



REPRESENTATION FORM

Introduction

The Proposed Local Development Plan (the Plan) sets out a strategy for future development in the Cairngorms National Park. It includes sites and proposals for development as well as the policies that will be used to make decisions on applications for planning permission. We aim to formally adopt the Plan in 2020 when the Local Development Plan 2015 comes to an end. The Plan focuses on the five year period until 2025. It also includes development proposals for the 10 year period until 2030, as well as providing a general indication of the likely scale and location of development as far as 20 years into the future.

How to comment

You can use this form to submit your comments on the Plan. Please complete a separate form for each part of the Plan you want to comment on.

All comments should be submitted no later than 5pm, Friday 5 April 2019.

Email: planning@cairngorms.co.uk

Post:

**Cairngorms National Park Authority
FREEPOST NAT21454
Grantown-on-Spey PH26 3BR**

You must submit your name and address to ensure your comments can be considered valid. This is because the Cairngorms National Park Authority (CNPA) is required by legislation to contact you in relation to your response.

Fair Collection Statement

As a registered Data Controller, the CNPA will collect, store and use your personal data for the purpose of informing the content of the Cairngorms National Park Local Development Plan 2020. You may request to see personal information held by the CNPA at any time. Information will be shared with the Scottish Government Department of Planning and Environment Appeals and may be published on our website. We will not publish address details but may publish the name of the person who has completed the form. By completing and submitting the form, you are consenting to the above.

Your details

Name Mark Tate

Organisation Cairngorms Business Partnership

Address [REDACTED]

.....

..... Postcode [REDACTED]

Email [REDACTED]

If you are representing a third party, please give their details below.

Name

Organisation

Address

.....

..... Postcode

Email

REPRESENTATION FORM

1. Which section of the Plan would you like to comment on? (Please state clearly which policy, settlement, site reference number, paragraph number etc, your comment relates to)
Our comments relate primarily to section 4, Policies.

2. What is your comment on this section of the Plan?
Please see our written submission attached with this form.

3. Please state clearly what change/s you wish to see made to the Plan to address your comment
Please see our written submission attached with this form.

What happens next?

Following the consultation period, all responses will be collated and assessed. The Proposed Local Development Plan and all consultation responses will then be submitted to Scottish Ministers and subject to an Examination by an independent Planning Reporter. You can keep up to date with progress on www.cairngorms.co.uk and Facebook and Twitter via [@cairngormsnews](https://twitter.com/cairngormsnews)

Queries

If you have any queries about the consultation process, please contact a member of the Planning Policy team.

Email: planning@cairngorms.co.uk

Telephone: **01479 873535**

Consultation response to the Proposed Local Development Plan 2020

The Cairngorms Business Partnership

The Cairngorms Business Partnership is a private sector funded, not-for profit, membership organisation with over 380 members across the Cairngorms National Park. We are both a destination marketing organisation and Chamber of Commerce affiliated to the Scottish Chambers network. As such we have a membership with significant direct experience of delivery within the Cairngorms National Park.

Our members deliver the collective aims, set out in section 1 of the National Parks (Scotland) Act 2000, everyday and in going through the process of responding to both the Main Issues Report and this report we have consulted broadly and our response has been agreed by our Board.

Executive Summary

We object to the Proposed Local Development Plan (PLDP) 2020 as it will not enable the National Park Authority to deliver on the collective achievement of the four aims of the National Park as required by the National Parks (Scotland) Act 2000 nor meet the development needs of the area. The private sector plays a central role in the collective pursuit of the four aims. The Local Development Plan, in the context of the National Park Partnership Plan and an overarching Economy Strategy, should act as an enabler for business in the collective pursuit of the aims. In its current form it does not do that.

Our development work is about collective achievement of the aims of the Park; we find it very difficult to respond on the policy basis as set out in the PLDP. Even professional advisers have commented that responding according to the process demanded is a time consuming and complex barrier to engagement.

We have four key objections to the proposed Local Development Plan 2020 as follows:-

1. Process
2. Economic Development
3. Statistical Basis
4. Deliverability

1. Process

At Appendix I is the CBP's response to the Main Issues Report.

Our response laid out our support and our concerns with each of the 10 issues in the Main Issues Report as well as challenging the statistical basis of the plan, particularly the reliance on and acceptance of National Records Scotland population projections.

We responded on each issue though the issues on which we had most value to add, and the issues that cause greatest concern to our members, were Issue 4 Housing and Issue 5 The Affordability of Housing.

We were therefore dismayed to find that in the Report to the CNPA Board of Directors entitled "Cairngorms National Park, Local Development Plan 2020, Main Issues Report, Summary of Responses and Recommended Actions" (appendix II) our responses were recorded in all sections except those related to Housing and Affordability of Housing. Our response (respondent number 076) was not reported or recorded in any part of either section 4 or section 5. In all other sections, where we were broadly supportive, our comments have been noted. The inference taken by the National Park Authority Board would reasonably be that we were also broadly supportive of sections 4 and 5 with which we have significant challenges.

We believe that the views of the business community, particularly in relation to these critical issues for business, should be fundamental to the decisions that the National Park Authority Board make in relation to such a critical document in the work of the CNPA as a planning authority. Our objection is; by not taking into account the views of the Cairngorms Business Partnership with regards to Housing and Affordability of Housing in the Main Issues Report, the Cairngorms National Park Authority as a planning authority approved publication of the PLDP in contravention of section 18(1) (a) of the Planning (Scotland) Act 2006.

2. Economic Development

Planning plays a critical role in the delivery of any economic strategy a public agency supports.

The Cairngorms National Park Authority, in its collective pursuit of the four aims, has a responsibility for economic development within the National Park.

Page 15 of the National Park Partnership Plan lists an Economic Strategy as being one of the key interdependent strategies to deliver the plan alongside the Local Development Plan and other strategies.

Page 9 of the Proposed Local Development Plan misquotes the National Park Partnership Plan referring to an 'Economic Action Plan'. We would wish this to be corrected and for the National Park Authority to take accountability for the development of an Economic Strategy in line with the ministerial approved National Park Partnership Plan.

Given that the Proposed Local Development Plan has been published without the context of a current Economic Strategy we believe that it will not deliver on key challenges faced by the local Economy and highlighted in the last Economic Strategy for the Cairngorms National Park. The availability of housing that employees can afford to buy or rent continues to be a key issue impacting business in the Cairngorms National Park and we do not believe that this PLDP will address that.

Further, the population projections on which the development plan is based would be disastrous for the local economy. Any Economic Strategy needs to address the need for housing and the infrastructure to support population growth and the development and diversification (to reduce reliance on low wage tourism sector whilst developing that sector) of the economy. This plan does not take account of that.

We object to the reference to an 'Economic Action Plan' in the PLDP as this is in conflict with the approved Cairngorms National Park Partnership Plan and therefore has no foundation. In addition, we object to the development need contained within the PLDP as an up to date Economic Strategy has not informed the PLDP and the PLDP does not address the serious challenges identified within the last Economic Strategy. Planning needs to be a function of economic strategy. The approach taken also fails to deliver the collective aims of the Cairngorms National Park as set out in the National Parks (Scotland) Act 2000

3. Statistical Basis - National Park Partnership Plan

The National Park Partnership Plan - Rural Development Policy Framework - A Sustainable economy supporting thriving businesses and communities - Policy 3.1, a; calls for:-

- maintaining the population of the National Park and maintaining or growing the proportion of the working age population;

In the report - Evidence Paper: Rural Development – Part 1 Housing it states that:-

“Population projections for the National Park are produced by National Records of Scotland (NRS), with the most recent being 2016 based projections, published in March 2018 (**Figure 14**). NRS’s (2018) principal projection is that between 2016 and 2041, the population of Cairngorms National Park will drop from 19,006 to 18,332 (a decrease of around 4%)”

The report further states that:

“According to the principal migration scenario, the number of children aged under 16 is projected to decrease by 20% over the projection period from 2,933 in 2016 to 2,362 in 2041. The number of people of working age is projected to decrease from 11,612 in 2016 to 10,710 in 2041, a decrease of 8%. The population of pensionable age is projected to rise by 18% from 4,461 in 2016 to 5,260 in 2041. However, the number of people aged 75 and over is projected to increase from 1,794 in 2016 to 3,242 in 2041, an increase of 81%. By 2041 the population is projected to be more heavily distributed at older ages.”

Whilst the report goes on to say that the total of all the new and existing sites identified in the plan could accommodate a population increase of 7% we know that given the previous record of delivery (see next section) this is a meaningless statistic. The evidence paper itself (p.126) reduces this figure to 3% based on CNPA’s assessment against ten year average delivery rates. We suspect that on delivery rates over the past plan period this would reduce significantly further. There is no demographic breakdown within this figure and we suspect the underlying trend would be for a reduction in working age population so a failure to achieve a key policy metric.

The base statistics for this plan should be predicated on the achievement of the National Park Partnership Plan policy in this respect and not NRS projections.

We object to the PLDP as we do not believe it will enable delivery of Policy 3.1a (and other policies within 3.1). We further believe that it is imperative that the National Park Authority responds to the NRS projections through a robust economic strategy to ensure that this policy can be achieved. Otherwise the Authority are planning to fail.

4. Deliverability

The previous development plan forecast a need for 690 new houses during the period of the plan. A 'generosity' level of 10% was agreed giving a Housing Land requirement for 759 homes (2014-2019).

According to Evidence Paper: Rural Development – Part 1 Housing the average completion rate for new homes is 70 per annum over the period of the last plan.

This would mean a completion of just 350 homes over a 5 year period against a Housing Supply Target of 759 of which 370 were to be "affordable". Only 46% of the target, on the basis of most recent actual experience, the 10% generosity level is therefore significantly inadequate to meet the need identified in the Demand and Needs Assessment

The National Park Authority has significantly failed to deliver against the current development plan and this has led to a crisis in housing that people who want to live, work in and care for the National Park can afford to buy or rent - at all salary levels

Whilst we fully support the drive to increase completions of "affordable" housing, simply increasing the ratio of "affordable" housing to 45% will have a significant impact on the commercial viability of a project and is likely to reduce the completion rate still further, particularly in those areas most in need of housing. We would expect more guidance from the planning authority and how commercial developers will be enabled to achieve this proportion.

The phrase "affordable" can be misleading in that affordable to the business community is affordability at every stage on the housing ladder to both rent and buy. Housing that enables entrepreneurs to build a future in the National Park and fulfil what should be an economic strategy to diversify the economy.

In the previous section we outlined why we believe that this represents a plan to fail. On evidence of previous performance we believe that even against the proposed plan the planning authority will significantly underperform.

We asked the National Park Authority for the total number of planning approvals in the park area during the term of the previous plan we did not receive this number, it may be that the number is within the 2,600+ pages of the consultation documentation, unfortunately we do not have the capacity to fully analyse it all.

Our objection is based on the fact that we do not see anything in the PLDP that would significantly change the outcome of the previous plan in relation to completions. A generosity level of 217% (1,650 housing land requirement) would have been required to



achieve the targeted homes based on past performance. We are suggesting, therefore, that the generosity level is too low at 10%. We object to the land supply allocated as this is inadequate to meet the demand ascertained by the Demand and Needs Assessment based on the best information available being the most recent past actual experience within the Cairngorms National Park.



Local Development Plan 2020 - Main Issues Report

Cairngorms Business Partnership (CBP) Summary and Response

Introduction / Executive Summary

The CBP welcomes the opportunity to comment on the 'Main Issues Report' (MIR) issued for consultation by the Cairngorms National Park Authority. The CBP considers that our 370+ members are fundamental to the collective delivery of the four aims of the National Park. A draft of this note has been sent to all of our members seeking feedback and that has been incorporated into our final response.

We note that the MIR states that consultations have already taken place with key stakeholders to seek input on the main drivers for change (p10). We are disappointed not to have been considered as a key stakeholder and have not been specifically consulted. The 'Main Issues' in our view are those selected by the National Park Authority. Whilst many of the main issues identified are key to our members they are not all reflective of the main issues we see as important drivers in the collective achievement of the National Park Aims.

Fundamentally we believe that basing the Local Development Plan (LDP) on, and accepting, the premise that the population of the National Park will decrease over the period of the plan is flawed. This does not reflect the ambition of our members and would be severely damaging to the economy of the National Park.

We are particularly concerned that the plan is based on statistics that predict that the population of young people is predicted to decrease by 21% and working age people is predicted to decrease by 10% out to 2039. This is the key challenge for the Park and a forecast we should be looking to change as a key driver rather than accept it as an input into the key drivers for change. Such a reduction in population would put the collective achievement of all our aims at significant risk particularly the cultural heritage articulated in the first aim and economic and community sustainability.

A thriving population and growing workforce are essential to the collective delivery of the four aims and we do not believe the MIR addresses this. **Our key conclusion is that reversing the forecast population decline and demographic imbalance should be a 'main issue' that needs to be addressed for change in the LDP.** We believe that this development plan needs

to be closely integrated with the Economic Development plan (and other plans) and as it stands the suggestions and predictions would not support an ambitious Economic Development plan.

Our answer, to the question on page 8, is, therefore, no. We do not believe that the current vision and long term outcomes set in the Cairngorms National Park Partnership Plan should act as the vision statement for the LDP. We believe a more ambitious vision around a growing population (particularly of working age and below) and robust and diverse economy supporting the collective achievement of the four aims should be articulated both through the development of this plan and through the development of next Economic Strategy. This needs to be a vision for the next 30 years at least.

We believe passionately in all four aims of the National Park. On page 5 of the report the legislation is misquoted and should read “if, it appears to the authority that there is a conflict”. We believe the underlined words are important and we would again ask for clarity on the process used within the CNPA Board for assessing conflict and any delegation of these powers to officers.

We have not commented on individual settlement based issues and land allocations at this time. We have provided brief initial feedback on each of the issues that the CNPA consider to be the main issues.

Main Issues Identified by the Cairngorms National Park Authority

Main Issue 1 - Over-arching development strategy

We agree with the focus on new development in existing settlements subject to the need for significant additional development land to that set out in the MIR to support the key issue of reversing the predicted declines in young and working age population. It should also be taken into account that some of the smaller settlements are often locally remote and whilst small are very important strategically to large geographic areas.

There is some confusion around the Map on page 14 in what differentiates communities. This appears contradicted in the parts of the rest of the document for example on page 35 Blair Atholl is placed on a par with Aviemore in relation to affordable housing and this is not reflected in the map where Blair Atholl is represented as an intermediate settlement. All settlements in the National Park should be given the ability to thrive and it is disappointing that south of Newtonmore and Ballater the MIR does not classify any settlements as Strategic. We believe settlements such as Blair Atholl and Braemar are strategic both in their local and National Park wide context.

Main Issue 2 - Designing great places

We agree with the adoption of government planning policy guidelines in respect of 'great places' with the exception of the addition of the line 'the highest standards of design'; government policy calls for high quality design and we believe this language should be used. As a National Park we should aspire to sustainable design ie appropriate design and siting for place and purpose, whilst applying this overarching aspiration proportionately for new developments to avoid adversely impacting on cost, viability and ultimately affordability of housing. To 'create easier movement' we must work to provide employment near communities, it is notable that no key employment sites (map page 14) are included south of Newtonmore and Ballater and we would question the omission of Blair Atholl, Braemar and Dalwhinnie.

There are also significant infrastructure challenges in relation to roads, transport, cycle and walking pathways and broadband to enable flexible working and sustainable commuting in and between communities.

We would welcome greater clarity on policy for potential developers.

Main Issue 3 - Impacts and opportunities from the A9 Highland Main Line upgrades

We welcome the addition of economic development land into the plan and this could support a new main aim of reversing the forecast dramatic decline in population through inward investment and diversification. We hope to focus on this, with the CNPA, as we develop the new Economic Strategy.

We agree that we should seek to ensure communities along the route benefit from the route.

We believe that we should use this as an opportunity to create a greater sense of arrival into the national park along these key access routes.

