

Cairngorms National Park

Local Development Plan 2020

Main Issues Report

Monitoring Statement



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Introduction

What is a Monitoring Statement?

It is a statutory duty under the Town and Country Planning (Scotland) Act 1997 to produce a Monitoring Statement alongside the Main Issues Report. Circular 6/2013 (Development Planning) advises that this should consider the changes in the principal physical, economic, social and environmental characteristics of the area and the impact of policies and proposals within the existing Local Development Plan.

What is the Purpose of a Monitoring Statement?

The Monitoring Statement is a supporting document that will help inform the production of the Local Development Plan (LDP). It will form part of the evidence base that will support the Main Issues Report (MIR).

It is essential that the effectiveness of policies within the existing LDP be monitored to ensure that they are working as intended and to help identify changes that may need to be made in the

next LDP. The monitoring statement will consider the allocations within the current LDP looking specifically at their deliverability as well as the need for further allocation as highlighted through the Housing Need and Demand Assessments (HNDAs) that cover the National Park, Employment Land Audits and Retail studies that have been carried out in advance of the MIR. The area of the National Park is shown in Figure 1.

Structure

The Monitoring Statement is split into 4 sections:

Section 1 highlights the key environmental, social and economic characteristics of the National Park. These are supported by a series of more detailed Evidence Papers, the baseline contained within the Strategic Environmental Assessment (SEA) and the Habitats Regulations Appraisal (HRA).

Section 2 provides a policy analysis and review of the current LDP's policies and

highlights areas of change that will be required within LDP 2.

Section 3 will review the deliverability of sites allocated within the current LDP and consider what changes might need to be made.

Section 4 will draw together the conclusions of the monitoring statement and identify implications to be considered within the MIR for LDP2.

Progression of LDP 1 to LDP 2

It is a statutory requirement for Planning Authorities to produce a new LDP every five years. Although the existing LDP was only adopted in March 2015 the majority of the baseline data will have been gathered between 2010 and 2013 and published as part of the first Monitoring Statement and SEA.

It is likely that this data has changed in the intervening period and so this Monitoring Statement has been produced, alongside a new SEA, to ensure that the current key

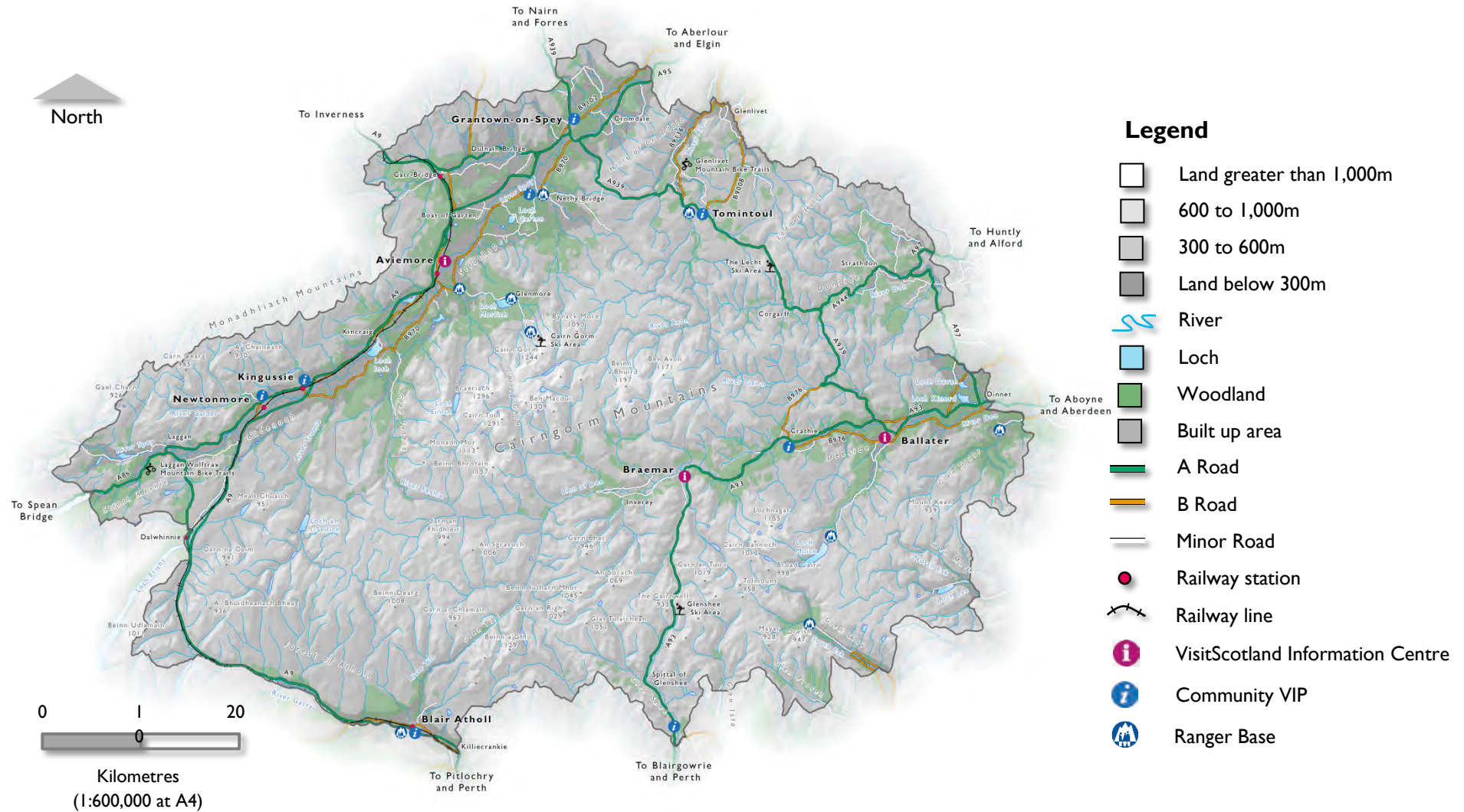


Figure 1 The Cairngorms National Park and area to be covered by the LDP.

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characteristics of the area are reflected in LDP 2 and its MIR.

Planning Hierarchy and the Impact of National Guidance and Legislation

There is a hierarchy of development planning within Scotland. At the highest level are national guidance documents in the form of Scottish Planning Policy (SPP), the National Planning Framework (NPF), as well as Circulars and Guidance notes, which help explain and clarify legislation, and design guidance which sets the overall design standards for development within Scotland.

Below these sit the development plans which take the form of Strategic Development Plans (SDPs), which cover the city regions, and Local Development Plans (LDPs) as well as Supplementary Guidance and other forms of non-statutory guidance. The Cairngorms National Park is outwith the city regions, and therefore not covered by an SDP, however the National Park Authority has the duty to produce a National Park Partnership Plan (NPPP) which acts as the management plan for the National Park.

The NPPP also provides strategic context for the National Park's LDP, outlining key issues and offering strategic direction.

These higher level documents, such as SPP, the NPF and the NPPP influence the content of the LDP. The aim of the LDP is to follow the guidance set out in the higher level documents and include policies and allocated sites that support the vision and outcomes of these strategies, while providing greater detail and a spatial strategy that are particular to the National Park.

Scottish Planning Policy and National Planning Framework 3

SPP is the Scottish Government's Policy on how nationally important land use planning matters should be addressed throughout the country. The NPF sets out the Scottish Government's spatial priorities for the next 20-30 years while SPP sets out policies that will help deliver the objectives of the NPF.

The National Park Partnership Plan
National Park Authorities are required to prepare a National Park Plan (NPP) under

section 11 of the National Parks (Scotland) Act 2000.

The Cairngorms National Park Partnership Plan (NPPP) 2017-2022 is therefore the current management plan for the Cairngorms National Park.

It is a plan for all those with an interest in and responsibility for managing the National Park. This includes public bodies that must have regard to the Plan in carrying out their functions and the private and voluntary sectors including businesses, land managers and communities who are all integral to managing the National Park.

In particular, the NPPP 2017-2022:

- Sets out the vision and overarching strategy for managing the National Park;
- Provides focus and priorities at a time of limited financial resources;
- Provides a strategic context for the Local Development Plan (2020-2025);
- Shows how the four aims of the National Park can be achieved

together, benefiting people and place.

The NPPP sets out the strategic direction and priorities for the National Park, identifying the things that the CNPA and its partners think will make the biggest contribution to a successful National Park over the plan's lifetime and beyond.

Section I: Key Characteristics

Socio-economic context

The Cairngorms National Park was designated in 2003 by the Scottish Parliament because it satisfied the conditions for a National Park as set out in the National Parks (Scotland) Act 2000.

The National Park is the UK's largest, with a total land area of some 4,528km². Dominated by mountain plateau, it boasts extensive moorland, forest and straths and is home to around 25% of the UK's threatened bird, animal and plant species. Approximately 18,000 people live in the National Park and it welcomes around 1.6 million visitors each year.

The general purpose of the National Park Authority (NPA), as set out in the 2000 Act, is to ensure that the National Park aims are collectively achieved in a co-ordinated way. The CNPA is therefore an enabling organisation that must work with and through other bodies to bring added value to the management of the National Park, to achieve the four aims.

The aims of the National Park are:

- to conserve and enhance the natural and cultural heritage of the area;
- to promote sustainable use of the natural resources of the area;
- to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public;
- to promote sustainable economic and social development of the area's communities.

If it appears to the authority that there is conflict between the first aim and the others, the first aim must be given greater weight.

Population

Population and household statistics within the Cairngorms National Park are calculated using an aggregate of data zones that roughly correspond with its boundary.

In 2015¹ the estimated population of the National Park was 18,512, with 9,134 males and 9,378 females (Figure 2).

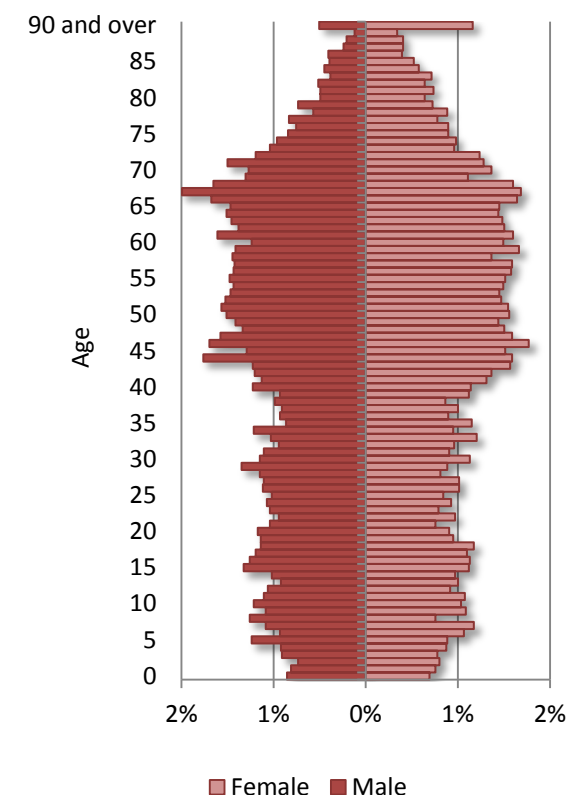


Figure 2 Estimated population profile by age and sex in the Cairngorms National Park in 2015

¹ 2015 Mid-year estimates represent the most recent set of population statistics at a data zone level at time of writing.

The National Park has a distinctly different population profile to the national average, with a higher proportion of people falling within the 55 to 74 age cohorts. When compared to other rural parts of Scotland, the Cairngorms National Park also has a relatively high proportion of residents within the 10 to 29 age cohorts – see NRS (2014). This is thought to be due to the relatively high number of opportunities for employment in the outdoor and tourism sectors. There is also a spike in the 10 to 15 year cohort, which is replicated across Scotland as a whole.

Although mid-year estimates suggest a slowdown in the rate of growth between 2011 and 2015, during the 21st century², the National Park has experienced a significant net increase in its resident population, rising by approximately 2,179 persons (a growth of 13.3%). This growth is well above the overall Scottish rate, which saw a net increase of around 5.6% over the same period.

² Figures between 2001 and 2009 include people living in the area of Perth and Kinross which did not become part of the National Park until 2010.

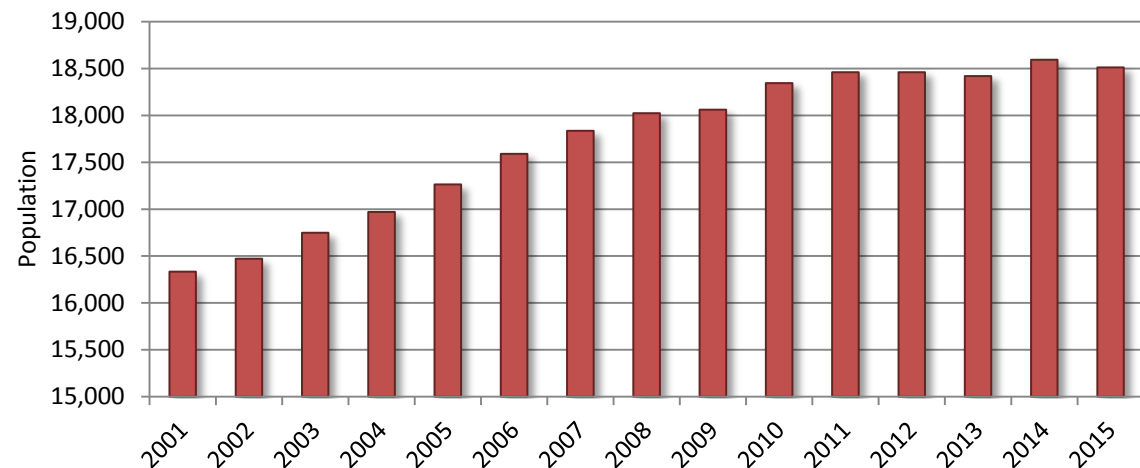


Figure 3 Mid-year estimates of total population for the Cairngorms National Park. Source: www.sns.gov.uk

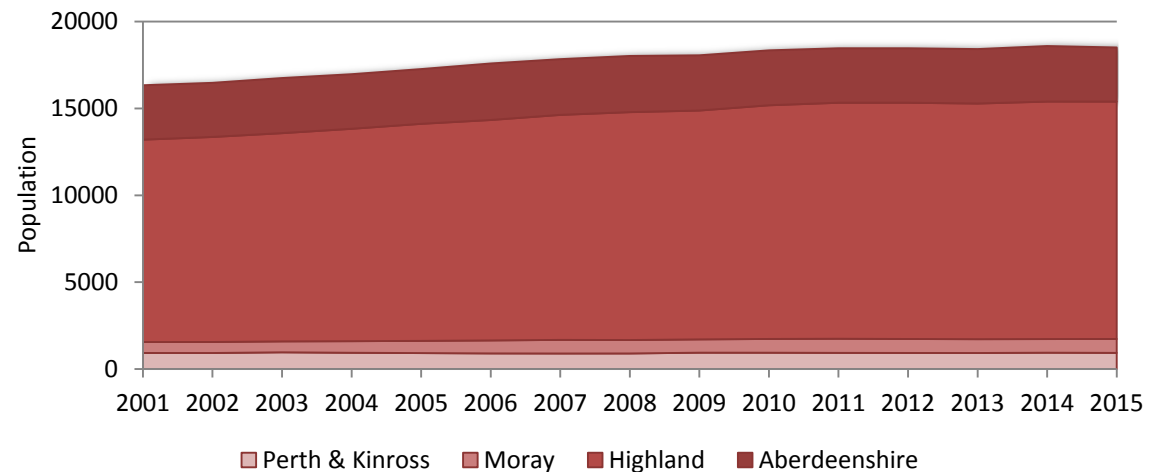


Figure 4 Mid-year estimates of total population for the Cairngorms National Park distributed by Local Authority Area. Source: www.sns.gov.uk

This growth has not been evenly distributed throughout the National Park. Indeed, the overall population in data zones within Aberdeenshire and Perth and Kinross has remained relatively stable.

The greatest increase occurred within Aviemore, which is estimated to have grown by around 1,009 people. Proportionally this represents a growth of around 142%. Most of Badenoch and Strathspey also experienced growth, gaining an estimated 1,014 people. Taken together, this addition of 2,023 persons resulted in the Highland area of the National Park growing by 17.4%.

Although net population change within the National Park has been positive, certain areas experienced a reduction in the population. For example, the population of datazone S01000312, which represents part of Ballter, lost around 93 persons (-14.5%). It is unclear if this represents a genuine trend or is a result of methodical or sampling changes to the mid-year estimate methodology.

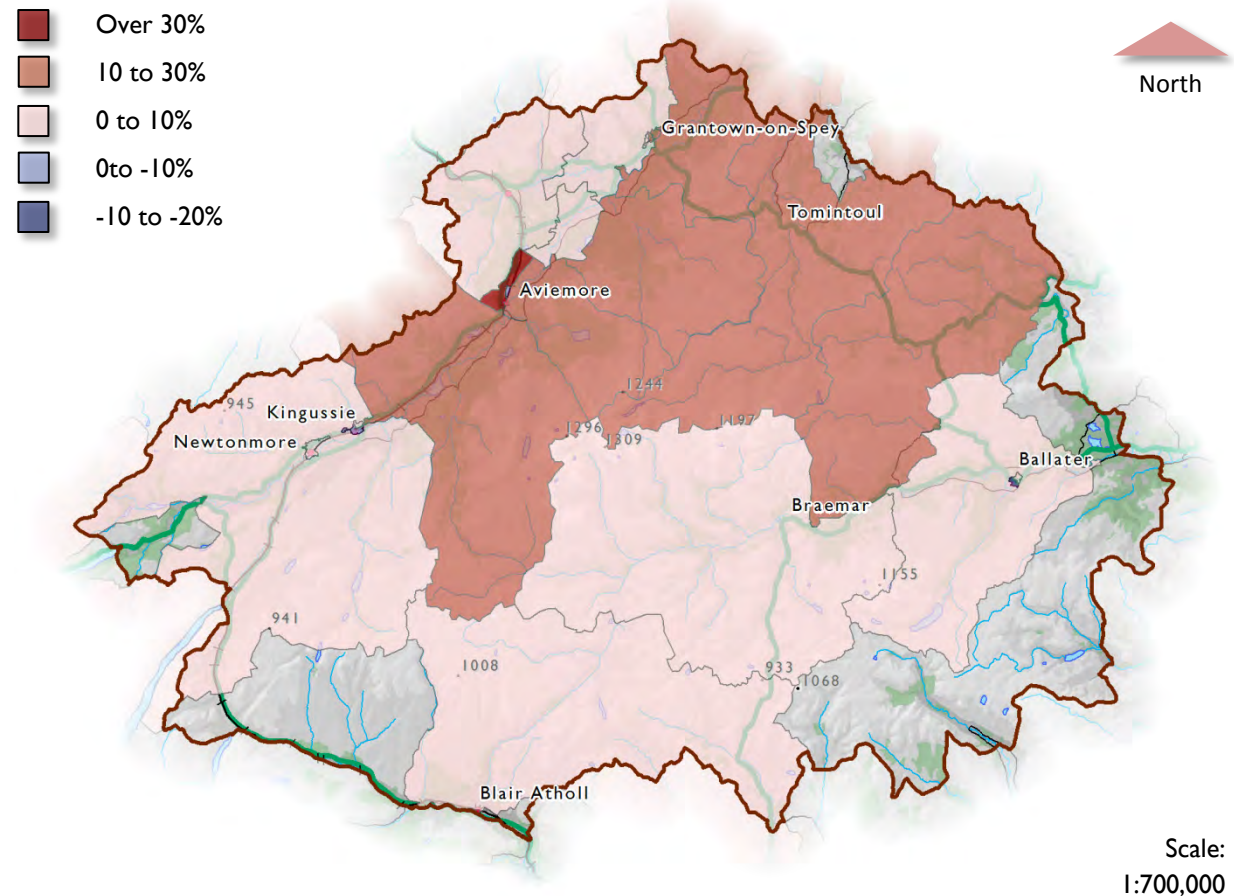


Figure 5 Estimated population change by 2001 datazone 2001-2014³.

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³ Measuring change at a datazone level up to 2015 is not possible as mid-year-estimates are now only published on the basis of the newer 2011 datazones.

Population and Household Projections

Population projections for the National Park are produced by National Records of Scotland (NRS), with the most recent being 2014 based projections, published in October 2016. NRS's (2016) principal projection is that between 2014 and 2039, the population of Cairngorms National Park will drop from 19,010 to 18,337 (a decrease of around 4%) (Figure 6).

This projection is in contrast to the level of growth experienced previously and indeed NRS' 2012 based principal projection, which projected a growth in the population of around 1%.

Population projections are calculations showing what happens under certain assumptions about future fertility, mortality and migration. Household projections also incorporate information on trends of household formation.

The assumptions in NRS' projections continue these past trends in local fertility, mortality, migration and household formation. They do not take account of

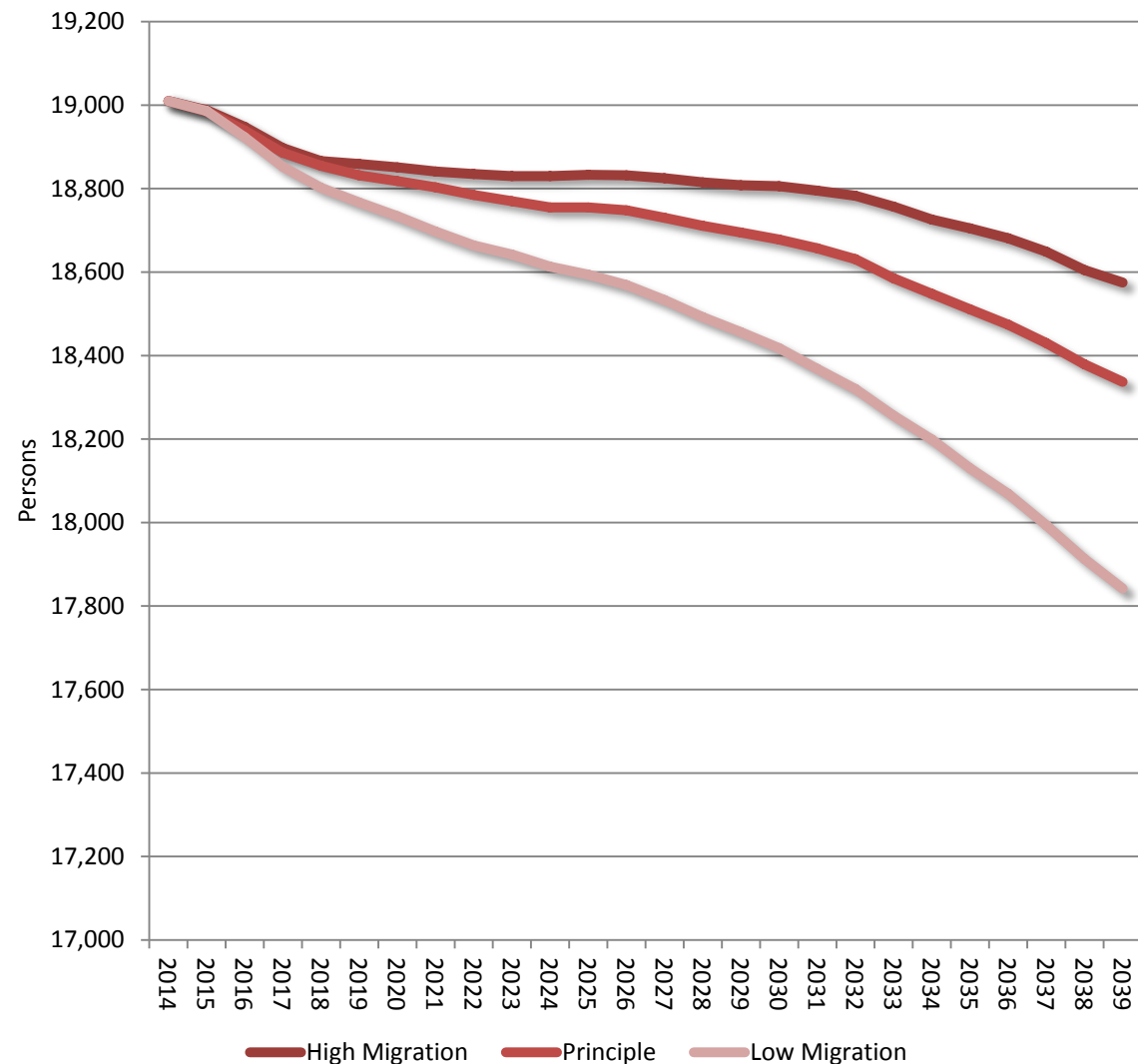


Figure 6 143 Estimated and projected total population of the National Park, 2002-2037 (NRS, 2016).

any future changes that may occur as a result of policy initiatives, social or economic change. They will reflect past policy changes and trends in house building, but they do not incorporate information on planned future policy changes or house building. For example, an area may have had a high level of house building over the last few years, which is now coming to an end, but the projections would show a continuation of the past trends. These projections are not, therefore, forecasts of what the government expects to happen.

Table I shows the principal projected percentage population change for the National Park and compares the projected rates of natural change and migration across areas between 2014 and 2039.

The population of the National Park is projected to decrease despite positive projected net migration to the area over the projection period. This is because the number of deaths is projected to exceed the number of births. This is largely due to the age structure of the population in these areas.

Table I Components of projected population change for the Cairngorms National Park, Principle projection 2014 to 2039 (NRS, 2016).

Natural Change (per thousand people)	Net migration (per thousand people)	Population change (percentage)
-71.8	52.8	-3.5

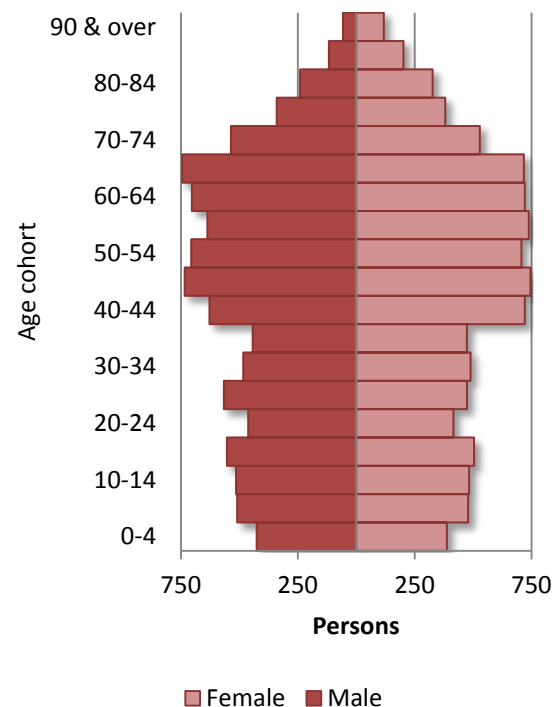


Figure 7 Estimated population profile by age and sex in the Cairngorms National Park in 2014 (NRS, 2016).

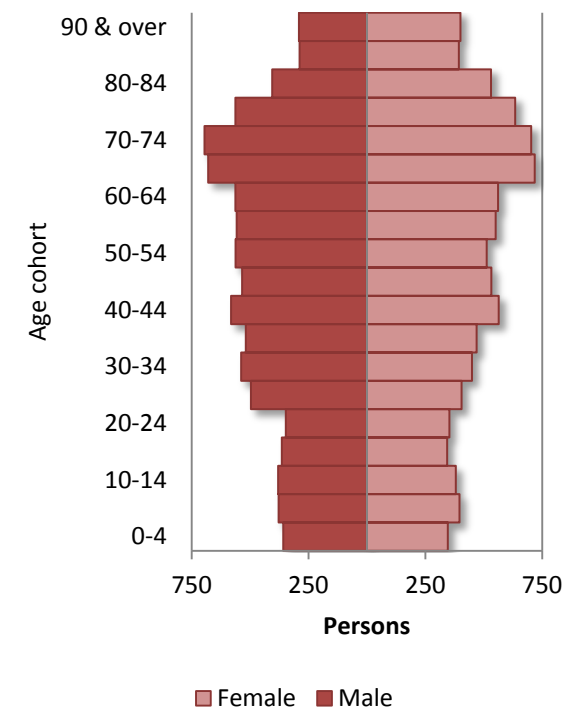


Figure 8 Projected population profile by age and sex in the Cairngorms National Park in 2039 (NRS, 2016).

NRS (2017) also give an indication of how the age structure of the population might change (Figure 5 and 6). According to the principal migration scenario, the number of children aged under 16 is projected to decrease by 21% over the projection period from 3,030 in 2014 to 2,383 in 2039. The number of people of working age is projected to decrease from 11,250 in 2014 to 10,178 in 2039, a decrease of 10%. The population of pensionable age is projected to rise by 23% from 4,730 in 2014 to 5,776 in 2039. However, the number of people aged 75 and over is projected to rise from 1,782 in 2014 to 3,505 in 2039, an increase of 97%. By 2039 the population is projected to be more heavily distributed at older ages.

Principal household projections for the National Park (National Records Scotland, 2016) suggest that households are set to increase from 8,653 in 2014 to 9,125 in 2039, an increase of 6% (Table 2 and Figure 7).

Table 2 Principle Household projections for the Cairngorms National, by type of household, 2014 to 2039 (NRS, 2017).

Household Type	2014	2019	2024	2029	2032	2039	Average annual change 2014-2039	Overall Change 2014-2039	
1 adult	2,889	3,016	3,178	3,337	3,434	3,494	24	605	21%
2 adults	3,177	3,260	3,350	3,424	3,405	3,335	6	158	5%
1 adult with children	453	465	493	520	547	571	5	118	26%
2+ adults with children	1,560	1,484	1,436	1,395	1,398	1,398	-6	-161	-10%
3+ person all adult	575	545	505	466	429	397	-7	-178	-31%
All households	8,653	8,770	8,963	9,143	9,213	9,195	22	542	6%

Given the limited nature of the projected population growth associated with these, it is clear that it does not entirely explain the projected change in the number of households. Indeed, the difference between the household and population projections is due to the trend in more people living alone or in smaller households. In the Cairngorms National Park, the average household size is projected to drop from 2.12 people in 2014 to 1.91 people in 2039 (Figure 8).

Housing Deprivation

The relationship between the availability of good quality housing and the health and well-being of people is now well recognised (National Housing Federation, 2014; Parliamentary Office of Science and Technology, 2011).

For example, children who are brought up in disadvantaged neighbourhoods, in poor quality housing or insecure accommodation are more likely to be exposed to avoidable health risks such as damp, cold, accidents, community safety concerns, inadequate pre-school and early-years provision, poor schools, and a

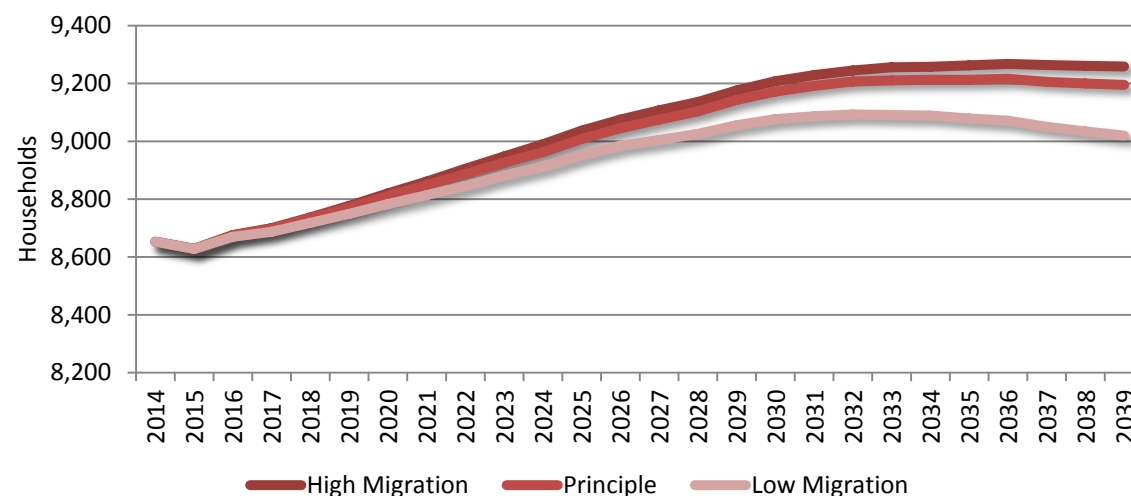


Figure 9 Overall household projections for the Cairngorms National Parks, 2014 to 2039 (NRS, 2017).

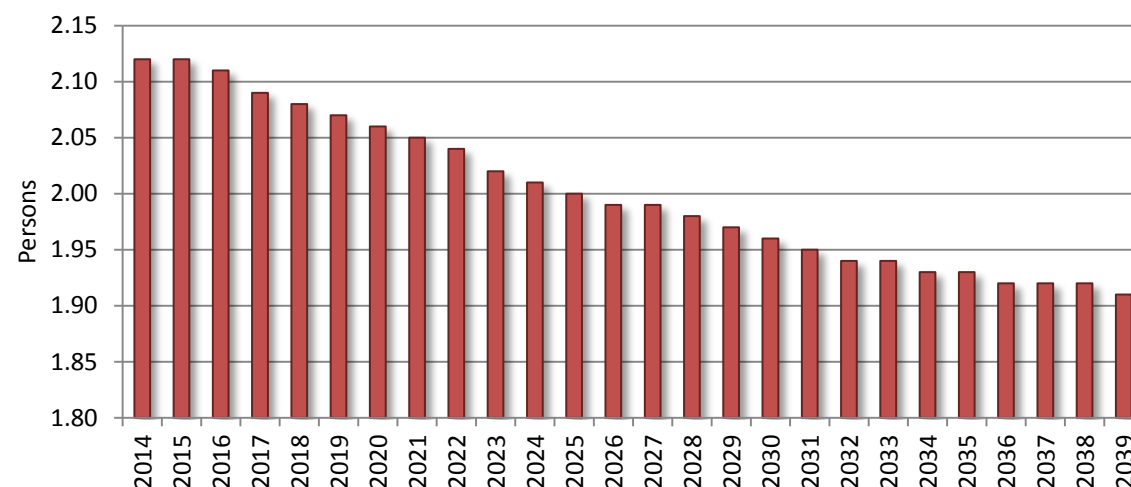


Figure 10 Principle projected household size for the Cairngorms National Park, 2014 to 2039 (NRS, 2017)

lack of safe play areas (Shelter, 2006). Similarly, growing older in poor quality, unaffordable or inappropriate housing has a negative impact on quality of life the maintenance of independence in retirement (The Housing and Ageing Alliance, 2013). Research carried out in England, showed an average life expectancy gap of seven years between the richest and poorest areas of the country. People living in poorer areas and households with the lowest incomes spend a greater proportion of their lives (an additional 17 years on average) coping with the impact of long-term illness and associated disability (Marmot, 2010).

Fortunately, there is not a high level of housing related deprivation within the National Park, with no data zones falling within the 20% most. There are however areas of the National Park where certain indicators of housing deprivation exceed the national average.

In particular, many areas of the National Park have relatively high proportions of the household population living in homes with no central heating, equating to

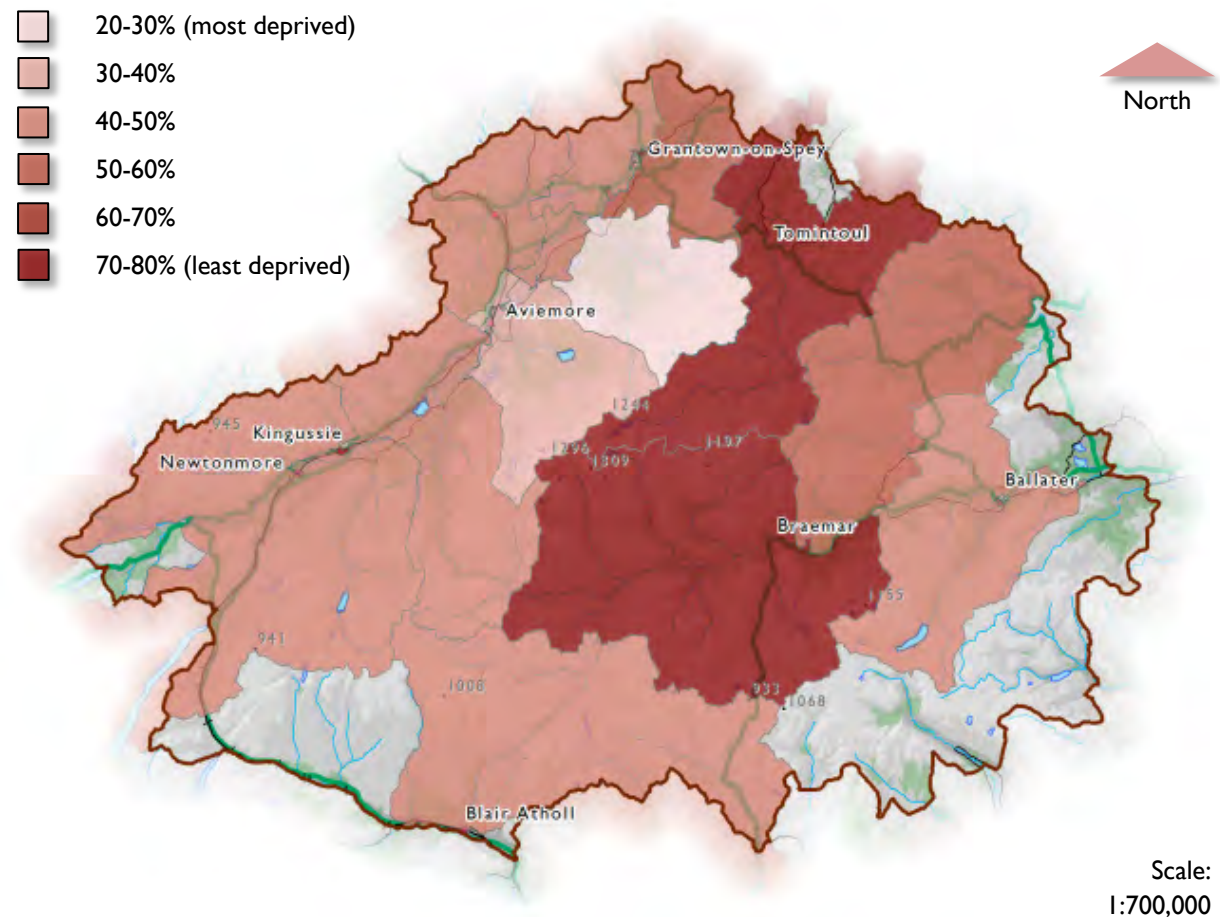


Figure 11 Housing Deprivation by SIMD decile, 2016.

