of buildings and be suitable.



Future local development plan housing policy will be informed by the Housing topic paper:

- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/housing?step=step1>

Policy 2 – Supporting economic growth

- National Planning Framework 4 Policies 27 (city, town, local and commercial centres) and 28 (retail) outline a town centre first approach, where development, including retail, is directed to the most sustainable places and communities can be accessed by a range of sustainable transport modes. This meets the expectations of Local Development Plan Policy 2.1 (town centres first).
- National Planning Framework 4 Policy 30 (tourism) aims to encourage, promote and facilitate sustainable tourism in a similar way to Local Development Plan Policy 2.1 and 2.3.
- National Planning Framework 4 Policy 25 (business and industry) encourages, promotes and facilitates business and industry uses where they are on allocated sites, with similar considerations of amenity impacts and compatibility to Local Development Plan Policy 2.4.
- National Planning Framework 4 does not contain a policy that protects existing economic uses (including tourism) in the same way as Local Development Policy 2.5 (although note that National Planning Framework 4 Policy 31 culture and creativity protects arts and cultural venues). It will need to be considered whether there is evidence to justify the protection of existing employment sites within the National Park.

Future local development plan economic growth policy will be informed by the Economic development topic paper, Tourism in the National Park topic paper and Retail and town centres topic paper:

- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/economic-development-survey?step=step1>
- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/tourism-in-the-national-park-survey?step=step1>
- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/retail-and-town-centres?step=step1>



Policy 3 – Design and placemaking

- National Planning Framework 4 Policy 14 (design, quality and place) requires development to be consistent with the six qualities of successful places, making Local Development Plan Policy 3.1 redundant.
- Local Development Plan Policy 3.2 requires major developments of over 50 dwellings to be supported by a masterplan. This requirement is not stated in National Planning Framework 4 but could be included in the new Local Development Plan on a site-by-site basis.
- Local Development Plan Policy 3.3 requires sustainable design through twelve criteria. These are covered by a wide range of National Planning Framework 4 policies as set out below:
 - Policy 1 – Tackling the climate and nature crisis
 - Policy 2a – Climate mitigation and adaptation (minimise emissions)
 - Policy 13b – Sustainable transport (sustainable travel and investment hierarchies)
 - Policy 19f – Heat and cooling (natural and passive building temperature management)
 - Policy 21b and 21d – Play, recreation and sport (children's outdoor play and recreation)
 - Policy 29b – Rural development (scale, siting and design)

A local development plan specific policy could still be beneficial to highlight local necessary requirements within these broad policy intentions, such as the need to reflect local vernacular and distinctiveness and the National Park Core Paths Plan.

- Local Development Plan Policy 3.4 supports the replacement of existing building stock and Policy 3.5 supports the conversion of existing building stock. National Planning Policy Framework 4 Policy 9d (reuse of existing buildings) states that given the need to conserve embodied energy, demolition is the least preferred option and reuse is supported.
- Local Development Plan Policy 3.6 requires alterations to reflect the building and area and maintain an appropriate level of private ground. Local expectations could be included in a local design policy in the new Local Development Plan.

Matters relating to design and place are covered within all topic papers.

Policy 4 – Natural heritage

- National Planning Framework 4 Policy 4 (natural places) provides policies to protect international, national and local designations, protected species, all other biodiversity and wild lands in a similar way to Local Development Plan Policy 4 (natural heritage) and its sub-policies.



- National Planning Framework 4 Policy 6 (forestry, woodland and trees) protects woodlands similarly to Local Development Plan Policy 4.3, but specific policy recognising the importance of woodland in the National Park likely to be required.
- National Planning Framework 4 Policy 11d (energy) ensures that renewable, low-carbon and zero emissions technologies are assessed under Policy 4.
- National Planning Framework 4 Policy 3 (biodiversity) requires local development plans to enhance biodiversity as well as protect, conserve and restore it. This could require a specific policy in the new local development plan to provide guidance on what is required in the National Park in terms of the amount of enhancement required and how and where it will restore degraded habitats and strengthen nature networks and the connections between them.

Future local development plan natural heritage policy will be informed by the Natural heritage topic paper and blue and green infrastructure topic paper:

- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/natural-heritage-survey?step=step1>
- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/blue-and-green-infrastructure?step=step1>

Policy 5 – Landscape

- There is no policy in National Planning Framework 4 which specifically protects landscape. A local policy will be necessary in the new Local Development Plan to define and protect the National Park's Special Landscape Qualities and proactively manage new private roads and ways.