Main Issue 4 - Housing

This is a critical issue to our members, to the future viability of our economy and to the collective achievement of the four statutory aims of the National Park. Given the number of hurdles to development, account should be taken of the fact that allocations may not ultimately be deliverable. The proportion of allocated sites in previous local (development) plans that have been developed during the plan's term are clear evidence of this issue. In light of this evidence, and the fact that we need to ensure the underlying population predictions do not come to fruition, we do not think the 10% allowance suggested is anywhere near sufficient.

We have already mentioned that reversing, rather than accepting, a population decrease and imbalance is critical and needs to be a 'Main Aim' in itself. This will have an impact on housing needs and will require more land to be made available for development.

We therefore disagree with the preferred option and believe CNPA should instead look to increase housing supply based on a greater ambition about population retention and growth and recognising the challenges within the National Park of delivering developments on allocated land.

We do not agree with the proposed housing supply targets or the proposed housing land requirements.

Main Issue 5 - The affordability of housing

We do not need to accept the status quo in relation to low paid jobs and should, through the next Economic Strategy, look to diversify our economy and seek inward investment. The CNPA should be leading this work (with ourselves and other agencies) in the collective pursuit of the four aims of the National Park.

Employers report that their staff struggle to find affordable housing even at salary levels way above the mean or median.

Referring to second and holiday homes as 'ineffective' housing stock is not helpful. These properties have provided the backbone to our tourist economy for almost two centuries, either as holiday lets or second homes, where people chose to come to spend their leisure time and disposable income. Statistics comparing our National Park with the rest of Scotland in relation to second home ownership are meaningless. A better comparable would be with other international quality rural tourist destinations and National Parks.

This is a supply side problem and we welcome the focus on providing more affordable homes.

With regard to the increase in proportion of affordable homes required in a new development we would like to see additional research and engagement with developers on the potential impact on the viability of developments before considering a response to this further.

Main Issue 6 - Economic development

We welcome the addition of new economic development land within the proposed plan. We believe that this may need to be increased if we are to target the reversal of the forecast population decline and imbalance as a main issue and hence we would like to see more flexibility built into the LDP.

Main Issue 7 - Impacts on Natura designations.

Conserving and enhancing the natural and cultural heritage of the area is critically important as are the other aims around use and enjoyment of resources and economic and social development.

We are proud that 'around' half of the Park is designated as being of European importance and recognise that 'around half', over half a million acres, is not designated that way. International best practice does not preclude development which is essential to sustain our natural and cultural heritage which are interdependent as articulated in the first statutory aim of the National Park.

In the collective pursuit of the four aims of the National Park we believe that the onus for coordinating and developing and delivering recreational management plans should rest with the Park Authority working in partnership, not developers.

We do agree in a more coordinated approach towards conservation measures is necessary and that the onus and burden for this should sit with CNPA.

Main Issue 8 - Planning obligations

We would welcome more rigorous justification for planning policies adopted by CNPA on planning applications and more specific guidance about potential planning obligations available in advance of applications being made.

Main Issue 9 - Flood risk and climate change resilience

We agree with the conclusion in principle though would welcome site analysis on the potential impact of this on the economic viability of sites, particularly with the aim of delivering more affordable housing.

Main Issue 10 - Land management in upland areas

Whilst surprised that the issue of tracks has been raised as a main issue, we agree with the presumption proposed. Assessment of applications needs to be based on objective cost benefit analysis however to ensure that economically important tracks are not automatically refused consent due to, for example, relatively low impact landscape issues.



Cairngorms
NATIONAL PARK
Pàirc Nàiseanta a' Mhonaidh Ruaidh

Cairngorms National Park Local Development Plan 2020 Main Issues Report

Summary of Responses and Recommended Actions



**#BIG PARK
#BIG QUESTIONS**

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Vision and Long-Term Outcomes

Respondents

Ref	Name / Organisation
030	Kincraig and Vicinity Community Council
031	John Muir Trust
033	Laggan Community Association
036	Halliday Fraser Munro on behalf of Mar Estate
039	N Kempe
043	The Highland Council
046	Ristol Consulting on behalf of Atholl Estates
048	Glenshee Ski Centre Ltd
049	Grantown-on-Spey and Vicinity Community Council
053	Inveresk Community Council
054	Rothiemurchus Estate
071	Edinglassie Estate (Dunecht Estates)
076	Cairngorms Business Partnership
082	D Morris
083	R Turnbull
089	Cromar Community Council
092	Scottish Land and Estates
100	Kingussie and Vicinity Community Council
135	Alvie and Dalraddy Estates
157	Balavil Estate Ltd
192	Aviemore Business Association
194	Quarch Technology
195	V Jordan
199	Scottish Natural Heritage
200	Highlands and Islands Enterprise
203	Savills (UK) Ltd on behalf of Crown Estate Scotland (Interim Management)
205	Ballater Resilience Group
206	J Walker
208	G & L Muirhead
209	Anonymous
210	Urban Animation on behalf of Invercauld Estate
211	National Trust for Scotland
212	Carrbridge Resident
213	S Caudrey
214	Anonymous

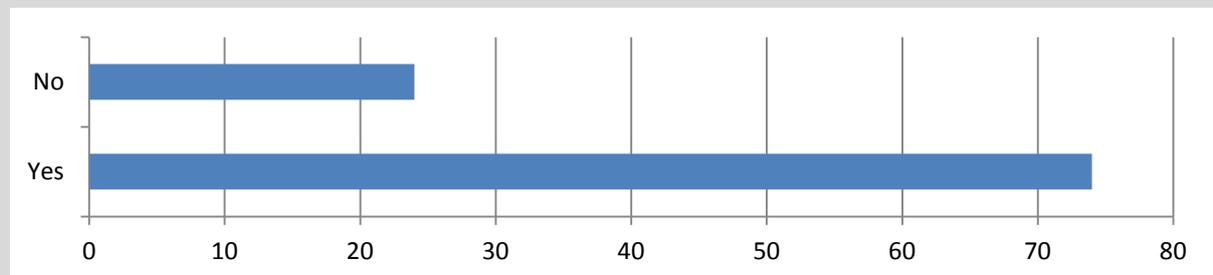
Ref	Name / Organisation
237	Aviemore and Vicinity Community Council
239	Anonymous
241	H Bendstrup-Charlton
242	Carrbridge Resident
243	P Hastings
244	Anonymous
246	Anonymous
247	Aberdeenshire Resident
248	Carrbridge Resident
249	C Winter
250	A Dunlop
251	S Dickie
253	Anonymous
254	MacBean Road Residents Association
255	Tulloch Homes Ltd
257	Anonymous
260	H Quick
264	D Sherrard
267	L MacLean
268	Anonymous
269	Aviemore Resident
270	Insh Resident
271	Dalwhinnie Community Council
272	Boat of Garten Resident
273	D Munday
275	Anonymous
281	Tactran
282	D Bruce
283	Ross McGowan Ltd
285	Anonymous
286	Anonymous
289	Anonymous
292	Munro Surveyors
293	Braemar Resident
294	A Angus

215	G Bulloch
216	Carrbridge Resident
217	Mountaineering Scotland
218	NHS Grampian
220	M Kinsella
221	Woodland Trust Scotland
222	Kingussie Resident
223	Blair Atholl Resident
224	D Stott
225	Anonymous
226	Braemar Resident
227	Moray Council
228	H Brown
229	Anonymous
231	C Campbell
232	Anonymous
233	Ballater & Crathie Community Council
235	Anonymous
236	Anonymous

302	Nethybridge Resident
304	Anonymous
305	Anonymous
306	Anonymous
307	Dulnain Bridge Resident
308	Ballater Resident
311	Anonymous
312	Anonymous
313	Anonymous
314	Anonymous
315	Kinnaird
316	Kingussie Resident
319	C McPherson
320	Anonymous
321	J Finnie
322	Anonymous
323	Grantown Resident
324	Anonymous
325	RSPB Scotland

Response Overview

We propose to use the vision and long term outcomes set out in the Cairngorms National Park Partnership Plan as the ‘vision statement’ for the Local Development Plan. Do you agree with this approach?



108 responders provided comments on the proposed vision and long term objectives. Ten of these did not choose to say whether they agreed with the proposal to use the vision and long term outcomes of the Partnership Plan as the ‘vision statement’ for the Local Development Plan, but did provide general comments.

Key points

- Most respondents supported the use of the Partnership Plan’s vision and long-term outcomes as the ‘vision statement’ for the Local Development Plan
- Many provided views on the long term outcomes that they wished to see prioritised, with some arguing for most emphasis on conservation and others arguing for most attention on rural redevelopment outcomes

Issues Raised

Support for the preferred option

Over 75% of respondents expressed general agreement with the proposal to use the vision and long term outcomes of the National Park Partnership Plan as the 'vision statement' for the Local Development Plan (036, 039, 043, 046, 053, 071, 082, 100, 157, 192, 194, 199, 200, 203, 205, 206, 208, 209, 211, 212, 213, 214, 217, 218, 221, 223, 225, 226, 227, 228, 231, 232, 236, 237, 239, 241, 242, 246, 247, 248, 249, 250, 254, 255, 257, 264, 267, 268, 269, 271, 272, 273, 281, 283, 286, 289, 292, 293, 302, 304, 305, 306, 307, 308, 311, 312, 314, 315, 316, 319, 320, 321, 322, 324).

A number of respondents felt that a common vision would help achieve consistency between the Partnership Plan and Local Development Plan (199, 203, 227, 281, 053) as well as providing a stable planning framework for investors and developers (157). Although supporting a common vision, one respondent felt as CNPA does not have full planning powers there may be a mismatch between the aspirations of the Partnership Plan and what the Local Development Plan can achieve (039).

Whilst supporting the vision, some respondents felt it could be open to interpretation and might mean different things to different people (036, 316). One respondent agreed with the high level nature of the vision, but felt that such a broad brush approach could not be applied to individual settlements (302). Another said their support for the vision would depend on how it is implemented (223), with some stating that flexibility in implementation and regular review will be necessary (273, 292).

Although supporting the vision, a number of respondents commented on the priority which they felt should be given to each of the long term outcomes. One suggested that all the long term outcomes should carry equal weight (194). Some felt that the highest priority should be given to conservation of natural and cultural heritage (211, 221, 269, 319), with some arguing that conservation of the environment and the sense of wildness should be prioritised as it underpins other outcomes such as attracting visitors and tourists (249, 264, 269, 320). However, others felt that rural development should be prioritised to keep people and businesses in rural areas (208, 209, 308), with one respondent arguing that there should be an easing of planning restrictions on development for key employers (268). One commented that the vision would only be meaningful if the CNPA strictly follows the ethos of the National Parks (Scotland) Act (217).

Some supported the vision providing that community views are taken into account when decisions relating to local areas are made (100, 273), and another supported the vision but felt more could be done to support communities experiencing particular difficulties such as Ballater and other smaller settlements (312).

Objection to the preferred option

Just under 25% of respondents who answered the question did not support the use of the Partnership Plan vision and long term outcomes as the 'vision statement' for the Local Development Plan (030, 076, 083, 092, 135, 195, 210, 215, 220, 222, 224, 229, 233, 235, 243, 244, 251, 253, 270, 275, 282, 285, 313, 323).

Some felt that the vision was too generic to be meaningful (210, 224, 313), although others felt it should be more flexible (092, 233).

Again, there were views about the priority which should be given to the long term outcomes. Some disagreed with the vision because they felt it does not place sufficient emphasis on safeguarding and enhancing natural and cultural heritage (083, 244), with some arguing that there should not be a 'development plan' but a 'conservation plan' (251, 253). Another felt that the first objective should refer to conservation and re-wilding, and that re-wilding should be a priority (215). However, others felt that the vision places too much emphasis on conservation and not enough on rural development to meet the needs of residents across the Park (030, 222, 229, 270, 285). Some commented that the vision places too much emphasis on tourism and visitors and does not adequately recognise the needs of local residents (135, 220).

The Cairngorms Business Partnership felt the LDP should include a more ambitious vision based around a growing population, particularly of working age and below, and a robust and diverse economy (076).

One respondent stated that the Partnership Plan vision and long-term outcomes are not sufficient to provide the vision statement required by sections 15(2) and (5) of the Planning etc. (Scotland) Act (195).

A number of respondents felt that the LDP and its vision should be driven by local communities (242, 282, 323), and one called for a long term outcome focused on local interests and representative of local knowledge and views (235).

General comments

Some respondents did not say whether they agreed with the proposal to use the vision and long term outcomes of the Partnership Plan as the 'vision statement' for the Local Development Plan but provided general comments.

Many of these echoed the points above, with views on issues including: the importance of consistency between the Partnership Plan and Local Development Plan (089, 260); the importance of the collective achievement of all the aims in the National Parks (Scotland) Act (054); a desire for greater prioritisation of the conservation outcome and incorporation of the 'Sandford principle' within the vision (325); and a desire for more emphasis on the rural development outcome (048).

One respondent said the Local Development Plan must support delivery of the natural heritage aims of the Partnership Plan and felt that land use strategies and planning policies are often not sufficiently joined-up (031). Another stated that there should be more attention to science, observation and local knowledge in relation to conservation (260).

One respondent stated that the second objective would be more acceptable if it included residents as well as visitors (049).

One respondent stated that there should be a ban on wood and coal burning in the Park (275).

Discussion

There is a significant level of support for the proposal to use the vision and long term outcomes of the Partnership Plan as the 'vision statement' for the Local Development Plan. Paragraph 86 of Scottish Planning Policy requires special regard to be paid to the desirability of consistency between the Partnership Plan and the Local Development Plan, and a number of comments have identified the benefits of using a common vision to help deliver consistency between the two documents.

Some respondents have criticised the vision and long term outcomes for being vague and generic. However, they reflect the overall aims of National Parks, as set out in the National Parks (Scotland) Act 2000:

- 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 the understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public; and
- to promote sustainable economic and social development of the area's communities

Many respondents have commented on the relative priority which should be afforded to the long term outcomes, with views differing on whether the outcomes should be pursued collectively or whether some outcomes should be prioritised over others. The National Park Partnership Plan aims to deliver the long-term outcomes in a co-ordinated way, and the Local Development Plan will also aim to achieve this. The requirement to ensure that the wider National Park aims are collectively achieved in a co-ordinated way is outlined in section 9(1) of the National Parks Act. Section 9(6) of the Act goes on to require that if, in relation to any matter, it appears to the National Park Authority that there is a conflict between the first aim and the other aims, greater weight must be given to the first aim. To help provide clarity, the Proposed Local Development Plan could include a specific reference to these requirements.

It is accepted, as some respondents have pointed out, that the Local Development Plan will not be able to deliver the Partnership Plan's vision in isolation. However, as explained in the diagram on page 8 of the Main Issues Report, the Local Development Plan is one of a number of other strategies (Cairngorms Nature, Active Cairngorms, Economic Strategy, and the LEADER Local Development Strategy) which together form the wider policy context for the management of the National Park.

In response to the call for the Local Development Plan to include a more ambitious vision based around a growing population, particularly of working age and below, and a robust and diverse economy, it should be noted that the vision and long term objectives already refer to "a sustainable economy supporting thriving businesses and communities". Expected population growth levels and the impact of these on new development requirements are considered under Main Issue 4 'Housing'. Measures to support and attract people of working age and below, including measures to increase the supply of affordable housing and support economic development are also outlined under Main Issues 5 'The Affordability of Housing' and 6 'Economic Development'. It is considered that the Partnership Plan vision and long term outcomes are appropriately ambitious and that, taken as a whole, the proposals in the Main Issues Report help to support the delivery of the vision and outcomes. It is therefore not necessary to amend the vision in response to this comment.

The argument that the Partnership Plan vision and long-term outcomes are not sufficient to provide the vision statement required by sections 15(2) and (5) of the Planning etc. (Scotland) Act was raised during the preparation of the existing Local Development Plan and rejected by the Reporter during the independent examination. It is therefore unnecessary to modify the vision in response to this comment.

In response to the calls for the Local Development Plan vision statement to be driven by local communities, it should be noted that the Partnership Plan vision and long term outcomes were subject to thorough public consultation. At a more localised level, the Main Issues Report also sets out detailed content for the defined settlements in the Park. This was developed following analysis of Community Action Plans, and has been subject to consultation through the Main Issues Report process. Settlement specific issues, including the need to support communities experiencing particular difficulties, are considered in the settlement section of this report.