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around 4.3% across the whole area (Scotland 2.3%). Levels of household overcrowding are relatively low within the National Park, with the vast majority of data zones falling below the Scottish average of around 13.9%.

Overcrowding statistics may be skewed by the fact that compared to the Scottish average, there is higher proportion of large dwellings within the National Park and a lower proportion of small ones. This may therefore mask significant instances of overcrowding suffered by those unable to afford larger properties.

A significant barrier in reducing household deprivation is the availability of enough new housing to replace existing poor quality stock while also meeting projected growth in households.

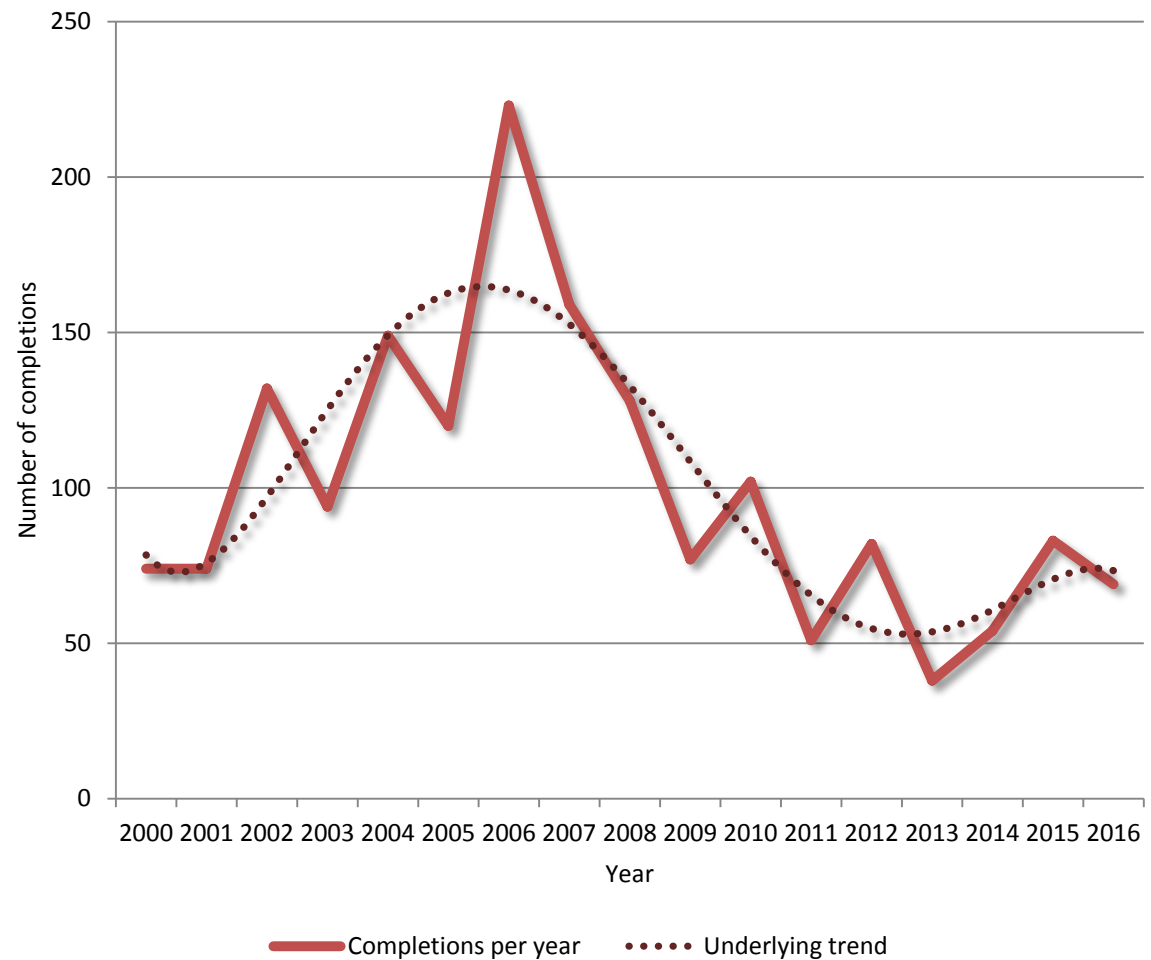


Figure 12

Between 2000 and 2008 the average completion rate in the National Park was just under 130 dwellings per year. However, the number fell sharply following the ‘credit crunch’ in 2008 and has resulted in an average annual completion rate of around 70 new dwellings. Taken over the whole period, the average annual completion rate was about 100 new dwellings (Figure 9). While an upward trend has been identified since 2013, it is likely that the ending of the Government’s Help to Buy Scheme (Scotland) in 2016, combined with continued constraints on mortgage availability, may dampened confidence in the housing market and limit the development of new homes.

Affordability is a further barrier. Between 1993 and 2015, the median price of a property in the Cairngorms National Park saw a net rise of almost 230%, with a peak in 2015 of £192,500 (Table 3). The ‘credit crunch’ does not appear to have had much of an immediate impact on prices, although it seems to have resulted in a lower level of sales since a peak in

Table 3 Median House Prices in the Cairngorms National Park (Source: <http://www.sns.gov.uk/>).

Year	Median Sale Price	Annual Change in Sale Price	Number of Sales	Annual Change in Number of Sales
1993	£56,000	N/A	237	N/A
1992	£58,500	4.5%	222	-6.3%
1995	£60,000	2.6%	234	5.4%
1996	£59,000	-1.7%	233	-0.4%
1997	£65,500	11%	274	17.6%
1998	£57,000	-13%	276	0.7%
1999	£68,876	20.8%	301	9.1%
2000	£75,000	8.9%	258	-14.3%
2001	£75,000	0%	344	33.3%
2002	£87,000	16%	338	-1.7%
2003	£93,250	7.2%	334	-1.2%
2004	£125,000	34%	306	-8.4%
2005	£146,000	16.8%	328	7.2%
2006	£175,000	19.9%	392	19.5%
2007	£180,500	3.1%	414	5.6%
2008	£181,000	0.3%	287	-30.7%
2009	£175,000	-3.3%	229	-20.2%
2010	£190,000	8.6%	289	26.2%
2011	£191,000	0.5%	251	-13.1%
2012	£176,500	-7.6%	230	-8.4%
2013	£165,000	-6.5%	294	-27.8%
2014	£182,500	10.5%	402	36.7%
2015	£192,500	5.5%	377	-6.2%

2007. The growth in house prices has also been lower and more variable since 2007 and while 2015 represents an all-time high, it is difficult in the current economic climate to tell whether this marks the beginning of a longer term trend..

Between 2007 and 2015, the median house price to median household income/earnings ratio in the National Park fell from over 8 times income to around 6 (see page 24 for information on income). However, despite this improvement, the lower availability of mortgage finance for first time buyers means that many aspiring households still cannot afford to buy.

There is also considerable variation in the median house prices across the National Park, ranging from £100,000 in part of Badenoch and Stathspey, to £355,000 in part of Deeside (Figure 10). However, it should be noted that statistics for these individual data zones can represent only a small number of sales

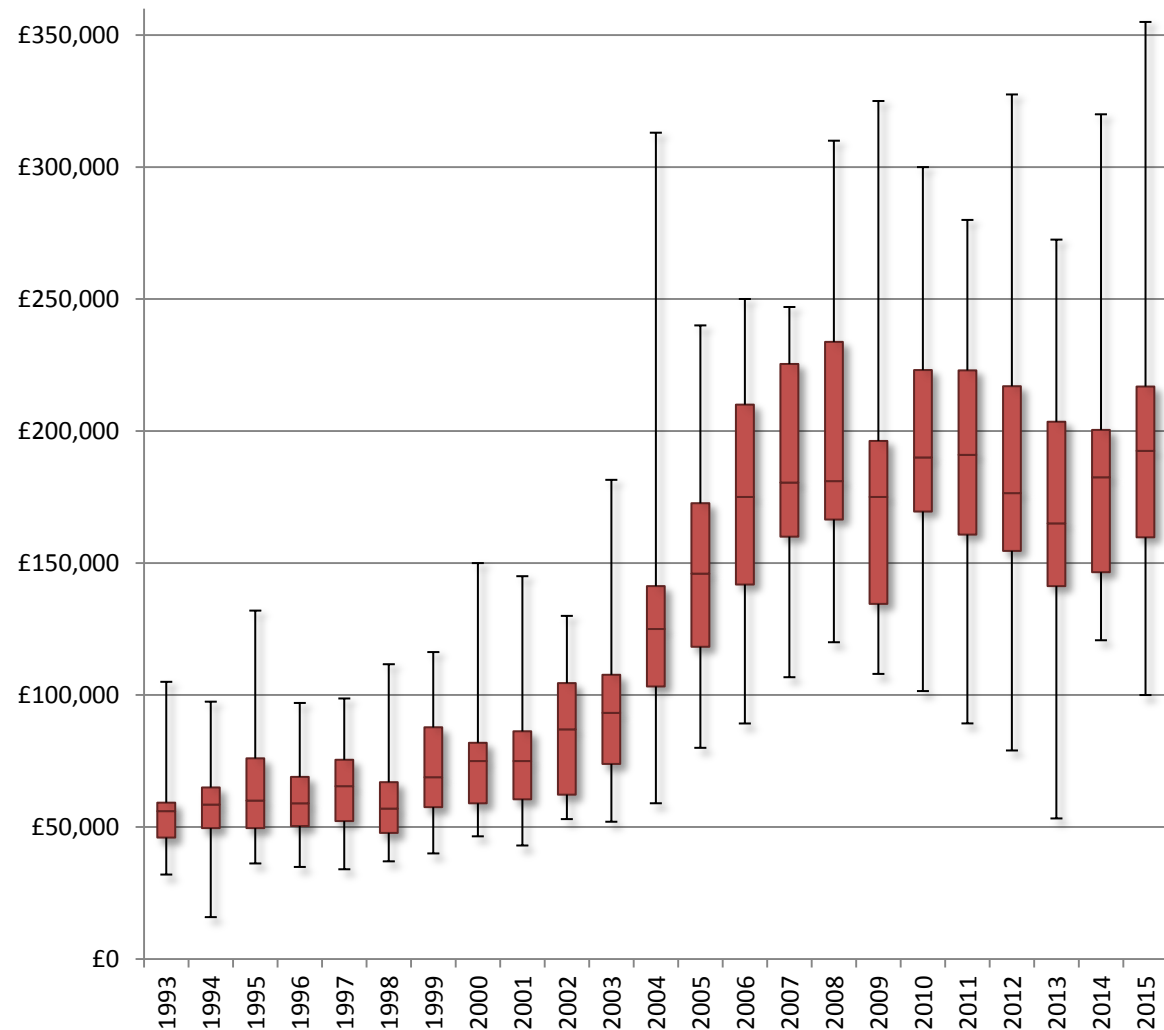


Figure 13 Box plots of Median house prices of data zones within the Cairngorms National Park (Source: <http://www.sns.gov.uk/>).

Figure 13 offers an insight into the evolution of median house prices across the National Park. It indicates that not only have median house prices risen dramatically since 1993, but that the difference between the most and least expensive data zones has also grown considerably. Indeed, the distribution of median prices has broadened across all quartiles, further indicating significant variations between localities.

Economic Activity

At the time of writing 2014 estimates of working age population were not available at a data zone level and therefore this report draws upon data from the 2013 mid-year estimates. These indicate that the National Park had a working age population of 10,909 people (51.9% of total population), with 5,666 males and 5,243 females. Those of pensionable age numbered 4,539 (24.6% of total population) with 1,911 males and 2,628 females.

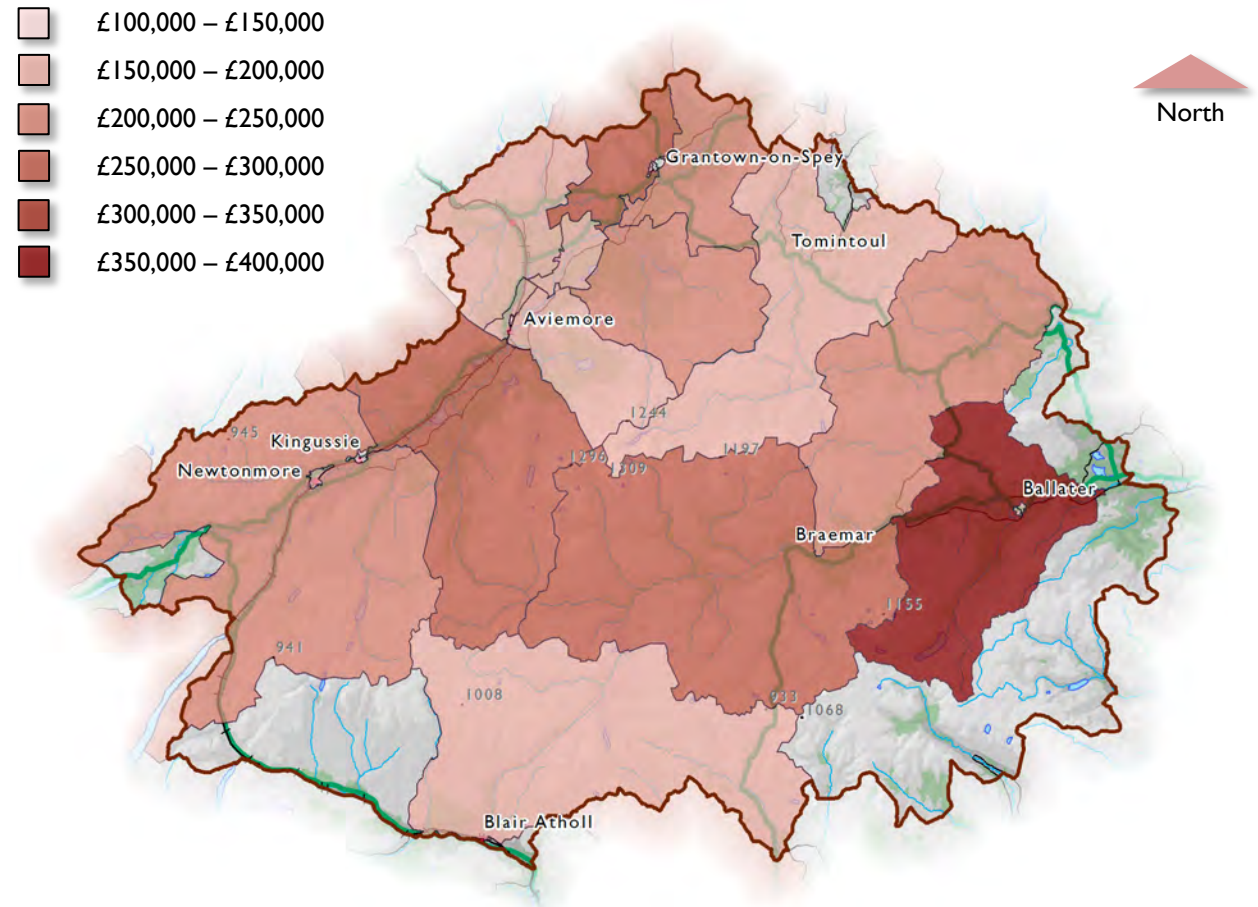


Figure 14 Median House Prices of data zones within the Cairngorms National Park in 2015.

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Educational achievement within the National Park is a little higher than the Scottish average. In terms of qualifications, the 2011 Census (Table LC5102SC) suggests that around 76.8% of the 16+ Census population had NVQ1 level and above (Scotland 73.2%), and around 30.8% had NVQ4 and above (Scotland 26.1%).

According to the Census (Table LC6107SC) of the economically active in 2011 (around 10,487 individuals, or 66% of the 16+ population), around 95% were classed as being in employment, which is slightly higher than the Scottish level of 91.9% (figure 11). Of the inactive, who numbered 5,377 (around 33.9% of the 16+ population), around 75% were inactive due to retirement. This is much higher than the Scottish retirement level of approximately 60%. There are two reasons for this. Firstly the National Park has a higher proportion of those over the age of 55 than the national average, and secondly, owing to the absence of a higher education facility within the National Park,

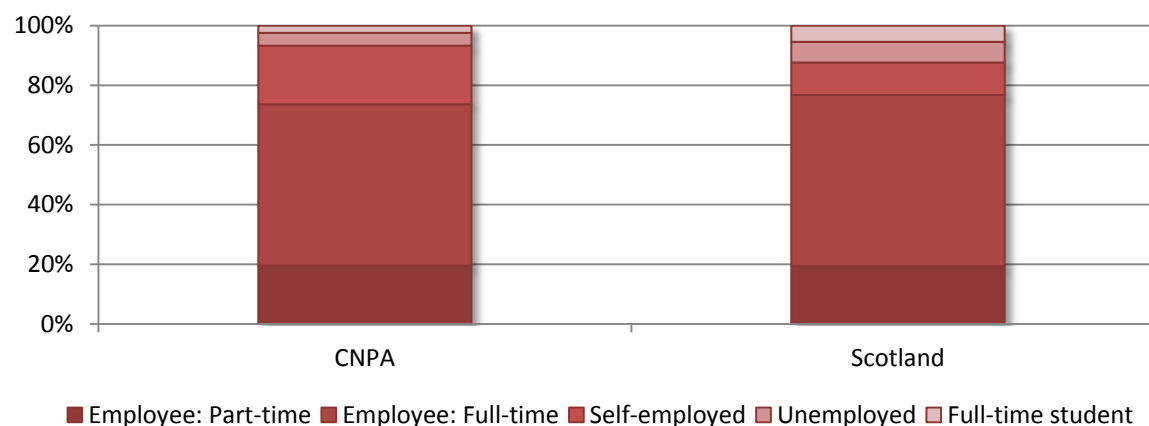


Figure 15 Occupations of the economically active population (Census table KS601SC).

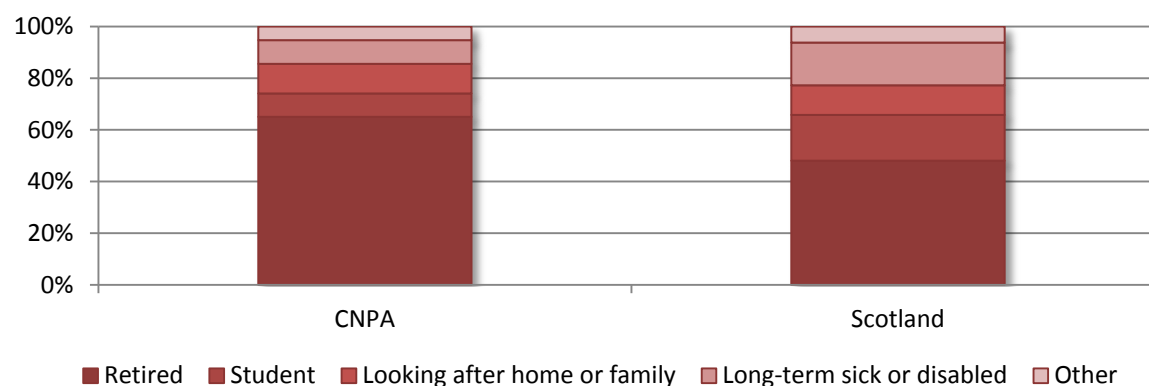


Figure 16 Figure 164 Occupations of the economically active population (Census table KS601SC).

For further information on variables, see www.scotlandscensus.gov.uk/variables

In order to protect against disclosure of personal information, some records have been swapped between different geographic areas. Some cell values will be affected, particularly small values at the most detailed geographies.

there are relatively few full time students residing within its boundary.

The Census profile of full time (72.8%) and part time (27.2%) employee jobs (excludes self-employed, government, trainees and HM Forces) (Table LC6109SC) is generally consistent with Scotland as a whole. The significance of certain employment sectors differs quite significantly however, with the proportion of those employed in agriculture, forestry and fishery, accommodation and food and 'other' forms of work far exceeding the Scottish average (Figure 13).

According to SIMD 2016 data, the National Park has relatively low levels of employment related deprivation, which it rates using indicators such as Working Age Unemployment Claimant Count, Working Age Incapacity Benefit recipients and Working Age Severe Disablement Allowance recipients. None of the data zones within the National Park fall into any of the most deprived categories, with 10 out of the 23 falling within the 20% least deprived.

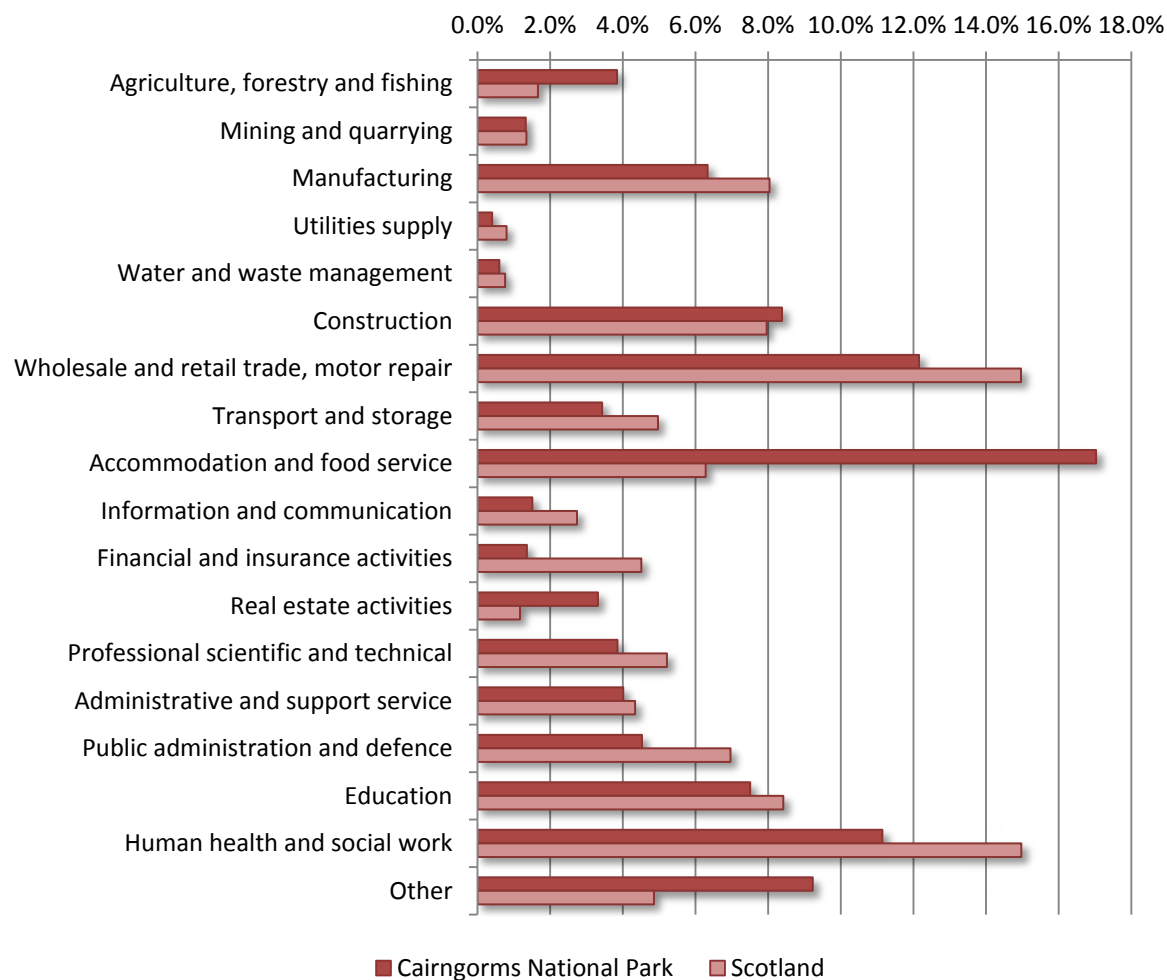


Figure 17 Proportion of all people aged 16 to 74 in employment the week before the census by industry (Census table KS605SC). Crown copyright 2013.

For further information on variables, see www.scotlandscensus.gov.uk/variables

In order to protect against disclosure of personal information, some records have been swapped between different geographic areas. Some cell values will be affected, particularly small values at the most detailed geographies.

Indeed, unemployment levels within the National Park are relatively low, with the Census suggesting that in March 2011 only around 445 of the population aged 16-74 (3.2% compared to the Scottish 4.8%) were unemployed, of which around 150 were in long term unemployment, while only around 35 had never worked at all (Table KS60ISC). There is however some geographical variation across the area, with the Moray part of the National Park experiencing the highest unemployment level, at around 6.2%.

Data on Out of work benefits issued to those of working age in the area supports this, with those claiming Job Seekers Allowance (JSA) in quarter 4 of 2012 standing at 225 (1.7%), below the Scottish figure of 4%. The nature of employment within the National Park is however extremely seasonal, with JSA claimants peaking in the winter months. Unemployment is at its lowest in July, which coincides with Scottish school and public holidays.

In employment terms, claimant data suggests that the recession began in the

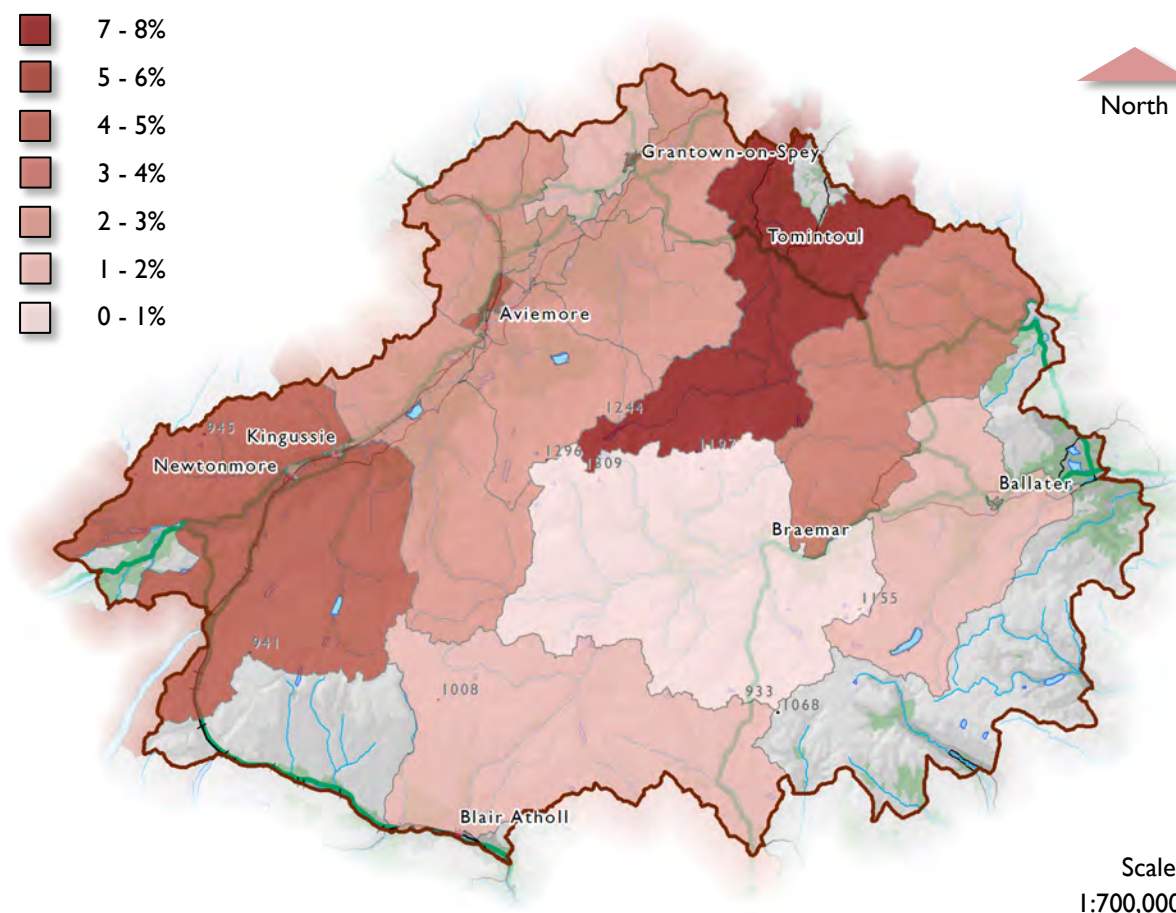


Figure 18 Proportion of the population aged 16-75 that are unemployed. (Census table KS60ISC).

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For further information on variables, see www.scotlandscensus.gov.uk/variables

National Park in March 2008. It continued to get worse at the rate of about two jobs per week until July 2009 when the position began to improve, with a stabilisation in the level of those claiming JSA. Most recent data suggests that claimant numbers are beginning to fall, though it is still too soon say whether this represents the beginnings of a durable recovery (CogentSi, 2010; CogentSi, 2013).

Wages and Income

Due to the low level of unemployment within the National Park, levels of income deprivation are relatively low according to the SIMD 2016. However, this masks the fact that there is strong evidence to suggest that average earnings within the National Park are well below the Scottish and British averages.

There is no official up-to-date data available for earnings specifically in the National Park, however an idea may be gained from the Local Authorities that contribute towards the National Park's area. Of these, only Aberdeenshire is above to the Scottish median income.

However, the shire figures will be heavily influenced by high earners living near and working in or near the city of Aberdeen, which is by far the best-paying Council area in Scotland. Therefore, Aberdeenshire residents who are actually living within the Park are likely to have smaller incomes more in line with the figures for other parts of the National Park.

The likelihood is that the nature of earnings for National Park residents is closer to the Moray and Angus figures than it is to Highland and Perthshire, because both the industrial and urban structure in the National Park is much closer to the first two Local Authorities. Indeed, there is evidence that it is likely to be below the Moray and Angus figures.

To aid understanding of the incomes of residents within the National Park, CongestSi (2010) calculated earnings by industry in each of its contributing NUTS3⁴ areas. With the exception of

⁴ NUTS is the standard statistical geography of the European Union. The National Park consists of part of four of Scotland's 23 NUTS3 areas.

utilities and distilling, the National Park tends to focus on the lower paying industries, notably the hospitality industries and retailing. Using these estimates of employee compensation industry-by-industry, annual earnings levels per head for National Park residents for 2006 were estimated at significantly lower levels than the contributing NUTS3 areas. One factor behind this is the relatively light representation of the public sector in the National Park's economy. Since they pay according to national scales, public authorities in rural areas tend to be amongst the better payers.

Average annual compensation of (non-agricultural) employees in the National Park in 2006 was estimated at £18,370, which is 74% of the Scottish average of £24,840 (CogentSi, 2010).

Another indicator of the income of National Park's residents may be found in research carried out by Herriot-Watt University on developing local and small area estimates of income distribution, poverty and deprivation (Bramley & Watkins, 2013). This study offers a snap

shot of household incomes at a data zone level in 2014. It should be noted that the figures presented in this study are not directly comparable to those the CogenSi study, since the Herriot-Watt figures represent household income rather than individual worker pay. The Herriot-Watt figures also include welfare payments (e.g. pensions, tax credits, JSA etc.) within their figures. It is not possible to use the figures to create an aggregate of the National Park either since it is not appropriate to sum the median figures or percentages for individual data zones. Therefore analysis must take place at a data zone by data zone level.

What the data presents therefore is an idea of the variation in median household incomes across the National Park. An analysis of these shows that the National Park's median gross weekly household income (£597) is above that of Scotland (£555) and, with the exception of Aberdeenshire, is comparable with all of its constituent Local Authorities. It also shows that the distribution of incomes is much narrower than these areas, with the

maximum income being lower and the minimum income being higher.

The figures also demonstrate a great deal of variation between the proportions of households on low incomes. For example, around 13% of households in S02001983 have a gross income of less than £300 per week, while the figure is around 25% for households in S02001285.

Deprivation

Scottish Index of Multiple Deprivation (SIMD) domains have been drawn upon throughout this report and since the level of deprivation experienced by an area can have significant influence on the health and wellbeing of its population, it is also worth considering the SIMD's overall ranking of data zones within the National Park as well as briefly summarising the factors that have led to this situation (Figure 19).

According to the SIMD 2016, overall deprivation levels within the National Park are relatively low. Two data zones (S01006789 and S01006793) fall within the 20% least deprived, while no data zones

are ranked within the most deprived 50% for location of data zones).

Most domains possess a low level of deprivation, and it is only the domains relating to drive times, public transport and access to services that show any signs of significant deprivation. This is consistent with the rest of remote rural Scotland, where the sparse nature of settlement makes long distances between services inevitable.

The 2016 SIMD is the fifth version of the index. However, because SIMD is a relative measure (it ranks Scotland's data zones relative to each other), it is not straightforward to interpret any change in a data zone's rank from one version of the index to another. Additionally, analysis of change over time is complicated because there have been changes to the methodology and changes to some of the

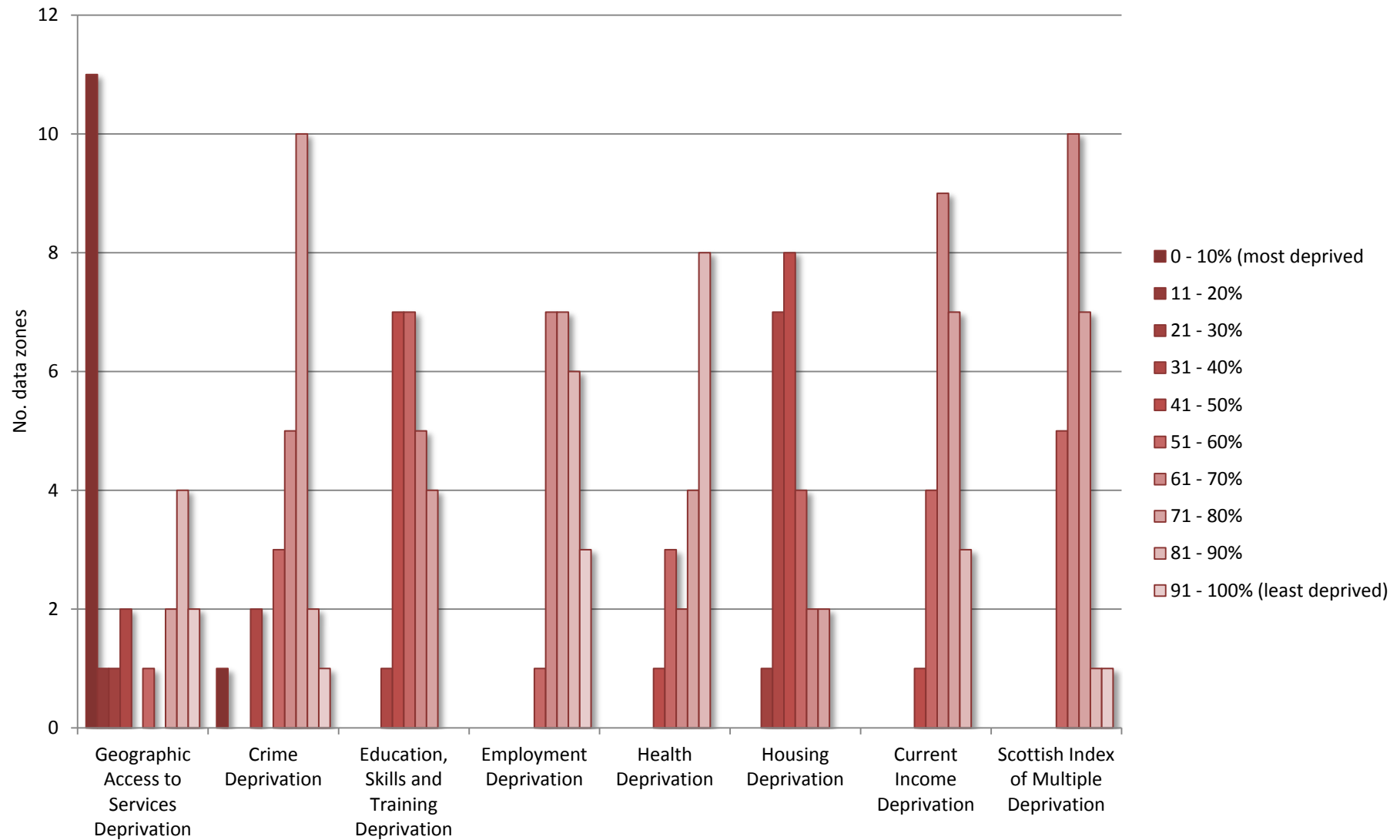


Figure 19 Distribution of SIMD 2016 deciles by domain according to data zones within the Cairngorms National Park

indicators used. Disclosure control methods can also complicate analysis of change over time for some SIMD indicators because when cell values are suppressed, this may lead to data zones having empty cells for one or more of the versions of the SIMD.