Future local development plan landscape policy will be informed by the Landscape in the National Park topic paper:

- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/landscape-in-the-national-park-survey?step=step1>

Policy 6 – Digital communications

- National Planning Framework 4 Policy 24e (digital infrastructure – siting) restricts support for digital infrastructure to where impacts are minimised and other options aside from new masts are exhausted. This means there is no need for a digital communications policy in the new Local Development Plan.



Future local development plan digital communication policy will be informed by the Digital infrastructure in the National Park topic paper:

- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/digital-infrastructure-in-the-national-park-survey?step=step1>

Policy 7 – Renewable energy

- National Planning Framework Policy 11 (energy) supports all forms of renewable energy, subject to a range of criteria, similar to Local Development Policy 7. National Planning Framework 4 Policy 11b specifically prevents wind farms in National Parks. There are no specific policies for hydropower, biomass and energy from waste and local policies could be considered.
- National Planning Framework 4 Policy 19 (heating and cooling) provides policy in relation to heat networks, which replaces Local Development Plan Policy 7.6

Future local development plan renewable energy policy will be informed by the Energy topic paper and Heating and cooling topic paper:

- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/energy-survey?step=step1>
- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/heating-and-cooling-survey?step=step1>

Policy 8 – Open space, sport and recreation

- National Planning Framework 4 Policy 20 (blue and green infrastructure) supports new open spaces. It, and National Planning Framework Policy 21 (play, recreation and sport), protect existing open spaces in a similar way to Local Development Plan Policy 8.

Future local development plan open space, sport and recreation policy will be informed by the play, recreation and sport topic paper:

- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/play-sport-and-recreation?step=step1>

Policy 9 – Cultural heritage

- National Planning Framework 4 Policy 7 (historic assets and places) provides specific protection for each of a wide range of historic assets in a similar way to Local



Development Plan Policy 9. A specific policy could be considered in the new Local Development Plan to ensure the overall cultural heritage of the National Park is protected.

Future local development plan cultural heritage policy will be informed by the Historic and cultural heritage topic paper:

- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/historic-and-cultural-heritage-survey?step=step1>

Policy 10 – Resources

- Every Local Development Plan sub-policy area except 10.3 is covered by a different National Planning Framework 4 policy, as summarised below:
 - Water resources by Policy 2d
 - Flooding by Policy 22
 - Waste management and minimalization and landfill by Policy 12
 - Minerals by Policy 33.
 - Carbon sinks and stores by Policy 5.
 - Contaminated land by Policy 18.
- Local Development Plan Policy 10.3 requires connection to the public sewerage. While not in National Planning Framework 4, this repeats the policy approach of the Scottish Environmental Protection Agency and Scottish Water and would not need to be repeated in the new Local Development Plan unless there is a specific local justification.
- Local Development Plan Policy 10.6 protects future viable extraction of workable mineral reserves. National Planning Framework 4 Policy 33 requires local development plans to support a landbank of construction aggregates of at least 10-years. A local policy will be needed to safeguard important workable mineral resources.

Future local development plan resource policy will be informed by the Flood risk and water management topic paper, the Zero waste topic paper and the Land use, soil and resources topic paper:

- [https://cairngormsldp.commonplace.is/en-GB/proposals/v3/flood-risk-and-water-management-survey?step=step1,](https://cairngormsldp.commonplace.is/en-GB/proposals/v3/flood-risk-and-water-management-survey?step=step1)



- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/zero-waste-survey?step=step1>
- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/land-use-soil-and-resources-survey?step=step1>

Policy 11 – Developer obligations

- National Planning Framework 4 Policy 18 (infrastructure first) provides the expectations for developer contributions. However, a specific Local Development Plan policy will be required, alongside a Delivery Programme, to identify the infrastructure necessary to address the impacts of different types of development planned for, indicating its type, level and location of financial or in-kind contributions.
- National Planning Framework 4 Policy 13g (strategic transport network mitigation) provides specific policy in relation to the Strategic Transport Network.

Future local development plan developer obligations policy will be informed by the Health and safety topic paper, the Education topic paper and Sustainable transport topic paper

- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/health-and-safety-survey?step=step1>
- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/education-survey?step=step1>
- <https://cairngormsldp.commonplace.is/en-GB/proposals/v3/sustainable-transport-survey?step=step1>

Table 27 Cairngorms National Park Local Development Plan 2021 policies, with relevant National Planning Framework 4 policies

Local Development Plan 2021 policy		National Planning Framework 4 relevant policies	Policy required in new Local Development Plan?
1	New housing development		
1.1	Housing delivery in settlements	16a	No
1.2	Housing development in existing rural groups	17c	Yes
1.3	Other housing in the countryside	9a 16f 17a 17v	No