Other comments have raised a number of matters of detail, but it is not considered appropriate or necessary to refer to these matters within the broad 'vision statement' for the Local Development Plan.

Recommendations

The Proposed Plan should:

- Use the vision and long term outcomes set out in the Cairngorms National Park Partnership Plan 2017-2022 to form the 'vision statement' for the Local Development Plan
- Include a more detailed commentary on the four aims of National Parks, and the legislative requirements governing the delivery of these aims

Main Issue I – Over-arching Development Strategy

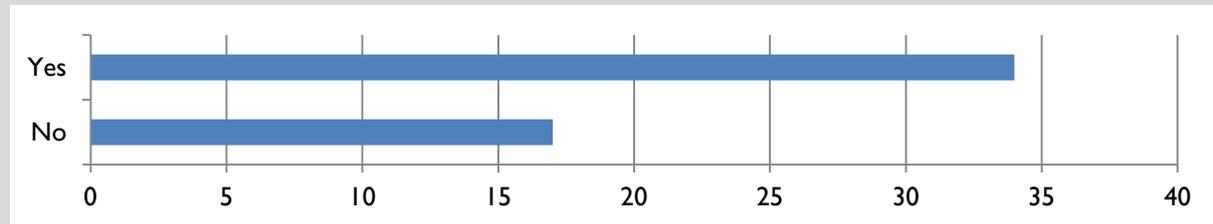
Respondents

Ref	Name / Organisation
001	Scottish Campaign for National Parks
003	Anonymous
004	Xander McDade Ward Councillor (Highland Perthshire), Perth & Kinross Council
007	Scottish Water
024	Braemar Resident
030	Kincraig and Vicinity Community Council
036	Halliday Fraser Munro on behalf of Mar Estate
039	N Kempe
040	Badenoch and Strathspey Conservation Group
043	The Highland Council
044	Scottish Environment Protection Agency
046	Ristol Consulting on behalf of Atholl Estate
049	Grantown-on-Spey and Vicinity Community Council
053	Inveresk Community Council
054	Rothiemurchus Estate
059	Savills on behalf of Invercauld Estate
064	Nethy Bridge and Vicinity Community Council
076	Cairngorms Business Partnership
082	D Morris
083	R Turnbull
086	Turnberry Planning on behalf of An Camas Mor LLP
089	Cromar Community Council
092	Scottish Land and Estates
100	Kingussie and Vicinity Community Council
116	Paths for All
135	Alvie and Dalraddy Estates
151	Forsyth Accounting Practice Ltd
157	Balavil Estate Ltd
188	Boat of Garten and Vicinity Community Council
191	J Knox
194	Quarch Technology

Ref	Name / Organisation
195	V Jordan
199	Scottish Natural Heritage
200	Highlands and Islands Enterprise
203	Savills (UK) Ltd on behalf of Crown Estate Scotland (Interim Management)
210	Urban Animation on behalf of Invercauld Estate
211	National Trust for Scotland
213	S Caudrey
215	G Bulloch
218	NHS Grampian
219	Savills on behalf of J and M Forbes Leith Partnership
221	Woodland Trust Scotland
224	D Stott
227	Moray Council
237	Aviemore and Vicinity Community Council
244	Anonymous
251	S Dickie
253	Anonymous
260	H Quick
264	D Sherrard
267	L MacLean
269	Aviemore Resident
271	Dalwhinnie Community Council
272	Boat of Garten Resident
273	D Munday
275	Anonymous
279	North East Mountain Trust
281	Tactran
282	D Bruce
283	Ross McGowan Ltd
285	Anonymous
290	A Walker
292	Munro Surveyors
293	Braemar Resident
294	J Angus
306	Anonymous
307	Dulnain Bridge Resident
321	J Finnie
325	RSPB Scotland

Response Overview

Do you agree that the overall development strategy of the current Local Development Plan remains appropriate, and that we should use this as the basis for the next Local Development Plan?



A total 69 people responded to this issue. 51 specifically answered the question, of which 35 (69%) agreed with the overall development strategy whilst 17 (33%) did not.

Key points

- Significant support for the preferred option of retaining the overall development strategy of the current Local Development Plan
- Some respondents concerned about overall development levels and their impact on conservation, whilst others would prefer to see a more flexible approach to development

Issues Raised

The majority of respondents agree that the overall development strategy remains appropriate for the next Local Development Plan (024, 043, 044, 046, 053, 054, 059, 064, 082, 083, 116, 188, 191, 199, 203, 213, 218, 221, 224, 227, 237, 260, 264, 267, 269, 271, 272, 273, 279, 281, 283, 292, 293, 321, 325), whilst there were also some who did not agree (030, 092, 135, 151, 157, 194, 195, 210, 211, 215, 251, 253, 275, 282, 285, 306, 307).

A number of respondents felt that focusing new development in existing main settlements with established services, facilities, and infrastructure is more sustainable and can help to promote active travel, reduce vehicle use and carbon emissions (007, 043, 044, 116, 213, 269, 281). Others added that it helps to protect natural resources and the sense of wildness outwith the main settlements (044, 191).

Others however felt there is too much emphasis on development within the National Park (040, 064). One was concerned about the “growth-orientated tone” of the strategy which they felt undermines the strengths of the area (including landscape, habitats and communities) (040). Another felt the preferred strategy fails to take into account the National Park aims, particularly the first aim of conservation (195). Concern was expressed by RSPB and others who felt that the scale and distribution of new development encouraged by the preferred approach could impact on sensitive species and habitats, particularly vulnerable populations such as Capercaillie (040, 325).

A number of comments related to the principle of development outside strategic settlements. The need for greater flexibility for development in intermediate and rural

settlements (215, 219) as well as rural areas outwith these was raised (001, 210). One response felt that the LDP should help deliver the Cairngorms Economic Strategy by recognising the 'fragile nature of the economy' and encouraging employment opportunities across the Park not just within settlements (054). Others felt that the LDP should encourage growth across the Park to attract and retain younger/working people and avoid population decline (076, 151, 203, 290). Another added that reinforcing growth where there is already growth could detrimentally impact other areas where development should be encouraged (203). It was also highlighted that housing should be built in response to local demand and that main settlements should not be the focus of development at the expense of surrounding rural communities (135, 219).

Conversely, some felt that a stricter approach to development outwith settlements is needed (083, 244), with one suggesting there should be no development outwith settlements (251). A zoning approach setting out the nature and scale of appropriate development in different parts of the National Park was also suggested (001, 039).

Scottish Water supported the preferred approach, but understood the need for some development in rural communities. They stated that water infrastructure should not be viewed as a barrier to this type of development but highlighted that it is the responsibility of the developer to connect the water and drainage of a new development to the public connection, which can be more challenging in some rural areas (007).

Settlement and site specific issues

Some respondents were opposed to the allocation and identification of An Camas Mòr as a strategic settlement (040, 211, 215, 325). RSPB expressed concern about its impact on the integrity of nearby Special Protection Areas. They feel it should not be identified as a strategic settlement solely on the basis that it has planning permission (325).

Concern was expressed about the scale of development proposed in Aviemore (040) and Carr-Bridge (040, 325). In addition, one respondent felt that specific allocations in Kingussie and Nethybridge are inappropriate (040).

The suggestion was put forward that Braemar should be a strategic settlement to reflect the recent growth and investment which is making it an important visitor destination and improving economic activity (036, 076, 210).

Support was expressed for the continued identification of Blair Atholl as an intermediate settlement (046), although one respondent suggested it should be a strategic settlement (076). It was also raised that Blair Atholl, Pitagowan & Bruar, Calvine and Killiecrankie should be considered more strategically as a group, as they are interlinked, connected to the same employers and should be better connected in terms of transport (004). It was also requested that Aldclune be identified as a rural settlement on the basis that it is of similar size to Killiecrankie and Calvine (046).

It was queried why Dalwhinnie is proposed to be reclassified as a rural settlement (227). Two respondents supported this change (271, 273), although one wished to see it retained as an intermediate settlement (200).

Another respondent felt that there should be opportunities to develop outwith recognised settlements and put forward a development site in Lynchat (157).

Other issues

Although supporting the development strategy, some respondents expressed concern about its application in practice, the scale of development within the countryside and the CNPA call-in process (083, 244). It was also raised that reference to development being accommodated in intermediate and rural settlements to 'meet local needs' is problematic as this approach has not met local needs in the past (040).

The issue of transport was raised by a number of respondents (004, 200, 275, 281). One felt there should be reference to air and transport pollution within communities (275). Tactran felt that opportunities to build on proposed investment in low carbon and low emission vehicle technology should be considered in the LDP as well as more innovative solutions to address rural transport poverty (281). It was also highlighted that the development strategy should take into account the A9 and railway improvements which will provide opportunities for economic growth, and that whilst other parts of the Park do not benefit from good transport infrastructure, economic development should still be supported (200).

Other general issues included: confusion about what differentiates Blair Atholl and Aviemore as both have the same affordable housing requirement but one is an intermediate settlement and the other is strategic (076); concerns about the impact of development on views, particularly around Aviemore (253); a proposal that land immediately outside the National Park be protected to safeguard views to and from the Park particularly from wind farms (049); and a suggestion that the Park's boundaries be extended to include the Dava Moor (049).

Discussion

There was significant support for the existing development strategy which sets a hierarchal approach with the majority of development being focused in 'strategic' settlements and smaller-scale development being located in 'intermediate' and 'rural' settlements.

However some respondents expressed concern about the scale of development within the National Park and were of the view that it will negatively impact on the conservation of protected species, habitats and landscapes. This argument was raised during the preparation of the current Local Development Plan and rejected by the Reporter. The development strategy builds on the strengths of the area and on its existing infrastructure, focusing growth on existing settlements. Whilst it is acknowledged that these also provide important corridors for natural heritage, there is no implication that the strategy will undermine these and the Proposed Plan will include a range of policies (including design, natural heritage, landscape, cultural heritage) to ensure their protection. The Proposed Plan will also be subject to statutory assessments, including Habitats Regulations Appraisal, to ensure there will be no adverse impacts on Natura sites.

Therefore it is not agreed that there is a conflict between the overall development strategy and conservation. The development strategy encourages sustainable growth in a way which delivers the four aims of the National Park. In devising the spatial strategy, the CNPA has

recognised that the most sustainable location for growth is within existing settlements and therefore the focus of the majority of growth is in those settlements. This approach accords with the National Park Partnership Plan (Policy 3.2) which sets out a settlement hierarchy identifying strategic settlements 'as the most sustainable places for future growth and the focus for housing land supply' (p. 74).

A number of respondents felt that there is a need for greater growth, flexibility and opportunities for housing and particularly economic development within rural areas. Whilst the overall development strategy directs the majority of development to strategic settlements, it also supports more modest growth in intermediate and rural settlements, as well as providing opportunities for appropriate economic development within the countryside.

Settlement and site specific issues

The objection to the identification of An Camas Mòr as a strategic settlement is noted. However, the CNPA's Planning Committee has resolved to grant planning permission in principle for the An Camas Mòr development, subject to a Section 75 agreement being signed. The proposal has been subject to Habitats Regulations Appraisal and this will be reviewed when further applications are submitted for the approval of Matters Specified in Conditions. Due to the scale of An Camas Mòr and its potential to make a strategically significant contribution toward the National Park's housing and employment land supply, there is a need for it to be recognised accordingly within the overall development strategy. However, it is agreed that it would be appropriate to show An Camas Mòr in a different way from existing strategic settlements in the development strategy diagram. It is therefore recommended that An Camas Mòr should be identified as a 'strategic scale planning consent' in the overall development strategy diagram. Further discussion on An Camas Mòr can be found under Main Issue 4b 'Housing Growth Around Aviemore' and the settlement section of this report.

Concerns were also raised about the scale and locations of development in a number of settlements, including Aviemore, Carr-Bridge, Kingussie and Nethybridge. These all play an important role in the settlement hierarchy, and it is therefore appropriate that development allocations are identified within these settlements. Further discussion of specific development allocations can be found within the settlement section of this report.

Whilst it is understood that there are strong relationships between Blair Atholl, Pitagowan & Bruar, Calvine and Killiecrankie, they are all intermediate and rural settlements and the Local Development Plan already aims to meet local development needs in these locations. It is therefore not considered necessary to identify these as a 'strategic group', however the strong relationships between these places, as well as the potential for improving linkages between them, could be identified within their relevant settlement statements.

The suggestion to identify Aldclune as a settlement is noted. Whilst it is acknowledged that this group of houses is comparable in size to other rural settlements, there are existing opportunities to contribute development to this group through the Local Development Plan's housing policy. No further changes are necessary in response to this comment.

Suggestions were put forward to identify Braemar and Blair Atholl as strategic settlements. It is acknowledged that whilst these villages play important roles as visitor destinations

within the National Park, the scale of both is still relatively small and reclassification is not considered appropriate.

There was a mixed response to the proposal to reclassify Dalwhinnie as a rural settlement. With limited services and opportunities for growth, it is maintained that Dalwhinnie exhibits qualities more characteristic of a rural settlement and therefore it is considered appropriate to reclassify it as 'rural'.

Other issues

Comments relating to the planning process and operation of planning within CNPA cannot be amended or reviewed through the Local Development Plan process. The aim of the Development Strategy to focus smaller scale development in rural and intermediate settlements to meet local needs is intended to provide suitable flexibility to respond to the often changing needs of smaller settlements. There is no clear evidence that the Local Development has not met local needs and it is considered that this approach remains suitable.

In response to the other general issues: the affordable housing requirement has no direct bearing on the classification of Blair Atholl and Aviemore within the settlement hierarchy; whilst the planning system cannot specifically protect 'views' development proposals will be assessed against all policies within the Local Development Plan, including policies designed to protect landscape character; the Local Development Plan only covers the National Park and therefore cannot protect land outwith its boundaries; and the Local Development Plan cannot influence or propose to extend the boundaries of the Park.

Recommendations

The Proposed Plan should:

- Retain the overall development strategy of the 2015 Local Development Plan, subject to the identification of An Camas Mòr as a 'strategic scale planning consent' in the overall development strategy diagram and a minor amendment to reclassify Dalwhinnie as a rural settlement

Main Issue 2 – Designing Great Places

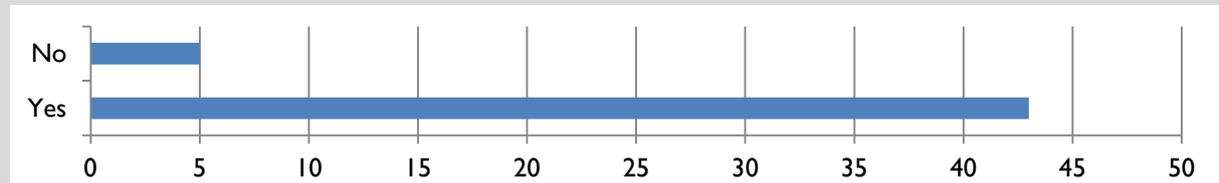
Respondents

Ref	Name / Organisation
032	KIncraig Community Council
036	Halliday Fraser Munro on behalf of Mar Estate
039	N Kempe
043	The Highland Council
044	Scottish Environment Protection Agency
046	Ristol Consulting on behalf of Atholl Estate
053	Inveresk Community Council
059	Savills on behalf of Invercauld Estate
064	Nethy Bridge and Vicinity Community Council
082	D Morris
083	R Turnbull
089	Cromar Community Council
092	Scottish Land and Estates
100	Kingussie and Vicinity Community Council
116	Paths for All
135	Alvie and Dalraddy Estates
151	Forsyth Accounting Practice Ltd
157	Balavil Estate Ltd
188	Boat of Garten and Vicinity Community Council
192	Aviemore Business Association
194	Quarch Technology
195	V Jordan
203	Savills (UK) Ltd on behalf of Crown Estate Scotland
215	G Bulloch
216	Carr Bridge Resident

Ref	Name / Organisation
218	NHS Grampian
220	M Kinsella
221	Woodland Trust Scotland
224	Denise Stott
227	Moray Council
233	Ballater & Crathie Community Council
235	Anonymous
237	Aviemore and Vicinity Community Council
251	S Dickie
260	H Quick
264	D Sherrard
267	L MacLean
271	Dalwhinnie Community Council
272	Anonymous
273	Dalwhinnie Community Council
281	Tactran
283	R McGowan Ltd
285	Anonymous
292	Munro Surveyors
306	Anonymous
312	Anonymous
319	C McPherson
320	Anonymous
325	RSPB Scotland

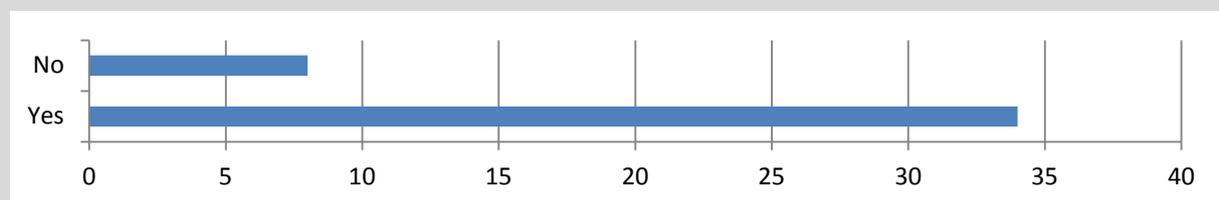
Response Overview

Do you agree that the new Local Development Plan should include a new policy requiring development proposals to show how they meet the six qualities of successful places?