Bearing in mind the cautions expressed above, there are ways of undertaking a limited amount of analysis of change over time. Figure 20 and Figure 21 offer two different means of measuring relative change, the former showing changes in overall rank and distribution of data zones and the latter showing the number of people falling within an overall SIMD decile.

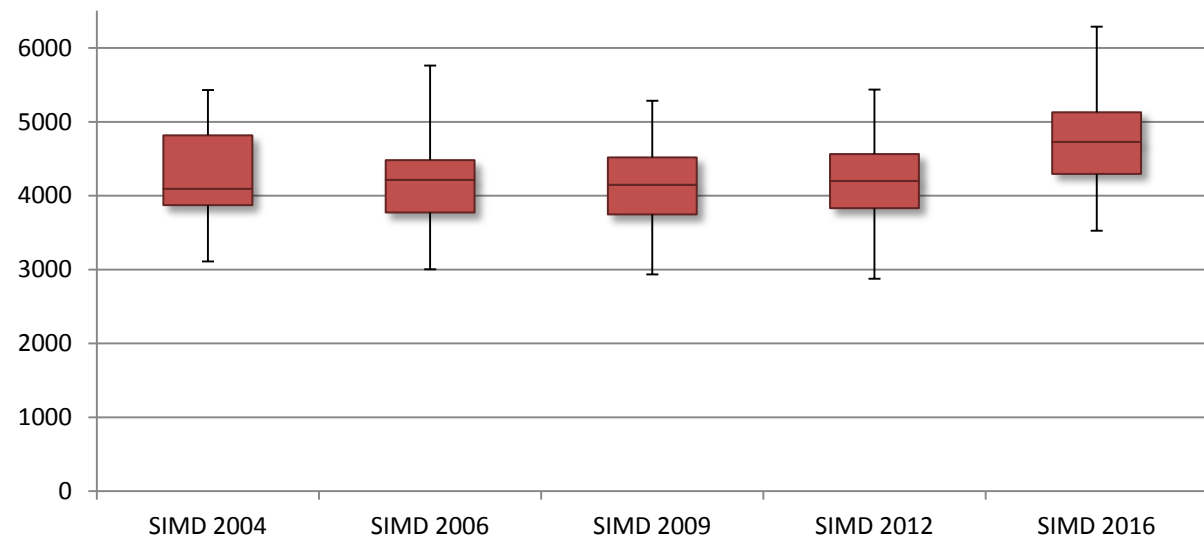


Figure 20 Boxplots showing the distribution of data zones in the Cairngorms National Park by their overall SIMD rank.

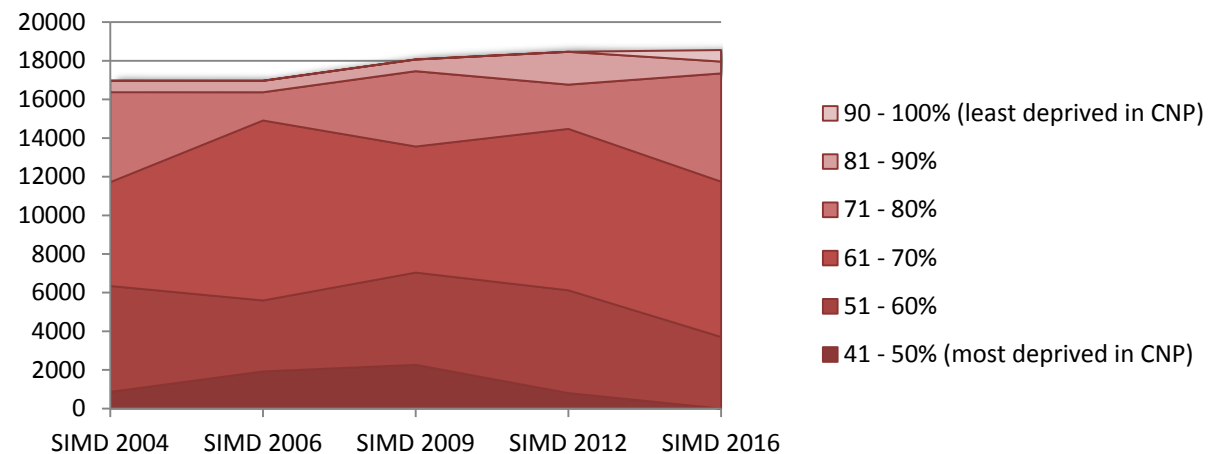


Figure 21 Population distribution by the overall SIMD decile for data zones in the Cairngorms National Park.

Transport Infrastructure Road

The National Park benefits from relatively good transport infrastructure and services compared to many other rural areas in Scotland. Four A Class roads, namely the A9, A93, A95 and A86 connect the area with Inverness, Moray, Aberdeenshire, Perth and Kinross and the West Coast.

The A9 is currently the subject of the A9 Dualling Strategy, which aims to link up the road's existing sections of dual carriageway to create a continuous Category 7 All Purpose Dual Carriageway between Inverness and Perth. It's one of the biggest infrastructure projects in Scotland's history and will involve the:

- Full grade separation of junctions to remove at-grade junctions;
- Grade separated junctions to provide direct links, over and under, the A9 for non-motorised user crossing / access;
- No gaps in the central reserve, to prevent right-turns across carriageways;

- Hard shoulder strips at least 1m width;
- Route, signage and lighting design to minimise overall visual impact (Transport Scotland, 2013, p. 1).

Once complete, the project is anticipated to provide the following benefits:

- Improved road safety and reduction in accident severity;
- Improved journey times and reliability;
- Safe crossing points to link non-motorised user routes and public transport facilities;
- Improved access to tourist and recreation sites;
- Improved trunk road transport infrastructure supporting sustainable economic growth, and resilience to climate change (Transport Scotland, 2013, pp. 1-2).

It is therefore anticipated that the programme will have significant implications for the LDP, which may result in cumulative or in-combination effects that demand consideration.

Networks of other A, B, C and unclassified roads provide access to other parts of the National Park. The area's geography means that links between certain parts of the National Park are relatively poor. A notable example is the route between Badenoch and Strathspey and Deeside, with the principle road, the A939 being susceptible to inclement weather.

The Scottish Index of Multiple Deprivation (SIMD) gives an indication some of the accessibility issues faced by certain parts of the part, with 11 of the 24 data zones used to define the National Park falling within the Index's most deprived 10% in terms of geographic access to services. It should be noted that such a situation is not unexpected for such a rural area, and none of the National Park's data zones rank highly in terms of overall deprivation.

Average drive time also demonstrates the nature of the National Park's road infrastructure, with the population often having to travel for a long time to reach key services. Of particular significance are the times needed to travel from the

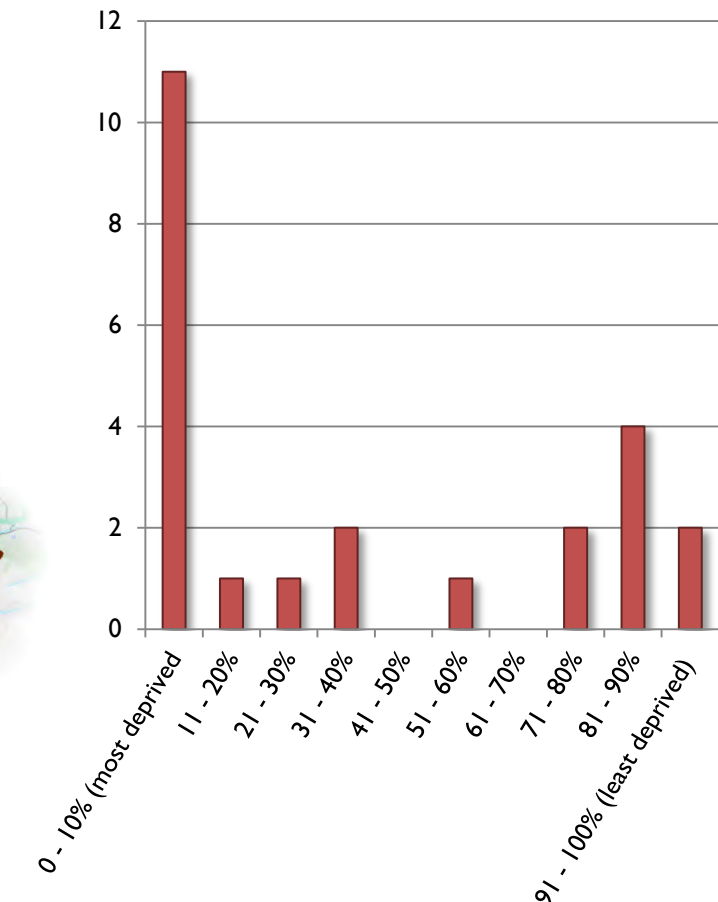
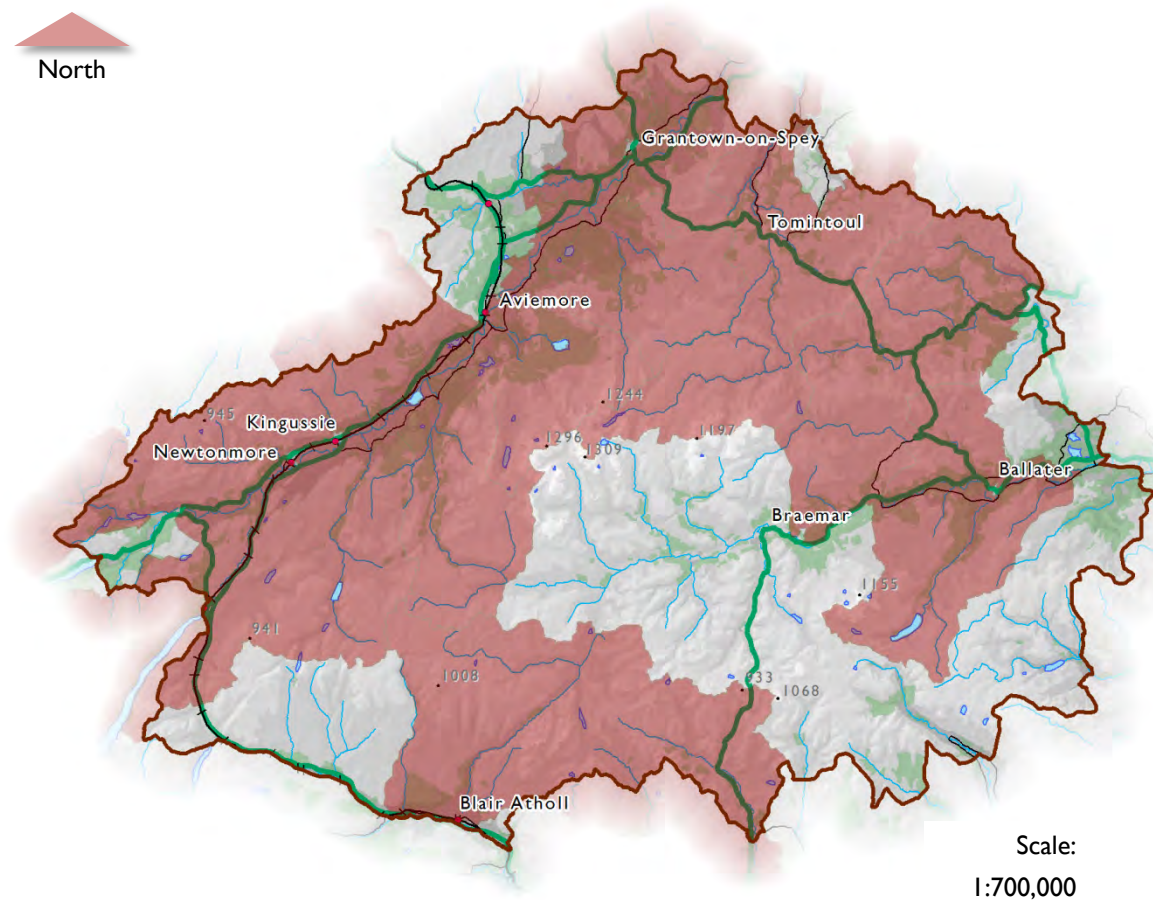


Figure 22 Data zone distribution by decile according to Geographic Access to Services Deprivation (SIMD, 2016).

Figure 23 Data zones ranked within the 10% most deprived according to geographic access to services (SIMD 2016).

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Braemar area to reach the nearest secondary school or retail centre.

The rurality of the area is also demonstrated through the relatively high instances of car ownership within the National Park. According to the 2011 Census around 85% of households had access to a car or van, which is higher than the Scottish level of around 70%. As a result, a high proportion of the National Park's population have a reliance on the area's road infrastructure.

Rail

The Highland Main Railway Line which runs between Inverness and Perth runs through the National Park, with stations at Carrbridge, Aviemore, Kingussie, Newtonmore, Dalwhinnie and Blair Atholl. Much of the line is single track, and trains coming in opposite directions are often timed to arrive at stations at the same time, where crossing loops permit them to pass.

If the annual passenger usage at stations, which is based on sales of tickets, is taken

as an indicator of the overall use of the line, then there is an indication that its popularity has increased significantly within the National Park over the last 17 years.

The data on fare types also gives an indication of the types of journey being made. For example, while, season ticket use remains extremely low (around 4%) relative to Scotland (around 28%) and the UK as a whole (around 39%), their increase in their use between 1997 and 2016, particularly at Aviemore station, may offer an insight into the impact of the town's significant population growth over

the past 15 years has had.

Waste

Estimates of household waste and recycling for Local Authority (LA) areas for 2011-2014 are recorded by SEPA. Specific data for Scotland's national parks is not available and therefore to get an approximation of the Cairngorms National Park's contribution further assumptions need to be made.

Mid-year population estimates have been used as a proxy for proportionally attributing the waste produced and recycled for the LAs that cover the

Table 4 Estimated household waste produced and recycled in the Cairngorms National Park.

	2011	2012	2013	2014	2015
Household Waste (tonnes)	10,113	9,923	9,779	9,935	10,080
Household Waste (kg per person)	548	538	531	534	542
Household Recycling (tonnes)	4,340	4,335	4,326	4,759	4,608
Recycling Rate	42.9%	43.7%	44.2%	46.6%	45.8%

National Park's area to the National Park itself. It is recognised that this is a blunt means of estimation; indeed estimates based on estimates should always be treated with caution. However, in the absence of detailed National Park specific information, the information presented in Table 4 offer a 'best-guess' and a generalised baseline for measurement over the plan period.

Environmental Context

Designated Sites

Protected areas represent the very best of Scotland's landscapes, plants and animals, rocks, fossils and landforms. Their protection and management will help to ensure that they remain in good health for all to enjoy, both now and for future generations.

The Cairngorms National Park is home to a number of areas designated to meet the needs of international directives and treaties, national legislation and policies as well as more local needs and interests:

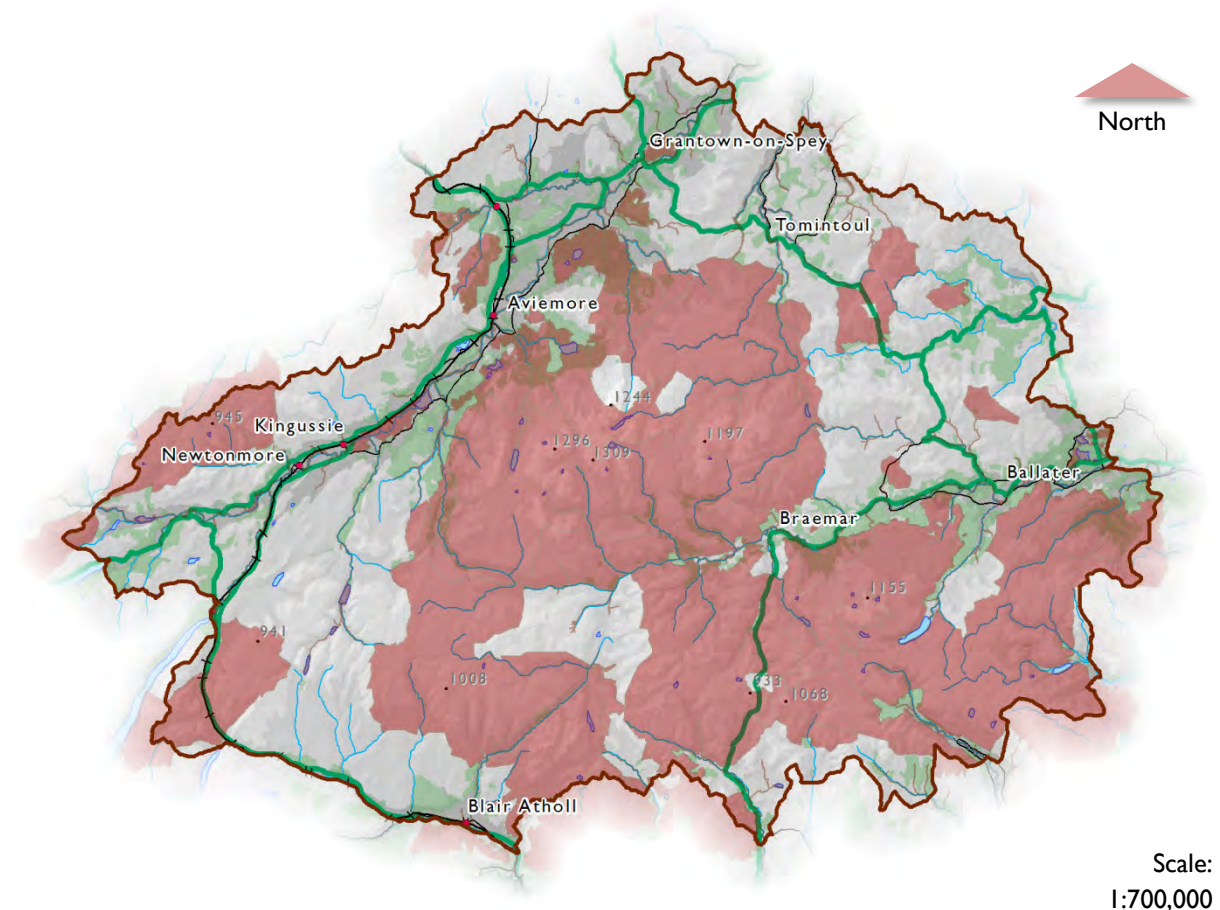


Figure 24 Natura sites within and overlapping the Cairngorms National Park boundary,

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Within and overlapping the National Park boundary are:

- 11 National Nature Reserves
- 59 Sites of Special Scientific Interest
- 23 Special Areas of Conservation
- 15 Special Protection Areas
- 3 Ramsar Sites
- 1 Biogenetic Reserve
- 2 National Scenic Areas
- 5 Wild Land areas

Within and overlapping the National Park boundary are:

- 5 Conservation areas
- 753 Listed Buildings or Structures
- 110 Scheduled Monuments
- 2 Battlefield Inventory Sites
- 10 Inventory of Gardens and Designed Landscapes
- 33 other identified historic and designed landscapes

Approximately 49% of the National Park's area is designated under international legislation.

Historic and Cultural Heritage

The landscape we see today is the endpoint of a long period of evolution, involving a complex interplay of the natural elements of climate, geology, geomorphology, soil development, vegetation succession and herbivore impact – and with a rich overlay of human elements linked to settlement, transport, farming and forestry.

Section 2: Policy Analysis

This section of the Monitoring Statement will look at the performance of policies in the current Local Development Plan.

Local Development Plan I

The Cairngorms National Park LDP I was adopted on 27th March 2015. This section provides an overview of how the LDP was used over the first and second years of its implementation, by both the National Park Authority and the Local Authorities whose area it covers (Figure 25).

The LDP was the first development plan that covered the whole of the National Park, replacing the Cairngorms National Park Local Plan 2010 and the Perth & Kinross Council Highland Area Local Plan 2000, which covered the part of the National Park added to its area in 2010. LDP I sets out policies and proposals for the development and use of land for the next 5-10 years, provides a broad indication of the scale and location of growth up to year 20, and provides the basis for the assessment of all planning

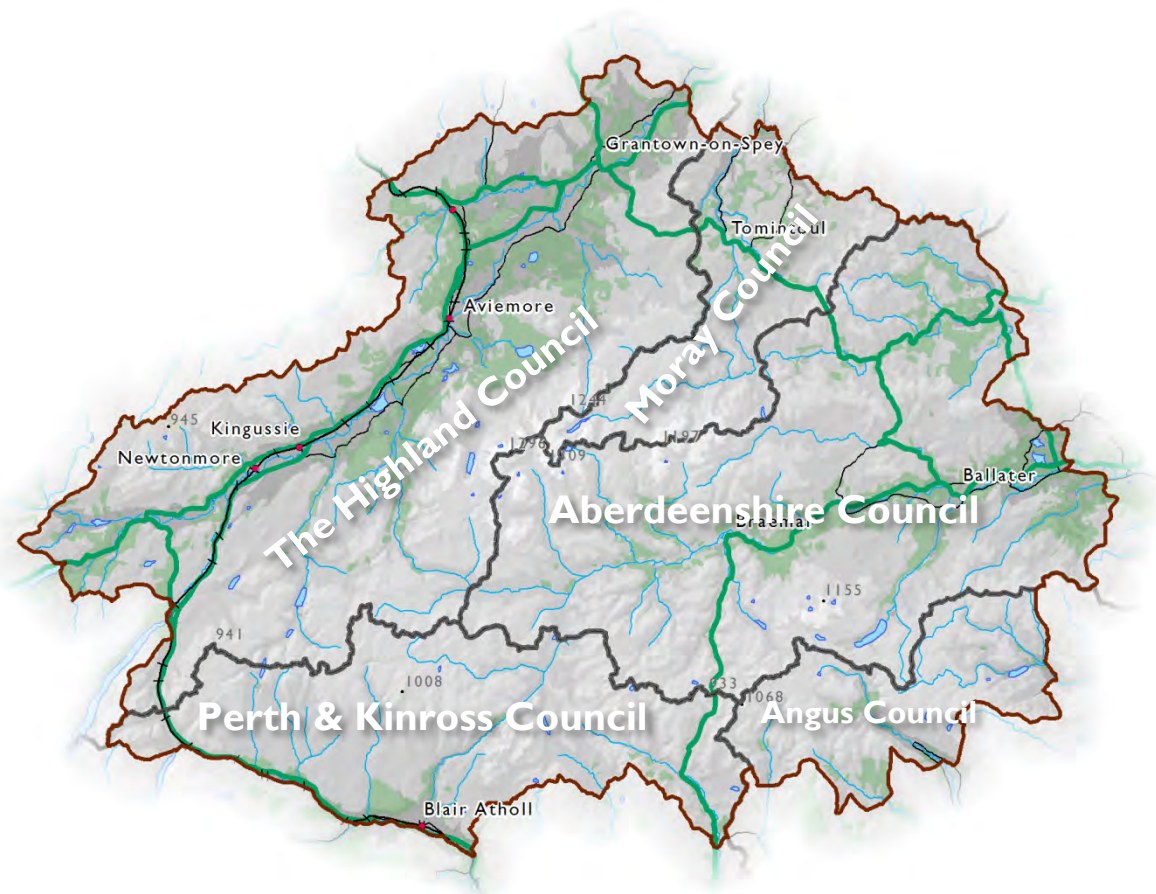


Figure 25 Local Authorities covering the Cairngorms National Park.

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applications made across the National Park.

The Scottish Government believes that the planning system is essential to achieving its central purpose of creating a more successful country, with opportunities for all of Scotland to flourish, through increasing sustainable economic growth. This involves promoting and facilitating development in the best places for it while protecting and enhancing the natural and built environment. The LDP is the main tool to deliver that. It provides guidance to developers and investors, and allows local communities and the general public to be involved in shaping the future of their area.

There are 11 policies each with associated Supplementary and non-statutory guidance that helps explain how the policies will be used and what is needed in order to get planning permission under them.

Methodology

This assessment is based on the professional judgement of the National Park Authority's officers and discussions with Development Management colleagues. To assess each policy we considered how many times it has been used (both by the CNPA and Local Authorities (Figure 25) and whether or not there had been any significant policy departures or failings. As well as this, consultation with development management colleagues highlighted any issues when implementing policies.

We also conducted a review of policies in light of any changes to higher level documents, for example, Scottish planning Policy (SPP). This highlighted several areas where minor amendments would be needed to ensure that policy is in line with these higher level documents.

Total Applications

This section provides some general statistics about the number of applications received and determined the CNPA and the Local Authorities. Since the Plan was adopted (27th March 2015 to 31st March 2017) 703 applications were determined within the National Park. Of these 52 (around 7%) were determined by the National Park Authority and 651 by the Local Authorities (Figure 26). Of these, 682 were approved and 21 refused, giving an approval rate of around 97% for the monitoring period (Figure 27). A further 43 applications were not determined due to either being withdrawn or being found not to require planning permission (e.g. they were for proposals within the permitted development rights of the applicant).

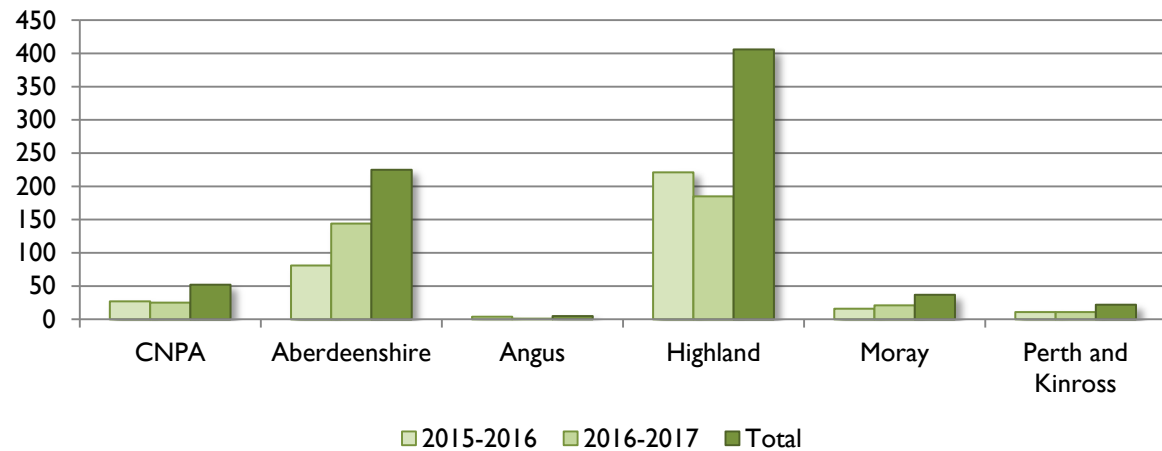


Figure 26 Number of applications received by the planning authorities March 2015 – March 2017.

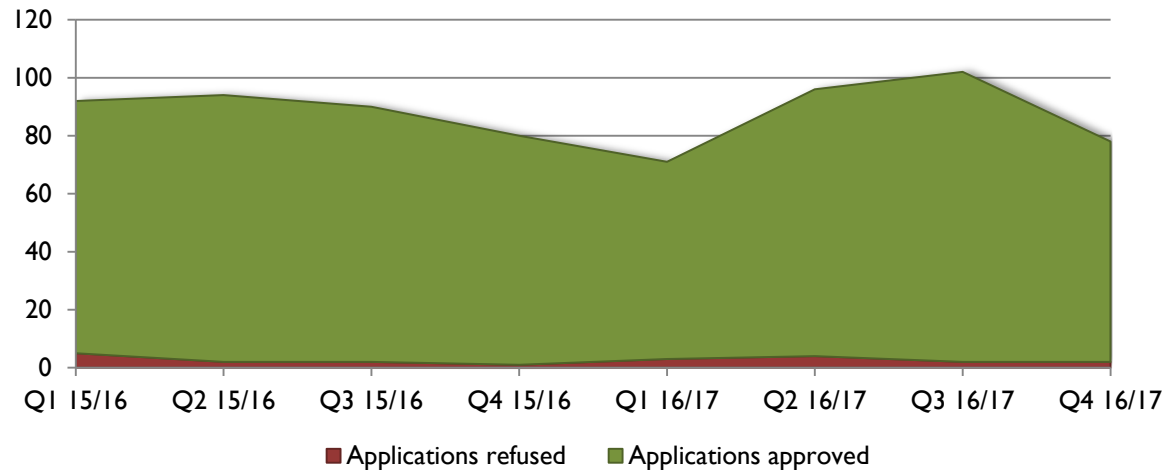


Figure 27 Number of applications determined using the Cairngorms National Park LDP by quarter.

Policy Use

This section provides information on how each policy was used over the monitoring period. Figure 28 and Figure 29 provide a summary of this information allowing easy comparisons to be made between their application. The most commonly used

policy is 'Policy 3 Sustainable Design'. This is unsurprising given that the policy should apply to most forms of development. The data gives an insight into the types of applications handled by the Local Authorities and those called in by the

National Park. Small scale applications are dominated by the LAs while the CNPA has taken a more direct role in applications that may have an effect on natural heritage or landscape concerns. (Policies 4 and 5).

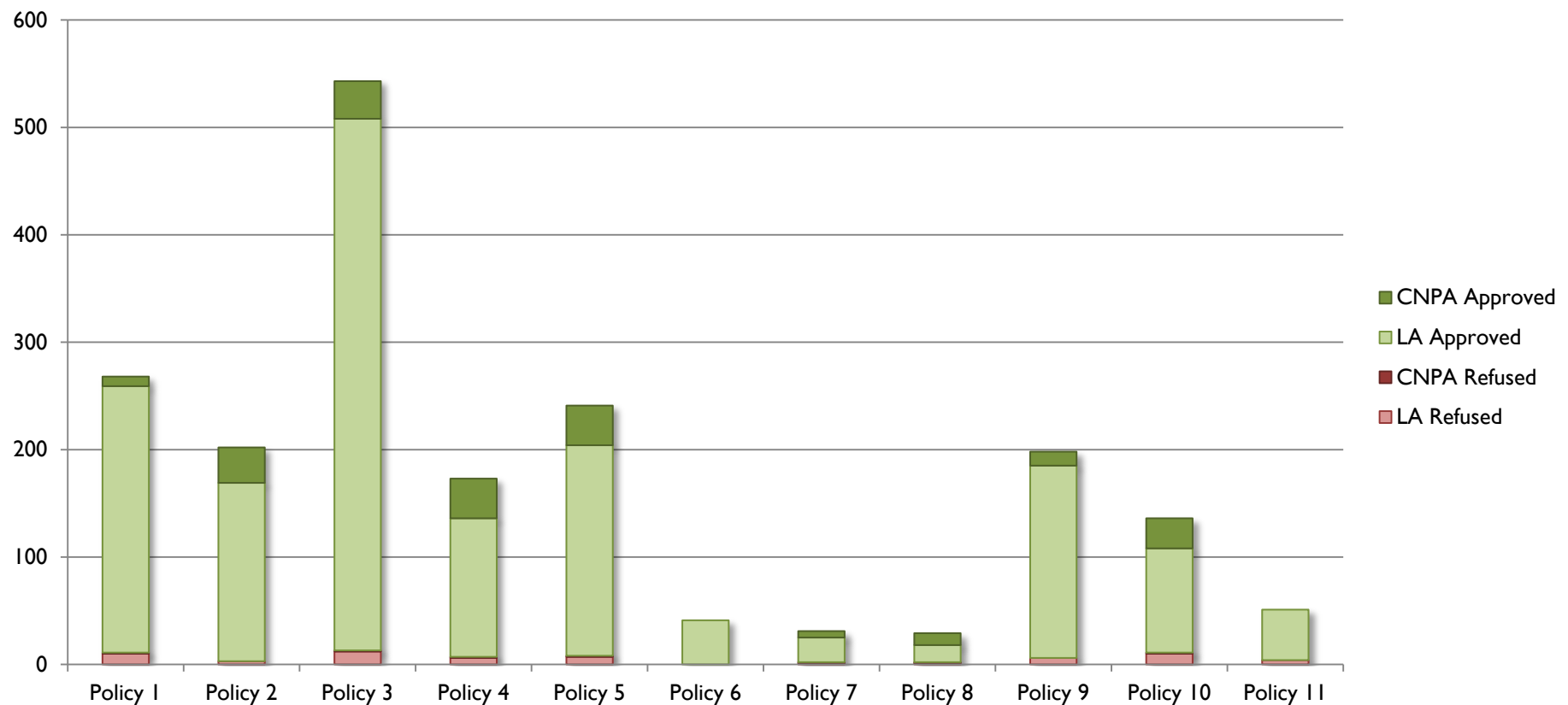


Figure 28 Summary of the number of decisions made by policy and Planning Authority type.

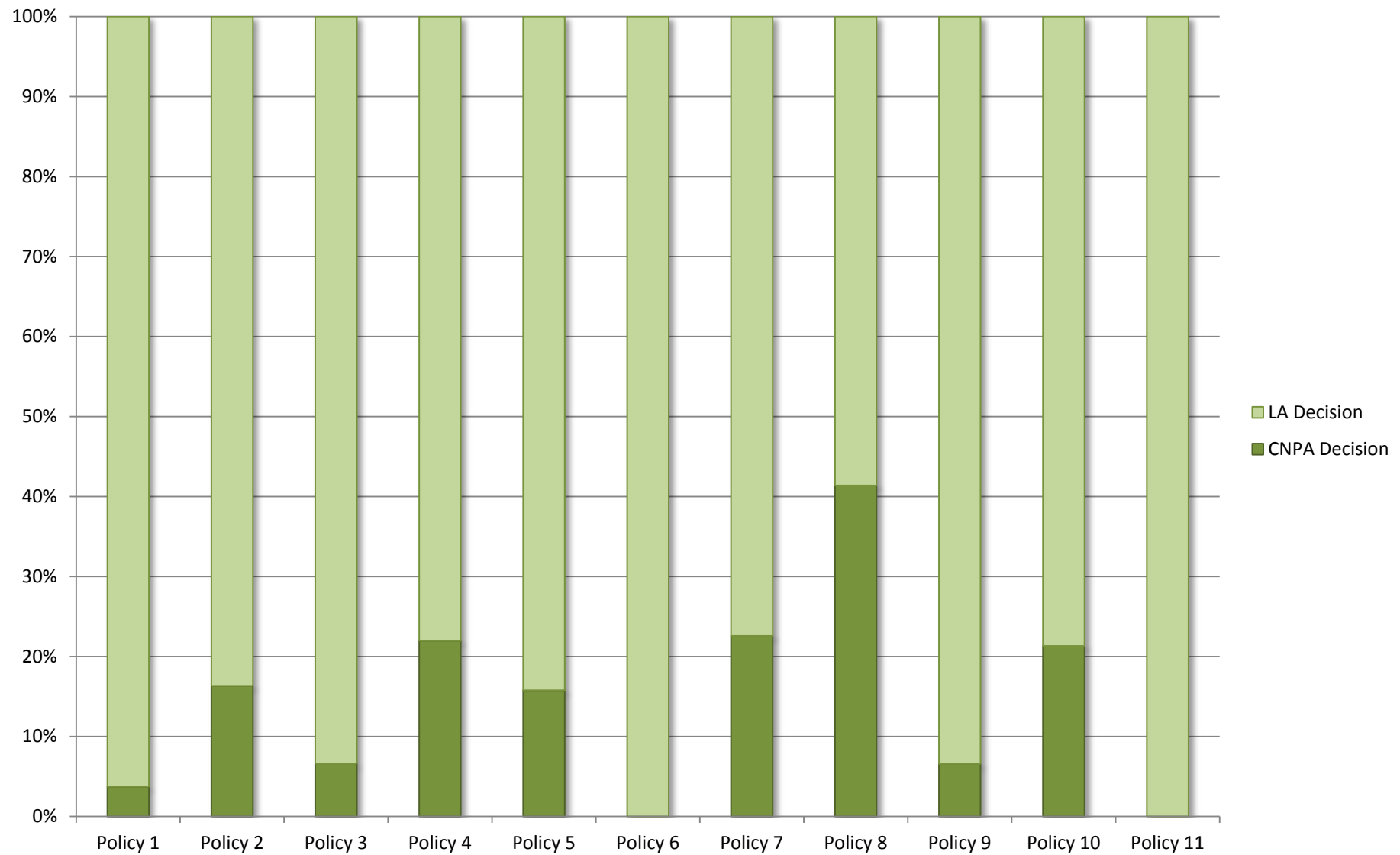


Figure 29 Summary of policy use by Planning Authority type.