Local Development Plan 2021 policy		National Planning Framework 4 relevant policies	Policy required in new Local Development Plan?
1.4	Designing for affordability and specialist needs	16c	No
1.5	Affordable housing	16e	Yes
1.6	Affordable housing exception sites		Yes
1.7	Alterations to existing houses	16g	No
1.8	Conversions		No
1.9	Replacement houses		No
1.10	Housing for gypsies, travellers and travelling show people	16d	No
2	Supporting economic growth		
2.1	Town centres first	27a, 27b, 28b	No
2.2	Tourist accommodation	30a	No
2.3	Other tourism and leisure developments	30a, 30b	No
2.4	Other economic development	26a, 26c, 26d, 26e	No
2.5	Protecting existing economic activity	31c	Yes
3	Design and placemaking		
3.1	Placemaking	14b	No
3.2	Major development		Yes – for specific allocations.
3.3	Sustainable design	1, 2a, 13b, 19f, 21b, 21d, 29b	Yes – to indicate locally specific expectations.
3.4	Replacing existing building stock		No
3.5	Converting existing building stock	9d	No
3.6	Alterations to existing building stock	16g	Yes – as part of 3.3.
4	Natural heritage		
4.1	International designations	4b, 11d	No
4.2	National designations	4c, 11d	No
4.3	Woodlands	6b, 6c	Yes
4.4	Protected species	4f	No
4.5	Other biodiversity	4d	No



Local Development Plan 2021 policy		National Planning Framework 4 relevant policies	Policy required in new Local Development Plan?
4.6	All development	4a, 4e	No
5	Landscape		
5.1	Special landscape qualities	4c	Yes
5.2	Private roads and ways		Yes
6	The siting and design of digital communications equipment	24e	No
7	Renewable energy		
7.1	All renewable energy developments	11a, 11e	No
7.2	Hydropower		Yes – if specific requirements are necessary.
7.3	Wind energy	11b	Yes – for single wind turbines.
7.4	Biomass		Yes – if specific requirements are necessary.
7.5	Energy from waste	11d	No
7.6	Heat networks	19a	No
8	Open space, sport and recreation		
8.1	New development	20b, 21a, 21d, 21f	No
8.2	Redevelopment of outdoor sports facilities		No
8.3	Redevelopment of other open space	20a	No
9	Cultural heritage		
9.1	Listed buildings	7b, 7c, 7j	No
9.2	Cultural and historic designations	7h, 7i, 7j	No
9.3	Conservation areas	7d, 7e, 7f, 7g	No
9.4	Other cultural heritage	7o	Yes – to refer to local cultural significance.
10	Resources		
10.1	Water resources		Yes – to protect water quality.
10.2	Flooding	22a, 22b, 22c	No



Local Development Plan 2021 policy		National Planning Framework 4 relevant policies	Policy required in new Local Development Plan?
10.3	Connection to sewerage		Yes – if specific local justification.
10.4	Waste management and minimisation	12b,12c,12d	No
10.5	Landfill	12e	No
10.6	Minerals	33d, 33e	Yes – to implement the safeguarding aspect of Policy 33.
10.7	Carbon sinks and stores	5a, 5c, 5d, 5e	No
10.8	Contaminated land	9c	No
11	Developer obligations	18a, 18b	Yes – to identify necessary infrastructure requirements alongside the Delivery Programme.
a	Education		
b	Healthcare		
c	Community facilities		
d	Transport provision and infrastructure	13g	
e	Natural heritage		

Summary of implications for 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), in particular the first aim 'to conserve and enhance the natural and cultural heritage of the area'.
- The spatial strategy and principles of National Planning Framework 4, in particular by:
 - Adding further detail through locally specific policies where there is considered to be a need to do so, based on the Cairngorm National Park's individual characteristics.



In its preparation the proposed plan should:

- Align with the Cairngorms National Park Partnership Plan 2022 – 2027. In particular through:
 - Supporting Policy A4 which seeks to conserve and enhance the special landscape qualities of the National Park.
 - Supporting Policy A5(g) which seeks to support off-site mitigation from development that contributes to ecological networks.
 - Supporting the Objective C2 target which is that by 2030, 75% of new housing is for social rental, mid-market rental or other affordable categories that provide affordability in perpetuity.
 - Supporting Policy C3 which seeks to enhance the design and sense of place in new development and existing settlements, in particular through high standards, retaining local character, the rehabilitation of redundant buildings and recycling of resources.
 - Supporting Policy C4(a) which seeks to ensure high-quality tourist facilities and infrastructure manage the effects of visitor pressures on the natural heritage and communities and Policy C4(b) which seeks to ensure that the upgrading or refurbishment of visitor hubs improves accessibility and facilities for all.
- Take account of the priorities of community action plans.