A total of 48 responders answered this question.

Do you agree that we should include a clearer policy in the new Local Development Plan to set out when tools such as master plans and development briefs will be used?



A total of 42 responders answered this question.

Key points

- General support for both preferred options.
- Desire to see both policies be applied proportionally with respect to the size and nature of proposed development.

Issues Raised

Six qualities of successful places

The majority of respondents expressed their agreement with the Preferred Option (036, 039, 049, 044, 053, 059, 064, 082, 083, 089, 092, 116, 151, 157, 188, 192, 194, 195, 203, 215, 216, 218, 220, 221, 224, 227, 233, 235, 237, 260, 264, 267, 271, 272, 273, 181, 283, 292, 306, 312, 319, 320, 325). Five respondents disagreed with the Preferred Option, although none expressed support for the alternative (046, 100, 135, 251, 285).

Although supporting the preferred option, many responders had concerns about the potential costs arising from meeting the six qualities of successful places, especially with regards to smaller scale development. Concerns were also expressed that applying such requirements on smaller developments would be overly bureaucratic, cause delays and even prevent development from happening. It was suggested that requirements should be commensurate with the scale and type of development. For example, it was suggested that householder development should not have to demonstrate how it meets the six qualities. Another argument was that some types of development did not need to meet certain qualities, for example it was suggested that a barn should not need to demonstrate how it was welcoming (043, 046, 059, 064, 089, 092, 157, 188, 203, 233, 271, 273).

Conversely, some argued that the standards should apply to all development because of the special nature of the National Park and its environment, and some thought that the Local Development Plan should apply even higher standards owing to its special status (053, 083, 306, 325). It was also suggested that policy in the National Park set higher standards for energy efficiency, use of local and/or non-toxic/recyclable materials, minimising access tracks and minimising light and noise pollution (039, 082, 083, 188, 306).

Several responders asked that flexibility be applied to the policy in order to enable innovation, and that particularly with affordable housing, to ensure housing targets are met (292, 233, 235, 312)

It was requested the policy be clear and contain as much information as possible as to how the six qualities and design standards in general should be met (188, 195, 220, 237, 273). Some felt that this could be achieved using Supplementary Guidance (SG), which should be delivered quickly and published alongside the Plan (224, 281, 325), while others felt that SG was unnecessary and that detail should be in the Plan (195). The Highland Council (043) suggested that the proposed SG make specific reference to how good design principles should be addressed at householder level.

It was suggested that clever and high quality design should be encouraged to build stronger communities where residents and neighbours take pride in each other's spaces and that designing great places should be people focussed (312).

SEPA (044) note that two of the six qualities are very relevant to their interests, namely of developments being 'Adaptable' and 'Resource efficient'. In terms of the former they requested that the policy encourages developments that are capable of connecting to existing/ future sources of district heat, and built to a water resilient design when in or adjacent to areas at risk of flooding. In terms of the latter, they stated they would support: allocations/development that re-use or share existing resources, maximise efficiency in resource use and prevent future resource depletion. SEPA (044) also stated that:

- air quality is an important element of place making and should be covered in the LDP
- the importance of green/blue infrastructure should be recognised
- spaces should consider the needs of pedestrians, cyclists and public transport ahead of private motor vehicles;
- developments should help to create a clear hierarchy and structure to open spaces and routes
- electric vehicle / low emission transport infrastructure should be considered when designing places including provision of electric charging points

The importance of travel and active travel were highlighted (281). One responder used the concept of 'easy to move around and beyond' to object to Site H1 in Carr-Bridge (216). Tactran asked that support of low carbon/low emission vehicle technologies as well as car sharing and rural car clubs be considered in the LDP (281).

One respondent (135) objected to the requirement to meet the six qualities of successful places on the basis that development and communities must include the provision of jobs and productive activities which may not be particularly pleasant or welcoming. They also felt that development should not be micro managed by government agencies but should be led by entrepreneurs.

It was requested that consideration should be given to bringing existing empty homes, dilapidated and ruined spaces back into the housing market. This, it was argued, would be a successful and sustainable use of space which aims to build upon existing resources and infrastructure, while conserving the landscape (221).

A couple of responders asked if a policy regarding broadband and provision for new technologies could be included in the LDP (233, 235). Another (092) asked to see rubbish collection, toilet and parking facilities included.

A few responders felt that the CNPA's record on good design had been poor and questioned its ability to implement the policy (151, 215) and that planning should be left to the Highland Council and Scottish Government (285).

Master plans and development briefs

The majority of respondents expressed their agreement with the Preferred Option (036, 043, 053, 059, 064, 083, 089, 157, 188, 192, 215, 216, 218, 220, 221, 224, 227, 233, 235, 264, 267, 271, 272, 273, 283, 292, 306, 312, 319, 320 325). Eight respondents disagreed with the Preferred Option, although none expressed support for the alternative (030, 082, 092, 100, 135, 192, 251, 285). There was not a great deal of discussion around the question, though a few points were made.

SEPA agree that the LDP should set out clearly when a masterplan or development plan will be used. However, they have no preference whether this is included in a new policy or incorporated into an existing policy and/or settlement statement.

Halliday Fraser Munro on behalf of Mar Estate (036), agreed with the preferred option but asked that the LDP built in flexibility to enhance local distinctiveness which they felt could be threatened by the homogeneous nature of modern housing development.

Balavil Estate Ltd (157) stated that the requirement of masterplans and development briefs should be commensurate with the size of the development proposal.

RSPB Scotland (325) believe that masterplans and development briefs should be required to provide details of how the biodiversity value of the site will be enhanced.

Tactran (281) agree that masterplans and development briefs are useful tools for larger developments and would welcome a clear policy detailing the circumstances that they will be used.

A number of respondents felt that additional requirements for masterplans and development briefs could add to development costs, be too prescriptive, and may be a disincentive to development and investment (030, 092, 135).

NHS Grampian (218) said that in the event that new healthcare solutions are proposed and new sites required. It would be a requirement for NHS Grampian that sites central to the community are identified. Where existing healthcare sites become surplus to requirements alternative uses to fit with the surrounding area would be considered.

Discussion

Six qualities of successful places

The preferred option is proposed because paragraph 55 of Scottish Planning Policy states that LDPs should contribute to high-quality places by setting out how they will embed a design-led approach, including reference to the six qualities of successful places. The six qualities demand that developments be: distinctive; safe and pleasant; welcoming; adaptable; resource efficient; and easy to move around and beyond.

While the majority of responders supported the preferred option there was a clear desire that the requirements of the policy be commensurate with the scale and nature of development. This was often expressed through suggestions for thresholds and exemptions. For example, it was suggested that householder applications be exempt or that certain qualities would not be applicable to certain types of development. The CNPA recognise this and agree the requirements of any policy would need to be proportional and relevant. It is also important to ensure that the requirements do not prevent the delivery of important site objectives, such as affordable housing. Proportionality within the policy could be addressed in a number of ways, for example the policy could only apply to developments of a certain size or it could require less information to support smaller developments. These issues will therefore be addressed in the development of the policy.

The argument that applying the six qualities of successful places is insufficient within a National Park is acknowledged. While the six qualities set out what objectives development should aim for with respect of placemaking, they do not set out exactly how these should be achieved. Indeed, it is acknowledged that while they cover placemaking matters very well they do not cover all material considerations that might need to be taken account of during the planning process with respect of good design. It is intended therefore that the six qualities should therefore provide an overarching framework for setting out both placemaking and design requirements. These additional design requirements may include factors such as the use of local materials, minimising light and noise pollution, and landscape and biodiversity matters.

A number of responders requested higher standards relating to energy efficiency. However, this issue is largely addressed through Building Regulations legislation. Although more stringent policy requirements could be included within the LDP, experience from other planning authorities indicates that it is difficult to implement these in practice.

SEPA's request that factors within their interest be included within the policy is accepted and these factors will be addressed, as far as possible, in the development of the policy. It is agreed that the policy needs to be clear and it is intended that the design policies be supported by supplementary guidance.

The argument that some productive activities will not be welcoming or pleasant is noted, and this will be addressed in the development of a proportionate policy as discussed above.

The request that consideration be given to bringing existing empty homes, dilapidated and ruined spaces back into the housing market sits outside the remit of the policy. Nevertheless, the current LDP does contain a policy framework that supports the replacement of existing houses and buildings (which may or may not be dilapidated or

ruined) and outlines how houses and buildings (which also may or may not be dilapidated or ruined) may be converted or altered. It is intended that this policy framework be carried into the next LDP with the alterations suggested in the Monitoring Statement.

The current LDP already contains a policy regarding digital infrastructure; it is intended that this, subject to any changes proposed in the Monitoring Statement or through the consultation, be carried forward into the next LDP.

Site specific matters, such as those raised about HI in Carr-Bridge, will be addressed in the relevant settlement section of the report.

Master plans and development briefs

Within the context of the LDP it is worth setting out where responsibility will sit with reference to development briefs and masterplans. It is intended that development briefs be responsibility of the Planning Authority to produce and adopt as statutory or non-statutory guidance. Masterplans could be the responsibility of either the Planning Authority or the developer and it is the intention of the preferred option to set out where and when this will be required.

The request for flexibility and that development briefs and masterplans should not be too prescriptive is acknowledged and there is sense in ensuring that requirements are not too rigid, particularly as much information about sites will not be known until the planning application stage. The level of detail provided within development briefs and masterplans is likely to be a factor here; for example, development briefs are not going to set out the road layout or plot locations, therefore there will be latitude in what developers can propose.

The concern that this option will result in extra work or expense is largely unfounded. The aim of producing development briefs and masterplans is actually designed to make what work will be required as clear as possible, thereby helping to avoid unnecessary or insufficient work and the associated time and costs. Developer led masterplans are only likely to be required on the largest sites, for example An Camas Mor or North Aviemore (should the latter be needed). Under these circumstances developers will be required to carry out significant work anyway and a masterplan provides a good way of directing and coordinating this work. In this respect, the requirement of masterplans and development briefs will be commensurate with the size of the development proposal.

The request that masterplans and development briefs should be required to provide details of how the biodiversity value of the site will be enhanced is acknowledged. It is intended that such guidance will contain information on the landscaping and biodiversity requirements of the site.

SEPA's comment that the preferred option could be included in a new policy or incorporated into an existing policy and/or settlement statement is agreed with. It may be most appropriate to take an approach that utilises settlement statements where allocations exist.

Recommendations

The Proposed Plan should:

- Ensure the implementation of the six qualities of successful places and design standards in general are commensurate with the scale and nature of the proposed development
- Develop a policy on the use of development briefs and masterplans and outline where a development brief or masterplan is required for an allocated site in the relevant Settlement Statement

Main Issue 3 – Impacts and opportunities from the A9 and Highland Main Line upgrades

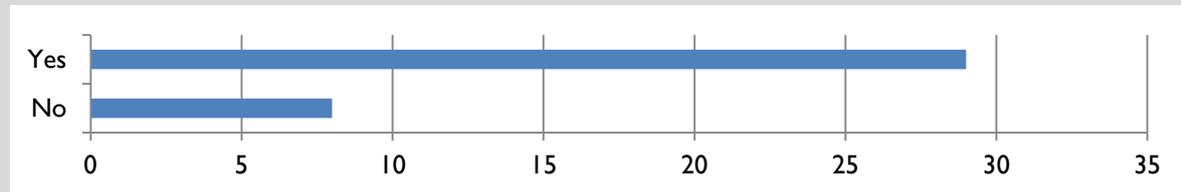
Respondents

Ref	Name / Organisation
001	Scottish Campaign for National Parks
003	Anonymous
011	Transport Scotland
030	Kincraig and Vicinity Community Council
033	Laggan Community Association
034	Braemar Resident
036	Halliday Fraser Munro on behalf of Mar Estate
039	N Kempe
043	The Highland Council
044	SEPA
049	Grantown-on-Spey and Vicinity Community Council
053	Inveresk Community Council
054	Rothiemurchus Estates
064	Nethy Bridge and Vicinity Community Council
076	Cairngorm Business Partnership
082	D Morris
083	R Turnbull
089	Cromar Community Council
092	Scottish Land and Estates
100	Kingussie and Vicinity Community Council
116	Paths for All
135	Alvie and Dalraddy Estate
151	Forsyth Accounting Practice Ltd
157	Balavil Estate Ltd
188	Boat of Garten and Vicinity Community Council
192	Aviemore Business Association
194	Quarch Technology
199	Scottish Natural Heritage
200	Highland and Islands Enterprise

Ref	Name / Organisation
201	A Brown
203	Savills (UK) Ltd on behalf of Crown Estate Scotland
206	J Walker
210	Urban Animation on behalf of Invercauld Estate
213	S Caudrey
216	Carrbridge Resident
224	D Stott
227	Moray Council
233	Ballater and Crathie Community Council
237	Aviemore and Vicinity Community Council
251	S Dickie
260	H Quick
267	L MacLean
271	Dalwhinnie Community Council
272	Boat of Garten Resident
273	D Munday
279	North East Mountains Trust
281	Tactran
282	D Bruce
283	Ross McGowan Ltd
285	Anonymous
292	Munro Surveyors
293	Braemar Resident
294	J Angus
306	Anonymous
316	Kingussie Resident
320	Anonymous
325	RSPB

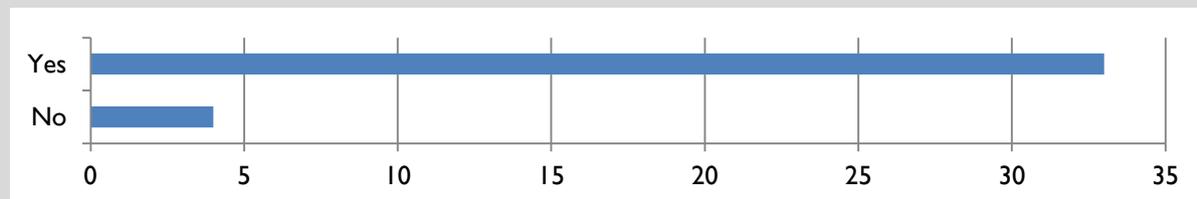
Response Overview

Q1: Do you agree with our proposals to allocate new employment land to take advantage of the opportunities for inward investment associated with the A9 and rail upgrades?



37 respondents answered this question. 78% (29) of respondents agreed with proposals to allocate new employment land, whilst 22% (8) did not.

Q2: Do you agree that we should seek to support those communities that are at risk of being by-passed by the A9 dualling project?



33 respondents answered this question. 89% (31) of the respondents agreed that we should seek to support communities at risk of being by-passed, whilst 11% (4) did not.