Sub-policies

With the exception of Policies 5, 6 and 11 all policies have sub-policies that sit below them, each of which deal with a different aspect of the Policy's concerns. Some sub-policies are relevant to all aspects of a particular development, for example Sub-policy 3.1 Design Statements could be applied to all applications, while others deal with specific situations.

Unfortunately, sub-policy information has often gone unreported in planning reports. It is therefore not possible to provide a detailed analysis of how they have been used over the monitoring period. Furthermore, due to the short nature of the monitoring period assumptions cannot be confidently drawn on the basis of a sample. There therefore exists a gap in the data about the LDP's implementation, which will need to be addressed as the Plan progresses.

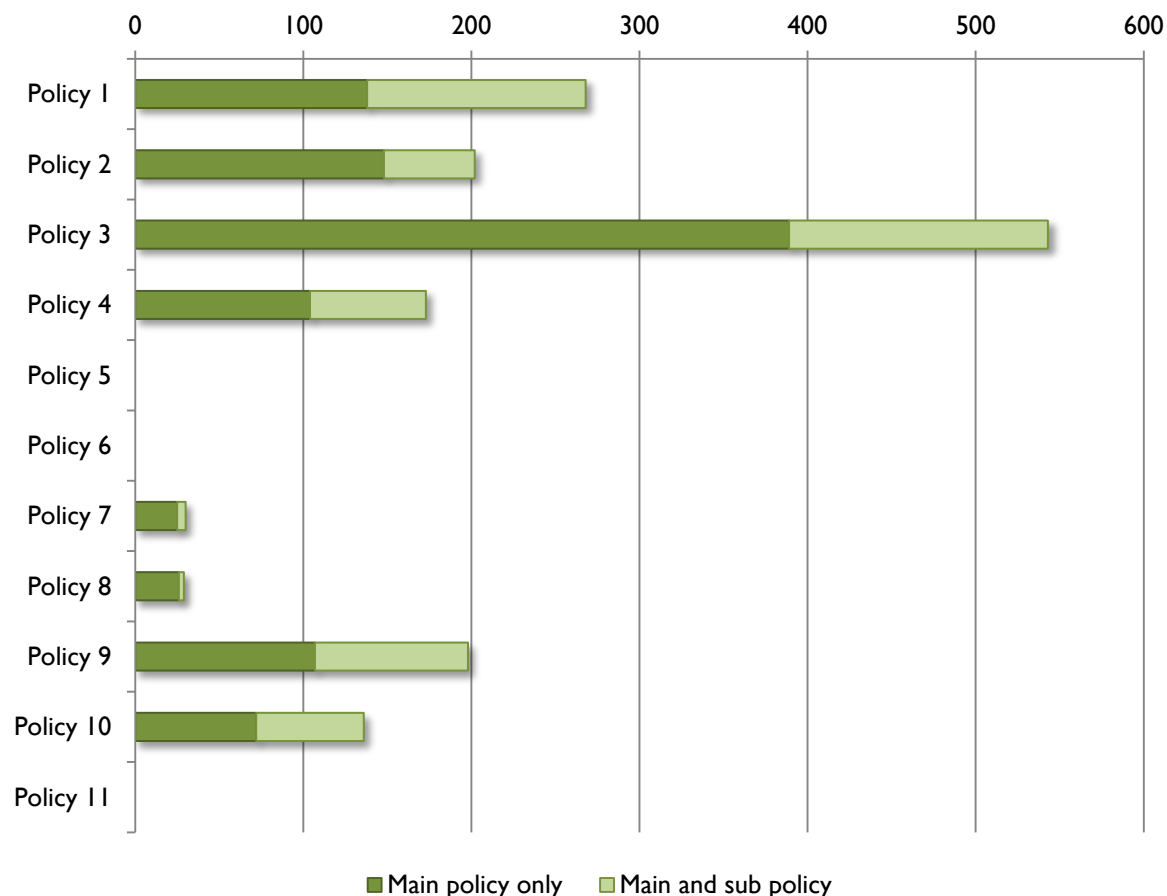


Figure 30 Extent of policy information recorded by planning authorities⁵.

⁵ Policies 5, 6 and 11 do not have sub-policies.

Policy I New Housing Development

Maintaining high quality places where communities can be sustainable and thrive is key to the long-term success of the National Park. This should be undertaken in a way that makes the best use of resources, integrates with services and facilities, and promotes the highest standards in design and environmental quality.

The LDP aims to enable and actively support the delivery of new housing which is affordable and meets community needs, in turn supporting and growing the economy.

The policy was used a total of 268 times, 10 times (3.7%) by the CNPA and 258 (96.3%) times by the LAs. It resulted in a total of 257 (95.9%) applications being approved and 11 (4.1%) refused (Figure 31 and Figure 32).

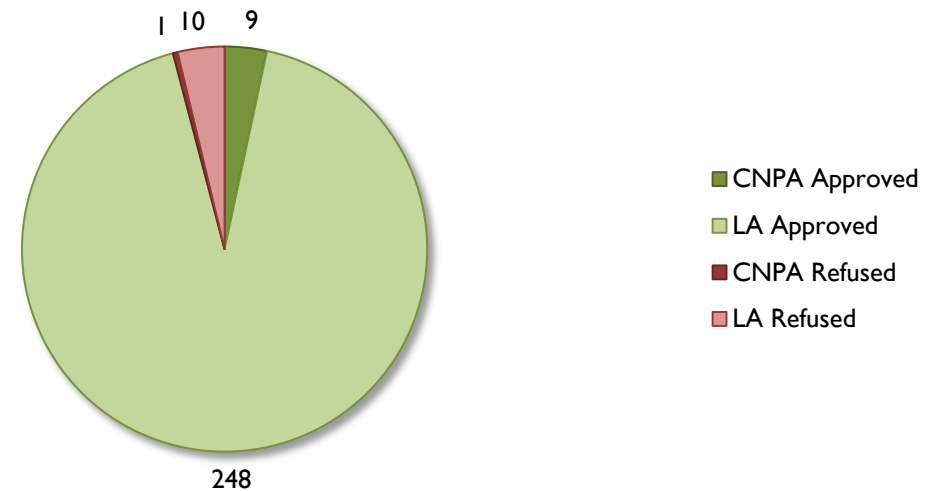


Figure 31 Use of Policy I by Planning Authority type.

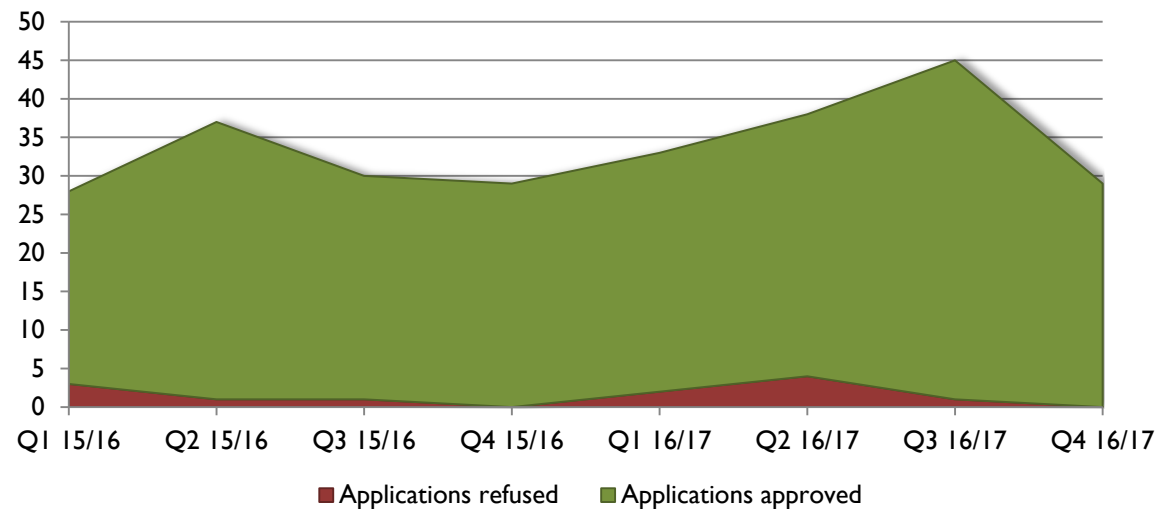


Figure 32 Use of Policy I by quarter.

Policy I New Housing Development

- Approved application
- Refused application

Scale:
1:600,000

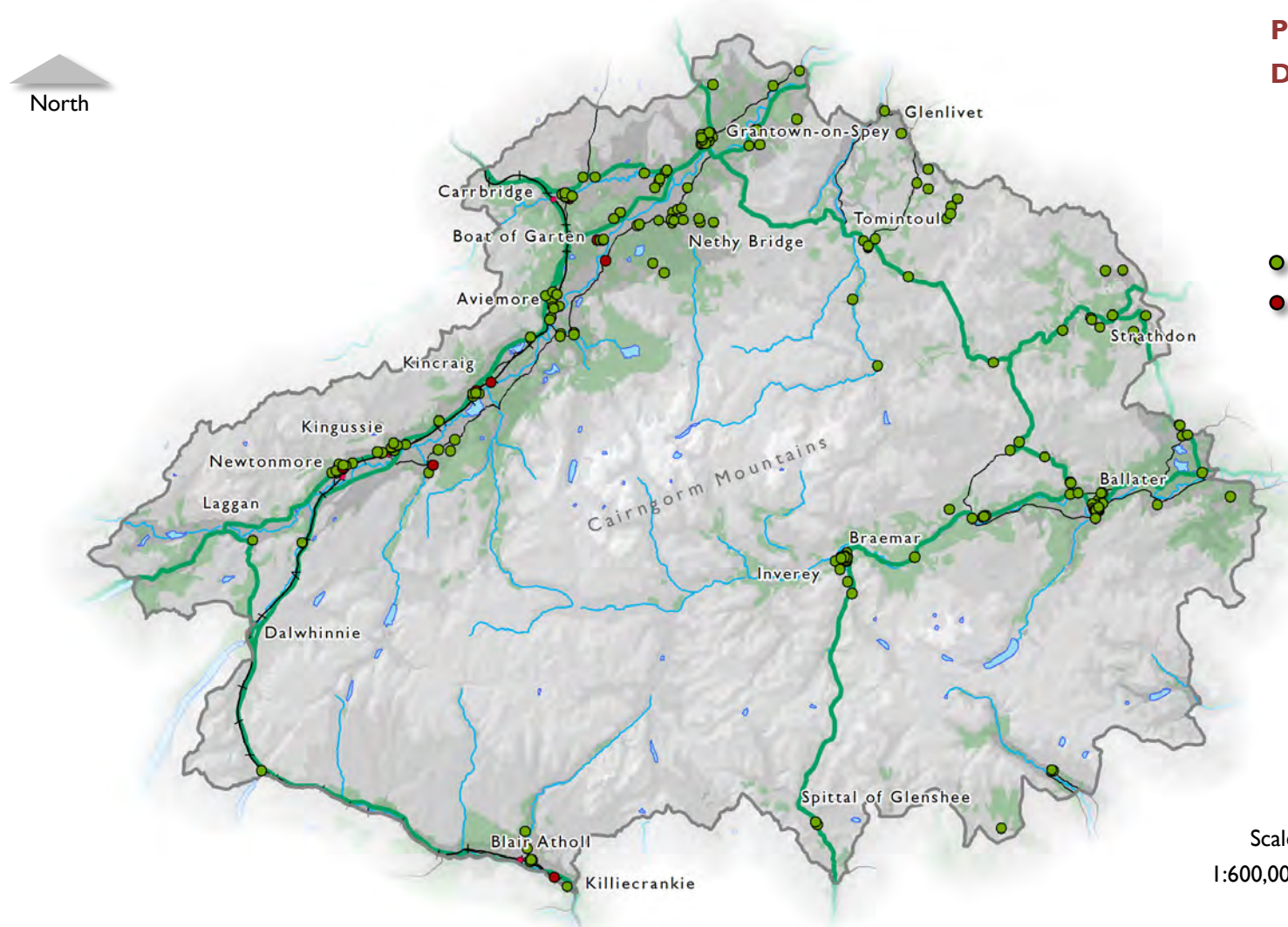


Figure 33 Location of planning applications where 'Policy I New Housing Development' was used. Reproduced by permission of Ordnance Survey on behalf and database right 2019. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority.

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Policy I: Sub-policies

The sub-policies sitting under 'Policy I New housing development' are:

- Policy I.1 Housing in settlements
- Policy I.2 Housing development in existing rural groups
- Policy I.3 Other housing in the countryside
- Policy I.4 Contribution towards affordable housing provision
- Policy I.5 Affordable housing developments
- Policy I.6 Affordable housing provided using cross subsidy from other housing
- Policy I.7 Alterations to existing houses
- Policy I.8 Conversions
- Policy I.9 Replacement houses
- Policy I.10 Housing for gypsies and travellers and travelling showpeople

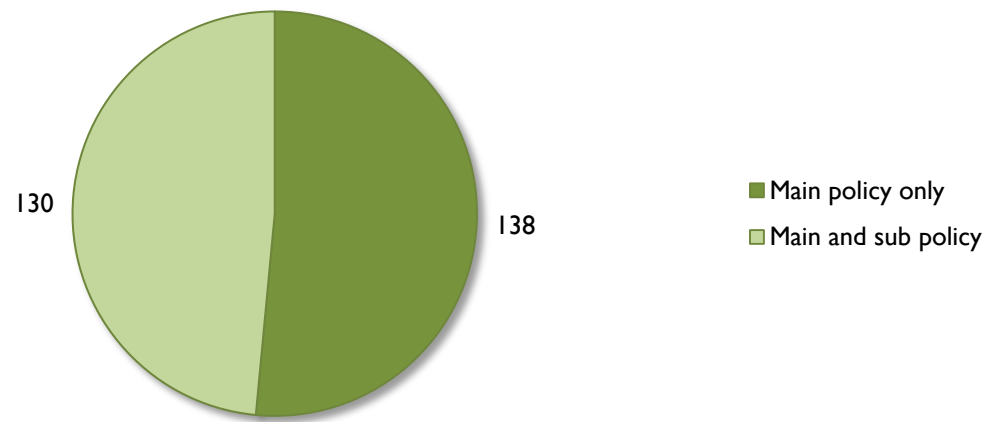


Figure 34 Extent of information recorded by planning authorities on the use of Policy I and its sub-policies.

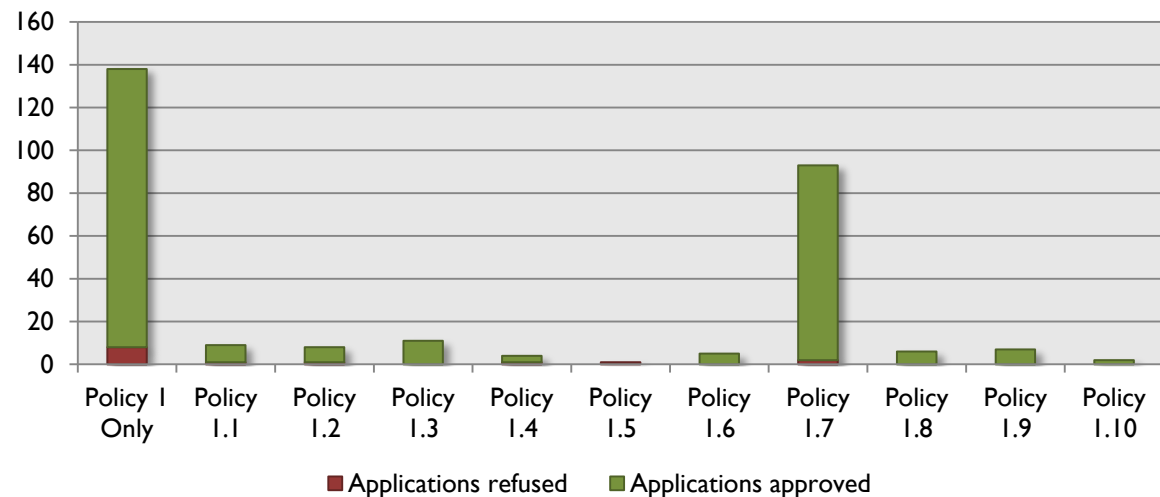


Figure 35 Decisions by Policy I's sub-policies according to available information.

Have there been any issues with the policy and its sub-policies?

No significant issues with the operation of the policy to date.

Is there a need for change in policy direction as a result of changes to legislation or guidance?

There have been no changes to legislation or policy at a National level. However, in 2017 the National Park adopted its National Park Partnership Plan.

The National Park Partnership Plan 2017-2022, which has been approved by Scottish Ministers, recognises affordability pressures in the Park and identifies a range of actions that the next Local Development Plan should take to help address them. In particular, it states that the next Local Development Plan should:

- Identify sites where the affordable housing contribution from new developments should be higher than the normal national maximum of 25% set by Scottish Planning Policy

- Use new policies in the next Local Development Plan to manage the nature of new open market housing so it is better targeted towards local needs (e.g. by seeking a greater mix of house types and sizes, with an emphasis towards smaller homes in new developments)
- Apply flexible planning policies to promote majority affordable housing developments and encourage innovative delivery models to maximise the number of affordable homes that are built

In order to ensure consistency with the National Park Partnership Plan, policy in the LDP will be needed to reflect this. The following questions therefore need to be considered in the Main Issues Report:

- The need to define areas where the maximum affordable housing requirement will exceed 25%.
- The need to identify the maximum affordable housing requirement where need clearly exceeds 25%.

- The need to provide greater guidance on the different types of affordable housing required. This may be done in Supplementary Guidance.

Are any other changes required?

As the plan moves forward consideration needs to be given to what the Housing Land Requirement will be in the forthcoming plan period.

According to the most recent NRS population projections, the overall population of the Park is predicted to fall from 19,010 to 18,337 over the 25 year period between 2014 and 2039 (a decrease of around 4%). This is because it is likely that over the next 20-25 years, more people will die of old age than are born in the National Park. We still expect migration to the National Park from other places to be high during that period.

At the same time as the overall population falling, the projections show an increase of 6% in the number of households in the National Park from 8,653 in 2014 to 9,195 in 2039. This is because it is expected that

there will be more small households, partly linked to the older population.

These projections give an indication of the level of new housing that the next Local Development Plan might need to provide for. However, they are only a starting point for making decisions about the future provision of housing land within the Park. They need to be considered alongside other factors and trends, including housing need and demand as well as the existing housing supply.

Is there a need for Supplementary Guidance?

Policy does not currently have any supplementary guidance but is supported by non-statutory guidance. The non-statutory covers all aspects of the policy but lacks detail under certain criteria. In particular there needs to be greater level of detail in terms of the provision of affordable housing, in particular the types of affordable housing that can be provided and where in the National Park particular needs arise.

An area which will need expansion is around the requirement to provide affordable housing at a level greater than 25%. For example, in what communities is it required, to what level is it required and what type of affordable product is best likely to serve that community.

Summary

Significant change required	Minor change required	Delete policy	Main issue topic	Comments
✓	✗	✗	✓	The National Park has significant issues with the availability of affordable housing in certain parts of the National Park, notably in the Aviemore, Deeside and Perthshire areas. A change of approach is needed in these areas in order to address this, including the setting of higher affordable housing thresholds in certain parts of the National Park.
✓	✗	✗	✓	Update housing land requirement in line with evidence, including that from population and household projections, the Housing Need and Demand Assessments and Housing Land Audits of Local Authorities, and the Action Programme of the National Park Authority.
✗	✓	✗	✓	Update Supplementary Guidance to provide greater detail on the provision of affordable housing.

Policy 2 Supporting Economic Growth

Sustainable growth in the economy of the Park is at the heart of supporting our communities, helping them become and remain vibrant and attractive places for people to live and work.

The LDP has an important role to play in addressing the economic, social and environmental issues facing towns, settlements and rural areas within the Cairngorms National Park and facilitating successful economic growth in the future.

The policy was used a total of 202 times, 33 (16.3%) times by the CNPA and 169 (83.7%) times by the LAs. It resulted in a total of 199 (98.5%) applications being approved and 3 (1.5%) refused (Figure 36 and Figure 37).

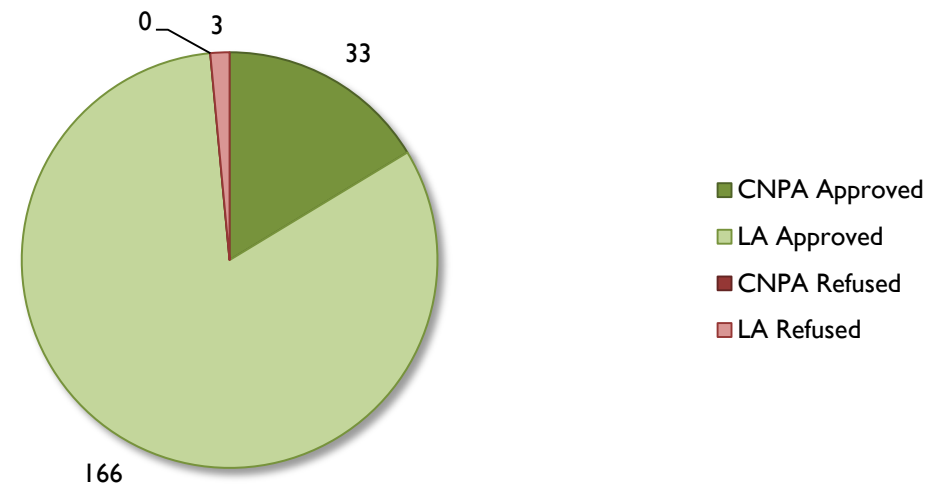


Figure 36 Use of Policy 2 by Planning Authority type.

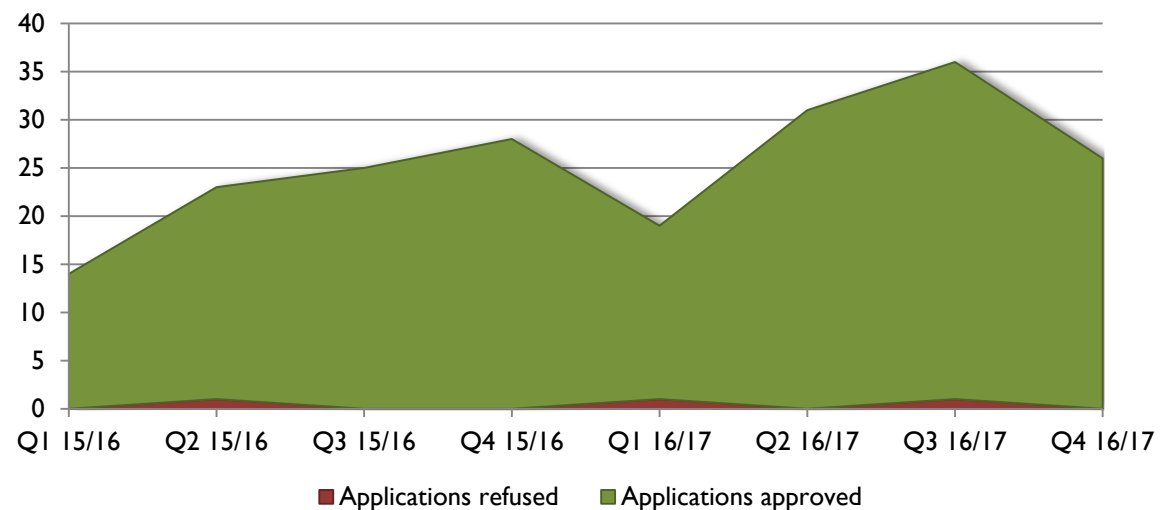


Figure 37 Use of Policy 2 by quarter.

Policy 2 Supporting Economic Growth

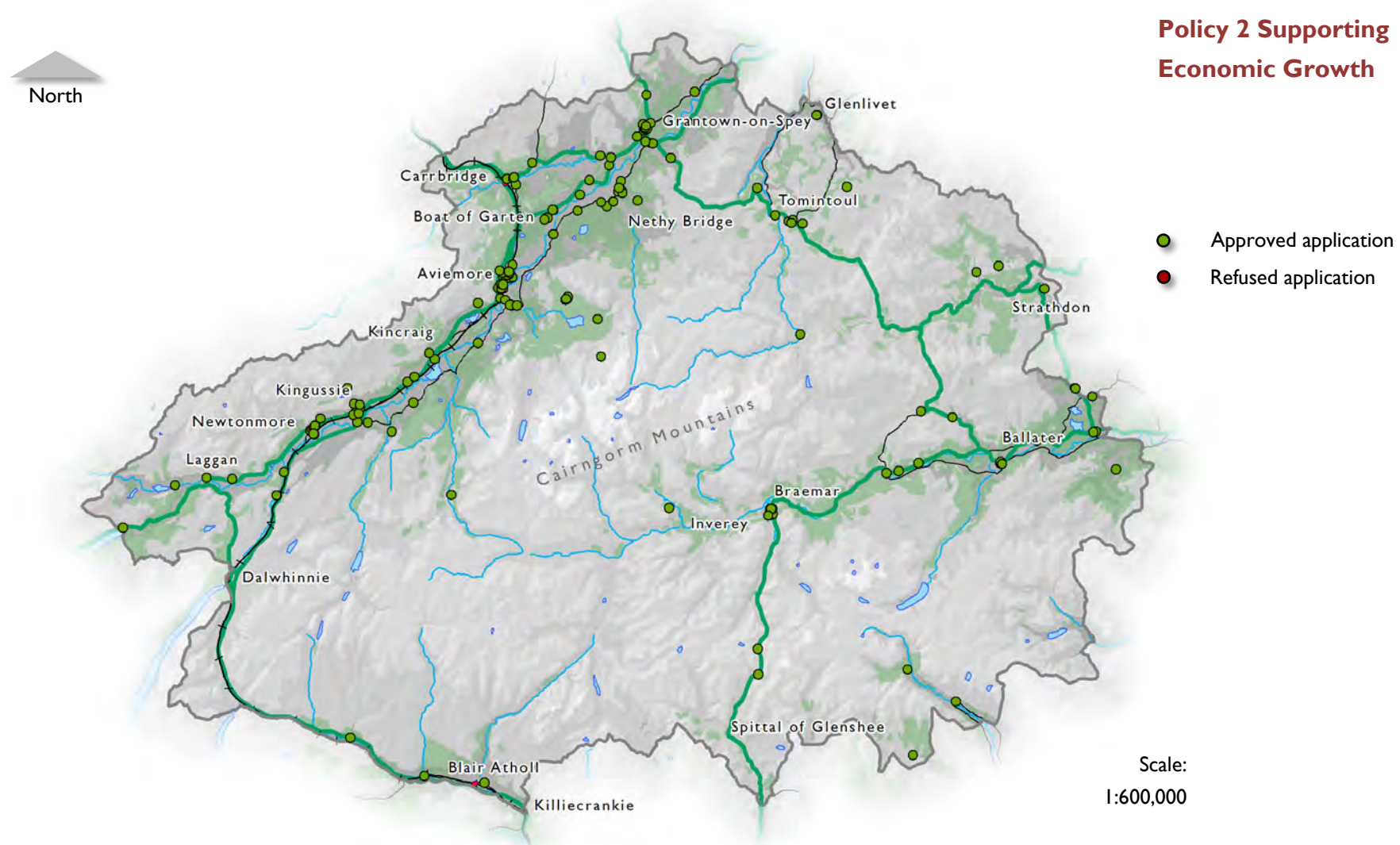


Figure 38 Location of planning applications where 'Policy 2 Supporting Economic Growth' was used. Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2019. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority.

Policy 2: Sub-policies

The sub-policies sitting under 'Policy 2 Supporting economic growth' are:

- 2.1 Retail development
- 2.2 Tourism and leisure development
- 2.3 Other economic development
- 2.4 Protecting existing sustainable economic activity

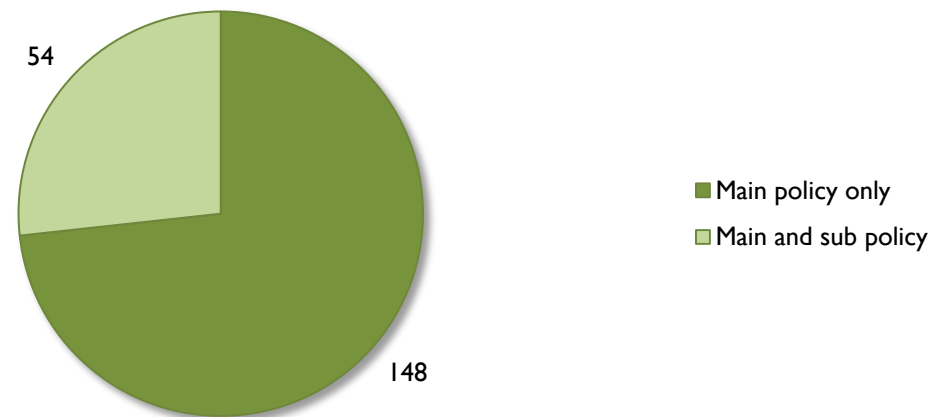


Figure 39 Extent of information recorded by planning authorities on the use of Policy 2 and its sub-policies.

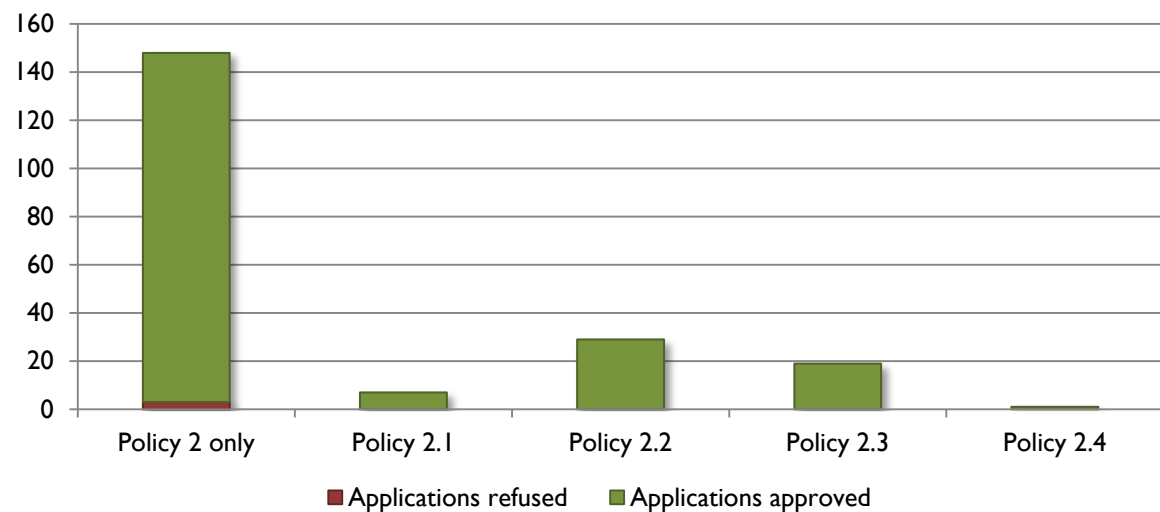


Figure 40 Decisions by Policy 2's sub-policies according to available information.

Have there been any issues with the policy and its sub-policies?

There have been some issues surrounding how broad the policy criteria are and it is unclear how compliance with some of the criteria can and should be demonstrated.

Is there a need for change in policy direction as a result of changes to legislation or guidance?

In respect of Part 2.1 (Retail Development), SPP sets out that planning in town centres should be 'flexible and proactive, enabling a wide range of uses' (Para. 60). Part of this includes the application of a sequential town centre first policy approach for high footfall generating uses including retail, commercial leisure, offices, community and cultural facilities. Whilst Part 2.1 currently advocates this approach for retail development within the National Park, this should be expanded in the next LDP to include other high footfall generating uses to ensure compliance with SPP.

The current policy 2.1 also requires the sequential approach for retail

development to be considered in the first instance 'within identified town/village centres'. SPP requires LDPs to identify town centres as those meeting the set of criteria set out in para. 62. It is considered that the current LDP's 'village cores' should be reviewed and renamed to reflect the terminology and criteria set out in SPP. Given the rural nature of the National Park, settlements are smaller and it may not be necessary to identify town centre boundaries in all of the settlements that currently have defined village cores. In these cases, the sequential approach could apply within the settlement boundary and this will be stated in the policy.

Part 2.2 (Tourism and Leisure Development) is supportive of most opportunities for tourism and leisure development and generally complies with SPP. However SPP states that Development Plans should be informed by the Tourism Development Framework (TDF) for Scotland which aims to help identify opportunities that 'maximise sustainable growth of regional and local

visitor economies' (SPP, Para 100). The framework includes specific actions for Planning Authorities which include supporting and encouraging specific tourism accommodation requirements (considering market demand), utilising opportunities along path networks and infrastructure, site allocations for tourism as well as upgrading infrastructure at snow resorts. In addition it encourages improvements to facilities for wildlife tourism and country sports. The TDF also specifically refers to the National Parks. Whilst recognising that both Parks provide exemplar development policy frameworks and approaches on how to plan for the visitor economy, it goes on to state that 'There are opportunities for further resort development within each Park, the need to provide more quality accommodation and develop and expand visitor attractions. It is recognised that there is also an ongoing need for investment in public realm in the key settlements and a requirement for supporting tourism infrastructure, such as the enhancement of facilities along scenic routes, improved car parking, more laybys

at scenic views, with interpretation and environmental standards of a quality which matches their designation as a National Park' (para 2.167, TDF, 2013).

Whilst the current policy approach is broad enough to cover all of these aspects it may be beneficial to tailor the policy and/or supporting text to be clearer about the tourism priorities that are particularly important in the National Park context. The Tourism and Leisure Policy could also be sub- divided into 2 parts for clarity – one for accommodation and another for activities, attractions and resorts.

Part 2.3 (Other economic development) is used for most other types of economic development. Again the policy is very broad which can be used to support a wide range of developments. This approach reflects the 'positive policy context' required by SPP.

SPP requires LDPs to align with relevant local economic strategies, which for the National Park is the Cairngorms Economic Strategy (2015). In addition, SPP acknowledges the 'continuing need for

diversification of our rural economy' (para. 92) and identifies the need to address the requirements of businesses in the area to support future investment. As with the policy relating to tourism, there is scope to retain the positive economic policy whilst also making the policy/supporting text more specific to the context of the National Park by including support for proposals which contribute to the delivery of the Economic Strategy (in place at the time of adoption).

Part 2.4 relates to the protection of existing sustainable economic activities. The purpose of the policy is to protect existing business uses and only permit alternative uses where it is demonstrated that they are not practical for financial or other reasons. This part of the policy remains in line with SPP.

Are any other changes required?

It was highlighted through the Visitor Infrastructure Evidence Paper and National Park Partnership Plan (2017) that there is a need for the provision of low cost camping and motor home sites in appropriate locations. Whilst part 2.2 of

the current policy supports opportunities for tourism accommodation and would apply to proposals for camping and motor home sites, the policy/supporting text could be expanded to make specific reference to these types of development.

There remains anecdotal evidence of an overall lack of business units in the Park, particularly for start-ups and smaller scale businesses. The proposed A9 dualling and Highland Main Line improvements may provide further opportunities for inward investment into the Park, and may add to this demand. The current LDP identifies only small amounts of new economic development land and relies primarily on the flexible wording of policy 2 to support development on unallocated land in appropriate locations. In order to meet demand, there may be a case for allocating additional economic development sites within the new LDP, as well as continuing to apply the existing flexible policy criteria. This will be a main issue for the MIR consultation.

In respect of part 2.4 of the policy, it should be clarified that this section applies

to allocated economic development sites as well as established business or industrial estates.

The wording of parts 2.2 and 2.3 should specifically state that proposals for tourism/leisure and economic development will be supported on sites

that are identified for these purposes within the settlements maps (as the LDP does not currently make any explicit link between these designations and the policy itself). In respect of part 2.4 of the policy, it should be clarified that this section also applies to tourism sites, as identified in the current planning advice.

Is there a need for Supplementary Guidance?

Yes. Currently the policy is supported by non-statutory planning guidance, however it is considered that statutory supplementary guidance would be beneficial to further set out more detailed advice on the application of the policy.

Summary

Significant change required	Minor change required	Delete policy	Main Issue topic	Comments
x	✓	x	✓	Need for new economic development allocations will be a main issue for MIR consultation. Otherwise, no significant changes to policy required. Minor changes recommended to: expand town centre first policy to include wider range of uses; review and rename identified 'village cores' consistent with SPP; Subdivide part 2.2 into two parts covering tourism accommodation (including support for low cost camping facilities) and another for activities, attractions and resorts; include reference to the Economic Development Strategy in part 2.3; Include policy criteria supporting and encouraging development of small business units; and amend part 2.4 to support diversification of economic development sites and allocations for business, tourism or leisure uses.

Policy 3 Sustainable Design

The distinctive character and identity of the Cairngorms National Park's natural and built heritage and settlements contribute to the qualities that make it special. The contribution that built development makes to our sense of place and quality of life is important to those who live and work in and visit the Park. Good design is key to achieving development fit for a National Park.

The policy aims to ensure that all development, not just the expensive or iconic, delivers high standards of design and contributes to the sense of place.

The policy was used a total of 530 times, 36 (6.6%) times by the CNPA and 507 (93.4%) times by the LAs. It resulted in a total of 530 (97.6%) applications being approved and 13 (2.4%) refused (Figure 41 and Figure 42).

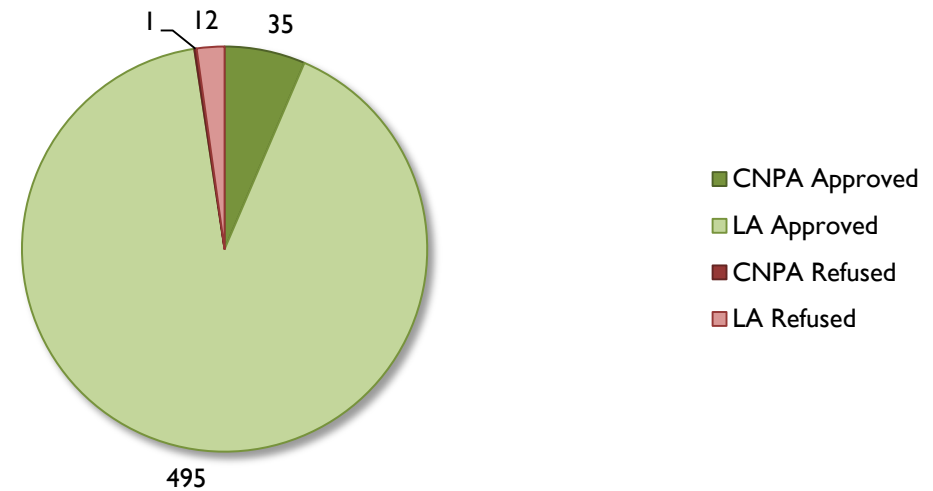


Figure 41 Use of Policy 3 by Planning Authority type.

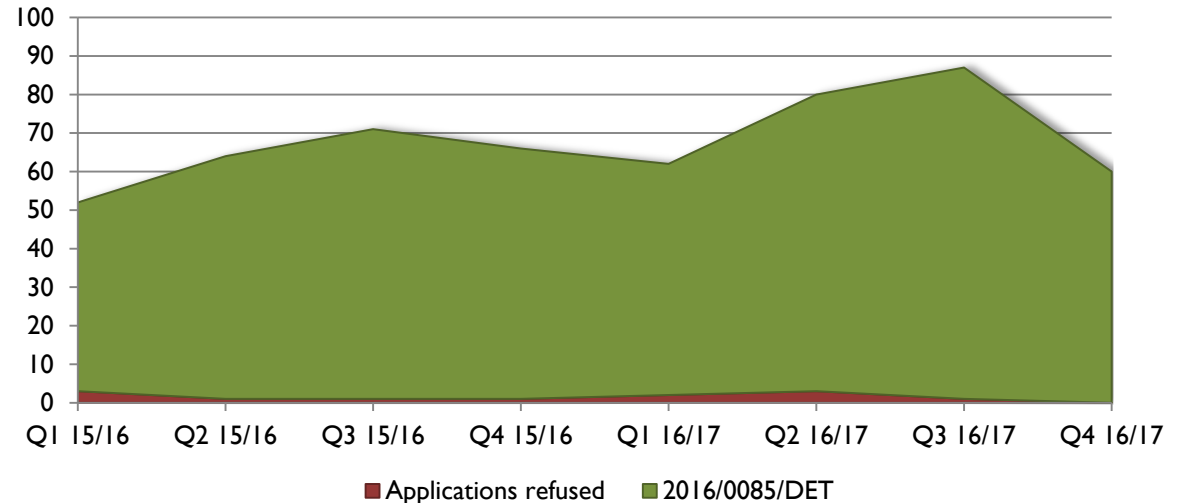


Figure 42 Use of Policy 3 by quarter.

Policy 3 Sustainable Design

- Approved application
- Refused application

Scale:
1:600,000

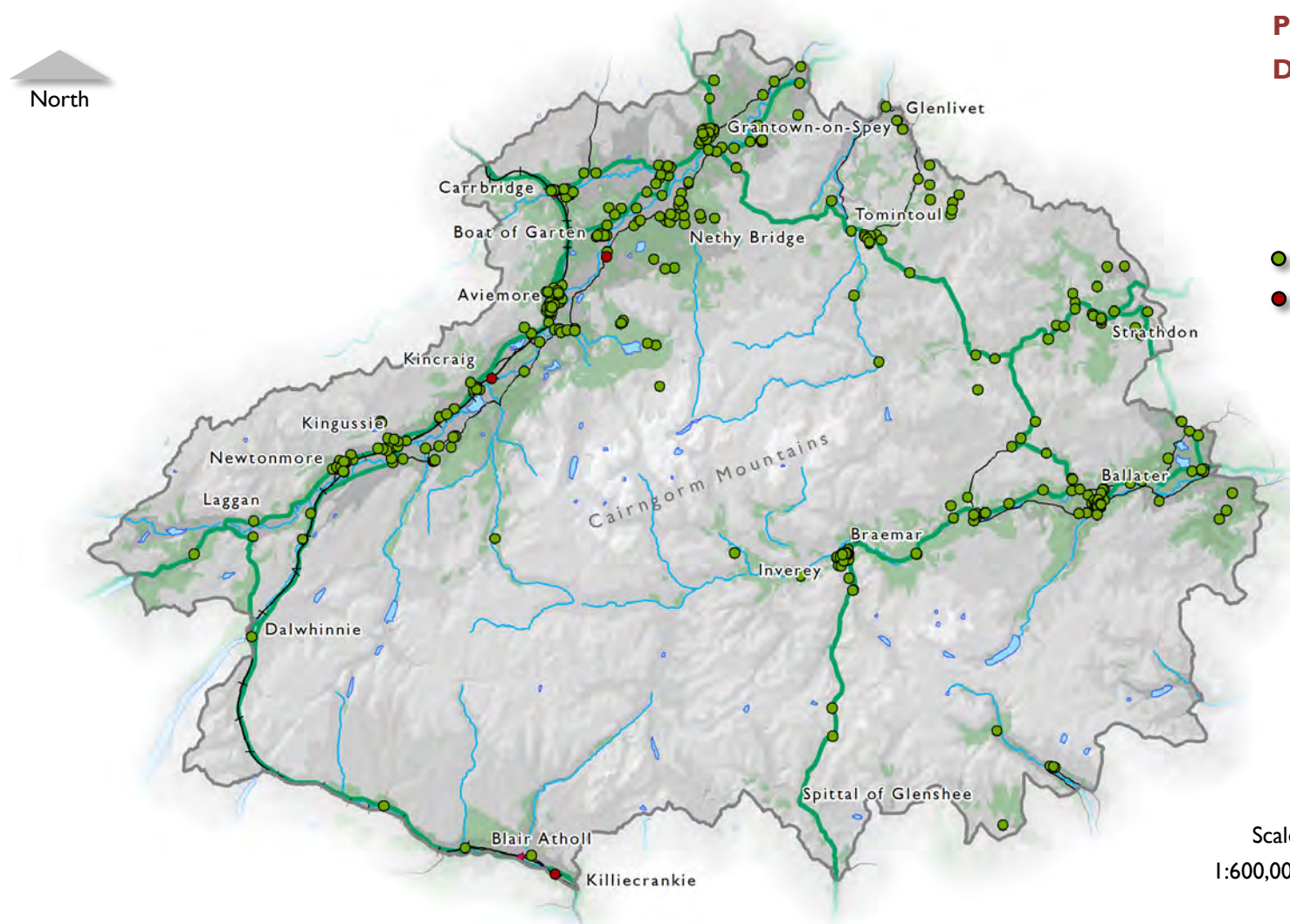


Figure 43 Location of planning applications where 'Policy 3 Sustainable Design' was used. Reproduced by permission of Ordnance Survey on behalf of HMSO. Crown copyright and database © right 2019. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority.

Policy 3: Sub-policies

The sub-policies sitting under 'Policy 3 Sustainable design' are:

- 3.1 Design statements
- 3.2 Replacing existing building stock
- 3.3 Converting existing building stock
- 3.4 Alterations to the existing building stock

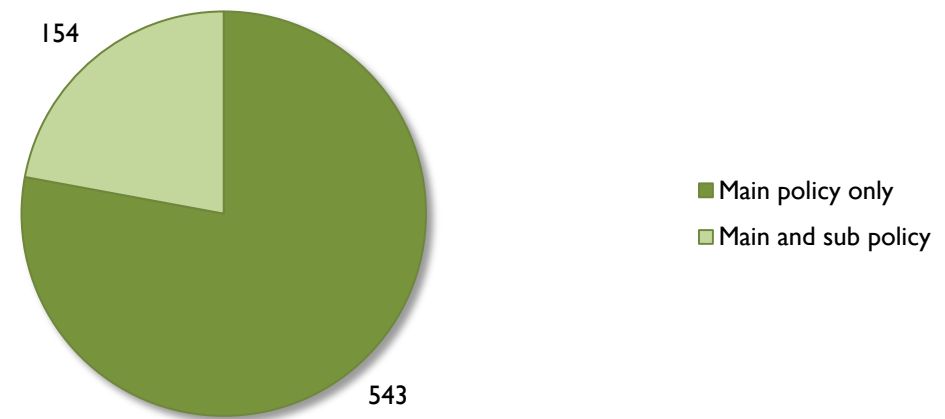


Figure 44 Extent of information recorded by planning authorities on the use of Policy 3 and its sub-policies.

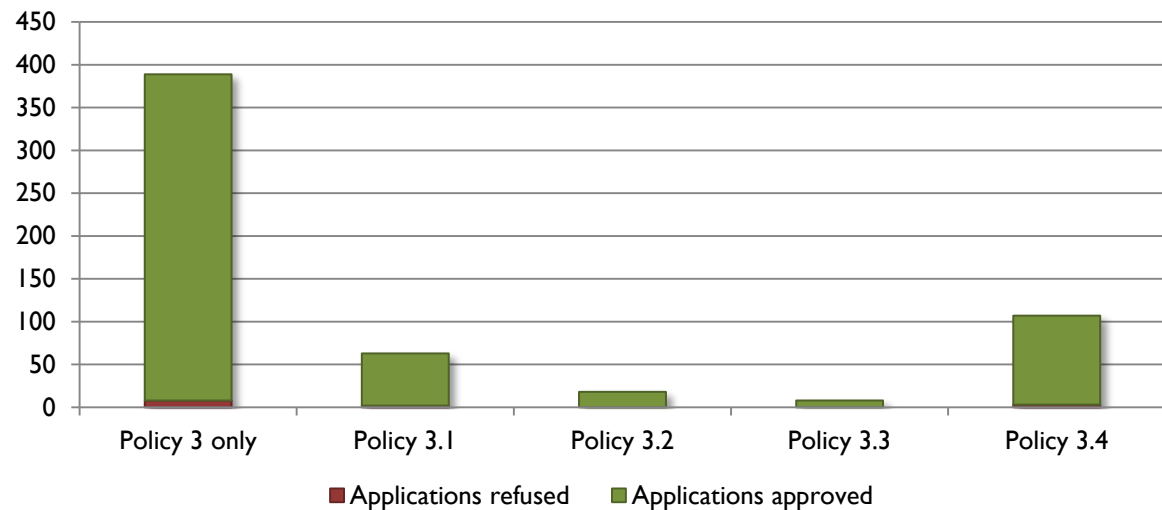


Figure 45 Decisions by Policy 3's sub-policies according to available information.

Have there been any issues with the policy and its sub-policies?

The policy currently requires all development proposals to submit a design statement. However, currently this is not being achieved, particularly for small householder applications.

In addition, part 1 of the policy requires design statements to demonstrate how proposals will meet the criteria set out in the policy. Some of the criteria are somewhat vague and the policy does not clearly set out how these criteria should be met / demonstrated.

Is there a need for change in policy direction as a result of changes to legislation or guidance?

Placemaking is one of the principal policies within Scottish Planning Policy and aims to deliver 'sustainable, well-designed places and homes which meet peoples needs' (para. 36). The Placemaking policy principles include supporting high quality developments that demonstrate the six qualities of successful places. These are: Distinctive; Safe and Pleasant; Welcoming;

Adaptable; Resource efficient and Easy to Move Around and Beyond.

Policy 3 currently does not refer to Placemaking or the qualities of successful places and therefore should be amended to reflect national policy. The next Local Development Plan should therefore require all new developments to contribute to support Placemaking by demonstrating that they meet the six qualities of successful places.

Part 3.1 of the current policy refers specifically to design statements, however it may be more appropriate to make this an overarching design (or 'designing successful places') policy which sets out the design principles that all new developments should achieve. The existing policy criteria in 3.1 could be replaced with the six qualities for successful places as sub headings (forming key 'design principles'), each of which contain further detail about the principle (which will include many of the existing policy criteria) and how design should reflect it.

A number of development briefs have been prepared to guide allocated sites and existing permissions on the ground as part of the current Local Development Plan. It is considered that the design principles should not only apply to planning applications and design statements but also masterplans and development briefs.

Are any other changes required?

As highlighted, design statements are not always being undertaken for all development proposals. There may be a perception that a design statement are not necessary for smaller householder developments and therefore the policy could be strengthened to clarify what information / detail is required for different scales of development.

In addition, the criteria set out in 3.1 are broad and informal feedback has suggested it would be beneficial to more clearly set out how developments can meet and demonstrate the design standards required. The policy (or supplementary guidance) should set out what a design statement should contain and how compliance with the design principles

should be demonstrated to enable applicants can provide more consistent and relevant information.

Reference is also made to the minimum standards set out in the Building Standards Technical Handbook in parts 3.1a and 3.1d. It is not considered this is necessary as meeting these standards are already a requirement for obtaining a building warrant and therefore including it within the policy is an unnecessary duplication.

Part 2 relates to the replacement of existing building stock. The policy sets out the circumstances where replacement of a building may be acceptable however does not directly relate to the design of such proposals. Whilst the policy does not directly refer to types of building stock (e.g. business or residential), it is considered that it may be more appropriate for this part of the policy to be contained within the relevant policies e.g. housing and / or economic development. Proposals for the replacement of a building would be required to demonstrate compliance the

qualities set out in the first part of the policy.

Part 3 relates to the conversion of existing building stock. The current policy (part a) states that conversions will be considered favourably where the building is redundant and unlikely to have a commercial or economic future in its current form.

There is an existing 'conversion' criterion within the housing policy already and it may be more appropriate to move this part into the economic development policy for consistency. Part b also sets out some general design guidance, however it is considered more appropriate that proposals for all conversions are assessed against the main design principles.

Part 4 sets out the principles for alterations to the existing building stock. The policy principles are very general and it may be more appropriate for such proposals to be assessed against the main design principles.

Is there a need for Supplementary Guidance?

Yes. Currently the policy is supported by non-statutory planning guidance, however it is considered that statutory supplementary guidance would be beneficial to further set out more detailed advice on the application of the policy.

Supplementary guidance in this case could be used to provide more detail on how to achieve the highest standards of design and how to demonstrate a proposal meets the six qualities for successful places. The Supplementary Guidance could include guidance on how the six qualities apply to different scales of development, along with guidance on the level of supporting information that will be required to be submitted alongside planning applications, to ensure that the new approach is proportionate.

Summary

Significant change required	Minor change required	Delete policy	Main Issue topic	Comments
✓	✗	✗	✓	Amendments include: Replacing part 1: Design statements with overarching 'designing successful places' policy applicable to all developments, masterplans and development briefs. This policy will set out the requirement for all developments to demonstrate how they meet the six qualities of successful places as set out in SPP; Removing reference to Building Standards Technical handbook; Relocate parts 2 and 3 to other relevant policies; and incorporating requirements for alterations to existing buildings (part 4) within the main design policy (part 1).

Policy 4 Natural Heritage

The range and quality of natural heritage in the National Park is unique in the UK and is internationally valued. A result of natural processes and land management, many of the special habitats and species need active management to continue to thrive. The unique natural heritage underpins all four aims of the Park, and the special qualities created as a result are valued by residents and visitors. It is key to the long-term success of the Park that habitats and species are protected.

The policy will ensure that development conserves and enhances the outstanding natural heritage of the Park. It offers the necessary level of protection from adverse development and enables enhancement.

The policy was used a total of 173 times, 38 (22.0%) times by the CNPA and 135 (78.0%) times by the LAs. It resulted in a total of 166 (96.0%) applications being approved and 7 (4.0%) refused (Figure 46 and Figure 47).

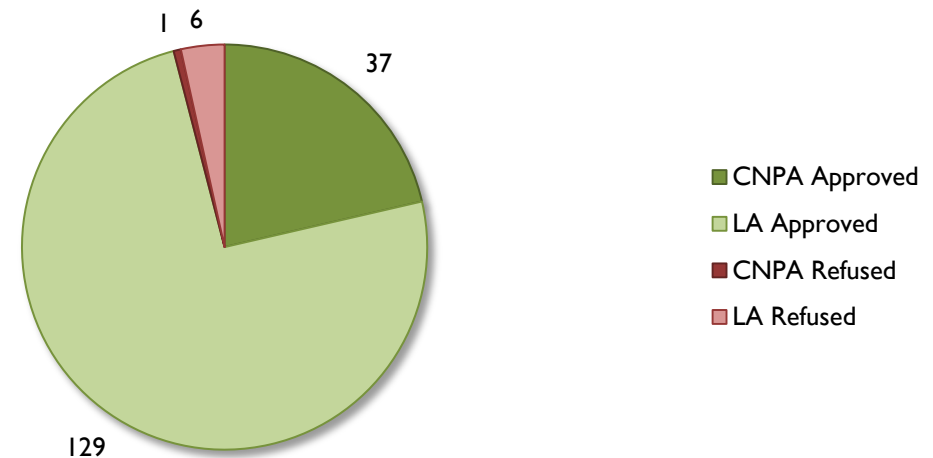


Figure 46 Use of Policy 4 by Planning Authority type.

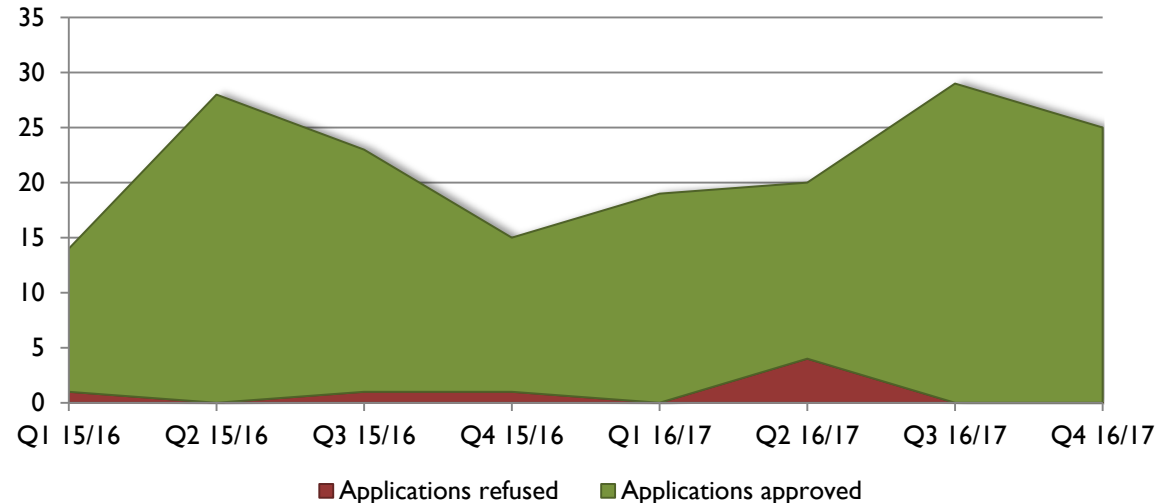


Figure 47 Use of Policy 4 by quarter.

Policy 4 Natural Heritage

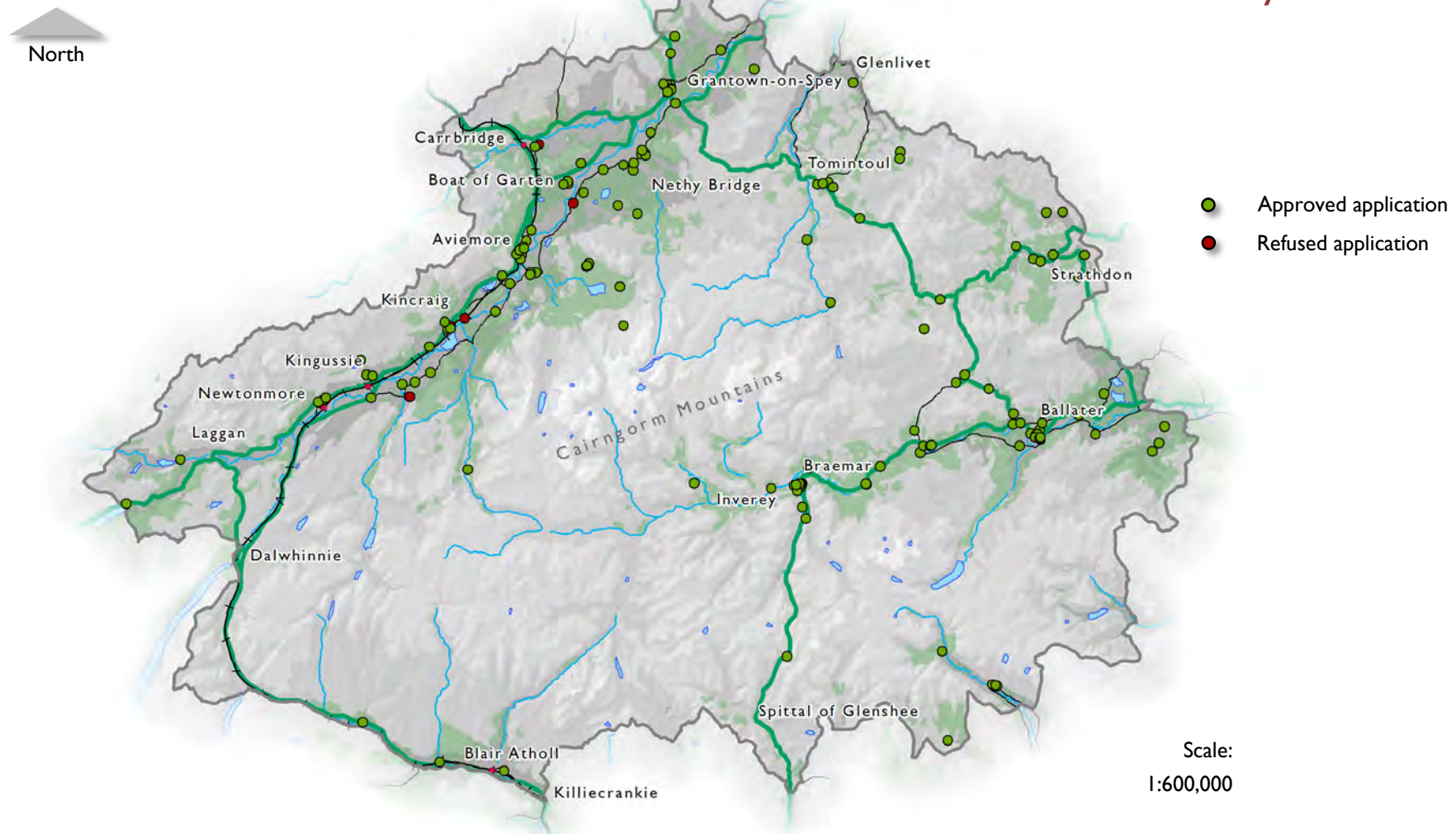


Figure 48 Location of planning applications where 'Policy 4 Natural Heritage' was used. Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2019. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority.

Policy 4: Sub-policies

The sub-policies sitting under 'Policy 4 Natural heritage' are:

- 4.1 International and national designations
- 4.2 National designations
- 4.3 Other important natural and earth heritage sites and interests
- 4.4 Protected species
- 4.5 Other biodiversity
- 4.6 All development

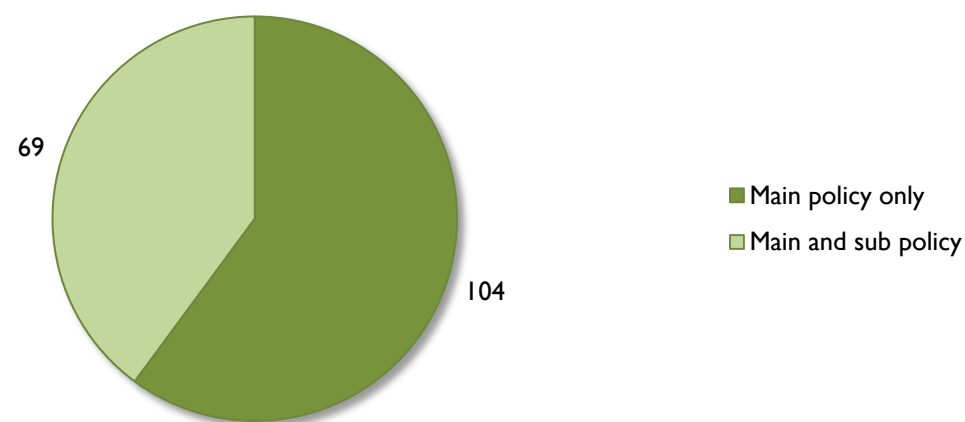


Figure 49 Extent of information recorded by planning authorities on the use of Policy 4 and its sub-policies.

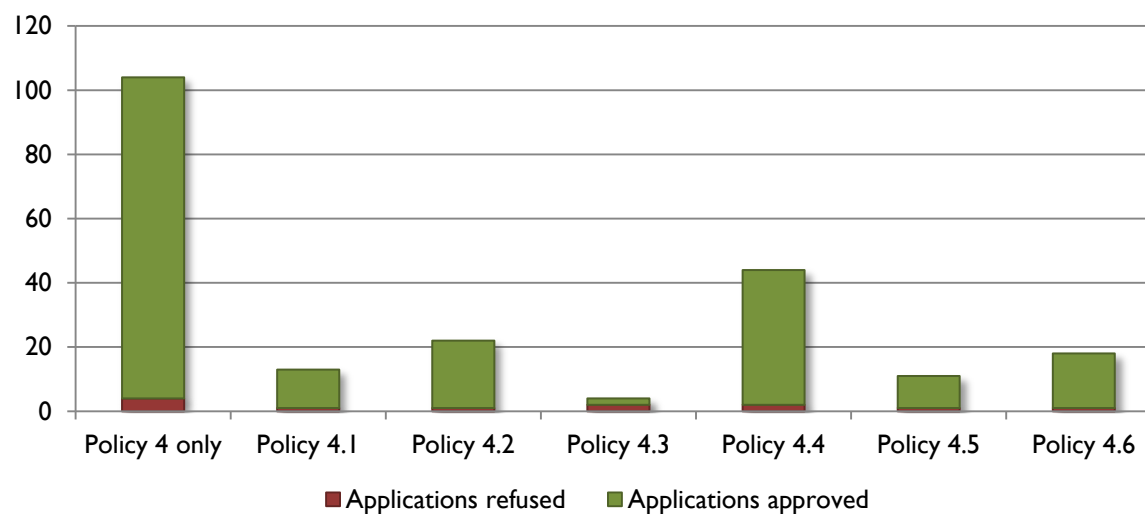


Figure 50 Decisions by Policy 4's sub-policies according to available information.

Have there been any issues with the policy and its sub-policies?

No significant issues with the operation of the policy to date.

Is there a need for change in policy direction as a result of changes to legislation or guidance?

The various sub-sections of policy 4 remain up-to-date and compliant with SPP guidance. No significant change is required in this respect. However, it is considered that the policy needs to be strengthened in respect to SPP's approach to the Ancient Woodland Index (AWI). SPP states that "*the planning system should protect and enhance ancient semi-natural woodland as an important and irreplaceable resource*" (para. 194) and later on that "*Ancient semi-natural woodland is an irreplaceable resource*" (para. 216).

The policy is currently not particularly strong in respect of protecting AWI; for example, AWI is non-replaceable, however policy 4.3.b refers to adverse effects being mitigated by the provision of features of commensurate or greater importance than those lost. In this

respect, the reference to 'integrity' in 4.3.a is also ineffective as a loss of trees is a loss of integrity. Part a. also refers to site objectives; however AWI areas do not have objectives or management plans.

It is recommended therefore that the AWI component of 4.3 is removed and that a separate policy point be created:

Woodland removal for development will only be permitted where removal of the woodland would achieve clearly defined additional public benefits. Compensation will be expected of at least equal to the quality and quantity of what is lost. Only in exceptional circumstances will lack of compensation be acceptable.

There will be a strong presumption against removal of Ancient Woodland Inventory sites, which are considered an irreplaceable resource. Only in exceptional circumstances will loss of AWI be permitted:

- a) Where the developer can clearly demonstrate that the need and justification for the development

outweighs the local, national, or international contribution of the woodland, or,

- b) Where it can be clearly demonstrated that the AWI site has low ecological value.

Where AWI removal is deemed acceptable, compensation for such loss will be mandatory.

Are any other changes required?

A number of small changes are required to the following parts of the policy.

Policy 4.4 Protected Species

Consistency is needed throughout the policy regarding overriding social, economic benefits. Therefore, in order to strengthen the policy and place the onus on developers to provide justification where there is an adverse effect, the following text should be added to the start of point a. on page 27 "*The developer can clearly demonstrate that...*".

In order tie the two parts of the policy together, point a. on page 28, would also need to be changed to:

- a) The developer can demonstrate that there are public health, public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.

Is there a need for Supplementary Guidance?

Yes. The continued use of supplementary guidance is recommended in order to set out more detailed advice on the application of the policy.

Under part c. on page 28 there is also the need to define what the “natural range” is, what scale are we referring to, natural range at the park, regional or national scale? This may be done through Supplementary Guidance.

Policy 4.5 Other biodiversity

No reference is made to compensation where there is adverse effect and this is required. Furthermore, there is again the need to define what the “natural range” is and again this may be done through Supplementary Guidance.

Policy 4.6 All development

Need to define which species/habitats are being referred to. This may be done through Supplementary Guidance.

Summary

Significant change required	Minor change required	Delete policy	Main issue topic	Comments
x	✓	x	x	<p>New policy wording required to deal with AWI:</p> <p>Woodland removal for development will only be permitted where removal of the woodland would achieve clearly defined additional public benefits. Compensation will be expected of at least equal to the quality and quantity of what is lost. Only in exceptional circumstances will lack of compensation be acceptable.</p> <p>There will be a strong presumption against removal of Ancient Woodland Inventory sites, which are considered an irreplaceable resource. Only in exceptional circumstances will loss of AWI be permitted:</p> <ul style="list-style-type: none"> a) Where the developer can clearly demonstrate that the need and justification for the development outweighs the local, national, or international contribution of the woodland , or, b) Where it can be clearly demonstrated that the AWI site has low ecological value. <p>Where AWI removal is deemed acceptable, compensation for such loss will be mandatory.</p>
x	✓	x	x	<p>Policy 4.4 Protected Species can be strengthened by amending point a. on page 27 as follows “<i>The developer can clearly demonstrate that...</i>”.</p> <p>In order tie the two parts of the policy together , point a. on page 28, would also need to be changed to:</p> <ul style="list-style-type: none"> a) The developer can demonstrate that there are public health, public safety or other

Significant change required	Minor change required	Delete policy	Main issue topic	Comments
				<p>imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.</p> <p>b)</p> <p>Under part c. on page 28 there is also the need to define what the “natural range” is.</p>
x	✓	x	x	Reference needs to be made to compensation in Policy 4.5 Other biodiversity and definition of “natural range” provided.
x	✓	x	x	Under Policy 4.6 All development, there is a need to define which species/habitats are being referred to.

Policy 5 Landscape

The landscapes of the Cairngorms are one of the National Park's most valuable assets, underpinning its character, designation and the appeal of the area as a place to visit, live and invest. The experience of large scale wildness in the National Park is particularly distinctive in UK terms.

The policy will conserve and enhance the diverse and spectacular landscapes of the National Park by ensuring that only development which conserves and enhances the special landscape qualities of the Park will be supported. It supports development that contributes to landscape enhancement and protects against development that would erode the landscape qualities we value.

The policy was used a total of 203 times, 38 (15.8%) times by the CNPA and 203 (84.2%) times by the LAs. It resulted in a total of 233 (96.7%) applications being approved and 8 (3.3%) refused (Figure 51 and Figure 52).

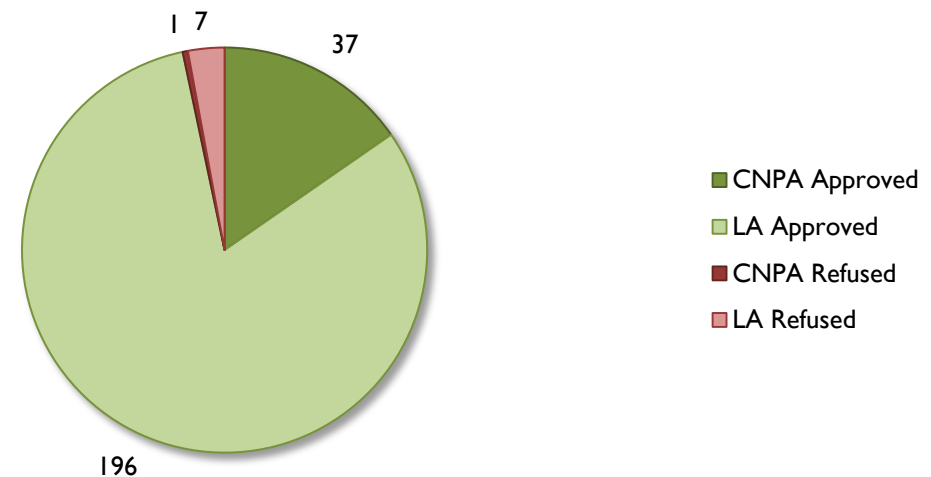


Figure 51 Use of Policy 5 by Planning Authority type.

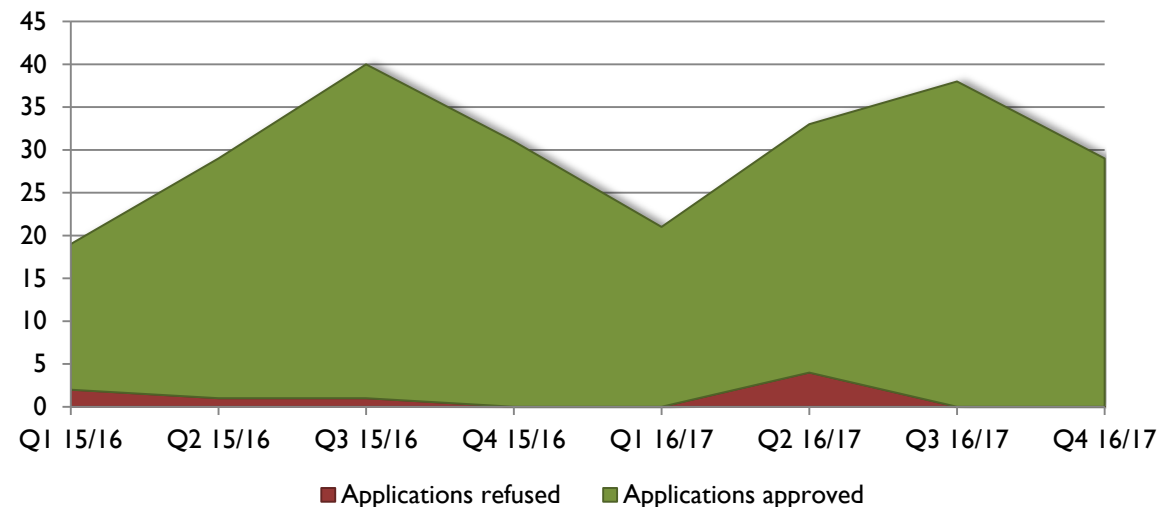


Figure 52 Use of Policy 5 by quarter.