Key points

- General support for this approach, however some expressed concern about the impacts of new development and others felt there should be greater flexibility for economic development proposals in other locations across the Park

Issues Raised

The majority of those who responded were in agreement with the proposals to allocate new employment land to take advantage of the opportunities associated with the A9 and rail upgrades (030, 043, 053, 054, 064, 082, 116, 151, 157, 188, 192, 194, 199, 203, 206, 210, 213, 224, 267, 271, 272, 273, 281, 283, 285, 292, 293, 306, 320) whilst a small number were not (041, 083, 092, 100, 216, 237, 251, 316).

An even greater majority were in agreement with the idea of seeking to support the communities at risk of being by-passed by the A9 dualling project, (030, 039, 043, 044, 053, 054, 064, 082, 092, 100, 116, 151, 188, 192, 203, 210, 213, 224, 237, 251, 267, 271, 272, 273, 281, 283, 285, 292, 293, 306, 316, 320, 325) whilst again a small number were not (083, 194, 206, 216).

A number of respondents did not answer the questions but provided general comments.

Support for additional economic development land was expressed as a mechanism for reversing the forecast population decline through inward investment (076). Another respondent agreed the Local Development Plan should encourage and facilitate investment in economic activities to support by-passed communities and settlements experiencing decline (135). Others emphasised the need for a flexible approach to economic development to support communities impacted by the A9 dualling (157, 203). However, two responses were of the view that settlements along the A9 are already bypassed by the existing road and communities continue to thrive, therefore little would change (194, 206).

It was highlighted that economic development sites in close proximity to the A9 would reduce the need for travel to the A9 and help to minimise vehicular emissions (199), as well as helping to reduce large vehicles passing through small towns (224). RSPB were of the view that it is sensible to identify economic development sites in the most sustainable locations and that this should not negatively impact on the environment (325).

Whilst supporting the preferred option, one respondent felt that economic development should only be allowed where necessary to support specific communities (064). Another felt that any new sites should only be developed when existing vacant premises in Aviemore and Newtonmore are full (260). Two respondents raised access concerns and felt that no development should be accessed directly from the A9 (064, 100).

A number of respondents raised concern about the potential environmental impacts of new economic development land. One cautioned that new sites along the A9 may impact on the character of the area and that some industries would not be suitable (064). Another felt that development along the route is not appropriate in a National Park designated for its natural environment (083). Concerns were also expressed that there are no mitigation proposals for impacts to landscape, habitats and wildlife, recreation and communities (039, 083).

Other responses considered sustainable travel issues. Some suggested that the new developments should be utilised to support improved active travel (116, 281), and a number highlighted the opportunities to improve public transport along the route which will also benefit the businesses and communities (116, 194, 273). However, others noted that accessibility could be negatively impacted if the dualling results in a reduction in public transport services (281) or impacts on outdoor recreation along the route (001). It was also highlighted that the Main Line rail improvements provide an opportunity to focus on reducing car use and supporting and promoting more sustainable transport (001, 039).

Concerns were expressed that communities may be bypassed on the Highland Main Line due to revised timetables which may miss smaller stops to improve journey times (001, 033, 100, 271). Transport Scotland however confirmed that was not correct based on the current proposed rail stopping pattern. They added that 'Phase 2' of the upgrade programme, to be delivered in Spring 2019, aims to achieve hourly services between Perth and Inverness and journey time improvements of around 10 minutes (011).

A number of respondents wished to see more economic development across the National Park, and felt that opportunities should not be constrained by proximity to transport infrastructure (089, 092). It was suggested that brownfield redevelopment sites should be considered favourably irrespective of proximity to transport corridors (092). The need for small, start-up, flexible and informal business opportunities, including in rural areas, was also identified (089, 151).

It was also highlighted that the focus of development and population along the A9 and Highland Mainline has implications for other parts of the Park. One response highlighted the need for upgrading the A93 (036), whilst others felt that the A93 corridor should not be overlooked (036, 210). Another commented that land based businesses and other rural parts of the National Park are overlooked by the approach (092). It was also added that reference should be made to the A96 dualling project (227).

Settlement and site specific issues

One respondent felt that on account of increased commuting from Aviemore, there is a greater case for the development of North Aviemore (which is closer to the A9) instead of An Camas Mor (001).

A number of responses related to the specific new site proposals. Support was expressed for the economic development proposal THC046/054 at Kincaig (030), although two respondents did not agree with this proposed allocation (201, 260). Another respondent expressed concern about the potential allocation of the THC030/069 at Carr-Bridge due to its restricted access from the village and potential for increased heavy traffic (216). One respondent felt that the proposals (including the proposed allocation of THC016) conflict with the re-designation of Dalwhinnie from an intermediate to rural settlement (200).

A specific site was proposed for inclusion as an economic development allocation or potential A9 compound at Lynchat (157).

Other issues

One respondent highlighted the need for greater assessment of potential impacts of the A9 dualling on communities (188), whilst a second suggested that the impacts should be monitored to determine where specific support is required (064). Another felt that that consideration should be given to the combination of increased pressures of commuting and the impacts on by-passed communities (279). Highland Council said they would be keen to work with CNPA to understand any potential increases in commuting pressure resulting from the A9 and Highland Mainline upgrading (043).

Tactran agreed with the need to support communities, particularly to minimise any loss of passing trade and highlighted potential benefits of the proposed Scottish Government investment in Electric and Low Carbon Vehicle infrastructure along the route (281). The importance of broadband in supporting businesses was also raised (092, 135).

One respondent felt there should be compensation for communities bypassed by both the A9 and Highland Mainline (049).

Discussion

The significant level of support for the preferred options is noted.

Some respondents may have misinterpreted the intention of the preferred approach set out for this main issue. For clarification, it does not support development directly onto the A9 or propose a presumption in favour of economic development along the entire route. The

approach only seeks to support development at the sites specifically identified in the Main Issues Report, which are considered to be well-located to take advantage of the potential for new inward investment as a result of the A9 dualling and Highland Main Line improvements. Concerns were expressed about the potential impacts of development on the landscape, character and natural environment of the National Park. However, all sites proposed as part of this approach are within or adjoining existing settlements and potential impacts have been assessed. It is not considered that these sites will have a detrimental impact on the character of the National Park. Any specific development proposals for these sites will also still require planning permission and will be assessed against all policies within the Local Development Plan, including policies designed to protect natural heritage and landscape character.

There were a number of comments in respect sustainable travel issues along the route. Many of these relate to issues which cannot be influenced or addressed through the Local Development Plan. For example, whilst the cycle route will be upgraded as part of the A9 dualling, this is not within the control of the Local Development Plan. Nevertheless, the Local Development Plan will seek to promote and encourage active travel through the sustainable design policy, which will be relevant for all new development – see Main Issue 2 ‘Designing Great Places’ for more detail.

Concerns expressed about public transport and the Highland Main Line in respect of amended timetables are noted. However, as Transport Scotland has pointed out, it should not be the case that any settlements will see a reduction in services. In any event, public transport and the timetabling of services is not a matter that can be directly addressed by the Local Development Plan.

In response to the calls for more economic development in other areas of the National Park, it should be noted that existing policy 2 (Supporting Economic Growth) is supportive of economic development proposals across the National Park, including in rural areas. Further issues in respect of economic development principles and policy are considered under Main Issue 6 ‘Economic Development’.

Other important road routes were mentioned including the A93 and the suggested inclusion of the A96 dualling. Although the importance of these other routes is noted, the purpose of including the A9 dualling as a main issue was to consider the potential impacts and opportunities of it and what it might mean for communities. There are no specific policies that will be attributed to the A9 corridor – the same policies will apply across the National Park.

Settlement and site specific issues

The site specific responses are noted and will be considered within the settlement section of this report. It is not agreed that there is any conflict between the preferred approach, which includes the potential allocation of a small economic development site (THC016) at Dalwhinnie, and the re-classification of Dalwhinnie as a rural settlement. See Main Issue 1 ‘Over-Arching Development Strategy’ for further consideration of Dalwhinnie’s status in the settlement hierarchy. The proposed site at Lynchat is addressed within the ‘Landward Sites’ section of this report.

Other issues

The other comments raised are noted. It is understood that continued monitoring of the impacts of the A9 dualling will be required, and all information gathered during the next plan period will be used to inform future revisions of the Local Development Plan (post 2025). Tactran's comments regarding investment in electric vehicle infrastructure are noted and this will be monitored. SPP states that 'Development plans should support the provision of infrastructure necessary to support positive changes in transport technologies, such as charging points for electric vehicles', and it is proposed to refer to this issue in the supporting text for policy 3 – see the 'Other Policy Changes' section of this report for more detail. The need for high quality broadband is noted and this issue is considered further under Main Issue 6 'Economic Development'.

The suggestion that there should be compensation for communities bypassed by the A9 and Highland Main Line is not a matter for the Local Development Plan.

Recommendations

The Proposed Plan should:

- Allocate sites for economic development, as proposed, to take advantage of the potential for inward investment resulting from the A9 and Highland Main Line improvements
- Include settlement objectives to help support settlements that may be affected by the A9 / Highland Main Line route

Main Issue 4A – How much new housing do we need and where should we build it?

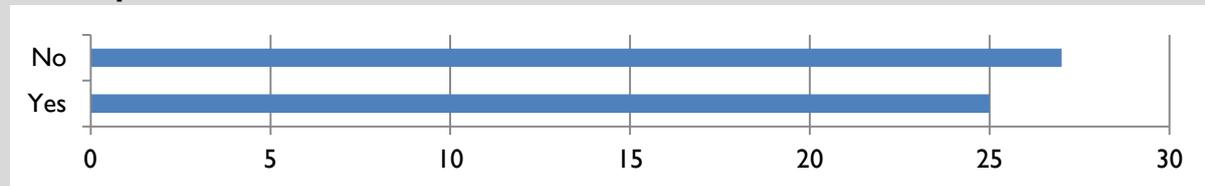
Respondents

Ref	Name / Organisation
030	Kincraig and Vicinity Community Council
033	Laggan Community Association
039	N Kempe
043	The Highland Council
046	Ristol Consulting on behalf of Atholl Estate
053	Inveresk Community Council
059	Savills on behalf of Invercauld Estate
060	Halliday Fraser Munro on behalf of Reidhaven Estate
064	Nethy Bridge and Vicinity Community Council
066	Cairngorms Campaign
082	D Morris
083	R Turnbull
089	Cromar Community Council
092	Scottish Land and Estates
100	Kingussie and Vicinity Community Council
135	Alvie and Dalraddy Estates
151	Forsyth Accounting Practice Ltd
157	Balavil Estate Ltd
188	Boat of Garten and Vicinity Community Council
192	Aviemore Business Association
195	V Jordan
200	Highlands and Islands Enterprise
203	Savills (UK) Ltd on behalf of Crown Estate Scotland
205	Ballater Resilience Group
206	J Walker
207	Anonymous
210	Urban Animation on behalf of Invercauld Estate
213	S Caudrey
215	G Bulloch
216	Carr Bridge Resident

Ref	Name / Organisation
219	Savills (on behalf of J and M Forbes Leith Partnership)
220	M Kinsella
221	Woodland Trust Scotland
224	D Stott
227	Moray Council
231	C Campbell
232	Anonymous
233	Ballater & Crathie Community Council
237	Aviemore and Vicinity Community Council
247	Aberdeenshire Resident
251	S Dickie
253	Anonymous
260	H Quick
267	L MacLean
271	Dalwhinnie Community Council
272	Boat of Garten Resident
273	D Munday
281	Tactran
282	D Bruce
283	R McGowan Ltd
285	Anonymous
289	Anonymous
292	Munro Surveyors
293	Braemar Resident
306	Anonymous
307	Dulnain Bridge Resident
319	C McPherson
321	J Finnie
325	RSPB Scotland

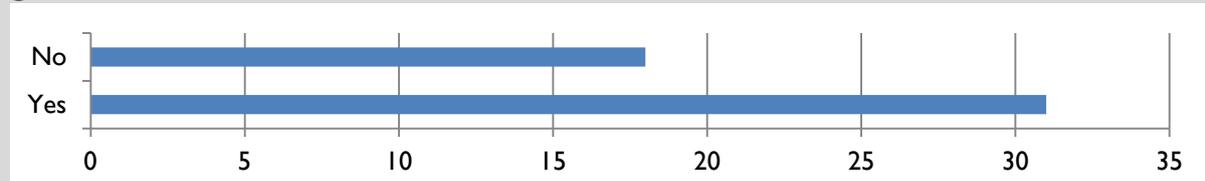
Response Overview

Do you agree with our proposed Housing Supply Targets for the next Local Development Plan?



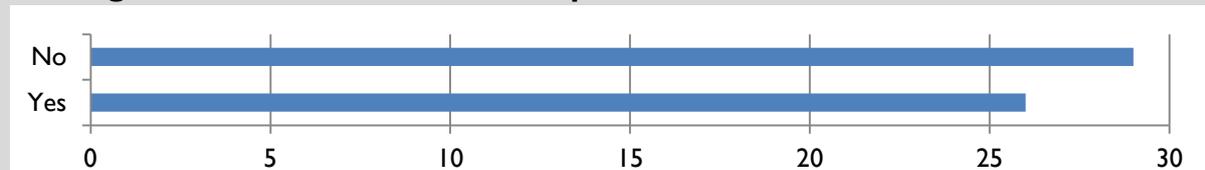
A total of 52 responders answered this question.

Do you agree that the proposed Housing Land Requirements are sufficiently generous?



A total of 49 responders answered this question.

Do you agree with our overall conclusions about the need for additional new housing sites in the new Local Development Plan?



A total of 55 responders answered this question.

Key points

- Much disagreement about the Housing Supply Targets (HST) and need for new sites
- Lots of arguments to either increase or decrease the HST
- Support for the 10% generosity level built into the Housing Land Requirement (HLR)

Issues Raised

Housing Supply Target

Most responders expressed their disagreement with the Preferred option (030, 033, 064, 066, 083, 092, 151, 157, 200, 206, 207, 210, 215, 216, 220, 224, 237, 247, 251, 253, 272, 282, 285, 292, 307, 319, 325). The remaining 25 responders expressed their agreement (039, 043, 046, 053, 082, 089, 100, 192, 203, 205, 213, 219, 227, 231, 232, 233, 260, 267, 271, 273, 283, 289, 293, 306, 321).

There were numerous reasons for the views held, with the most significant being that;

- The Housing Supply Target (HST) is about right (043, 053, 213, 231, 232, 306);
- The HST is too low (092, 157, 200, 207); and
- The HST is too high (064, 066, 083, 215, 247, 272, 319, 325).

One area of discussion centred around National Records of Scotland's 2014 based population and household projections, which between 2014 and 2039 project a population decline from 19,010 to 18,377 (around 4%) and a household increase from 8,653 to 9,195 (6%). It was argued that because there was a projected fall in population and only a small rise in households the HST was too high (064, 083, 253). Others argued that the projected fall in population meant that the HST should be even higher in order to attract more people to the area (200, 203).

Highland and Island Enterprise (200) did not believe the population of the National Park will age as projected. They argue that "*due to social preferences for millennials, the improvements in both physical and digital connections, SDS's and HIE's own activities supporting talent attraction and the Park Authority's proposed changes to affordable housing policy*" the trend won't be as marked.

A small number of responders were of the opinion that housing / population statistics were flawed (224), not based on a real understanding of local needs or demands (206) or were simply too high, either within a specific HMA or across the National Park as a whole (215, 272). One responder (188) stated that it was not clear how the HSTs were arrived at.

Linked to the discussion about population and household projections were comments on the nature of Housing Need and Demand Assessments (HNDAs); all of these argued that the HST should be higher (200, 203, 210). Savills Ltd on behalf of Crown Estate Scotland (203) were under the impression that a 'low growth' scenario had been chosen.

Another strand of argument was that the LDP should be more 'ambitious' with its HST, primarily to promote economic development (092, 151, 157, 200, 203).

Scottish Land and Estates (092) argued that the HST was too low and wanted to see a higher target based on what they called the "*desirability effect*".