Policy 5 Landscape

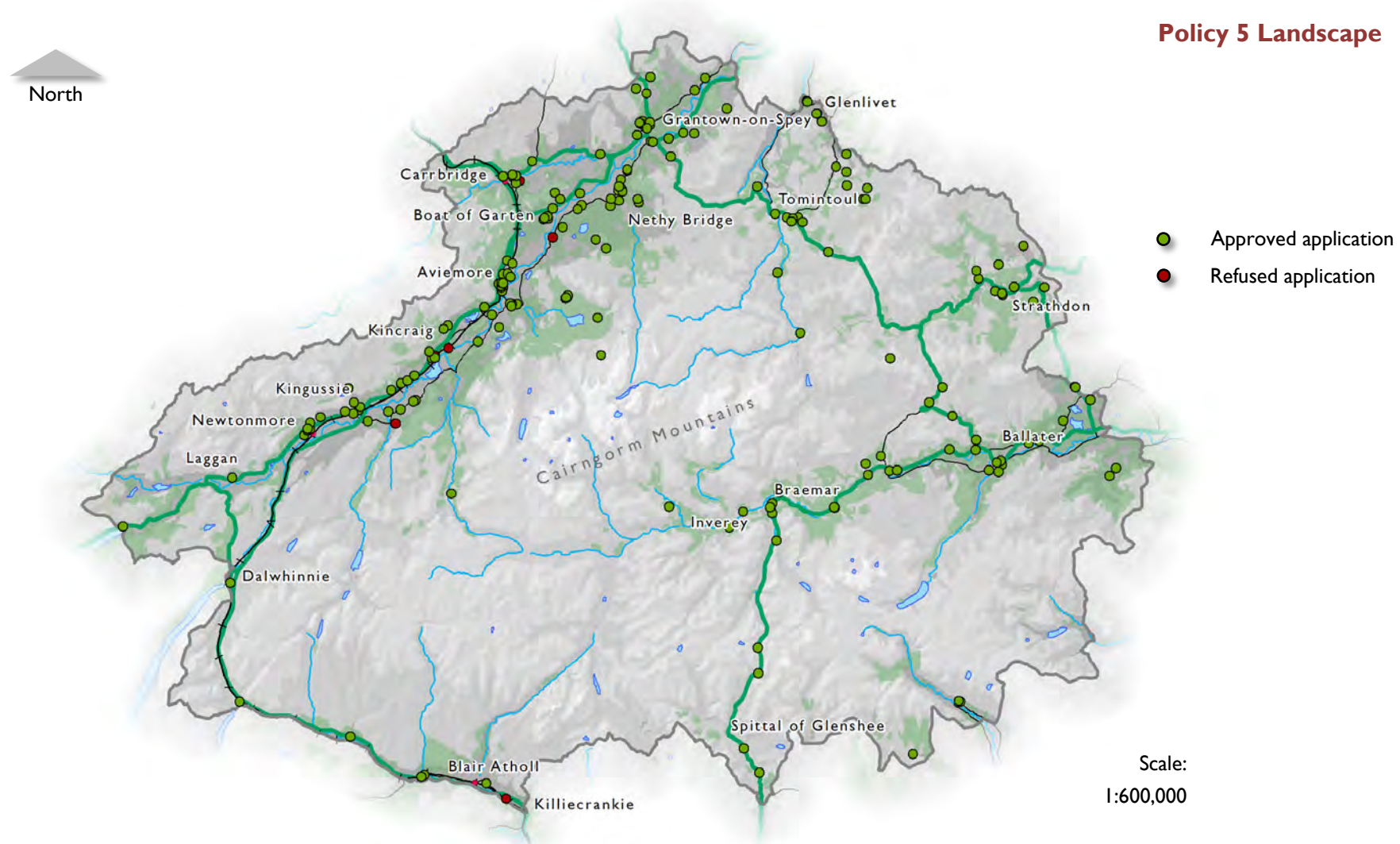


Figure 53 Location of planning applications where 'Policy 5 Landscape' was used. Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2019. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority.

Have there been any issues with the policy and its sub-policies?

No significant issues with the operation of the policy to date.

Is there a need for change in policy direction as a result of changes to legislation or guidance?

While there is not a need to change directions, SPP 2014 makes greater reference to Wild Land Areas and therefore this needs to be reflected in the scope of the policy. According to SPP, *“Plans should safeguard unspoiled sections of coast which possess special environmental or cultural qualities, such as wild land. The economic value of these areas should be considered and maximised, provided that environmental impact issues can be satisfactorily addressed”*.

While it is not considered that a change is needed to the policy wording, reference to Wild Land areas needs to be made in the ‘How it will be applied’ section of the Plan. Paragraph 7.9 would be the most appropriate location.

Are any other changes required?

In order to strengthen the understanding of the policy, the following additions to the supporting text and Supplementary Guidance / Non-statutory Guidance should be made:

- Explicit link to Landscape Toolkit
- Make sure consistent terminology is used e.g. ‘Special Landscape Qualities, not *Special Qualities*.
- The relationship between landscape characteristics and special landscape qualities needs to be clarified.
- Need to state when and how Landscape & Visual Impact Assessment / Special Landscape Quality Impact Assessments / Wild Land Impact Assessments should be carried out
- Reference to be made to the landscape planning guidance

Is there a need for Supplementary Guidance?

Yes. The continued use of supplementary guidance is recommended in order to set

out more detailed advice on the application of the policy.

Summary

Significant change required	Minor change required	Delete policy	Main issue topic	Comments
x	✓	x	N	Minor changes needed to the policy's supporting text, making reference to Wild Land, the Landscape toolkit, Special Landscape Qualities. Minor changes also needed to provide clarity about certain aspects of the policy including matters relating to Special Landscape Qualities, and the application of impact assessments.

Policy 6 The Siting and Design of Digital Communications Equipment

The policy is intended to support world class digital technology through the provision of the most up to date networks to serve homes and business premises whilst ensuring that all such infrastructure installations are sited and designed to keep environmental impacts to a minimum.

The policy was used a total of 41 times, all by the LAs. It resulted in a total of 41 (100%) applications being approved (Figure 54 and Figure 55).

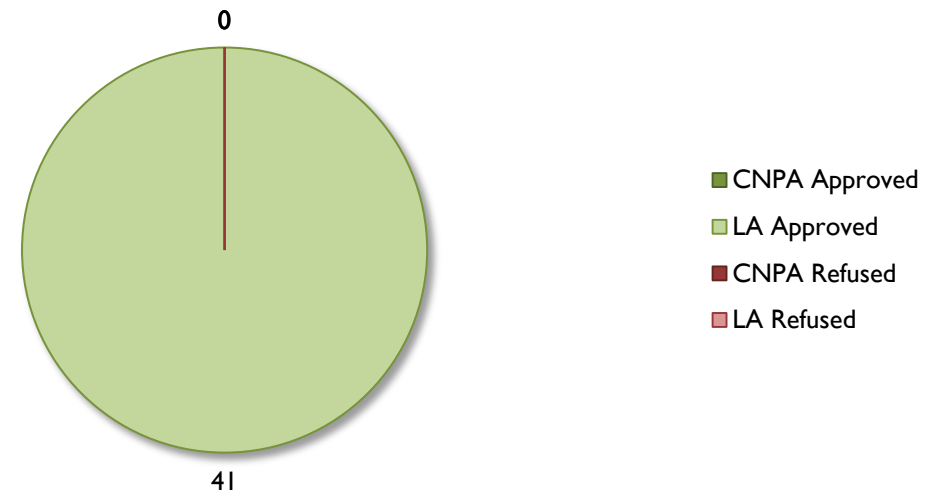


Figure 54 Use of Policy 6 by Planning Authority type.

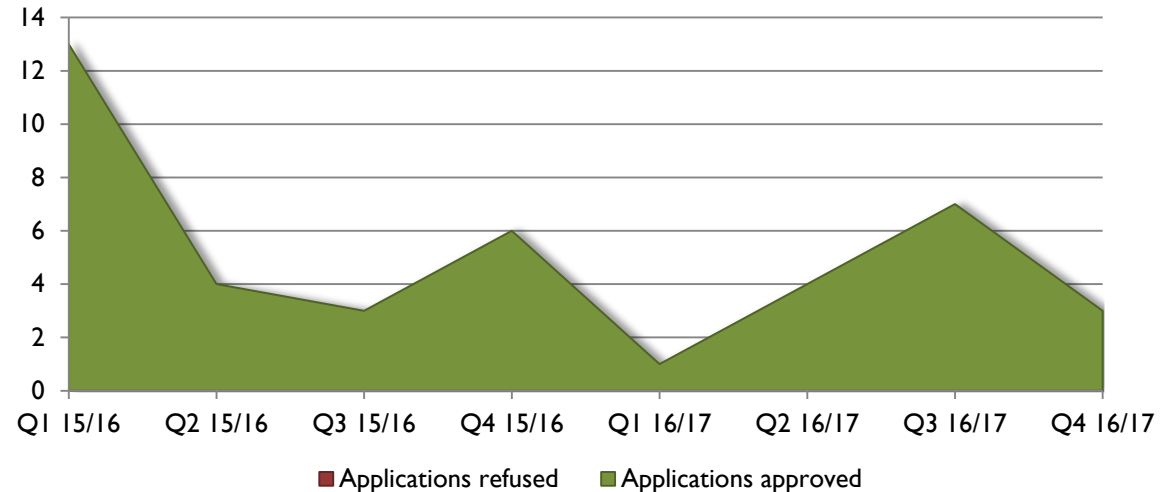


Figure 55 Use of Policy 6 by quarter.

Policy 6 The Siting and Design of Digital Communications Equipment

- Approved application
- Refused application

Scale:
1:600,000

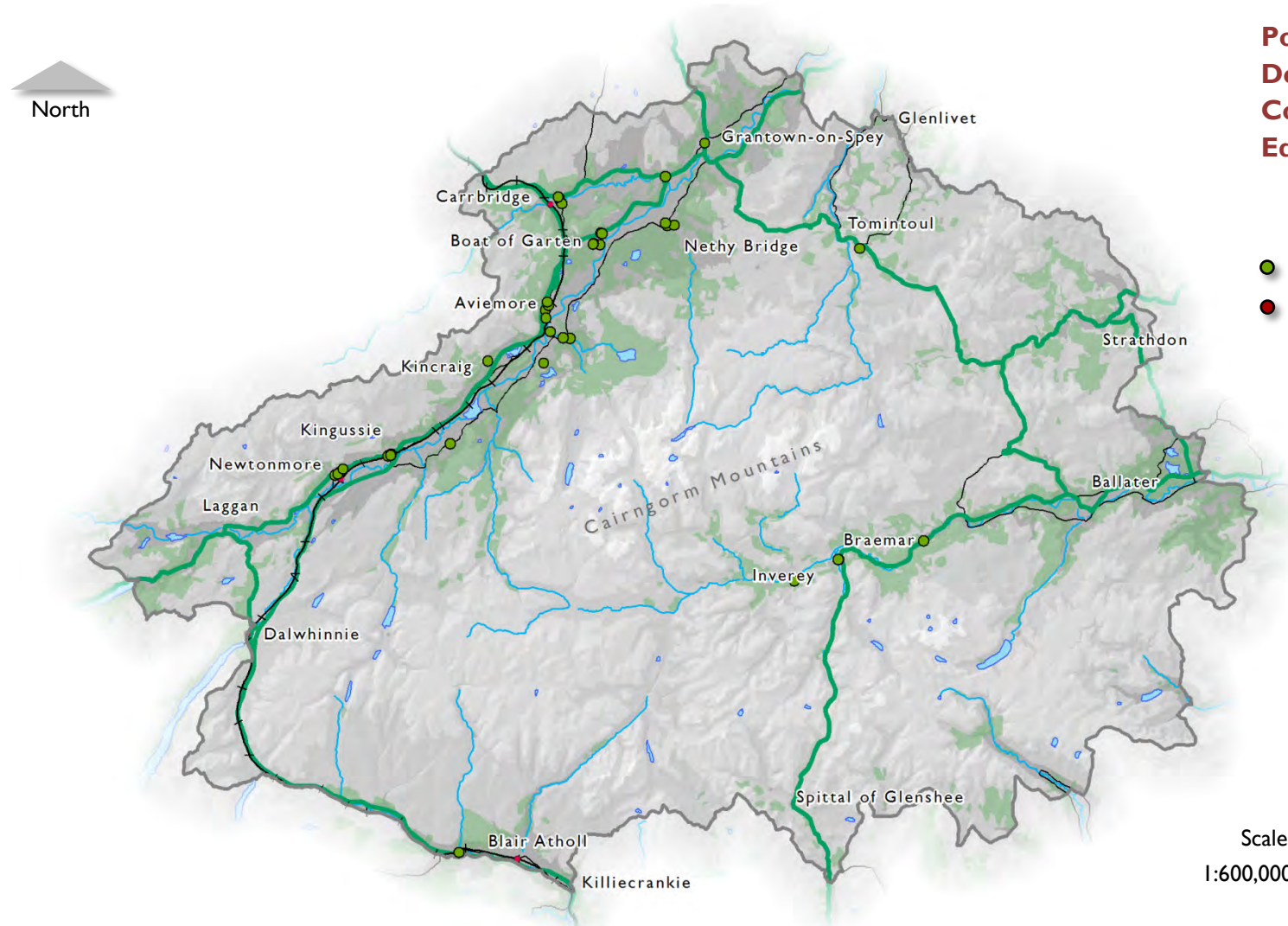


Figure 56 Location of planning applications where 'Policy 6 The Siting and Design of Digital Communications Equipment' was used. Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2019. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority.

Have there been any issues with the policy and its sub-policies?

No significant issues with the operation of this policy to date.

Is there a need for change in policy direction as a result of changes to legislation or guidance?

Scottish Planning Policy states that development plans should set out the criteria which will be used when determining planning applications for communications equipment. It also provides detailed guidance on the range of matters that should be included in such policies. In addition, it adds that development plan policies should encourage developers to explore opportunities for the provision of digital infrastructure to new homes and business premises as an integral part of development.

The existing Local Development Plan already contains a specific policy on the siting and design of digital communications equipment. This policy outlines the criteria that will be used to determine planning applications for communications

equipment, and includes the full range of matters set out in Scottish Planning Policy. Therefore, it is considered appropriate to retain this policy approach within the next Local Development Plan.

However, it does not specifically encourage developers to provide digital infrastructure or high speed broadband connections to new homes and business premises. Whilst we could include this as a new policy requirement in the next Local Development Plan, there may be problems with meeting this requirement in parts of the National Park as it is not entirely covered by superfast broadband services.

It is also worth noting that the Building Standards Technical Handbook has been recently revised and section 4.14 now requires all new buildings to be designed and constructed to include in-building infrastructure to enable connection to superfast broadband services. This was noted by the Reporter that recently examined the Aberdeenshire Local Development Plan. As a result, he concluded that the development plan did

not need to include a policy on this issue, commenting that: *"I remain extremely sceptical that the planning system is the best suited or most appropriate vehicle for ensuring the provision of particular infrastructure to and within buildings. It is not through the planning system that buildings are provided with electricity, gas and water connections, and it is questionable why that should be different for broadband connections"*.

We therefore think the inclusion of a policy to encourage developers to provide digital infrastructure or high speed broadband to new buildings is unnecessary, and might lead to confusion of inconsistency with the building standards process.

Are any other changes required?

No.

Is there a need for Supplementary Guidance?

No. All other policies apply and if further guidance is required in respect of landscape impacts, reference should be

made to the Landscape supplementary
Guidance.

Summary

Significant change required	Minor change required	Delete policy	Main Issue topic	Comments
x	x	x	x	No significant amendments proposed / required.

Policy 7 Renewable Energy

The National Park has an abundance of natural resources which provide options to generate renewable energy, and we want to encourage this in a way which promotes the sustainable use of those resources without negative impacts on its special qualities. This includes energy from biomass, hydro, solar, heat pumps, anaerobic digestion, energy from waste and some wind energy.

The policy aims to enable appropriate renewable energy generation by harnessing the Park's natural resources in a way which achieves the collective delivery of the four aims of the Park. It sets the framework to harness this energy potential, and so will allow the Park to play its part in addressing the issues of climate change and fuel poverty.

The policy was used a total of 30 times, 6 times (20.0%) by the CNPA and 24 (80.0%) times by the LAs. It resulted in a total of 29 (96.7%) applications being approved and 1 (3.3%) being refused (Figure 57 and Figure 58).

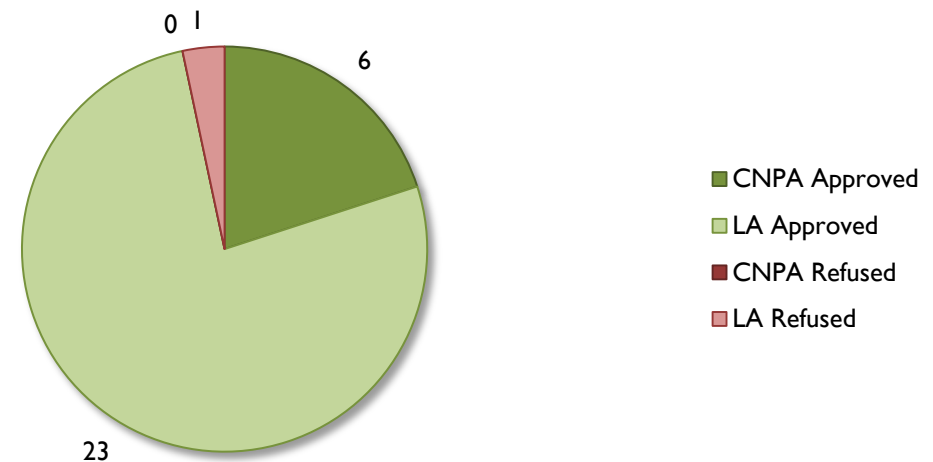


Figure 57 Use of Policy 7 by Planning Authority type.

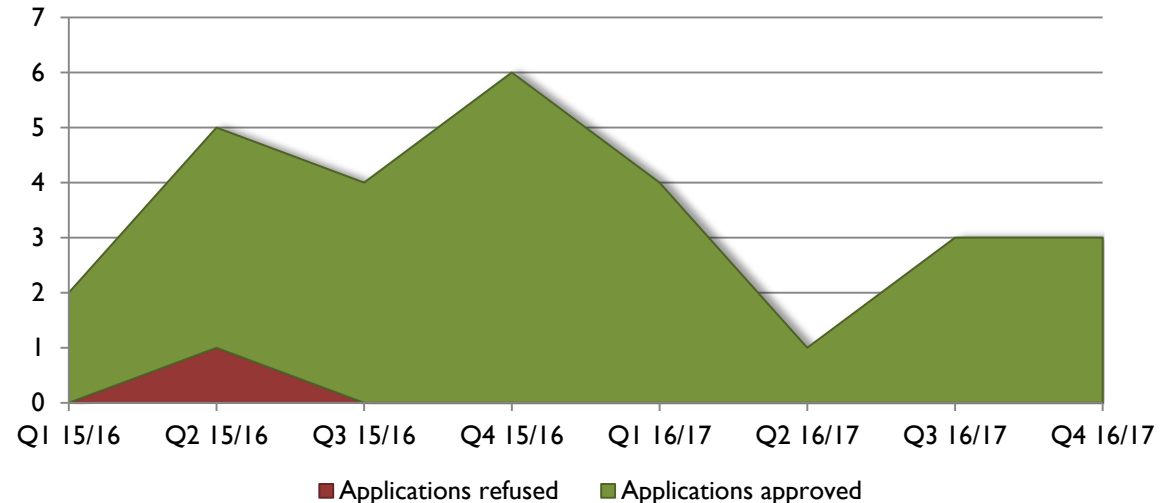


Figure 58 Use of Policy 7 by quarter.

Policy 7 Renewable Energy

- Approved application
- Refused application

Scale:
1:600,000

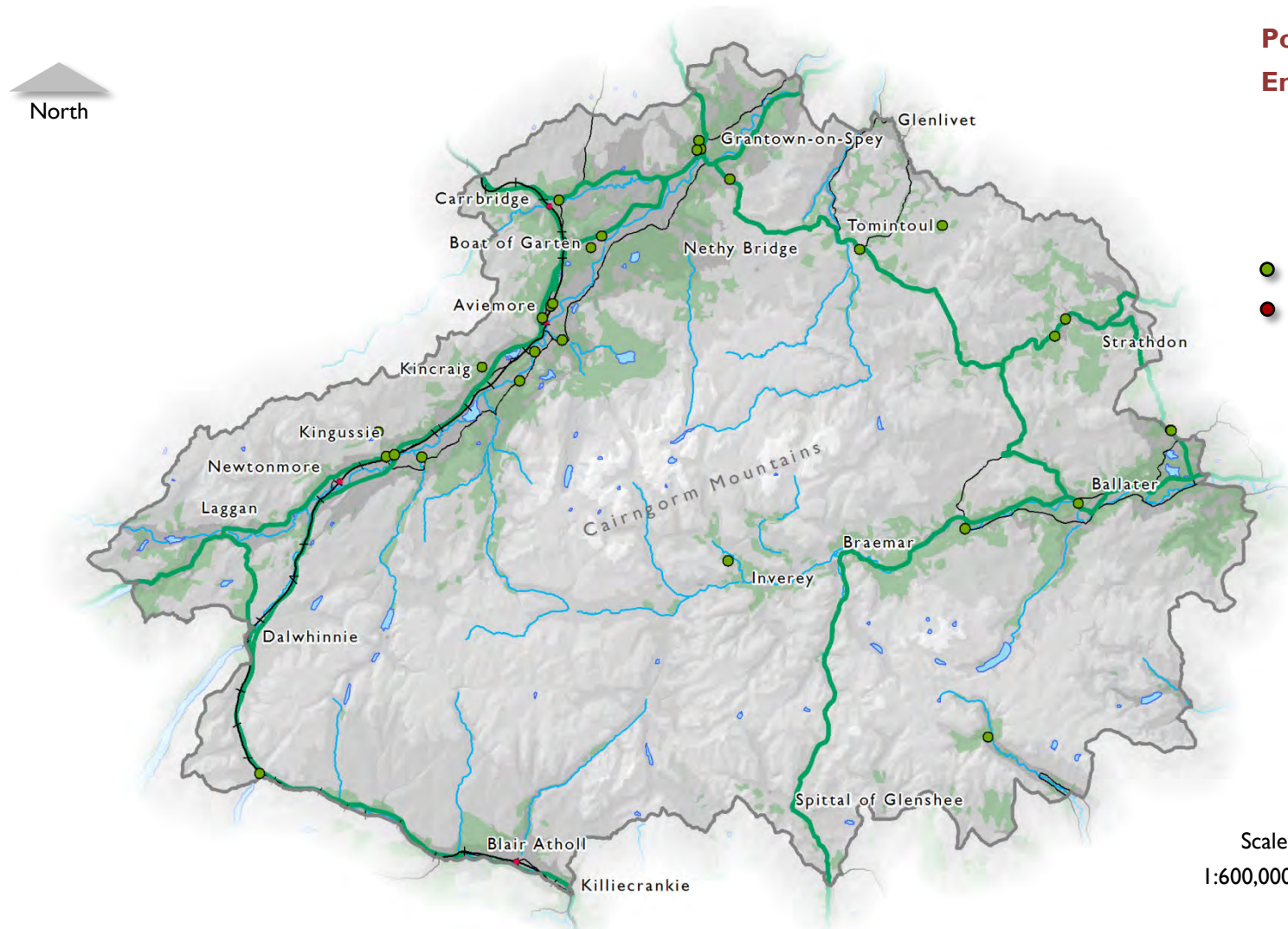


Figure 59 Location of planning applications where 'Policy 7 renewable Energy' was used. Reproduced by permission of Ordnance Survey on behalf of HMSO. Crown copyright and database © right 2019. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority.

Policy 7: Sub-policies

The sub-policies sitting under 'Policy 7 Renewable energy' are:

- 7.1 All renewables developments
- 7.2 Hydropower
- 7.3 Wind energy
- 7.4 Biomass
- 7.5 Energy from waste

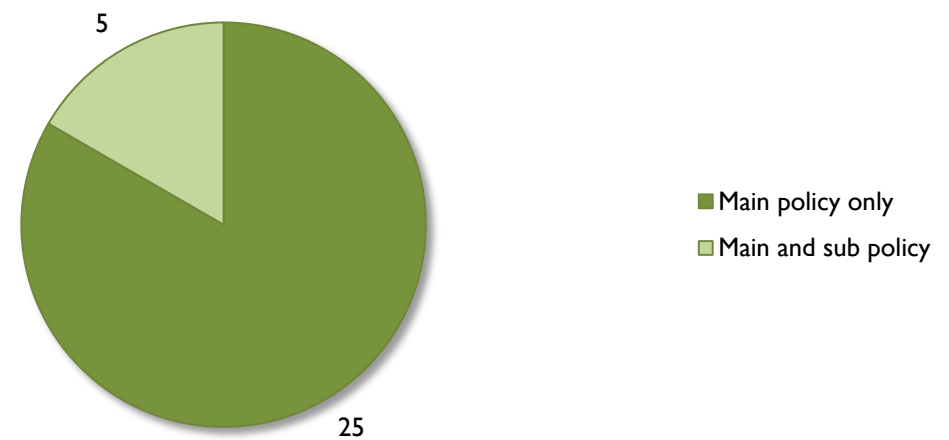


Figure 60 Extent of information recorded by planning authorities on the use of Policy 7 and its sub-policies.

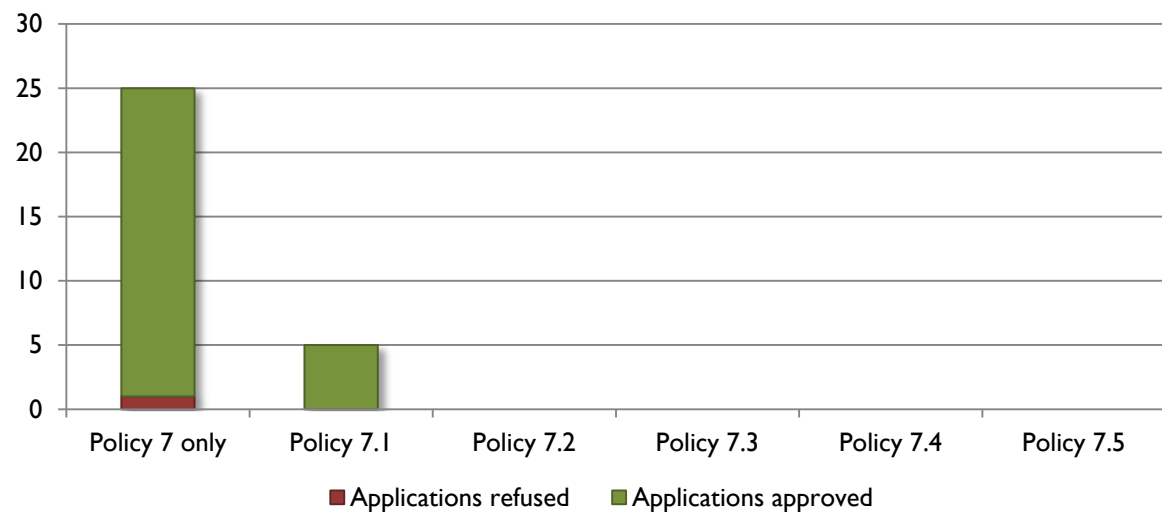


Figure 61 Decisions by Policy 7's sub-policies according to available information.

Have there been any issues with the policy and its sub-policies?

There have been some issues with recent hydropower developments within the National Park where unauthorised works have taken place outside of approved planning application boundaries.

This has identified the need for careful control over proposed working corridors, access arrangements and reinstatement proposals in future hydropower schemes. The wider issue of hill tracks is likely to be a main issue for the MIR consultation. However, as a separate minor change section 2 of policy 7 (and its associated guidance) could be amended to identify the need for any future planning applications to fully address these issues.

Is there a need for change in policy direction as a result of changes to legislation or guidance?

The various existing sub-sections of policy 7 remain up-to-date and compliant with SPP guidance.

However, SPP now places more emphasis on supporting the development of heat

networks in as many locations as possible (para. 159). It also states that where heat networks are not viable, microgeneration and heat recovery technologies associated with individual properties should be encouraged (para. 160). Policy 7 does not fully reflect this new emphasis on heat networks, and the policy is therefore likely to require amendment to encourage the consideration of heat networks or other microgeneration and heat recovery technologies.

Are any other changes required?

The final paragraph of section 1 of the policy states that financial bonds will be used where appropriate to secure decommissioning and site restoration. This could be amended to refer to the use of planning conditions and/or financial bonds, as in many cases decommissioning and restoration will be secured through the imposition of suitably worded planning conditions rather than the use of financial bonds.

Is there a need for Supplementary Guidance?

Yes. The continued use of supplementary guidance will be necessary to set out more detailed advice on renewable energy developments within the Park.

Summary

Significant change required	Minor change required	Delete policy	Main issue topic	Comments
x	✓	x	x	Minor changes recommended to: refer to use of conditions and/or financial bonds to secure decommissioning and restoration; highlight need to address working corridors and access arrangements for future hydro proposals; and encourage consideration of heat networks or other microgeneration and heat recovery technologies.

Policy 8 Sport and Recreation

The Cairngorms National Park offers outstanding opportunities for formal and informal recreation, from sports pitches and sports centres to ski centres, golf courses and mountain bike centres, and a network of paths that links communities to the countryside. There are also many other public and amenity open spaces, ranging from public parks, landscaping schemes within large-scale developments, community sports hubs and formal equipped play areas.

The policy aims to ensure the needs of local communities and visitors for recreational space and facilities are accommodated, and existing facilities protected. This includes informal and formal recreation provision.

The policy was used a total of 29 times, 12 (41.4%) times by the CNPA and 17 (58.6%) times by the LAs. It resulted in a total of 27 (93.1%) applications being approved and 2 (16.9%) refused (Figure 62 and Figure 63).

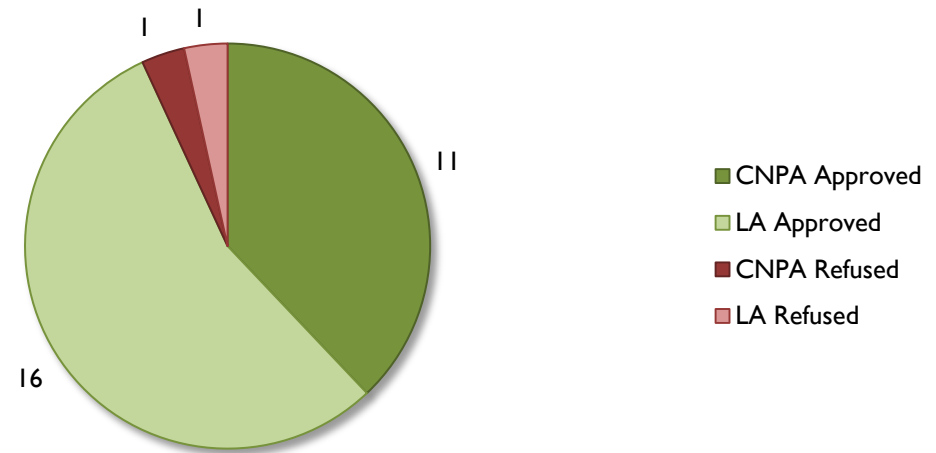


Figure 62 Use of Policy 8 by Planning Authority type.

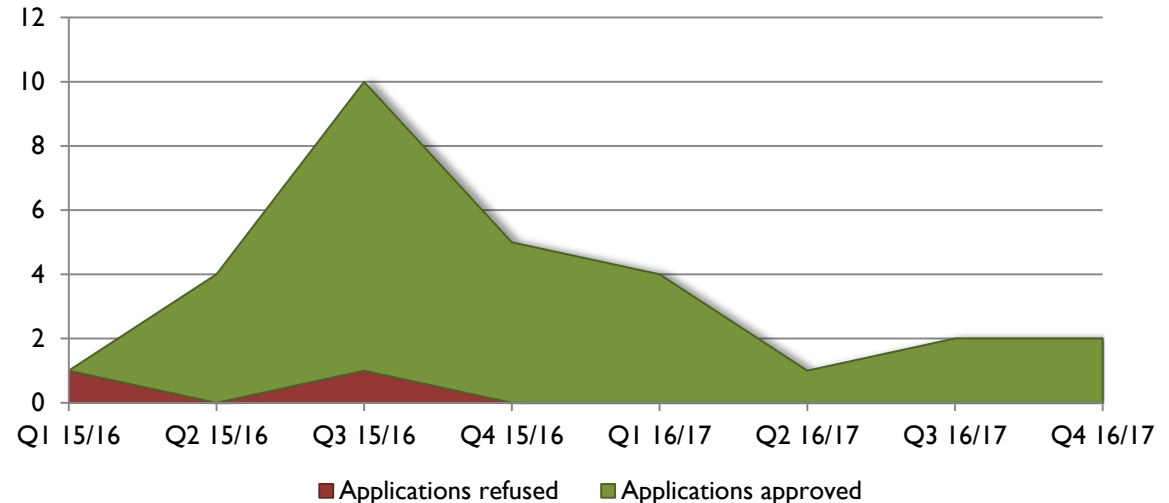


Figure 63 Use of 8 by quarter.

Policy 8 Sport and Recreation

- Approved application
- Refused application

Scale:
1:600,000

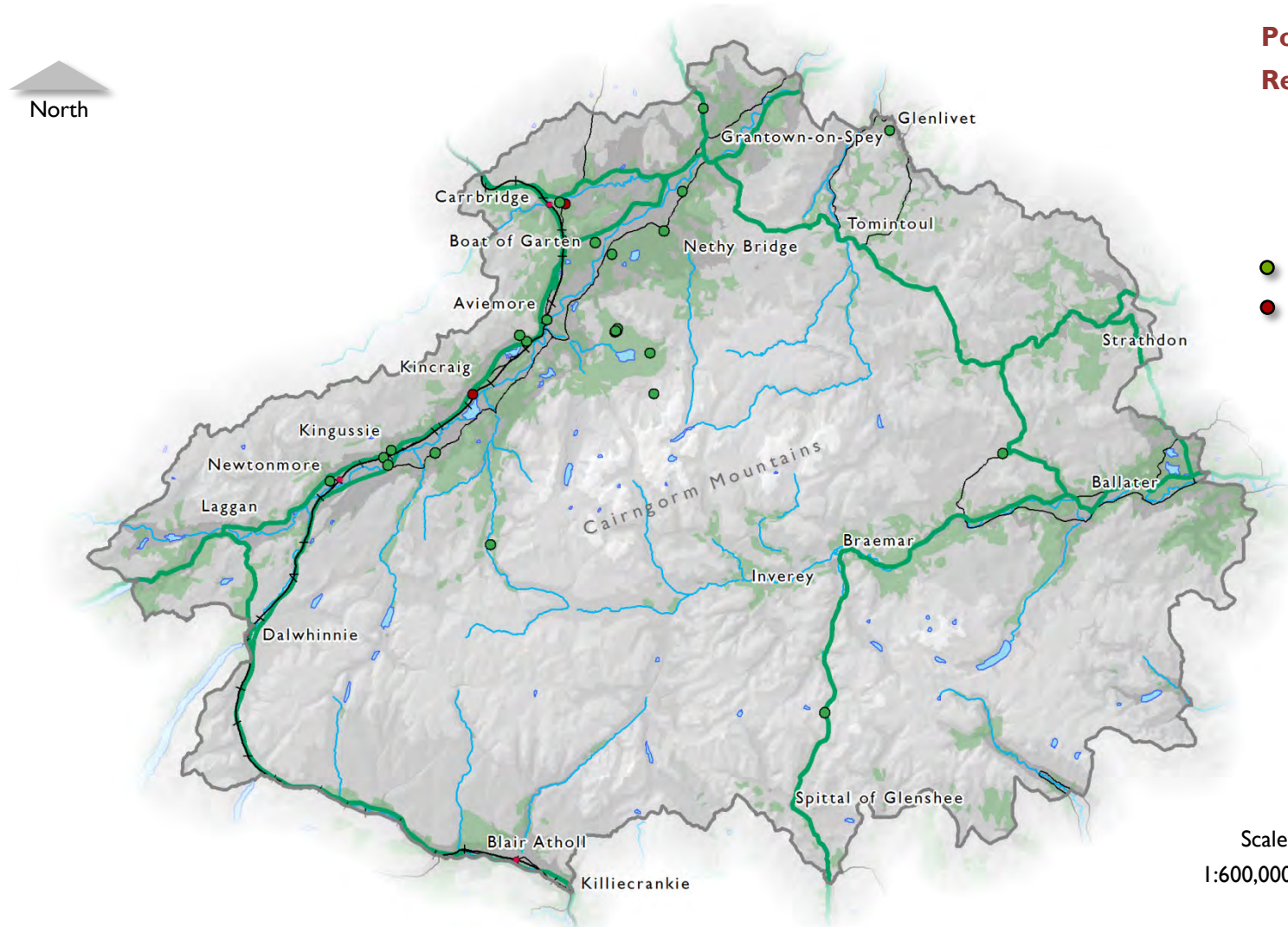


Figure 64 Location of planning applications where 'Policy 8 Sport and Recreation' was used. Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2019. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority.

Policy 8: Sub-policies

The sub-policies sitting under 'Policy 8 Sport and recreation' are:

- 8.1 New development
- 8.2 Re-development
- 8.3 Reduction of facilities

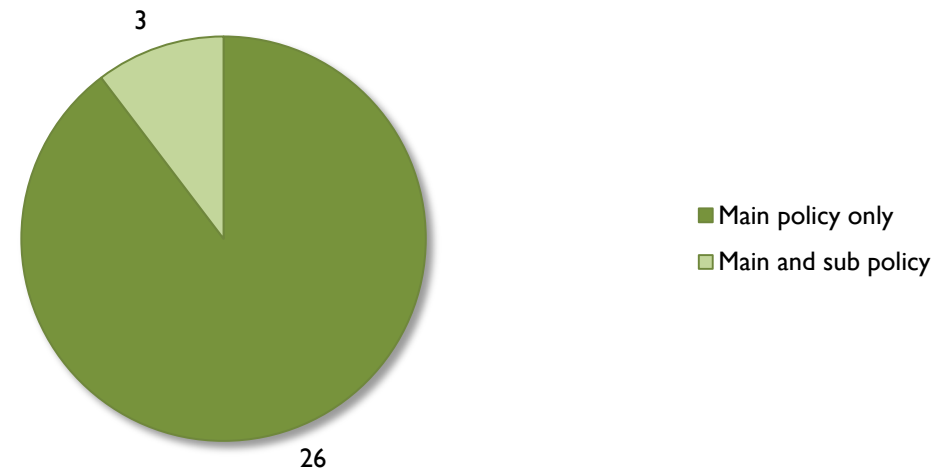


Figure 65 Extent of information recorded by planning authorities on the use of Policy 8 and its sub-policies.