Other respondents argued that the HST was too high because of the special nature of the National Park and its landscape and ecology (066, 247, 319, 325). RSPB Scotland (325) argued that the HST for the Badenoch and Strathspey Housing Market Area (HMA) should not be met in full within the HMA, and should instead be met in the adjacent Inverness HMA as permitted by Scottish Planning Policy (SPP). Another responder (195) argued that Aberdeenshire's housing should be met within the same HMA but outside of the National Park's boundary. One responder (306) believed that the HST was fine but the amount of land proposed for allocation was too generous. Another (233) felt that the LDP was attempting to fit too many houses per piece of land.

Several responders felt that the HST should be delivered flexibly and innovatively, with some expressing support for the approach to sites suggested in the preferred option (046, 092, 157, 188, 203). Savills Ltd on behalf of Crown Estate Scotland (203) suggested the use of a policy similar to Moray Council's Policy H2 Long Term Housing Designations (LDP 2015). Scottish Land and Estates (092) argued that flexibility in allocations would ensure that economic activity in the National Park was not constrained.

Several responders framed their arguments against the allocation of specific sites and/or the approach to particular settlements and areas. These are:

- Angus area, where it was questioned why a HST of zero had been identified (272)

- An Camas Mòr, where it was argued that An Camas Mòr was not needed or appropriate (066, 213, 231, 232), was too big (260) or was in the wrong place and a smaller new settlement should be established on THC030/069 in Carr-Bridge instead (307)
- Ballater, where HI was deemed unnecessary and it was asked why 250 new homes were needed if the proposed HST for Aberdeenshire was 154 (195, 205)
- Braemar, where it was argued that HNDAs did not properly take account of the settlement's need. It was stated that a local housing needs assessment was published by the Highlands Small Communities Housing Trust in 2015 and that this provides a more reliable estimate of local need. It identified a significant extant demand of 59 homes, rising to 102 homes by 2020. Consequently, the preferred sites do not reflect the need and demand in Braemar (210). Another responder argued there were limited housing sites in Braemar (285)
- Carr-Bridge, where it was argued that site HI was not needed (216)
- Coylumbridge, where it was argued that limited development could take place along the south side of the Ski Road (307)
- Highland area, where it was stated that the HST was too high (272)

Several responders made comments about the HST being directed by local communities or being targeted at local people or being delivered through small scale developments within existing settlements (030, 064, 100, 210, 213, 224, 247, 251, 260, 292, 319, 325).

Scottish Land and Estates (92) were keen to see incentives for developing empty properties, both residential and non-residential. Balavil Estate Ltd (157) felt that the development of work from home and self-build units should be promoted.

Several responders highlighted the need for affordable housing. They covered topics relating to a need for higher levels of affordable housing, for certain tenure types and the needs around specific settlements (033, 082, 220, 251, 253, 273, 285, 293).

Several responders made comments about the need to control second home ownership (064, 188, 220, 221, 271, 273, 285, 306). One response (220) believed the HST was based on the "*premise of more holiday homes*". Dalwhinnie Community Council (271) believed second home ownership is rising. Nethy Bridge and Vicinity Community Council (064) said they would also like to see the general 'presumption in favour' of a tourism related planning application removed and each proposal justified along with all other applications. They say that in Nethy Bridge, properties being built as holiday accommodation have later been sold as market houses.

Housing Land Requirements and Generosity

The majority of respondents agreed that the Housing Land Requirements are sufficiently generous (039, 043, 053, 082, 089, 100, 188, 192, 195, 205, 207, 213, 215, 220, 224, 227, 231, 232, 237, 247, 251, 260, 267, 271, 273, 283, 289, 306, 307, 319, 321). Eighteen respondents disagreed, although none expressed support for the alternative (030, 033, 060, 064, 066, 083, 092, 135, 151, 157, 206, 210, 216, 219, 233, 272, 292, 293).

Those who chose to comment on the Housing Land Requirement (HLR) can be split into two broad camps – those who believed the level of generosity applied to be too high and those who believed it to be too low.

Those who argued that the 10% was too generous (066, 083, 325) did so because:

- It places the National Park's high quality landscape and ecology at risk.
- The population and household projections suggest that a much lower level of needed housing is needed.

According to RSPB Scotland (325) it wasn't necessary to apply a 10-20% margin because of the National Park's special character of the environment and the first statutory aim of the National Park. They cited the fact that Loch Lomond and Trossachs National Park LDP had not done so and that this approach had been supported in the Reporter's Examination Report.

Several responders argued for a higher margin of generosity (060, 092, 135, 157, 200, 219). Two responders (060, 219) argued it should be set at 20% because of uncertainty and time delay associated with large sites such as An Camas Mòr and Kingussie EPI. Savills on behalf of J and M Forbes Leith Partnership (219) argued that due to the geographically fragmented nature of the National Park, with the Cairngorms massif effectively preventing easy movement between areas, a more generous level should be provided within each of the Park's constituent parts. Scottish Land and Estates (092) believed a higher margin should be delivered through what they call 'long sites', which could be developed if demand for them were needed. Highlands and Islands Enterprise (200) believed that the higher level of affordable housing proposed by the LDP will result in the area becoming more attractive to younger buyers and result in the need for a level of generosity of around 15-20%. They also believed that population and household projections should be treated cautiously and therefore a higher level of generosity is needed to deal with this.

Additional New Housing Sites

Most responders expressed their disagreement with the preferred option (030, 064, 066, 083, 092, 151, 195, 205, 206, 207, 210, 215, 216, 219, 220, 221, 224, 231, 232, 237, 247, 253, 260, 282, 285, 292, 307, 319, 325). The remaining 26 responders expressed their agreement (033, 043, 053, 059, 082, 089, 100, 135, 157, 188, 192, 203, 213, 227, 233, 251, 267, 271, 272, 273, 281, 283, 289, 293, 306, 32).

A number felt that new sites could not be justified while large sites such as An Camas Mòr and HI, Ballater remain allocated (066, 083, 195).

RSPB (325) supported the identification of new sites to add flexibility, but believed the overall area of land allocated should be reduced as they do not agree with the HST or HLR.

Scottish Land and Estates (092) felt that the proposed new sites are insufficient. They argued that consideration should be given to the aspirations of businesses looking to grow in the area. They felt 'a flexible policy approach' was needed to meet demand and would also like to see a policy which permits small developments, which can be added to as and when required by housing and employment demand.

Urban Animation on behalf of Invercauld Estates (210) did not believe the preferred sites in Braemar will provide an adequate supply of new opportunities for housing or other facilities.

Several responders felt that emphasis should be given to bringing empty and derelict buildings back into use (039, 135, 221). It was suggested that new sites should be within

existing housing areas and not expand them (319). It was also suggested that focusing on these areas first would reduce the need for new sites elsewhere (221).

Discussion

Housing Supply Target

Population and Household Projections

A great deal of discussion was centred on the National Records of Scotland (NRS) 2014 based population and household projections. It is stated within the MIR and the Housing Evidence Paper that the figures quoted need to be treated with caution. However, this does not mean that the methodology applied or that the assumptions made are questioned or deemed unreliable. It reflects the simple fact that the margin of error becomes more significant at later stages of the 25 year projection period. This is one of the reasons population and household projections are refreshed every two years and policy documents such as LDPs are also reviewed within shorter time frames. The projections for the first 5 to 10 years of the period have a much lower margin of error and are therefore likely to present a reasonably close picture of what is likely to happen over the timeframe of the LDP.

It is worth noting that since the MIR was published new 2016 based population projections have been released by NRS, covering the period up to 2041. These show a similar picture to the 2014 based projections, with a decrease from 19,006 to 18,332 (about 4%) over the whole projection period (2014 based projection also have a fall of around 4%). Therefore, despite new evidence, the projected outlook remains broadly the same and does not trigger a need to update our assumptions about housing need and demand. 2016 based household projections are yet to be officially published.

It should also be noted that population and household projections are just one component of the evidence base used in HNDAs to arrive at an estimate of housing need and demand. Responders that focus on these projections as a means of critiquing the proposed HST, for example by pointing out that there is projected to be a fall in population over the projection period, or that the household projections do not match the HST, miss out on all the other considerations, such as the need for particular tenures, property sizes, specialist accommodation types etc.

Evidence for the HST

Paragraph 121 of SPP states that: *“In the National Parks, local development plans should draw on the evidence provided by the HNDAs of the constituent housing authorities. National Park authorities should aim to meet the housing land requirement in full in their area”*

As set out in the Housing Evidence Paper, the HST has been arrived at through an analysis of the HNDAs that cover the National Park area and other supporting data; it will not be repeated *verbatim* here. All of the HNDAs used have been found to be robust and credible by the Centre for Housing Market Analysis (CHMA). Each is therefore a reliable base for calculating the HST for the National Park in the plan period, to the extent that they address the need and demand for housing in the National Park. The argument that a low growth scenario has been used as the basis of its HST is false; it has used the principle growth or equivalent scenario from each HNDA.

Since the MIR was published certain new data has been released while decisions on other LDPs, as well as comments to the MIR consultation, have led to the conclusion that a revision to the HST is required. These are:

- A new Aberdeen City and Shire HNDA has been published.
- A new Moray Council HNDA has been published.
- The Examination Report on Stirling Council's LDP 2 has been published.

A summary of this new data is presented in Annex I. Based on the factors discussed in Annex I it is recommended that the HST set out within the MIR be revised as shown in Table I below.

Table I Revised Housing Supply Targets

Local Authority Area	2020-2024			2025-2029			2030-2039 (indicative target)		
	Market	Affordable	Total	Market	Affordable	Total	Market	Affordable	Total
Aberdeenshire	30	30	60	26	23	49	47	38	85
Angus	0	0	0	0	0	0	0	0	0
Highland	154	178	332	118	100	218	236	200	436
Moray	18	10	28	14	7	21	22	13	35
Perth & Kinross	15	12	27	9	7	16	18	14	32
CNPA Total	218	229	447	167	137	304	323	265	588

Table 2 below presents revised HLRs based on a generosity level of 10% being applied to the HSTs in Table I (a more detailed discussion around the generosity level is presented in the following section).

Table 2 Revised Housing Land Requirements based on a generosity level of 10%.

Local Authority Area	2020-2024	2025-2029	2030-2039 (indicative target)
Aberdeenshire	66	54	94
Angus	0	0	0
Highland	365	240	480
Moray	41	23	39
Perth & Kinross	30	18	35
CNPA Total	502	334	647

The main difference between the HST (and as a consequence HLR) presented in the MIR and the revised ones presented in Table I (and as a consequence the HLR presented in Table 2) is that the HST for 2020-2024 HST is higher, while the HSTs for 2025-2029 and 2030-2039 are lower. These are relatively minor adjustments and are unlikely to satisfy those who argued for a higher or lower HST. However, it is reiterated that in compliance with SPP, the HST is based on the contents of the HNDAs covering the National Park. No

responders have suggested an alternative method of calculating the HST, nor have they submitted any information on what they believe it should be. In the absence of any quantifiable alternative, the HST as revised in this report, remains the most robust policy view of the number of each housing market area needs over the periods of the LDP.

Angus HST

The reasons for the Angus area not having its own HST are outlined in the Housing Evidence Paper. Angus Council HNDA (2010) places the area of Angus within the Cairngorms National Park within the West Angus and Strathmore & Glens HMAs. The HMAs include the settlements of Forfar, Kirriemuir and Letham and stretch north to include the Angus Glens (Glen Esk, Glen Clova, Glen Prosen and Glen Isla). There are only 33 dwellings in the Angus area of the National Park, 11 of which are ineffective stock, which led the Council's housing market analysis to conclude that purchasers from the Cairngorms National Park have no influence on the operation of any HMA in Angus. This area was therefore excluded from consideration in the assessment of housing need and demand.

Since the publication of the 2010 HNDA, TAYplan have carried out a Joint HNDA that covers its area (TAYplan, 2013). The Joint HNDA covers the West Angus and Strathmore & Glens HMAs, although the National Park area of the HMAs technically falls outside of the TAYplan area. The Joint HNDA does not draw any conclusions about the National Park.

No conclusions relating to the National Park can be drawn from these HNDAs, therefore in this area the CNPA must take into account any other information available to provide the needed land supply. Given the extremely small size of the population, which is unlikely to be more than 50, and the number of households within the area, it is clear that a quantitative analysis of need is not possible. Given the area's relative geographical isolation to the rest of the National Park, it is also clear that this population is unlikely to generate any demonstrable need that needs to be met at a strategic level; indeed the area has seen only two new dwellings completed since 2000. Therefore, a policy based approach to housing provision is thought to be the most robust option within the area, with no HST set and applications considered on a case by case basis.

Displacing growth to adjacent HMAs and areas outwith the National Park

Several responders have suggested that some of the HST be met outside of the National Park's boundary. Paragraph 121 of SPP allows this, stating: "*National Park authorities should aim to meet the housing land requirement in full in their area. However, they are not required to do so, and they should liaise closely with neighbouring planning authorities to ensure that any remaining part of the housing land requirement for the National Parks is met in immediately adjoining housing market areas, and that a 5-year supply of effective land is maintained.*"

The suggestions were to displace part of the HST from:

- Badenoch and Strathspey HMA to Inverness HMA
- The Aberdeenshire part of the National Park to elsewhere in the Rural Aberdeenshire HMA
- The affordable housing requirement for the Perth and Kinross area of the National Park to elsewhere in the Highland Perthshire HMA

The latter two suggestions would still see the HST met within their own HMAs, just not within the National Park.

The position that the CNPA begins with in deciding whether or not to apply this provision is in the statement that National Park authorities should aim to meet the housing land requirement in full in their area. There would therefore need to be a compelling reason to transfer parts of the HST outside of the National Park boundary, even if it was still within the same HMA.

The CNPA does not believe that there currently exist any compelling reasons to do so. There is sufficient unconstrained land to meet the HLR in full within the National Park's boundary and according to the Strategic Environmental Assessment (SEA) and Habitats Regulations Appraisal (HRA) assessments carried out to date, any potential negative effects arising from meeting the HLR can be avoided, mitigated or compensated. The proposed HLR is considerably lower than the HLR in the current LDP, which was found to be compatible with the statutory aims of the National Park. It continues to be the CNPA's position that the application of the LDP's policies along with statutory and non-statutory guidance will ensure that the National Park's statutory aims are met and significant negative effects avoided.

Ambition and flexibility

Several responders requested that the HST have more 'ambition'. While the HST is a policy view of the number of homes to be delivered it needs to be evidence based and, as stated by SPP, reflect the evidence contained within the HNDAs that cover the National Park's area. The HST reflects this evidence and any increase on a speculative basis is not supported by national policy. It is also worth stating that the National Park already has a very generous land supply that is in excess of the HST as presented in Table 3 of the MIR (page 28). Much of this land supply already has planning permission and there is no reason that it should not be delivered over the Plan period. In a similar vein Scottish Land and Estates (092) requested that the HST be higher because of a "desirability effect". This approach would not be supported by National policy and, again, it should be pointed out that the National Park already has a generous housing land supply.

Several responders asked that the policies around delivering the HST be "*flexible*". This covered a number of factors, including sites, windfall development and general housing policy. With respect to sites, the aim of the MIR is to identify a range of preferred options to meet housing need. The sites identified in the MIR are varied in scale and location and should enable a variety of delivery mechanisms. There is land within settlement boundaries that provides opportunities for windfall, which by its very nature, is flexible. Flexibility is also built into the HST by virtue of the generosity provided by the HLR. In policy terms the current LDP already provides considerable flexibility in terms of the type and location of housing provided, and these policies will be carried forward into the Proposed Plan.

Sites

A number of responders wrote about specific sites in relation to the HST. One comment said that while the HST was fine, they felt the land supply was too generous. There is still work that needs to be done on the amount of land that needs to be allocated and the density of said allocations. It may be that some preferred sites are altered, added or removed in the process of the production of the Proposed Plan. Changes may also arise because of comments made in the consultation on the MIR. Site specific issues are considered in the relevant settlement section of this report.

It should also be noted that the existence of an allocation does not necessarily mean that it is intended to be delivered in its entirety during the Plan period. For example, in the case of An Camas Mòr and Ballater HI, these are allocated to deliver housing over longer time periods extending beyond 2039.

Long Term Allocations

Several requests were made for a policy similar to Moray Council's Policy H2 Long Term Housing Designations. The CNPA is indeed proposing a policy similar to this with respect to An Camas Mòr – see Main Issue 4B 'Housing Growth Around Aviemore'.