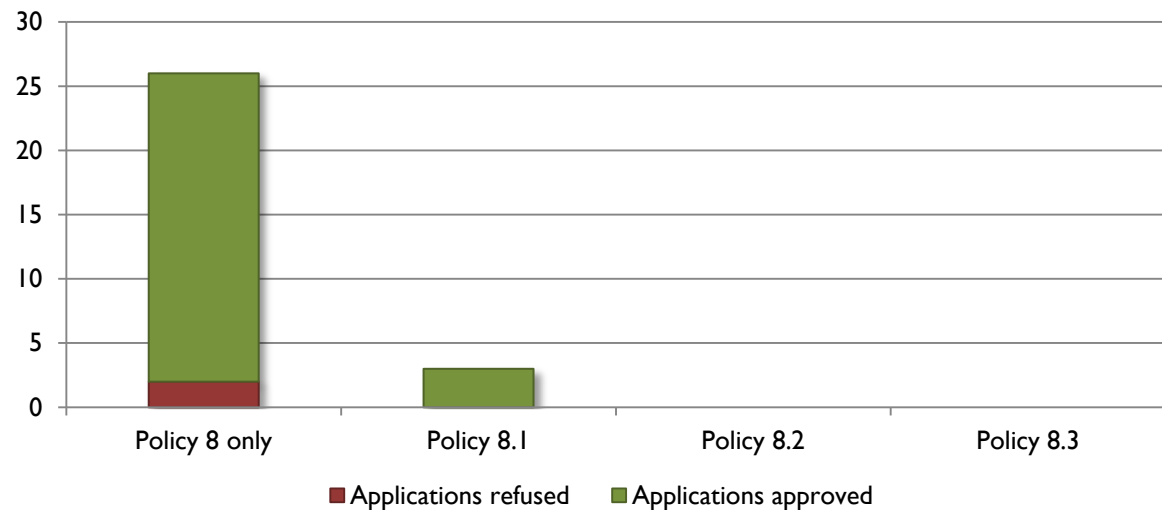


Figure 66 Decisions by Policy 8's sub-policies according to available information.

Have there been any issues with the policy and its sub-policies?

No significant issues with the operation of the policy to date.

Is there a need for change in policy direction as a result of changes to legislation or guidance?

The various sub-sections of policy 8 remain up-to-date and compliant with SPP guidance. No significant change is required in this respect. However, SPP refers specifically to allotments, and there is currently no reference to these in either the policy or supporting text. This omission should be addressed.

Are any other changes required?

The wording of sections 2 (Re-development) and 3 (Reduction of Facilities) is repetitious and potentially confusing. Both sections refer to the protection of existing open spaces and it is not entirely clear how the two sections differ. The policy could be improved by making a clearer distinction between these two sections and clarifying the situations they are intended to apply in.

Section 2 was added to the policy in response to comments from Sport Scotland. They wished to see the protection of existing pitches and sports facilities being addressed separately from the protection of other recreational facilities and open spaces. This approach is consistent with SPP guidance, which addresses the identification and protection of general open space (para. 224) separately from outdoor sports facilities (para 226).

It is therefore recommended that sections 2 and 3 should be retained as separate parts of the policy. However, the title and criteria of section 2 should be amended to clarify that this section applies specifically to pitches and sports facilities, whilst the title and criteria of section 3 should be amended to clarify that this section applies to all other recreational facilities and open spaces. The policy wording and/or supporting text could also clarify that the protection of existing open spaces will be particularly applicable to sites that are identified as open spaces within the settlement maps, as the LDP does not

currently make any explicit link between these designations and the policy itself.

Is there a need for Supplementary Guidance?

Yes. The continued use of supplementary guidance is recommended in order to set out more detailed advice on the application of the policy.

Summary

Significant change required	Minor change required	Delete policy	Main issue topic	Comments
x	✓	x	x	Include reference to allotments in supporting text. Clarify that section 2 refers specifically to pitches and sports facilities, whilst section 3 refers to all other recreational facilities and open spaces. Make specific link between policy and open space designations in settlement maps.

Policy 9 Cultural Heritage

The cultural heritage of the Cairngorms ranges from archaeological remains to internationally significant listed buildings, important architectural and historic townscapes, historic gardens and landscapes, and ancient routes through the Park. All of these provide a clear link to the history of this part of Scotland and the part it played over time to create the Park and communities we know and value today.

The policy aims to conserve and enhance the rich cultural heritage of the Cairngorms National Park. It plays a key role in ensuring all development makes an appropriate contribution to the conservation and enhancement of cultural heritage in the Park.

The policy was used a total of 198 times, 13 (6.6%) times by the CNPA and 185 (93.4%) times by the LAs. It resulted in a total of 192 (97.0%) applications being approved and 6 (3.0%) refused (Figure 67 and Figure 68).

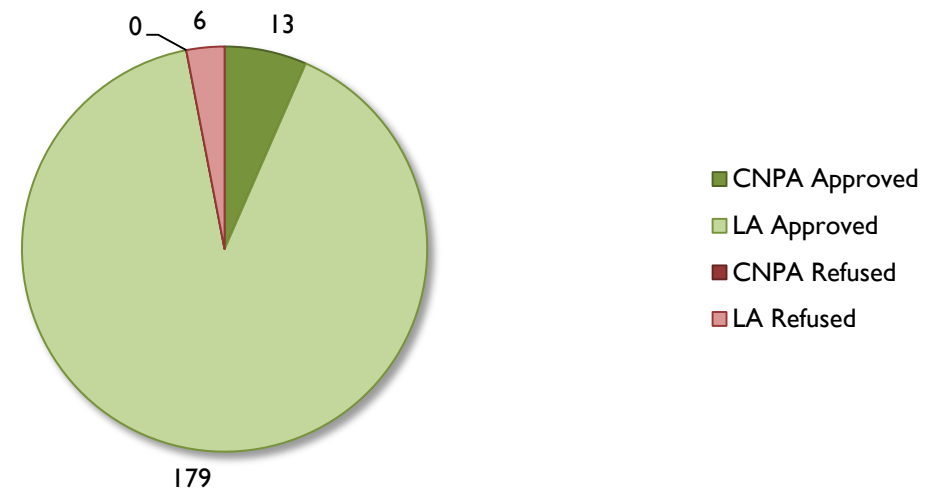


Figure 67 Use of Policy 9 by Planning Authority type.

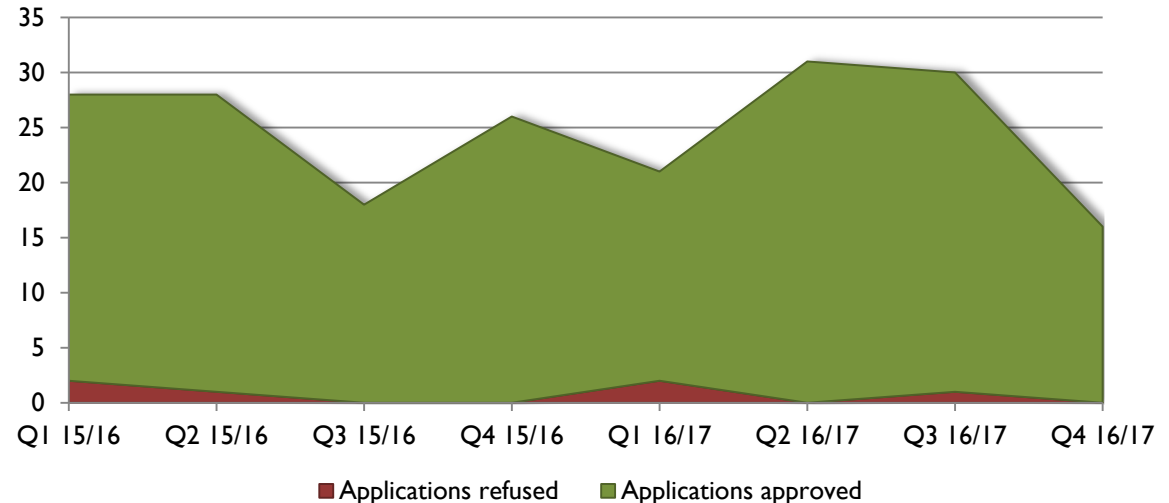


Figure 68 Use of Policy 9 by quarter.

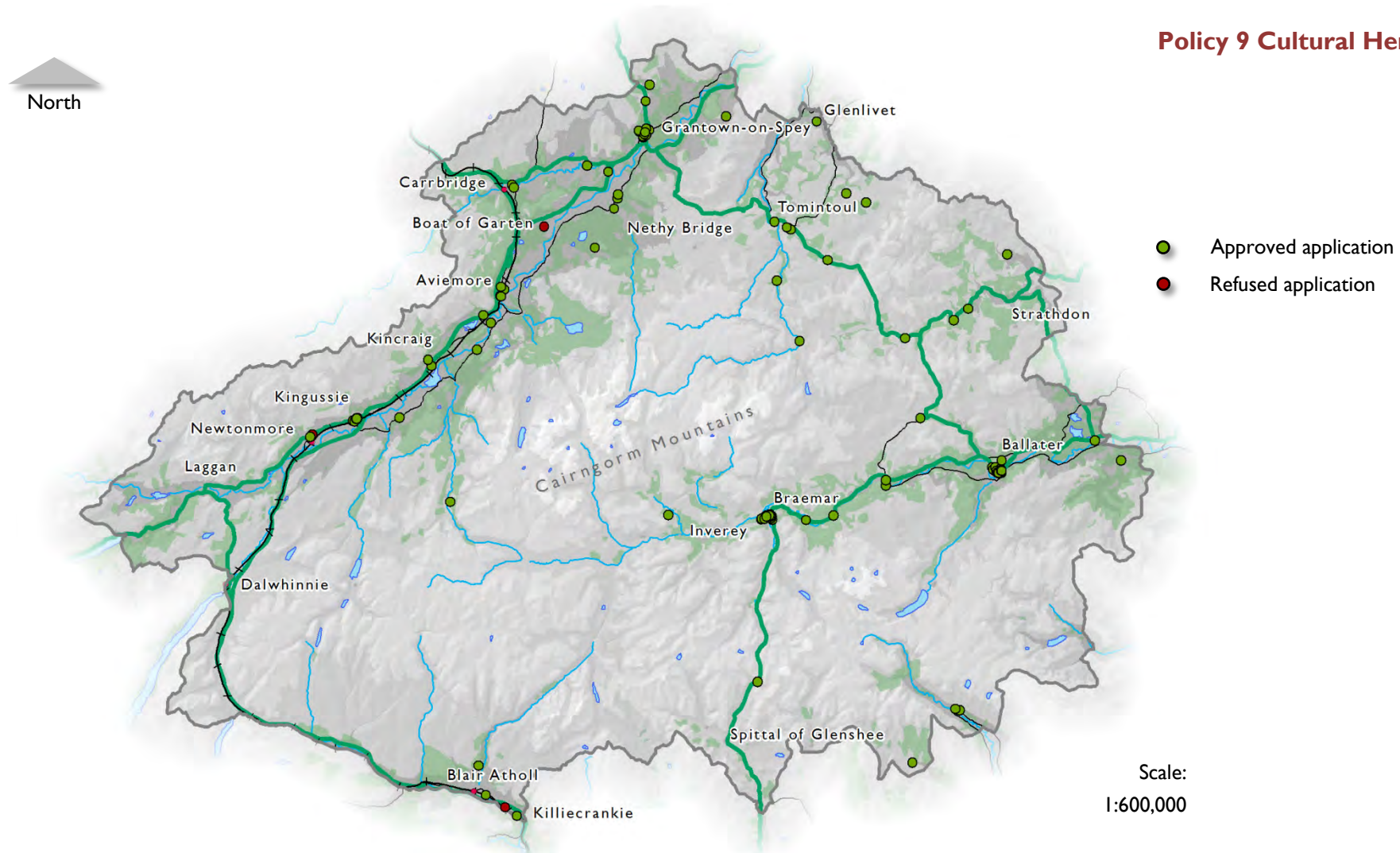
Policy 9 Cultural Heritage

Figure 69 Location of planning applications where 'Policy 9 Cultural Heritage' was used. Reproduced by permission of Ordnance Survey on behalf of HMSO. right 2019. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority.

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Policy 9: Sub-policies

The sub-policies sitting under 'Policy 9 Cultural heritage' are:

- 9.1 National designations
- 9.2 Conservation areas
- 9.3 Other local cultural heritage
- 9.4 Enabling development
- 9.5 Furthering our knowledge
- 9.6 Demolition – removal of asset

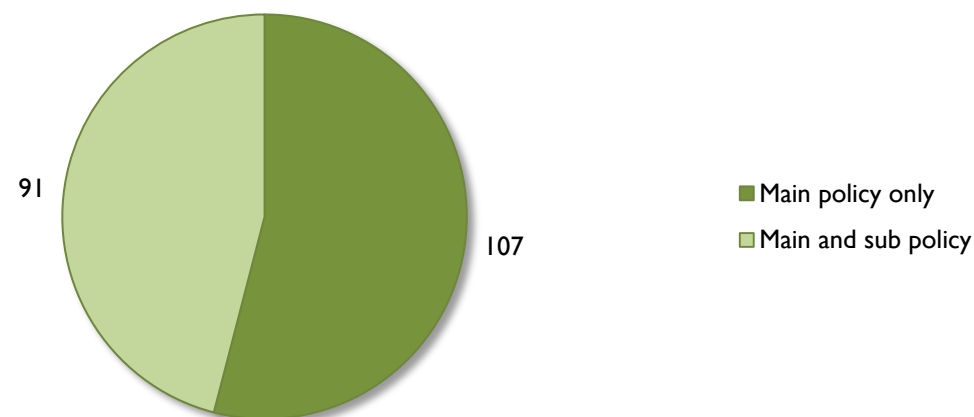


Figure 70 Extent of information recorded by planning authorities on the use of Policy 9 and its sub-policies.

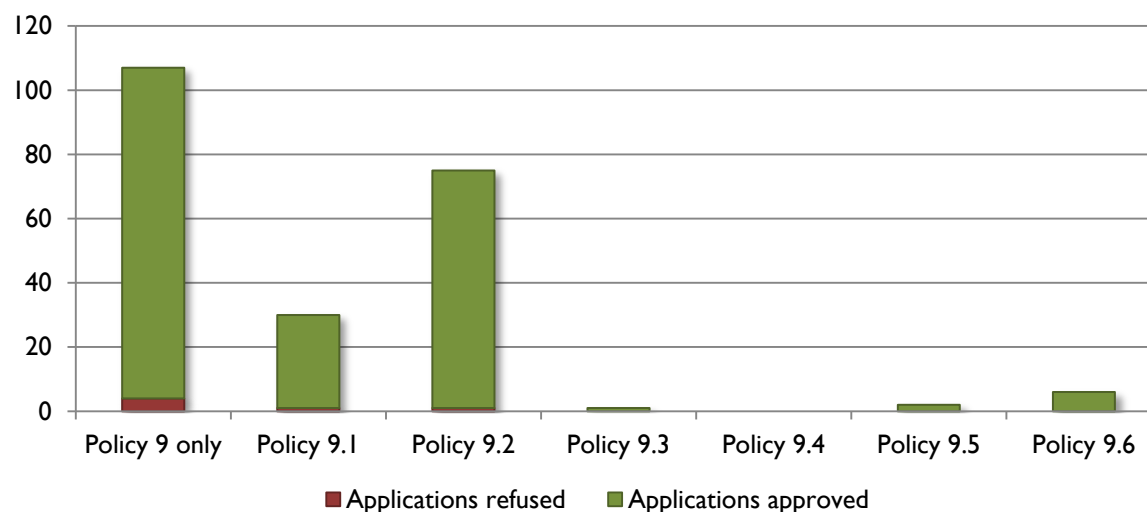


Figure 71 Decisions by Policy 9's sub-policies according to available information.

Have there been any issues with the policy and its sub-policies?

No significant issues with the operation of the policy to date.

Is there a need for change in policy direction as a result of changes to legislation or guidance?

The sub-sections of policy 9 remain up-to-date and compliant with Scottish Planning Policy.

Part 1.1 refers to developments affecting scheduled ancient monuments, listed buildings and inventory gardens, landscapes and battlefields. Scottish Planning Policy and the Historic Environment Policy provide guidance on these elements separately and given the differing policy needs (for example preserving scheduled monuments is generally about minimal intervention to avoid significant changes whereas maintaining buildings can be more extensive). It is considered that it may be more appropriate to separate this part of the policy to have one part covering listed buildings and another for scheduled monuments, battlefields and designed

gardens and landscapes. Listed building consent is the most common type of application assessed by this policy and therefore may benefit from more specific and detailed policy guidance. Listed buildings are also directly linked with 9.4 Enabling development.

It is also considered that there direct reference could be made to Scottish Historic Environment Policy (now replaced by the Historic Environment Scotland Policy Statement 2016).

Are any other changes required?

Part 9.2 Conservation Areas requires development in or affecting a conservation area to 'enhance its character and be consistent with any relevant conservation area appraisal or management plan'. CNPA do not currently carry out conservation area management plans or appraisals and the only one that currently exists is for Blair Atholl (from 2007). It may be appropriate to remove this from the policy and refer to supplementary guidance which could set out more detailed guidance for development in

conservation areas more generally in the National Park.

Part 9.3 covers development affecting 'other local cultural heritage'. Informal feedback has highlighted that this is somewhat vague and it is not clear what 'other local cultural heritage' is. Scottish Planning Policy highlights that there is 'a range of non-designated historic assets and areas of historic interest... which do not have statutory protection' (para. 151). It states that authorities should protect and preserve these as far as possible and in situ. 9.3 could be strengthened to more clearly reflect this and set out what type of assets and designations the policy applies to for example CNPA's historic designed landscape sites.

Canmore sites (a Historic Environment Scotland managed catalogue of archaeological sites, buildings and industry heritage across Scotland) could also be included within part 9.3. These sites do not carry the same weight as national designations but are important cultural heritage assets. Part 9.3 is called other 'local' cultural heritage, however, it is

considered that it would be more appropriate to rename this part 'Other cultural and historic heritage' to cover a wider range of historic, archaeological and cultural assets.

Part 9.4 covers to enabling development which supports development that would not otherwise be permitted to cross fund the restoration of redundant listed buildings. The principles in the policy are compliant with Scottish Planning Policy, however it may be more appropriate to locate this part of the policy under the new 'listed buildings' heading.

Part 9.5 requires developers to provide specialist information and recording where a development affects a cultural heritage asset (most relevant for archaeological assets). This part of the policy is also somewhat vague and it is not clear what is being asked for and in what circumstances. The information required to demonstrate how impacts of development on cultural heritage assets will be minimised should be set out in the relevant part of the policy and / or supplementary guidance. Therefore it is considered that this part of

the policy is removed and incorporated into the relevant part of the policy covering historic / cultural designations.

Part 6.I sets out the circumstances when it may be acceptable for the demolition of a listed building or building within a conservation area. This policy is compliant with Scottish Planning Policy, however the Historic Environment Policy provides further detail on the circumstances when demolition is acceptable. As such, the policy should also include a criterion reflecting HEP's requirement that 'the demolition of the building is essential to delivering significant benefits to economic growth or the wider community' (para. 3.48).

Is there a need for Supplementary Guidance?

Yes. Currently the policy is supported by non-statutory planning guidance, however it is considered that statutory supplementary guidance would be beneficial to further set out more detailed advice on the application of the policy.

Supplementary guidance in this case could be used to provide more guidance on developments involving listed buildings and where development has the potential to impact on them. In addition, it could also contain further detail on cultural / historic designations and conservation areas within the National Park.

Summary

Significant change required	Minor change required	Delete policy	Main issue topic	Comments
x	✓	x	x	Proposed changes include: Separating 9.1 into listed buildings and cultural/ historic designations to provide more specific policy guidance on these respective assets; Amend 9.3 heading to 'other cultural and historic heritage'; include 'enabling development' within the new listed building part of the policy; remove 9.5 and incorporate relevant parts in the cultural/ historic designations section; and include additional requirement in 9.6 for the demolition of listed buildings and buildings within a conservation area to reflect the Historic Environment Policy.

Policy 10 Resources

Reducing our consumption and protecting our limited resources is integral to conserving what is important about the Park, and helping our communities adapt to a lower carbon way of living.

The policy aims to reduce the overall resource use footprint of the National Park, protect resources where appropriate and ensure we use and manage natural resources in an effective way. It will protect what is important about our resources, while facilitating appropriate development in ways which create a net positive outcome. It complements legislative obligations beyond the planning act, and allows sufficient flexibility to adapt to changes and developments in technology and research associated with the protection and exploitation of resources.

The policy was used a total of 136 times, 29 (21.3%) times by the CNPA and 107 (78.7%) times by the LAs. It resulted in a total of 125 (91.9%) applications being approved and 11 (8.1%) refused (Figure 72 and Figure 73).

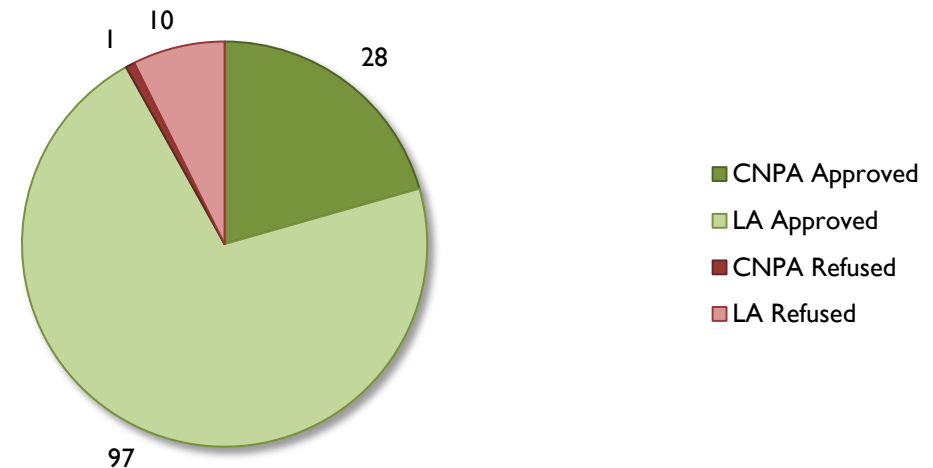


Figure 72 Use of Policy 10 by year.

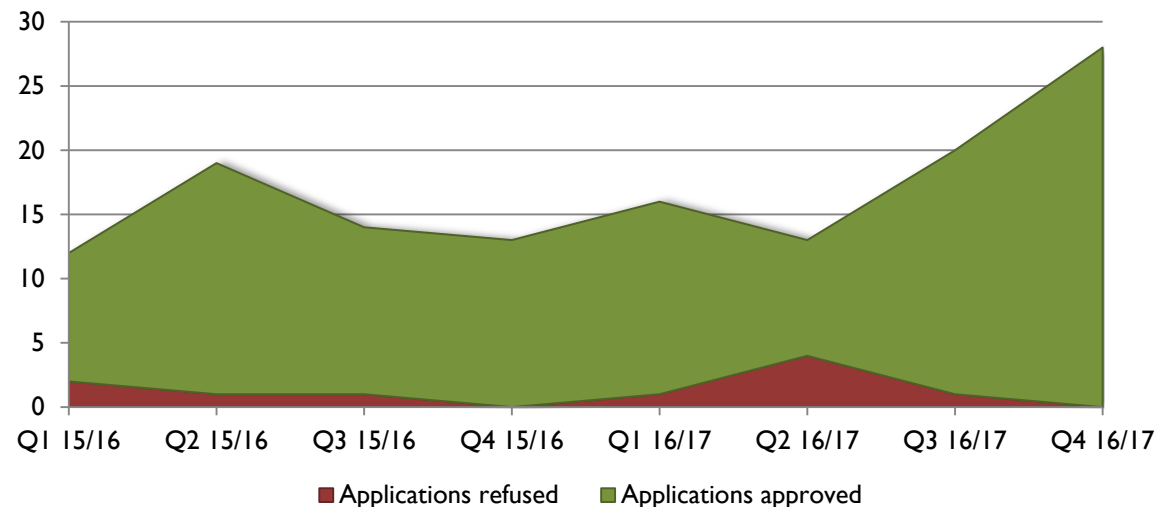


Figure 73 Use of Policy 10 by quarter.

Policy 10 Resources

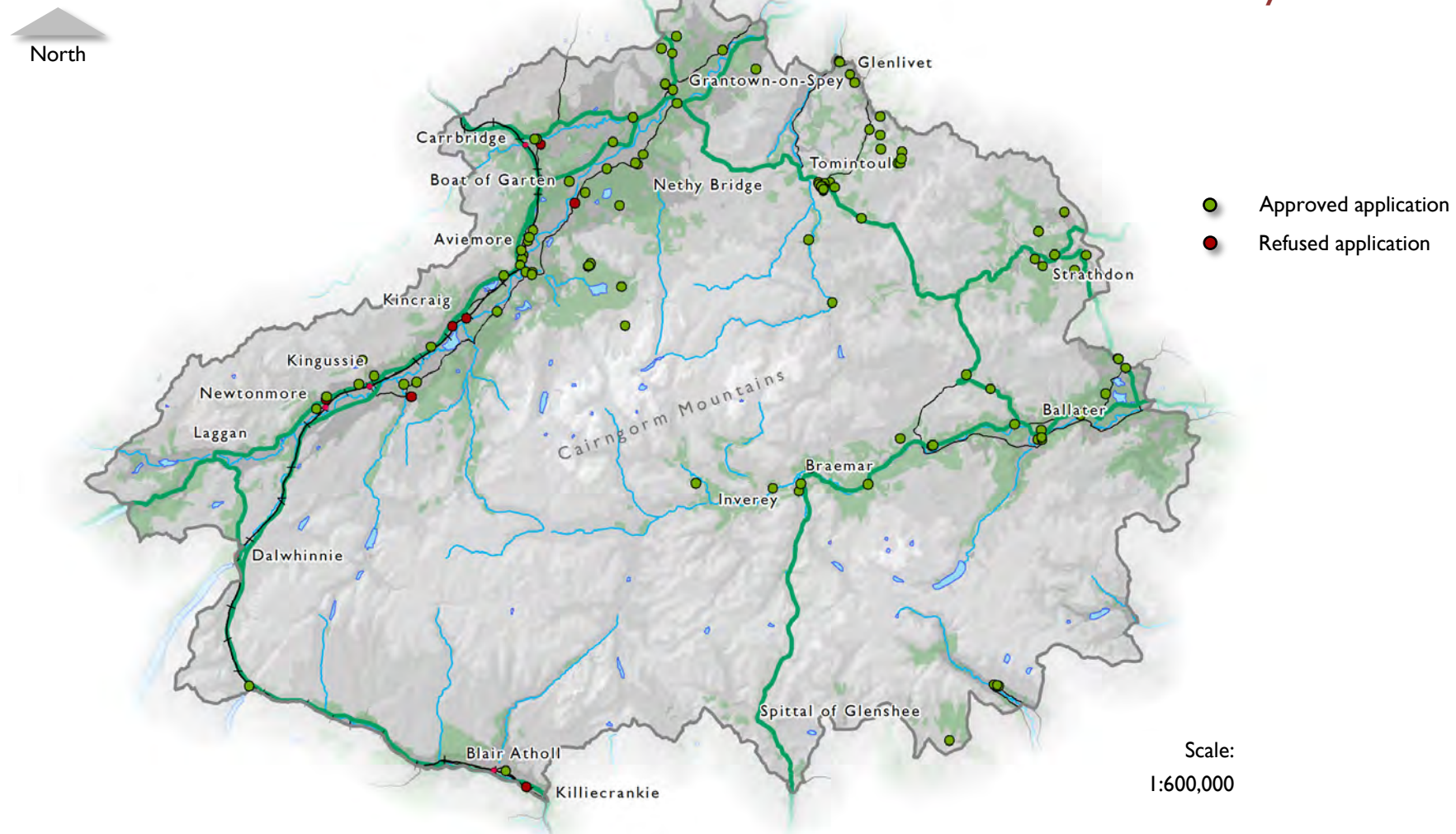


Figure 74 Location of planning applications where 'Policy 10 Resources' was used. Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2019. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority.

Policy 10: Sub-policies

The sub-policies sitting under 'Policy 10 Resources' are:

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

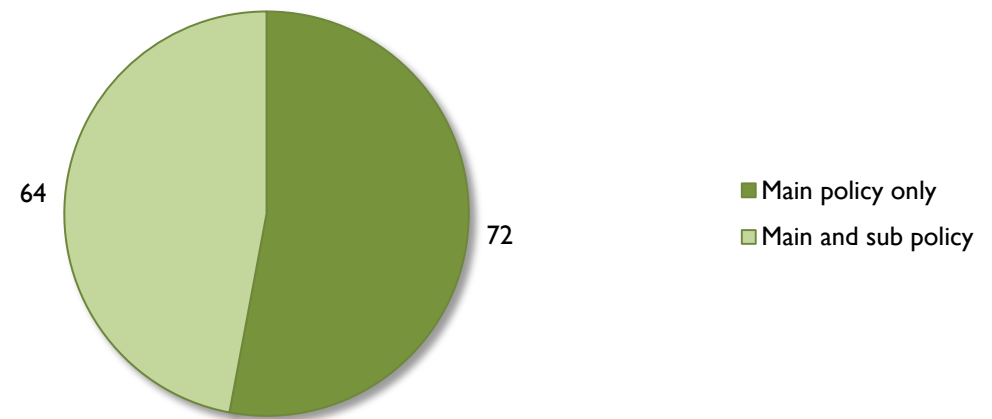


Figure 75 Extent of information recorded by planning authorities on the use of Policy 10 and its sub-policies.

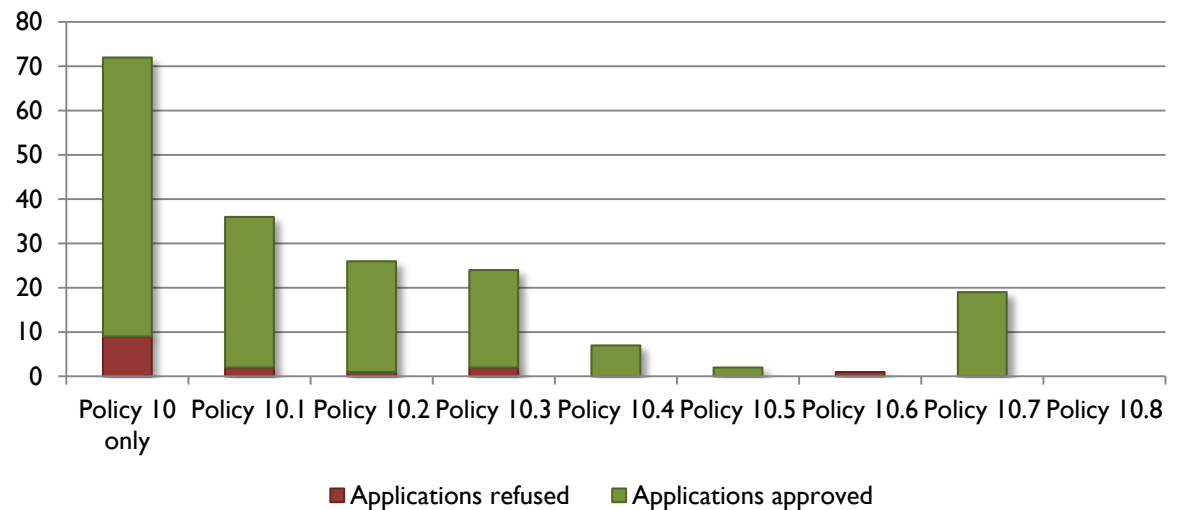


Figure 76 Decisions by Policy 10's sub-policies according to available information.

Have there been any issues with the policy and its sub-policies?

No significant issues with the operation of the policy to date.

Is there a need for change in policy direction as a result of changes to legislation or guidance?

Section 1 of the policy (Water Resources) accords with current legislation and guidance. However, the reference to SUDS Manual C697 should be updated, as this has now been superseded by SUDS Manual C753.

Section 2 (Flooding) continues to accord with the key principles in para. 256 of SPP; that development should not be at significant risk of flooding, should not increase the probability of flooding elsewhere, and should not lead to a piecemeal reduction of the functional floodplain. Para. 263 of SPP sets out a detailed flood risk framework for new development, and whilst this is not included in the policy it is included in the associated planning advice. This enables the policy to be more concise – an approach which is considered to remain

appropriate for the new LDP. However, the policy may need to be amended to reflect both guidance in para. 262 of SPP, which states that LDPs should support measures including natural flood management or green infrastructure creation, and the new National Park Partnership Plan, which seeks to support and further develop the role of natural flood management. It is therefore necessary to consider how the new LDP can best support natural flood management, and it is recommended that this is included as a main issue within the MIR consultation.

Section 4 of the policy (Waste Management and Minimisation) accords with the key principles in para. 176 of SPP. However, it does not contain any specific reference to the waste hierarchy. This omission could be addressed by making a minor change to the final paragraph of this part of the policy - this should make clear that new waste management facilities should reflect the principles of the waste hierarchy as well as contributing towards the delivery of the Zero Waste Plan.

Criterion a) should also be modified to refer to safeguarding *the operation of* existing strategic waste management facilities (as it is important that not only are the sites of these facilities safeguarded, but also that their ongoing waste handling operations are not compromised by allowing sensitive new developments on adjacent/nearby sites – see para. 183 of SPP).

The remaining sections of policy 10 (Connection to Sewerage, Minerals, Carbon Sinks and Stores, Contaminated Land, and Landfill) continue to accord with current legislation and best practice guidance.

Are any other changes required?

No.

Is there a need for Supplementary Guidance?

Yes. The continued use of supplementary guidance is recommended to provide advice on the application of the policy – for example, to set out more detailed matters such as the flood risk framework that will apply to new developments.

Summary

Significant change required	Minor change required	Delete policy	Main issue topic	Comments
✓	✓	x	✓	<p>Minor change to section 1 to update the previous reference to SUDS Manual C697 with the new SUDS Manual C753.</p> <p>Minor changes to section 4 to refer to safeguarding the operation of existing waste management facilities in criterion a), and to make clear within the final paragraph that new waste management facilities should reflect the principles of the waste hierarchy as well as contributing towards the delivery of the Zero Waste Plan.</p> <p>Consideration of how best to support natural flood management will be a main issue for the MIR consultation.</p>

Policy 11 Developer Contributions

New developments can have an impact on facilities, services and infrastructure outside the development site. As they cannot be seen in isolation from the community in which they are sited, it is important that these impacts are addressed as part of the development, so that communities are not disadvantaged as a result.

Developer contributions can help to overcome problems in granting planning permission by reducing, eliminating or compensating for some negative impacts arising from the proposed development.

This policy will ensure the delivery of a wide range of improvements which are needed as a result of new development, while ensuring that contributions are at an appropriate level that maintains viability.

The policy was used a total of 51 times, all by the LAs. It resulted in a total of 47 (92.2%) applications being approved and 4 (7.8%) refused (Figure 77 and Figure 78).

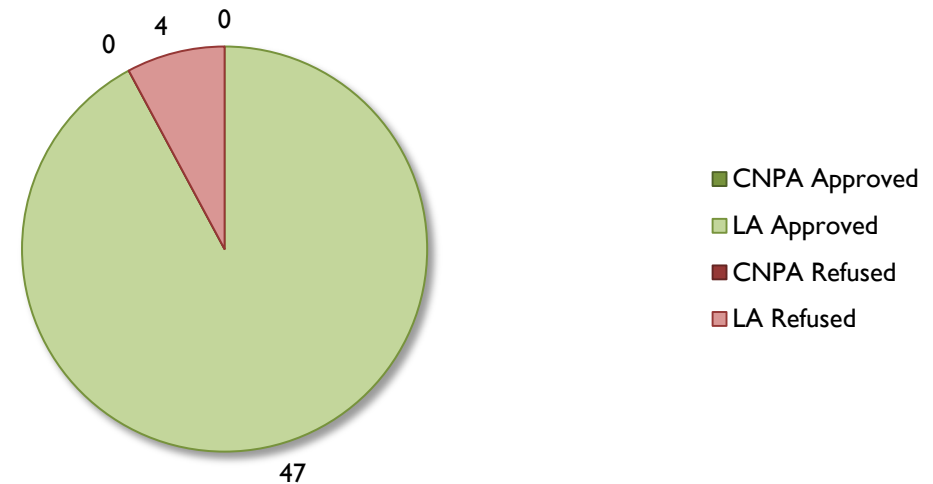


Figure 77 Use of Policy 11 by Planning Authority type.