Empty and Derelict Properties

Paragraph 117 of SPP states that: *“The housing land requirement can be met from a number of sources, most notably sites from the established supply which are effective or expected to become effective in the plan period, sites with planning permission, proposed new land allocations, and in some cases a proportion of windfall development”*.

Crucially the CNPA needs to be confident that whatever sites it identifies to meet the HLR are deliverable within the LDP period. In the case of windfall development, which is essentially what the conversion of empty or derelict properties would be, the assessment of the expected contribution must be realistic and based on clear evidence of past completions and sound assumptions about likely future trends (SPP, para. 117).

The very nature of empty or derelict properties means that there is inherent uncertainty about the timescales in which and frequency at which they can be bought back into use. The current LDP already contains policies that allow empty and derelict buildings to be bought back into use, either through reinstatement, conversion or replacement. It is intended that this policy approach be carried forward into the Proposed Plan.

It should also be noted that bringing empty or derelict homes back into use, while supported in principle, would not add to the net number of homes within the National Park. Any such developments would therefore not contribute directly towards meeting the HST/HLR for the plan period.

Affordable Housing, Occupancy Criteria and Second Homes

All matters relating to affordable housing, occupancy criteria and second homes are dealt with under Main Issue 5 'The Affordability of Housing'. It should be noted that properties developed specifically as holiday accommodation cannot be legally sold as market housing without first gaining planning consent to change their use. Such applications would be treated on a case by case basis.

Housing Land Requirements and Generosity

A number of representations questioned the application of a “generosity” allowance to establish the housing land requirement in the National Park. Many of these related to the overall HST being either too high or too low, and where this is the case it has been discussed and responded to in the section on that topic. This leaves this section of the report to cover the following three issues raised:

- That the level of generosity is too high
- That the level of generosity is too low
- That no generosity allowance should be provided

Paragraph 116 of SPP states: *“Within the overall housing supply target, plans should indicate the number of new homes to be built over the plan period. This figure should be increased by a margin of 10 to 20% to establish the housing land requirement, in order to ensure that a generous supply of land for housing is provided. The exact extent of the margin will depend on local circumstances, but a robust explanation for it should be provided in the plan.”*

The preferred option is to apply the lower end of this range, with a 10% allowance for generosity. As explained in the MIR, this is because much of the land in the Cairngorms National Park is of European or National importance for nature conservation. This limits the amount of land that is appropriate for development. Taking account of the overall aims of the National Park, it is the CNPA’s position that these local circumstances merit the lower percentage.

Options for different levels of generosity were discussed during the examination of the current LDP; these were:

- 25% in Badenoch and Strathspey HMA,
- 20% in Moray HMA, and
- 0% in the Aberdeenshire, Angus and Perth & Kinross parts of the National Park

In these instances the Reporter did not consider the higher levels to be appropriate for a National Park, where its collective aims must be taken into account (pg. 45 of the Examination Report). It was the Reporter’s view that when the collective aims of the National Park, the LDP vision and spatial strategy, and the historic rate of housing completions were taken into account, any margin to be added to the HST should be at the lower end of the scale. They therefore recommended that a margin of 10% be applied to the HST in all constituent planning authority areas in the National Park.

The collective aims of the National Park and the LDP vision remain the same while the proposed spatial strategy has only been modified slightly. It is therefore the opinion of the CNPA that the situation remains broadly the same and therefore the reporter’s recommendation supports the MIR’s preferred option to set the generosity at 10% for the whole National Park.

Arguments have been made that delay to the delivery of sites such as An Camas Mòr and Kingussie EPI have meant that there has been an undersupply of housing in recent years which should be remedied by increasing the generosity allowance. Delivery rates and shortfalls have been acknowledged within the discussion in the HST section and Annex I. The changes proposed there mean that increasing the level of generosity to account for delivery shortfalls is not required.

The CNPA does not believe that there is merit applying no level of generosity at all, as is the case in the Loch Lomond and Trossachs National Park LDP, since local circumstances are different. In Loch Lomond’s case the HST/HLR was set at a significantly higher level than required by the HNDA. Therefore, they already include a significant level of ‘generosity’. This is not the case in the Cairngorms context, and failing to apply any generosity in setting the HLR would mean the Proposed Plan would be inconsistent with SPP guidance.

Additional New Housing Sites

New Sites

Before discussing the consultation responses around the new sites, it is worth first setting what new sites have been proposed in the MIR (Table 3) as well as what sites are proposed to be deleted (Table 4); the net effect being an important point. It should be noted that the new sites may change following the consultation and the additional information that is being gathered. The same applies to sites carried forward from the current LDP as well as the sites proposed for deletion.

Table 3 Proposed new sites and sites taken forward from LDP 2015 that have been amended to deliver a higher number of units.

Settlement	Site Reference	Notes	No. units
Blair Atholl	PKC003	New site	8
	PKC005	New site	8
Braemar	AB009	New site	6
	AB023	New site	15
Dalnain Bridge	EPI	Existing site - number of units increased from 10 to 20	10
Grantown-on-Spey	THC039	Extension to H2 for a total of 50 units	30
Laggan	THC065	New site for affordable housing. No number set in MIR. Probably <10	-
Nethy Bridge	THC002	New site	20
	THC003	New site	4
Total proposed new units			101

Table4 Sites in LDP 2015 that are proposed to be deleted or amended to have fewer units.

Settlement	Site Reference	Notes	No. units deleted
Dalwhinnie	HI	Deleted because of flood risk constraints.	6
Dinnet	HI	Deleted because of delivery constraints.	4
Dalnain Bridge	HI	Site area reduced to exclude woodland so units reduced from 30 to 20.	10
Nethy Bridge	HI	Deleted because of significant natural heritage constraints.	15
Total units proposed for deletion			35

The net contribution of new sites, or increases in the number of units on existing sites, is therefore 66. This forms part of a much larger land supply of approximately 2,944 dwellings, which come from sites and extant permissions identified in the current LDP. This figure significantly exceeds the 811 units in the HLR that the MIR identifies as being needed over the period of 2020-2029. It also exceeds the 1,531 that the MIR indicates is needed up to 2039. It is also worth noting that it exceeds the revised HLR presented in Table 2 above.

It is therefore understandable why some responders feel that there is no need for additional sites to be allocated in the next LDP. However, it is important to consider likely delivery rates. As outlined in the MIR, a number of the existing housing allocations are relatively large. Whilst this provides longer term certainty of housing land supply, it is possible that some of these sites may take some time to commence development. It is therefore maintained that the addition of a relatively modest number of new smaller sites will help to add flexibility to the overall housing land supply and help to increase delivery rates in the shorter term.

With respect to requests to include even more new sites, it is felt this land supply is already more than sufficient to deliver the flexibility envisioned by certain responders.

Urban Animation on behalf of Invercauld Estates did not believe that the addition of a new site of 21 new dwellings would provide an adequate supply for Braemar. They cite evidence from a Local Needs Study carried out in 2015, which suggested a need for around 100 new dwellings in the settlement by 2020. The CNPA acknowledges this but also recognises the limits of such studies, as well the fact that its findings appear to contradict the findings of the Aberdeen City and Shire HNDA (2017). HNDA's are more robust over the long term and over broader geographies, and it is these assessments that the CNPA must base its HLR on. Site specific issues are considered in more detail in the settlement section of this report.

Miscellaneous comments

It was suggested that land at Coylumbridge could be allocated for housing. This is not considered necessary given the level of growth proposed for Aviemore and An Camas Mòr.

It was requested that sites should promote 'work from home' activates and self-build units. Sites in the LDP already allow for these sorts of properties and this approach will continue in the new Plan.

Several comments were made about bringing derelict and empty buildings back into use. The current LDP already allows this, as will the Proposed Plan. However, as discussed in the Housing Supply Target section above, these sorts of developments do not remove the need for a land supply of allocated sites.

Suggestions that new sites should be within existing settlements are acknowledged and where possible this has been the approach taken in identifying preferred options. Sticking rigidly to such a policy would however yield insufficient sites and reduce certainty and would most likely mean that the HLR could not be met.

Recommendations

The Proposed Plan should:

- Include adjusted Housing Supply Targets and Housing Land Requirements to reflect the latest evidence from HNDAs and the Reporters decision on Stirling Council's LDP 2
- Apply a 10% generosity level to the Housing Supply Target to get the Housing Land Requirement
- Allocate the small number of new sites proposed in the MIR (subject to any site specific issues discussed in the settlement section of this report)
- Provide allocations to deliver the Housing Land Requirement in all Housing Market Areas wherever possible

Annex I

Since the MIR was published certain new data has been released while decisions on other LDPs, as well as comments to the MIR consultation, have led to the conclusion that a revision to the HST is required. These are:

- A new Aberdeen City and Shire HNDA has been published.
- A new Moray Council HNDA has been published.
- The Examination Report on Stirling Council's LDP 2 has been published.

Aberdeen City and Shire HNDA

A new Aberdeen City and Shire HNDA (2017) has been found to be robust and credible by the CHMA and should therefore be used as basis for arriving at a HST for the Aberdeenshire part of the National Park.

The Aberdeenshire City and Shire HNDA presents Principal, Low Migration and High Migration Scenarios. The CNPA maintains the view that the Principal Scenario is the most appropriate for the National Park; the requirement for the Rural HMA in Aberdeenshire according to this scenario is presented in Table 1.

Table 1 Aberdeen City and Shire HNDA Principal Scenario annual averages for the Rural HMA

Tenure	2016-2020		2021-2025		2026-2030		2031-2035	
	No.	%	No.	%	No.	%	No.	%
Social Rent	204	36%	164	31%	107	24%	77	20%
Below Market Rent	100	18%	100	19%	98	22%	93	24%
Total Affordable	304	54%	264	50%	205	46%	170	44%
Private Rent	106	19%	104	20%	95	21%	82	21%
Owner Occupier	157	28%	155	30%	145	33%	131	34%
Total Market	263	46%	259	50%	240	54%	213	55%
Total Requirement	568	N/A	523	N/A	446	N/A	387	N/A

These annual averages may be adjusted to the time frame of the Cairngorms National Park LDP and, using the methodology set out within the Housing Evidence Paper, disaggregated to provide an estimate of the National Park's requirement (Table 2 and Table 3).

Table 2 Disaggregated Aberdeen City and Shire HNDA Principal Scenario annual averages for the Cairngorms National Park area of the Rural HMA based on the 2016 based population statistics presented in the HNDA

	2015-2019		2020-2024		2025-2029		2030-2034	
	No.	%	No.	%	No.	%	No.	%
Social Rent	4.4	36%	3.7	32%	2.5	26%	1.8	21%
Below Market Rent	2.1	18%	2.1	19%	2.1	21%	2.0	24%
Total Affordable	6.5	54%	5.8	51%	4.6	47%	3.8	45%

	2015-2019		2020-2024		2025-2029		2030-2034	
	No.	%	No.	%	No.	%	No.	%
Private Rent	2.3	19%	2.2	20%	2.1	21%	1.8	21%
Owner Occupier	3.4	28%	3.3	29%	3.1	32%	2.9	34%
Total Market	5.6	46%	5.6	49%	5.2	53%	4.7	55%
Total Requirement	12.1	N/A	11.4	N/A	9.9	N/A	8.5	N/A

Table 3 Disaggregated Aberdeen City and Shire HNDA Principal Scenario covering Cairngorms National Park Plan periods for the Cairngorms National Park area of the Rural HMA, based on the 2016 population quoted in the HNDA

	2015-2019		2020-2024		2025-2029		2030-2034	
	No.	%	No.	%	No.	%	No.	%
Social Rent	21.8	36%	18.4	32%	12.7	26%	8.9	21%
Below Market Rent	10.7	18%	10.7	19%	10.5	21%	10.1	24%
Total Affordable	32.6	54%	29.1	51%	23.2	47%	19.0	45%
Private Rent	11.4	19%	11.2	20%	10.4	21%	9.1	21%
Owner Occupier	16.8	28%	16.6	29%	15.7	32%	14.3	34%
Total Market	28.2	46%	27.8	49%	26.1	53%	23.4	55%
Total Requirement	60.7	N/A	56.9	N/A	49.3	N/A	42.3	N/A

There are two key differences between the scenario presented in the 2011 and 2017 HNDAs and consequently the proposed HST. These are:

- The overall total requirement is lower in the 2017 HNDA;
- The affordable housing requirement is higher in the 2017 HNDA, both numerically and proportionally.

Moray Council HNDA

A new Moray Council HNDA (2018) has also been found to be robust and credible by the CHMA. The HNDA uses the Scottish Government's definition of a functional housing market area and concludes that the whole of Moray is a functional HMA, within which six sub or local HMAs exist. The HNDA identifies the area of the Cairngorms National Park that lies within its boundary as one of these local HMAs. This makes calculating a HST a somewhat simpler task.

The HNDA considers three scenarios for the housing units required between 2018 and 2037 (Table 4). The Housing Market Partnership believes Scenario 3 is the most appropriate as it best reflects the Council's population and economic growth aspirations as well as the "thin" market for intermediate tenure housing (Table 5). It is therefore this scenario that will be taken as the basis for the Cairngorms LDP HST.

Table 4 Additional housing units 2018/19 to 2037/38¹

Tenure	HNDA Scenario 1 (minimum)	HNDA Scenario 2 (Base)	HNDA Scenario 3 (Base - reduced MMR variant)
Social rent	1,194	2,198	2,457
Below market rent	322	705	445
Total Affordable	1,516	2,903	2,902
Private Rent	415	957	957
Owner Occupier	928	2,082	2,082
Total	2,859	5,941	5,941

Table 5 Moray Council HNDA Scenario 3 housing need and demand for the Cairngorms HMA¹.

Tenure	2018-22		2023-27		2028-32		2033-37	
	No.	%	No.	%	No.	%	No.	%
Social rent	8.2	46%	6.1	43%	5.2	43%	5.1	44%
Below market rent	1.3	8%	1.1	8%	1.0	8%	0.8	7%
Total Affordable	9.5	54%	7.2	51%	6.2	51%	5.9	51%
Private Rent	3.6	21%	3.0	22%	2.6	21%	2.5	22%
Owner Occupier	4.6	26%	3.9	28%	3.3	28%	0.0	0.0%
Total Market	8.2	46%	6.9	39%	5.9	34%	2.5	14%
Total	17.7	N/A	14.1	N/A	12.1	N/A	11.6	N/A

These annual averages may be adjusted to the time frame of the Cairngorms National Park LDP using the annualised data contained within the HNDA.

Table 6 Moray Council HNDA Scenario 3 housing need and demand for the Cairngorms HMA covering Cairngorms National Park Plan periods^{1,2}.

Tenure	2020-24		2025-29		2030-34		2035-39	
	No.	%	No.	%	No.	%	No.	%
Social rent	6.8	45%	5.8	43%	6.1	43%	5.3	46%
Below market rent	1.2	8%	1.1	8%	1.1	8%	0.8	7%
Total Affordable	7.9	53%	6.9	51%	7.1	51%	6.1	53%
Private Rent	3.1	21%	2.9	21%	3.0	22%	2.6	22%
Owner Occupier	4.0	26%	3.7	27%	3.9	28%	3.3	28%
Total Market	7.1	47%	6.6	44%	6.9	46%	5.9	39%

¹ May not sum due to rounding.

² 2035 estimates based on data calculated for 2036 and 2037 only; remaining years projected from this data.

Tenure	2020-24		2025-29		2030-34		2035-39	
	No.	%	No.	%	No.	%	No.	%
Total	15.0	N/A	13.5	N/A	14.0	N/A	12.0	N/A

There are two key differences between the scenario presented in the 2011 and 2018 HNDAs and consequently the proposed HST. These are:

- The overall total requirement is higher in the 2018 HNDA;
- The affordable housing requirement is numerically higher in the 2018 HNDA, although proportionally it is about the same.

The 2011 HNDA identified a need for 2 dwellings per year, one of which would be of an affordable tenure. This equated to a requirement of 10 units across the plan period, 50% of which would need to be affordable. This generated concern because of the proportionally high level of affordable housing identified by the HNDA, which in an area that is relatively peripheral in market terms, could lead to sites becoming unviable. It was therefore decided in calculating the HST that the target should be set at 15 dwellings, with 5 being affordable.