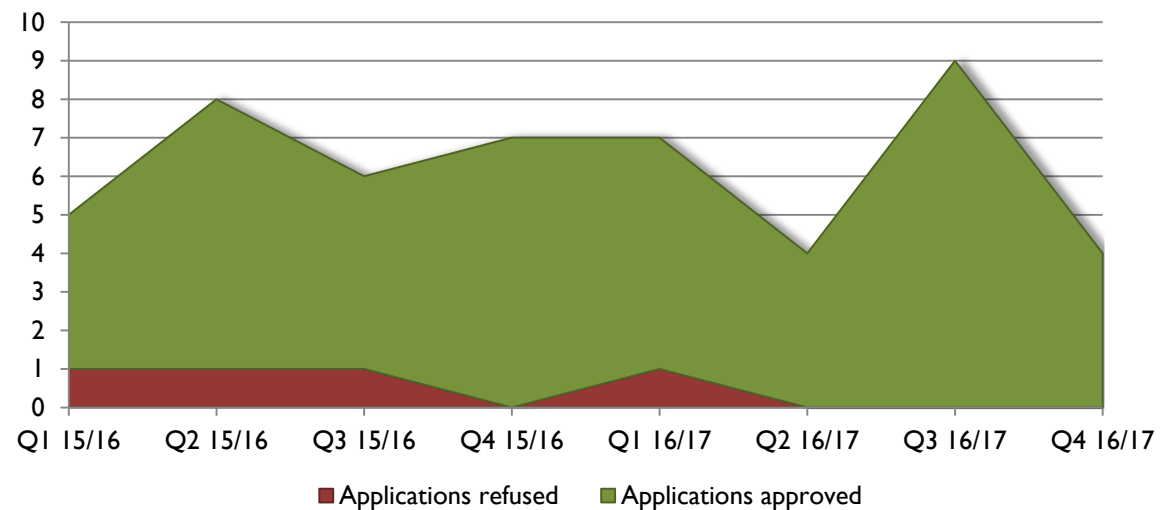


Figure 78 Use of Policy 11 by quarter.

Policy 11 Developer Contributions

- Approved application
- Refused application

Scale:
1:600,000

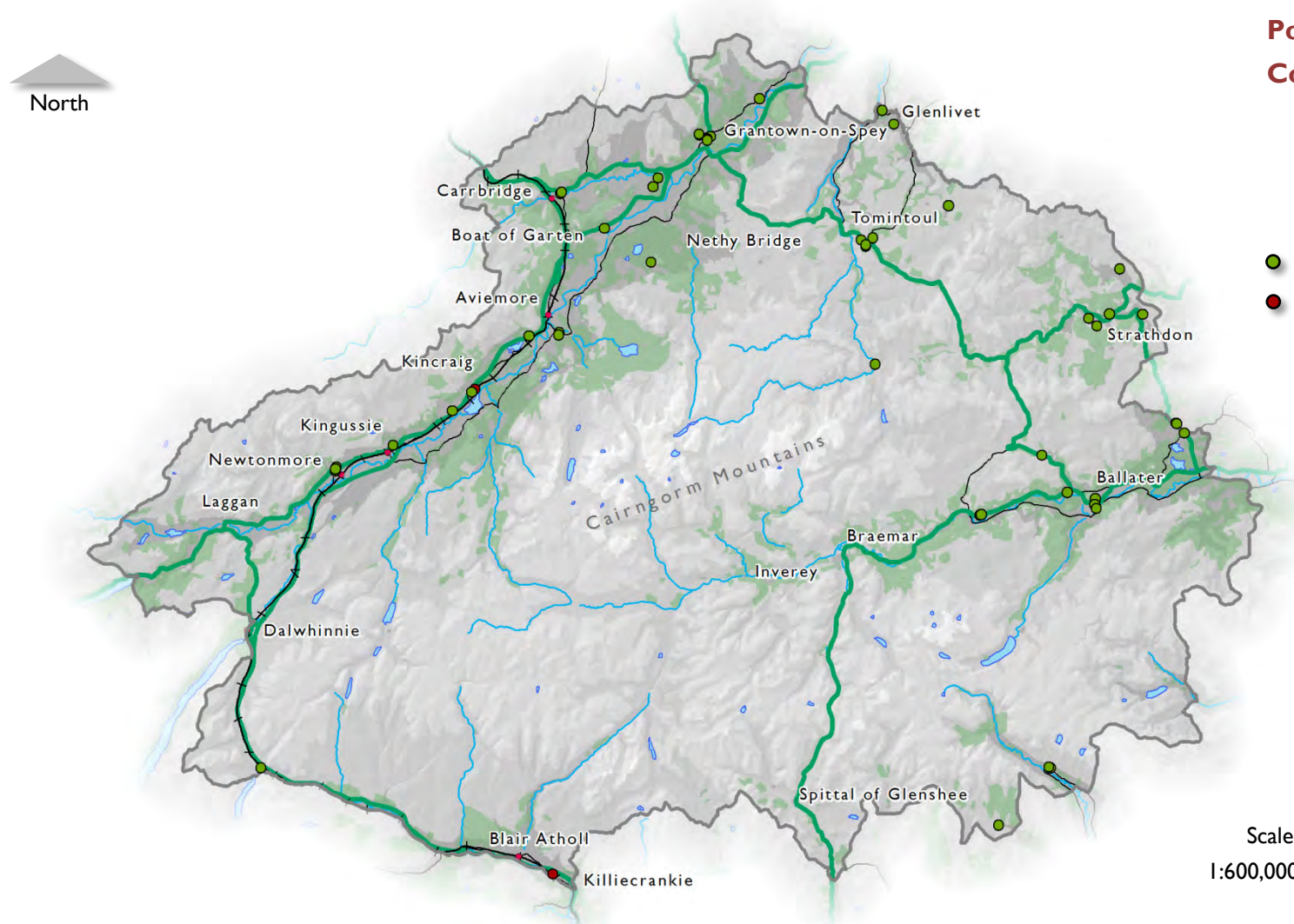


Figure 79 Location of planning applications where 'Policy 11 Developer Contributions' was used. Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2019. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority.

Have there been any issues with the policy and its sub-policies?

The current policy contains a list of developer obligations and refers to the Supplementary Guidance for further detail. However both the policy and supplementary guidance are very general and there is very limited information about the levels of developer contributions required or how they should be calculated. For a number the obligations identified within the policy, contributions cannot be sought as there is no evidence to demonstrate they are needed, the scale of development required to trigger the need for it is very high or it should be addressed through the individual planning application (such as landscaping).

The settlement statements within the Local Development Plan also set out what types of contributions are required within each area. However the same generic list is used for most settlements and again, there is little justification or guidance about what should be sought for that particular location and why it is needed.

Therefore in many cases, it is not appropriate or possible to request developer obligations.

The housing policy sets out the required levels of developer contributions for affordable housing and this however is clear.

Is there a need for change in policy direction as a result of changes to legislation or guidance?

Scottish Planning Policy contains limited guidance on developer obligations but requires development plans to identify contributions for affordable housing and new road infrastructure, services and routes where required. The current policy approach is compliant with this.

However the Development Planning Circular (6/2103) sets out that Local Development Plans must include information on the items for which financial or other contributions will be sought, and the circumstances (locations, types of development) where they will be sought. Whilst the current policy approach sets out what contributions

could be sought, it does not clearly set out the circumstances for doing so.

In addition, Circular 3/2012 *Developer Obligations and good neighbour agreements* requires developer obligations to meet a set of tests - set out in legislation – which include to serve a planning purpose; relate to the proposed development either directly or cumulatively; and fairly and reasonably relate in scale and type to the development.

Whilst the tests are already set out in the current Supplementary Guidance, it is not possible to demonstrate that the obligations within Policy 11 meet all of these criteria and when they are needed.

It is therefore considered that a new policy approach to developer obligations is required to better reflect the requirements set out in the national Circulars and ensure the obligations meet the appropriate tests. The current list of obligations should be reviewed and amended to ensure the need for them can be demonstrated and evidenced. Where it cannot be demonstrated that a particular

contribution is necessary, it should not be included in the policy.

The policy should include a revised overarching policy setting out the overall approach supported by more specific guidance in the plan about what planning obligations will be required in different settlements/locations.

The instances in which planning obligations can be justified will vary across the National Park. Settlement statements should be used to clearly set out the obligations required on a settlement basis for example if a local school is reaching or over capacity, an education contribution will be required and this can be highlighted in the settlement statement. Conversely, if a school is well below capacity, it is unlikely that developer contributions would be required and therefore would not be included. This approach will help to give a clear and more accurate picture of the likely required obligations for each settlement and give greater certainty to developers.

In addition, current good practice makes clear that it is only reasonable to require planning obligations towards particular items where there is a clear strategy and programme for delivering these items. It would therefore not be appropriate, for example, to require developers to make a financial contribution towards new community facilities where there are no firm proposals for what such facilities might be or when and how they will be delivered.

The National Park Authority is not an infrastructure or service provider and therefore working with the respective local authorities, infrastructure providers and other key stakeholders will be fundamental in establishing infrastructure needs and proportionate levels of developer contributions in different circumstances. For some items/obligations, it may be necessary to refer directly to the relevant authority's calculations as they will be providing the service, such as education.

Are any other changes required?

No.

Is there a need for Supplementary Guidance?

Yes. Circular 3/2012 states that the broad principles - including what developer obligations are required for - should be set out in the Local Development Plan Policy and the methods of calculation and levels of contribution should be set out in Supplementary Guidance. Supplementary guidance will be required to be amended to more accurately and appropriately set out the levels of contributions required in which circumstances.

Summary

Significant change required	Minor change required	Delete policy	Main Issue topic	Comments
✓	✗	✗	✓	Proposed changes include: including a over-arching new policy approach which sets out more detailed and upfront information in respect of developer contributions; reviewing and amending the current types of obligations set out in the policy; including the tests of developer obligations within the policy supporting text; setting out settlement specific contributions within settlement statements; and revising the supplementary guidance to include more detailed levels of contributions required.

Section 3: Allocated Sites

The following section provides a monitoring updates on sites currently allocated in LDP I. A simple traffic-light system (green, amber, red) has been used to show the National Park Authority's view on the status of all sites based on an annual monitoring framework that informs its Action Programme.

Assessment Criteria:

	No significant infrastructure constraints affecting delivery of the site.
	Moderate constraints or further assessment required to determine the extent of constraint. Appropriate mitigation measures required.
	Significant infrastructure or other constraints that may render the development undeliverable.

The section outlines progress and identifies constraints or barriers to development of land and sites for housing, employment and community or other


uses. This includes current allocations (identified as 'H' sites) as well as existing permissions (identified as 'EP' sites). Some sites have planning permission that was granted over 3 years ago, however in many cases these have been implemented through the starting of construction or servicing of sites.

Each site has also been assessed in respect of flooding, roads, water & drainage, electricity and education under the infrastructure requirements heading. These have been informed through consultation with the relevant authorities.



All sites, particularly those sites that fall within the amber and red categories, will continue to be monitored.

It is important to note that this information is primarily based on the most recent Action Programme, published August 2017. The Action Programme can be accessed using the following link: <http://cairngorms.co.uk/wp-content/uploads/2017/07/170704-Action-Programme-Final2.pdf>



Housing Land Aberdeenshire

ABERDEENSHIRE	Site details	Infrastructure requirements/ deliverability	Actions /deliverables	Timescales	Progress update
BALLATER					
HI Monaltrie Park					
 <p>1:10,000</p>	<p>Allocated for 50 residential units. Forms part of larger site with overall capacity for 250 units. Masterplan required for whole site.</p> <p>Owner / developer: Invercauld Estates</p> <p>Planning status: No current planning permission.</p>	<ul style="list-style-type: none"> Flood risk assessment required (FRA); Two access roads and footpath connections required; 	<ul style="list-style-type: none"> Preparation of a masterplan for the site is underway 	<p>Delivery from 2018</p>	<p>Pre-application discussions underway with relevant authorities</p> <ul style="list-style-type: none"> There is housebuilder interest in developing the site A Flood Assessment (FRA) is being commissioned and will inform the Masterplan for the site.



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ABERDEENSHIRE	Site details	Infrastructure requirements/ deliverability	Actions /deliverables	Timescales	Progress update
BRAEMAR					
HI Chapel Brae					
 <p>1:5000</p>	<p>Allocated for 6 residential units.</p> <p>Owner / developer: Mar Estate</p> <p>Planning Status: No current permissions.</p>	<p>No significant infrastructure constraints.</p> <p>Small risk of surface water flooding adjacent to site.</p>			Owner is currently exploring options for the site.
EP2/3 St Andrews Terrace and Kindrochit Court					
 <p>1:6,000</p>	<p>Sites have consent for a total of 41 residential units: EP2 (30 units) and EP3 (11 units).</p> <p>Owner / developer: Gordon Land Ltd</p> <p>Planning Status: Full planning permission for sites approved April 2014 (07/219/CP and 07/223/CP).</p>	<p>EP2</p> <ul style="list-style-type: none"> • WWTW (Waste water treatment works) will require expansion to accommodate development • Overhead line to be diverted / underground • Road improvements will be required outwith the site to 	<p>Permission now implemented.</p>	2017	Site works underway.

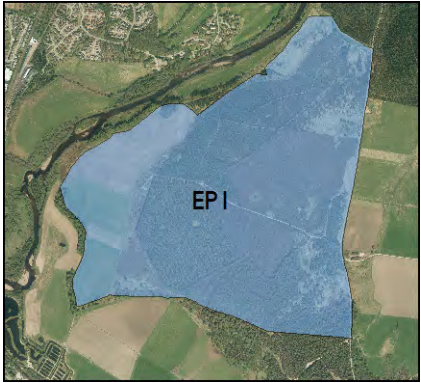
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ABERDEENSHIRE	Site details	Infrastructure requirements/ deliverability	Actions /deliverables	Timescales	Progress update
		<p>provide adequate access.</p> <p>EP3</p> <ul style="list-style-type: none"> • WWTW will require expansion to accommodate development. • Minimum junction visibility standards are required for the site and roads construction consent required. 			
EP4 Invercauld Farm					
	<p>Existing consent for 4 remaining residential units (part of a larger 13 unit development).</p> <p>Owner: Invercauld Estates</p> <p>Planning Status: Full permission approved November 2007 (05/168/CP) which has been implemented through the construction of a part of the site.</p>	<p>No significant constraints / infrastructure requirements.</p>			<p>Site is substantially completed with 4 units remaining to be developed.</p>


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ABERDEENSHIRE	Site details	Infrastructure requirements/ deliverability	Actions /deliverables	Timescale s	Progress update
DINNET					
H1: Land to the West and H2: Land to the East					
 <p>I:4,000</p>	<p>H1 is allocated for 4 residential units.</p> <p>Owner / developer: Dinnet and Kinnord Estates</p> <p>Planning Status: No current permissions.</p>	<ul style="list-style-type: none"> Part of site lies within medium likelihood of fluvial flooding and will require FRA. WWTW upgrade may be required. Footpath, street lighting and speed limit should be extended to site. 			Owner is currently exploring options for the site.
 <p>I:7,000</p>	<p>H2 is allocated for 15 residential units.</p> <p>Owner / developer: Dinnet and Kinnord Estates</p> <p>Planning Status: No current permissions.</p>	<ul style="list-style-type: none"> Site adjacent to area of medium likelihood of fluvial flooding and will require FRA. WWTW upgrade may be required. Footpath, street lighting and speed limit should be extended to site. Transformer capacity to be determined and overhead lines would need to be diverted or undergrounded. 			Owner is currently exploring options for the site.
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Highland

HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
AN CAMAS MOR					
 <p>1:35,000</p>	<p>Existing consent for development of a new community (1500 houses; associated business, community facilities and provision of infrastructure).</p> <p>Owner / developer: An Camas Mor LLP</p> <p>Planning status: Planning Permission in principle (09/155/CP, expires March 2017). Further submission required prior to expiry.</p>	<ul style="list-style-type: none"> • Growth project for WWTW required. • Feasibility study required for phasing of development for most appropriate electricity connection options. • Education requirements to be assessed. 	<p>CNPA currently considering S42 planning application for amendment to condition I and issue of a new consent with revised periods for implementation.</p>	<p>2017 for determination of planning application</p>	<p>Planning permission pending.</p>

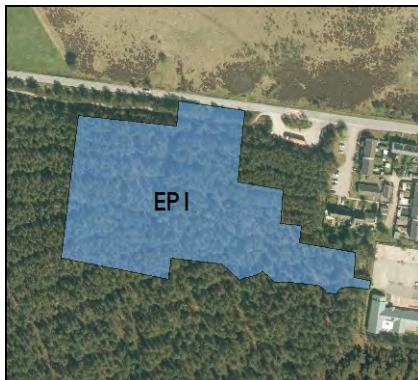

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HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
AVIEMORE					
EPI Horsefield – Aviemore Highland Resort					
 <p>1:10,000</p>	<p>Site has planning permission for 140 residential units. It forms part of the wider Aviemore Highland Resort site and will be included within the masterplan for the Resort.</p> <p>Owner/developer: McDonald Hotels</p> <p>Planning Status: Full permission approved March 2008 (05/306/CP) which has been implemented through the construction of part of the site.</p>	<p>Site has been partially constructed. No significant infrastructure constraints.</p>	<p>Preparation of a development brief for the wider Aviemore Highland Resort Site is being progressed which incorporates EPI.</p>	<p>Consultation on draft development brief in 2017 and adoption in 2018.</p>	<p>A small section of affordable housing is complete.</p>

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HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
AVIEMORE					
EP2 / EP3: Dalfaber					
 <p>1:14,000</p>	<p>Sites have capacity for 114 residential units (previously allocated) and consent for 93 units.</p> <p>Owner / developer: Reidhaven and Seafeld Estates</p> <p>Planning Status: Planning permission granted at appeal in March 2016.</p>	<p>No significant infrastructure constraints.</p>	<p>Further details of design to be submitted for approval for consents to be implemented.</p>	<p>2017/18</p>	<p>Owner progressing site.</p>

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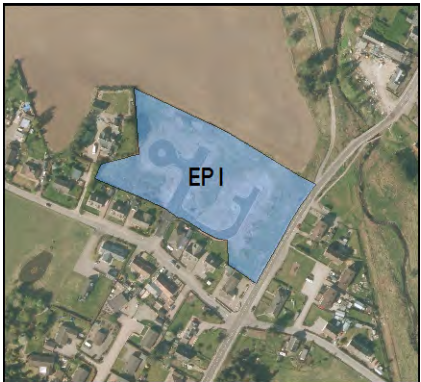

HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
BOAT OF GARTEN					
EPI: West of Boat of Garten					
 <p>1:6,000</p>	<p>Site has consent for 32 residential units.</p> <p>Owner / developer: Davall Developments Ltd</p> <p>Planning Status: Full permission approved October 2014 (2013/0115/DET).</p>	Under construction			
CARR-BRIDGE					
HI: Carr Road					
 <p>1:10,000</p>	<p>Site is allocated for 72 residential units.</p> <p>Owner / developer: Tulloch Homes</p> <p>Planning Status: No current permission.</p>	<ul style="list-style-type: none">• Feasibility of public sewer connection to be established.• Transport statement required to detail accessibility for all modes of transport.• Upgrading of electricity supply may be required.	Submission of planning application to progress the site.	Unknown	Development Brief approved by Committee in May 2017 and has now been published.

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HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
H2: Crannich Park					
 <p>1:6,000</p>	<p>Site is allocated for 22 residential units.</p> <p>Owner / developer: Tulloch Homes / Highland Council</p> <p>Planning Status: No current permission.</p>	<p>Potential constraints in respect of:</p> <ul style="list-style-type: none"> Groundwater and drainage <p>No significant infrastructure constraints.</p>	<p>Submission of planning application.</p>	<p>2017</p>	<p>Planning application is being progressed by Highland Council which will include open market and affordable homes (approximately half of each).</p>


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HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
CROMDALE					
EPI: Auchroisk Park					
 <p style="text-align: right;">1:7,000</p>	<p>Site has consent for 22 plots dating back from 1998.</p> <p>Owner / developer: Site is subdivided for self-build plots.</p> <p>Planning Status: Permission granted in 1998 (BS/97/224) which has been implemented through individual detailed planning applications and completion of 2 units.</p>	<p>Potential constraints in respect of:</p> <ul style="list-style-type: none"> • Marketability <p>No significant infrastructure constraints.</p>	Marketing sites	2017 - ongoing	2 units completed. The remaining plots are currently being marketed.
HI: Kirk Road					
 <p style="text-align: right;">1:6000</p>	<p>Site allocated for 20 residential units.</p> <p>Owner / developer: George McConachie</p> <p>Planning Status: No current permission.</p>	<p>Potential constraints in respect of:</p> <ul style="list-style-type: none"> • Traffic impact on Kirk Road / A95 junction. <p>No significant infrastructure constraints.</p>			Owner currently exploring options for the site.



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HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
DALWHINNIE					
HI: Opposite Community Hall					
 <p>1:5,000</p>	<p>Site allocated for 6 units.</p> <p>Owner / developer: Unknown</p> <p>Planning Status: No current permission.</p>	<p>Potential constraints in respect of:</p> <ul style="list-style-type: none"> • Marketability <p>Site lies within the medium likelihood fluvial flood extent. Site unlikely to be suitable for development.</p>			No current progress.



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HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
H2: Land by Garage					
 <p>1:5,000</p>	<p>Allocated for 6 units.</p> <p>Owner / developer: Unknown</p> <p>Planning Status: No current permission.</p>	<p>Potential constraints in respect of:</p> <ul style="list-style-type: none"> • Marketability <p>Site close to medium likelihood flood extent and FRA required. Overhead line required to be diverted / undergrounded.</p>			No current progress.



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HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
DULNAIN BRIDGE					
HI: West of play area					
 <p>1:6,000</p>	<p>Allocated for 30 residential units.</p> <p>Owner / developer: Reidhaven and Seafeld Estates</p> <p>Planning Status: No current permission.</p>	<ul style="list-style-type: none"> • WWT capacity under review and may need to be increased. • Junction improvements required at School Road /Fraser Road and pedestrian and cycle links. • Overhead lines traversing the site will require diverting or undergrounding. 	Submission of planning application	2017/18	A Development Brief for the site was approved in 2015. Planning application process expected to commence.
EPI: Adjacent to A938					
 <p>1:6,000</p>	<p>Site has consent for the formation of an access road and sewage pumping station and subdivision of land to form 10 house plots.</p> <p>Owner / developer: Muckrach Estate / Savills</p> <p>Planning Status: Full permission (04/00118/FULBS) approved 2010.</p>	No significant infrastructure constraints. There is a drain within the site boundary and further flood risk information may be required for any amendments to the planning permission.	Marketing of site	2017	The bellmouth junction with the A938 has been constructed.

HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
GRANTOWN-ON-SPEY					
HI: Beachen Court					
 1:10,000	<p>Site allocated for 50 units. Two separate applications pending for 43 units and 10 affordable units.</p> <p>Owner / developer: Reidhaven Estates and Highland Council.</p> <p>Planning Status: Planning permission approved in October 2016 (2015/0394/DET and 2016/0060/DET).</p>	Under construction			
EPI: Strathspey Hotel					
 1:2,500	<p>Site has consent to convert the existing hotel into 3 residential units and 4 flats on land to the rear of the hotel.</p> <p>Owner / developer: Tyree Investments Ltd</p> <p>Planning Status: Full permission approved in January and February 2016 (15/02983/FUL and 15/02789/FUL).</p>	No significant infrastructure constraints.	Obtain Building Warrant Construction start date	Complete Summer 2016	The land to the rear of the former hotel will be developed first, with an aim to start in Summer 2017.
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HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
H2: Castle Road					
 1:8,000	<p>Site is allocated for 20 residential units.</p> <p>Owner / developer: Reidhaven Estates</p> <p>Planning Status: No current permission.</p>	<ul style="list-style-type: none"> Roads to be designed to adoptable standard with appropriate access visibility. Overhead low voltage network crossing on the site which requires to be addressed. 	Proposed delivery of site	2017-2020	Site owner is currently focusing on the delivery of site H1 in Grantown before progressing H2.
KINCRAIG					
H1: Opposite School					
 1:10,000	<p>Site is allocated for 40 residential units.</p> <p>Owner: Alvie & Dalraddy Estates</p> <p>Planning Status: No current permission.</p>	<ul style="list-style-type: none"> Some surface water flood extent and small watercourse on the site. Overhead lines may need to be diverted / undergrounded. 			A Development Brief for the site was approved in 2015.

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HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
KINGUSSIE					
EPI: Land between Ardbroilach Road and Craig an Darach					
 <p>1:20,000</p>	<p>Site has consent for 300 units, economic development uses; community uses including infrastructure, landscaping etc.</p> <p>Owner: Davall Developments Ltd</p> <p>Planning Status: Planning permission granted (2015/0316/DET and 2015/0317/DET).</p>	<p>No significant infrastructure constraints.</p> <p>Overhead network crossing the site requires to be diverted or undergrounded.</p>	<p>Planning permission granted.</p>	<p>2017</p>	<p>Suspensive conditions to be discharged.</p>
EP2: St Vincent's Terrace					
 <p>1:5,000</p>	<p>Site has consent for 4 residential units.</p> <p>Owner / developer: Allan Munro Construction Ltd</p> <p>Planning Status: Permission approved at appeal for plot layout in 2009 (08/184/CP). Full permission for individual plots approved 2014.</p>	<p>No significant constraints.</p>	<p>Planning conditions of individual plots to be discharged.</p> <p>Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2019. All rights reserved. Ordnance Survey Licence number: 100040965 Cairngorms National Park Authority. © Getmapping</p>	<p>2017</p>	<p>Conditions to be discharged.</p>

HIGHLAND	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescale	Progress update
NETHYBRIDGE					
HI: Craigmore Road					
 <p>1:6,000</p>	<p>Site allocated for 15 residential units.</p> <p>Owner: Tulloch Homes</p> <p>Planning Status: No current permission.</p>	<p>Potential constraints in respect of:</p> <ul style="list-style-type: none"> • Natural heritage • Small watercourse adjacent to site and further flood risk information will be required • Overhead network crossing the site will require diverting or undergrounding. 			No progress.
NEWTONMORE					
HI: Land between Perth Road and Station Road					
 <p>1:15,000</p>	<p>Site allocated for 120 residential units.</p> <p>Owner: Tulloch Homes</p> <p>Planning Status: Full permission for 81 units approved in 2009 (07/230/CP). A Development Brief for the site has been approved (2015).</p>	<p>Under construction</p> <p>Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2019 All rights reserved Ordnance Survey Licence number</p>			

Moray


MORAY	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescales	Progress update
TOMINTOUL					
H1: Land to North East					
 <p>1:6,000</p>	<p>Site allocated for 8 residential units.</p> <p>Owner / developer: The Crown Estate</p> <p>Planning status: No current permission.</p>	<p>Potential constraints in respect of:</p> <ul style="list-style-type: none"> • Marketability <p>No significant infrastructure constraints.</p>			No progress.
H2: Lecht Drive					
 <p>1:6,000</p>	<p>Site allocated for 8 residential units.</p> <p>Owner / developer: The Crown Estate</p> <p>Planning status: No current permission.</p>	<p>Potential constraints in respect of:</p> <ul style="list-style-type: none"> • Marketability <p>No significant infrastructure constraints.</p>			No progress.

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MORAY	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescales	Progress update
EP2: 57 Main Street					
	<p>Site has consent for 8 residential units.</p> <p>Owner / developer: William Lippe Architects</p> <p>Planning Status: Full permission approved March 2008 (07/418/CP).</p>	Under construction			

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Perth and Kinross

PERTH & KINROSS	Site details	Infrastructure requirements/ site constraints	Actions /deliverables	Timescales	Progress update
KILLIECRANKIE					
EPI: Railway Yard					
 <p>1:3,000</p>	<p>Site has consent for 6 residential units.</p> <p>Owner / agent: Discovery Homes</p> <p>Planning Status: Full permission approved 2010 (07/02013/FLL) and building warrant approved January 2015.</p>	<p>No significant infrastructure constraints.</p>	<p>Development of site</p>	<p>Early 2018</p>	<p>Current issues with drainage layout which are being progressed with Scottish Water.</p>

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Housing Sites Within LDP I That Have Been Delivered

Settlement	LDP ref	Site name	Update
Ballater	H2	Sir Patrick Geddes Way	Development complete.
Braemar	EPI	Balnellan Road	Development complete.
Aviemore	EP4	Grampian Road	Development complete.
	EP5	High Burnside	Development complete.
	EP6	Milton Place	Development complete.
	EP7	Granish Way	Development complete.
Dalnain Bridge	EP2	Church Terrace	Planning permission expired.
Kincraig	EPI	Ardgeal	Development complete.

Employment Land

Settlement	Site	Type of Development	Current use / status	Total Area (Ha)	Available supply – Estimated (Ha)	Progress
Aberdeenshire						
Ballater	ED1: Ballater Business Park	Economic	In operation / existing use	0.59	0	
	TI: Caravan Park	Tourism	In operation / existing use	2.75	0	
Braemar	ED1: The Ambulance Station	Economic		0.11	0.11	Comprises 2 sites.
	ED2: The Mews	Economic	In operation / existing use	0.30	0	
	TI: Caravan Park	Tourism	In operation / existing use	4.62	0	
SUB-TOTAL				8.37	0.11	
Highland						
An Camas Mor	EP: An Camas Mor	Mixed use development	Undeveloped – proposal is for a new settlement which will include a proportion of employment land.	1.57	1.57	
Aviemore	ED1: Dalfaber Industrial Estate	Economic	Existing use as industrial estate	7.06	0.5	
	ED2: South of Dalfaber	Economic	Site currently vacant	3.53	3.53	Site identified as preferred

Settlement	Site	Type of Development	Current use / status	Total Area (Ha)	Available supply – Estimated (Ha)	Progress
	Industrial Estate					option for new hospital.
	ED3: Myrtlefield Industrial Estate	Economic	In operation / existing use	1.18	0	
	ED4: Supermarket Site	Economic	In operation as Tesco store	0.52	0	
	EP8: Aviemore Highland Resort	Economic	In operation / existing use	24	3.53	A development brief for the site is being progressed to inform future applications. It will be published for consultation in late summer 2017.
Boat of Garten	ED1: Steam Railway Station	Economic	In operation / existing use	2.72	0	
	TI: Caravan Park	Tourism	In operation / existing use	2.30	0	
Carr-Bridge	ED1: Land at Railway Station	Economic		2.21	2.21	
	ED2: Garage	Economic	In operation / existing use	0.29	0	
	TI: Landmark	Tourism	In operation / existing use	12.62	0	

Settlement	Site	Type of Development	Current use / status	Total Area (Ha)	Available supply – Estimated (Ha)	Progress
Cromdale	ED1: The Smoke House	Economic		0.26	0	
Dalwhinnie	ED1: Garage	Economic	In operation / existing use	0.30	0.10	
Dalnain Bridge	ED1: Garage	Economic	In operation / existing use	0.14	0	
Glenmore	T1: The Camp Site	Tourism	In operation/ existing use	10.41	0	CNPA now working with two delivery groups to specifically improve public access and visitor experience as outlined in the strategy.
	T2: Glenmore Lodge	Tourism	In operation / existing use. Cairngorm and Glenmore Strategy was approved in September 2016.	6.35	0	
Grantown-on-Spey	ED1: Woodlands Industrial Estate	Economic	In operation / existing use	7.46	1.94	
	T1: Caravan Park	Tourism	In operation / existing use	8.56	0	
Inverdrue and Coylumbridge	T1: Caravan Park	Tourism	Existing Use on part of site	1.23	0	
Kincraig	ED1: Baldow Smiddy	Economic	In operation / existing use	0.29	0	

Settlement	Site	Type of Development	Current use / status	Total Area (Ha)	Available supply – Estimated (Ha)	Progress
Kingussie	ED1: West of Spey Street	Economic		1.37	0.29	
	ED2: Council Depot	Economic	In operation / existing use	0.86	0	
	ED3: McCormack's Garage	Economic	In operation / existing use	0.09	0	
	T1: Caravan Park	Tourism	In operation / existing use	2.68	0	
	EPI: Land between Ardbroilach Rd and Craig an Darach	Mixed use – including small proportion of employment land.	Planning permission approved.	2.15	2.15	2.15Ha is approximate area of employment land which forms part of larger site (Approx 18.5 Ha).
Newtonmore	ED1: Rear of Cafe	Economic		1.32	0.73	
	ED2: Industrial Park	Economic	In operation / existing use	3.97	1.19	
SUB-TOTAL				105.44	17.74	
Moray						
Tomintoul	ED1: Garage to north	Economic	In operation / existing use	0.68	0	
	ED2/3: By A939	Economic	Existing use	2.46	1.55	

Settlement	Site	Type of Development	Current use / status	Total Area (Ha)	Available supply – Estimated (Ha)	Progress
	TI: Tomintoul	Tourism		1.64	1.37	
SUB-TOTAL				4.78	2.92	
Perth & Kinross						
Blair Atholl	ED1: Blair Atholl Business site	Economic	In operation / existing use	3.51	0	
	TI: Caravan Park	Tourism	In operation / existing use	12.42	0	
	EPI: Adjacent to Blair Atholl Hotel	Economic	In operation / existing use	0.17	0	
	EP2: Ranger Base	Tourism	In operation / existing use	0.37	0	
	EP3: Caravan Park	Tourism	Extension to Caravan Park	5.3	3.2	
SUB-TOTAL				21.77	3.2	
CNPA TOTAL				140.36	23.97	

Community and other sites

Settlement	Site	Proposed / potential use	Current use / status	Progress
Aberdeenshire				
Ballater	C1: Old School Site	Development of the site must benefit the community. Possible uses may include affordable housing, open market housing, mixed use, recreation or tourism.	Site has been sold and owner is progressing application to develop for affordable housing.	Planning application to be submitted in 2017.
Braemar	C1: Site north of St Andrew's Terrace	Site provides development opportunity to support the sustainable economic stability of the community and provide enhanced community facilities.		
Highland				
Aviemore	C1: Land between the Bowling Green and Railway line	Protected for community use.		
	C2: Former school playing fields	Allocated for community use.		
Grantown-on-Spey	C1: Site adjacent to play area	Site provides opportunity for development which supports the needs for the community.		
Kingussie	C1/C2: Community car parks	The community car parks will be protected from development.		Site contains surface water flooding issues.
Moray				
Tomintoul	C1: Old School site	Site provides development opportunity to support		Site has now been

Settlement	Site	Proposed / potential use	Current use / status	Progress
		the sustainable economic stability of the community and provide enhanced community facilities.		sold privately.
Perth & Kinross				
Blair Atholl	CI: River Tilt Caravan Park	Existing tourism site provides opportunity for re-development to benefit the community. Possible uses may include affordable housing, open market housing, mixed use, recreation or tourism.	Site is currently in use as a Caravan Park.	

Section 4: Conclusions

The issues highlighted throughout the Monitoring Statement will be taken into account when preparing the new LDP, and will inform the MIR.

The Monitoring Statement shows that, in general terms, the environmental and social characteristics of the National Park area have not changed significantly since the existing LDP was produced. As such, the LDP's vision and overall spatial strategy are unlikely to require significant change. The existing approach to protecting and enhancing the important natural and cultural heritage assets of the Park should also be retained in overall terms.

However, the following issues may result in changes to elements of the existing LDP strategy:

- Updated population and household projections
- The unique pressures in relation to the affordability of housing in the Park

- The potential implications of proposed infrastructure improvements (e.g. the A9 dualling and Highland Main Line improvements).

These issues are explored in more detail in specific topic/evidence papers and will be considered in more detail in the MIR.

The Monitoring Statement also shows that, in general terms, the current LDP's policies are being implemented as envisaged and achieving the desired outcomes. Whilst it is recommended that minor technical changes be made to a number of policies, these are generally not significant in nature.

More significant updates are recommended in respect of the following policies:

- Policy 1 (New housing development) – need to update housing supply targets and land requirements in line with most up-to-date evidence. Also need to

review affordable housing requirements in areas of greatest need

- Policy 2 (Supporting economic growth) – need to consider case for allocating new economic development sites
- Policy 3 (Sustainable design) – need to review policy to take account of the six qualities of successful places
- Policy 10 (Resources) – need to consider how best to support natural flood management through the new LDP
- Policy 11 (Developer contributions) – new policy approach required to set out more detailed and upfront information on developer obligations, including the obligations that will apply on a settlement by settlement basis

These recommended updates will be considered in more detail in the MIR.

The current LDP's development allocations are also generally progressing

as envisaged, and it is recommended that most of the existing site allocations are carried forward into the new LDP.

However, a small number of existing housing allocations have been found to be subject to significant constraints which suggest that continued allocation would be inappropriate. It is recommended that the following existing housing allocations be deleted in the new LDP:

- HI, Dalwhinnie – site subject to significant flood risk constraints
- HI, Dinnet – very small site which is not likely to be viable due to topography and drainage constraints
- HI, Nethy Bridge – site subject to significant ecological constraints

A small number of the current LDP's employment and community allocations are either developed or are no longer needed for the purposes identified in the plan. These allocations could be amended/deleted in the new LDP. A number of existing housing allocations also include woodland areas, and where

possible the site boundaries should be amended to exclude these areas. These changes to existing allocation will also be considered in more detail in the MIR.