While the 2018 HNDA suggests a need for 15 dwellings across the plan period, 51-53% of these are identified as being affordable. This once again raises the concern about viability and so Table 7 proposed to adjust the HST to take account of this.

Table 7 Proposed HST required for Moray area of Cairngorms National Park³.

Tenure	2020-24		2025-29		2030-34		2035-39	
	No.	%	No.	%	No.	%	No.	%
Total Affordable	8	33.3%	7	33.3%	7	33.3%	6	33.3%
Total Market	16	66.6%	14	66.6%	14	66.6%	12	66.6%
Total	24	N/A	21	N/A	21	N/A	18	N/A

Stirling Council LDP Examination

The examination of Stirling Council's LDP 2 commenced on 24 March 2017 with the Report of Examination published on 24 November 2017. During the examination a great deal of discussion was had around the methodology used to calculate the HST. Objectors to the Council's methodology argued that it failed to take account of a shortfall in housing delivery that had occurred in the years 2010-2015. There was also some discussion about how this shortfall should be calculated, with some objectors arguing that it should be based on the contents of the HNDA, which was published in 2011, and others the Housing Land Requirement in the previous LDP. The Council took an opposing view, arguing that there was no technical requirement to incorporate the shortfall, however it was calculated, in the new HST.

The Reporter concluded that the appropriate HST for the new LDP should be based on the HNDA, incorporating the shortfall from the period 2010 to 2015 (page 52 of the Stirling Council LDP 2 Examination Report). This decision has implications for the way the CNPA calculates its HST, since a shortfall was not included in the HST presented in the MIR.

³ May not sum due to rounding.

In determining what the shortfall might be, like the Stirling Council example, the CNPA considers the best approach is to use the HNDAs that cover the National Park area. Using the HST from the current LDP (2015) is not considered appropriate as, since then, new HNDAs have been produced covering the Aberdeenshire (2017), Highland (2015) and Moray (2018) parts of the National Park. All of these HNDAs suggest that the housing market in these areas has undergone changes since the HST for the current LDP was calculated.

Because five different HNDAs cover the National Park's area, each published at different times, careful consideration needs to be given to how the shortfall might be calculated. This calculation is particularly problematic in the parts of the National Park that are within HMAs that largely sit outwith its boundary. The proposed approach is as follows:

- Aberdeenshire City and shire HNDA was published in November 2017 and its findings can be disaggregated to the area of the County within the National Park and adjusted to meet the timeframes of the CNPA LDP timetable (see Table 3). As described earlier in this report, the MIR's HST needs to be adjusted to reflect this and therefore any shortfall will be calculated according to the need and demand calculated for the 2015-2019 period outlined in Table 3.
- Moray Council HNDA was published in April 2018. By definition, any shortfall from previous years will have been built into the new estimates of housing need and demand. However, the estimates of need and demand are annualised beginning in 2018, which means that need and demand for years 2015 to 2017 are not. However, it is unlikely that the need and demand is significantly different to the 17.7 identified for years 2018 – 22 (see Table 5) and for want of a more compelling figure it is deemed appropriate to consider this, rounded to 18 (8 market / 10 affordable) as the figure by which any shortfall can be calculated. This however, needs to be considered against the viability concerns expressed about the area and the resulting adjustment to the HST and that the shortfall should not be applied on top of the additional market housing allowed for.
- Highland Council HNDA was published in 2015. The HST within the MIR is based on the second five year period set out within the HNDA and assumes that the whole requirement for the 2015-2019 period is met within that five years. Evidence on completions from 2015-2017 suggests that delivery is likely to fall short in this period and therefore, an estimate of this shortfall needs to be carried forward into the new HST.
- The Perth and Kinross area of the National Park is technically covered by the TayPlan HNDA (2013), though it does not form part of the TayPlan area. Calculating the HST in this area, and consequently any potential shortfall, is complicated by the fact that the area sits within the much larger Highland Perthshire HMA, which includes towns outwith the National Park such as Pitlochry and Aberfeldy. The HST calculated for the MIR is 16 dwellings (7 of which are affordable) for each five year period of the Plan. This is similar to the current LDP's (2015) HST, which is also 16 units, though all of these are identified as affordable. It is considered that therefore that the HST should be calculated on the basis of the delivery of 16 units.
- Due to local factors the Angus area of the National Park does not have a HST. The reasons for this are explained elsewhere in this report. It is not therefore possible to calculate a shortfall as it is not possible for a shortfall to exist. No adjustments are therefore necessary in this area.

Based on the evidence presented within the HNDAs and past and projected completion rates, Table 8 presents the estimated shortfall that will need to be taken account of in the plan period 2020-2024. This is based on completion data for 2015-2017 and will need to be updated as the Plan progresses to adoption.

Table 8 Estimated shortfall in housing delivery 2015-2019.

Local Authority Area	Housing Supply Target 2015-2019	Projected Completions 2015- 2019	Projected Shortfall 2015-2019
Aberdeenshire	61	58	3
Angus	0	0	0
Highland	306	275	31
Moray	18	5	13
Perth & Kinross	16	5	11
CNPA Total	401	343	58

Revised HST and HLR for Cairngorms National Park LDP 2020

Based on the factors discussed above the HST set out within the MIR has been revised as shown in Table 9.

Table 9 Housing Supply Target

Local Authority Area	2020-2024			2025-2029			2030-2039 (indicative target)		
	Market	Affordable	Total	Market	Affordable	Total	Market	Affordable	Total
Aberdeenshire	30	30	60	26	23	49	47	38	85
Angus	0	0	0	0	0	0	0	0	0
Highland	154	178	332	118	100	218	236	200	436
Moray	18	10	28	14	7	21	22	13	35
Perth & Kinross	15	12	27	9	7	16	18	14	32
CNPA Total	218	229	447	167	137	304	323	265	588

Table 10 presents the revised HLR based on a generosity level of 10%. The discussion around the generosity level is presented in the next section of the report. Many of the arguments for a higher generosity level centred around the need to take account of a potential shortfall in housing delivery. These arguments are now redundant, since it is proposed that the shortfall be taken account of in the HST.

Table 10 Housing Land Requirement based on a generosity level of 10%.

Local Authority Area	2020-2024	2025-2029	2030-2039 (indicative target)
Aberdeenshire	66	54	94
Angus	0	0	0
Highland	365	240	480
Moray	41	23	39
Perth & Kinross	30	18	35
CNPA Total	502	334	647

The main difference between the HST (and as a consequence HLR) presented in the MIR and the revised one presented in Table 9 (and as a consequence the HLR presented in Table 10) is that the HST for 2020-2024 HST is higher, while the HSTs for 2025-2029 and 2030-2039 are lower.

Main Issue 4B – Housing growth around Aviemore

Respondents

Ref	Name / Organisation
030	Kincraig and Vicinity Community Council
039	N Kempe
043	The Highland Council
044	Scottish Environment Protection Agency
053	Inveresk Community Council
060	Halliday Fraser Munro on behalf of Reidhaven Estate
082	D Morris
083	R Turnbull
092	Scottish Land and Estates
100	Kingussie and Vicinity Community Council
151	Forsyth Accounting Practice Ltd
157	Balavil Estate Ltd
192	ABA
194	Quarch Technology
195	V Jordan
206	J Walker
207	Anonymous
213	S Caudrey
215	G Bulloch
219	Savills (on behalf of J and M Forbes Leith Partnership)
220	M Kinsella
224	D Stott
231	C Campbell

Ref	Name / Organisation
232	Anonymous
237	Aviemore and Vicinity Community Council
247	Aberdeenshire Resident
251	S Dickie
253	Anonymous
260	H Quick
267	L MacLean
271	Dalwhinnie Community Council
272	Boat of Garten Resident
273	D Munday
281	Tactran
282	D Bruce
283	Ross McGowan Ltd
285	Anonymous
289	Anonymous
292	Munro Surveyors
306	Anonymous
307	Dulnain Bridge Resident
316	Kingussie Resodemt
319	C McPherson
321	J Finnie
325	RSPB Scotland

Response Overview

Do you agree that we should include long-term development land in the Local Development Plan which could be released for development in the event that An Camas Mòr does not progress as envisaged?



A total of 45 responders answered this question.

Key points

- General support for the preferred option and support for the North Aviemore sites
- Some questions about the need for so much land to be allocated

Issues Raised

The majority of respondents agreed with the preferred option (030, 019, 043, 044, 053, 060, 082, 092, 100, 151, 157, 192, 194, 206, 213, 219, 231, 232, 247, 253, 260, 267, 271, 272, 273, 281, 282, 283, 289, 292, 306, 316, 321, 325). Eleven respondents disagreed (083, 195, 207, 215, 220, 224, 237, 251, 289, 307, 319).

There was a great deal of support for placing a contingency in place in the event that An Camas Mòr proves undeliverable. There was also support for the sites chosen to deliver this (044, 053, 092, 157, 192, 206, 213, 231, 232, 281, 306, 325). Indeed several responders suggested removing An Camas Mòr altogether and replacing it with the sites identified as THC045 / THC059 and North Aviemore (039, 082, 247, 271, 316)

Some responders thought that long term options should be allocated across the National Park and that there should be a more permissive policy on windfall developments adjacent to existing settlements (030, 157, 219, 292).

Several responders questioned the need for the scale of development and An Camas Mòr and the THC045 / THC059 and North Aviemore sites, suggesting that one or the other be reduced in size (260, 272)

Several responders felt that the risks of An Camas Mòr coming forward were such that some or all of THC045 / THC059 and North Aviemore and other small sites should be allocated for delivery within the LDP timeframe alongside it (043, 060).

One respondent (307) argued that An Camas Mòr was in the wrong place and that a smaller new town should instead be established on THC030 / THC 069 in Carr-Bridge.

Several responders (083, 195, 251, 285, 319) did not believe the policy was necessary as they did not think An Camas Mòr, the North Aviemore sites, sites in other parts of the National Park or development in general were needed (220).

One response (215) thought that the money spent in masterplanning An Camas Mòr would have been better spent on “*trying to fix the string of bad planning decisions that have been made in Aviemore*”.

Several responders questioned the need for the policy. There were a variety of reasons, namely:

- There was no reason that An Camas Mòr cannot be delivered (151),
- The CNPA has an obligation to the residents and businesses of Aviemore to ensure An Camas Mòr is developed (224),
- It sends message that the CNPA does not support An Camas Mòr (237),
- Having the Long Term sites outside the settlement boundary defeats the purpose of the settlement boundary (237).

It was also questioned whether or not the policy was possible under current planning policy and legislation (195).

SEPA (044) requested that future allocations be subject to early assessment to allow for any site constraints to be highlighted as early as possible. Tactran (281) stated that the accessibility and transport implications of any additional land allocations would need to be considered. RSPB Scotland (325) stated that the long term sites should not be allocated unless it is concluded beyond reasonable scientific doubt that development on the sites would not adversely affect the integrity of any Natura site. They added that would be essential that development is only permitted at these sites if it is established beyond doubt that residential development at An Camas Mòr will not happen. They wished to see a clear statement in the LDP that An Camas Mòr ceases to be suitable for development in the event that the existing planning permission lapses.

A few miscellaneous responses were also received. Kingussie and Vicinity Community Council (100) wrote “*if the communities want this to happen then yes. It should not be at the whim of developers.*” Kincaig and Vicinity Community Council (030) felt that “*more housing throughout the strath would drive the costs down*”. A couple of responders expressed concern about properties in An Camas Mòr and the Long Term sites becoming second homes and this preventing them from meeting housing need (260, 273).

Discussion

The merits of An Camas Mòr will not be discussed in detail in this report. The CNPA’s Planning Committee has resolved to grant planning permission in principle for the An Camas Mòr development, subject to a Section 75 agreement being signed. The Proposed Plan cannot delete or reduce the size of An Camas Mòr, or ‘swap’ it for the North Aviemore sites or Carr-Bridge or anywhere else. Due to the scale of the development, the Proposed Plan will need to take An Camas Mòr into account and recognise it as a strategically significant component of the housing land supply.

Factors around housing delivery, uncertainty and the need for flexibility were discussed in the MIR and are also set out under Main Issue 4A ‘How much new housing do we need and where should we build it?’. Since An Camas Mòr represents a significant component of the housing land supply, the risk of it proving undeliverable, which could result in the CNPA failing to demonstrate a 5-year land supply as required by SPP, needs to be addressed. While

some objectors to the preferred option argue that there is no reason that An Camas Mòr cannot be delivered, the site faces significant infrastructure related challenges that need to be overcome before the development can commence. While the CNPA will continue to work with the site promoters to address these, if these challenges cannot be overcome during the lifetime of the Plan, then an alternative strategy to meet the overall housing land requirement is needed. The preferred option simply reflects a need to manage risks in meeting housing needs within the National Park.

Support for the preferred option suggests that this may be the best way to manage these risks. The generosity of the housing land supply outlined earlier in this report mitigates against allocating the North Aviemore sites, or indeed any other sites, for delivery within the lifetime of the Plan. While doubts have been expressed around the preferred option's compliance with planning policy and legislation, these are unfounded, because a similar policy is already contained within Moray Council's LDP.

It is agreed that if the North Aviemore sites come forward it should only be if An Camas Mòr is demonstrated to be undeliverable within the lifetime of the plan and the 5-year land supply is rendered unachievable in its absence. The LDP cannot however set a policy framework that would prevent An Camas Mòr being reconsidered for development at an indefinite future point. Even if it is not delivered in the lifetime of the Proposed Plan, or even in future plan periods, it cannot be said that it won't be needed at some point in the future.

Further work will be needed on the way in which the North Aviemore sites should be developed. This could be set out in supplementary guidance or planning advice.

Recommendations

The Proposed Plan should:

- Progress the preferred option and include long-term development land at North Aviemore which could be released for development in the event that An Camas Mòr does not progress as envisaged

Main Issue 5 – Affordability of Housing

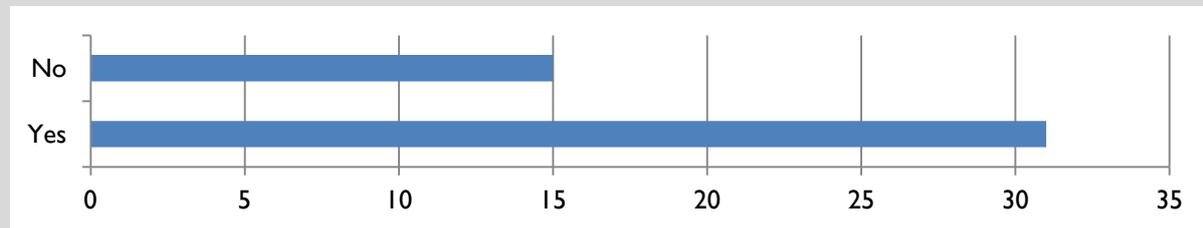
Respondents

Ref	Name / Organisation
030	Kincraig and Vicinity Community Council
033	Laggan Community Association
036	Halliday Fraser Munro on behalf of Mar Estate
039	N Kempe
043	The Highland Council
046	Ristol Consulting on behalf of Atholl Estate
053	Inveresk Community Council
060	Halliday Fraser Munro on behalf of Reidhaven Estate
064	Nethy Bridge and Vicinity Community Council
066	Cairngorms Campaign
082	D Morris
083	R Turnbull
089	Cromar Community Council
092	Scottish Land and Estates
100	Kingussie and Vicinity Community Council
135	Alvie and Dalraddy Estates
151	Forsyth Accounting Practice Ltd
157	Balavil Estate Ltd
188	Boat of Garten and Vicinity Community Council
192	Aviemore Business Association
194	Quarch Technology
195	V Jordan
205	Ballater Resilience Group
210	Urban Animation on behalf of Invercauld Estate
212	Carr Bridge Resident
213	S Caudrey
215	G Bulloch

Ref	Name / Organisation
216	Carr Bridge Resident
218	NHS Grampian
219	Savills (on behalf of J and M Forbes Leith Partnership)
220	M Kinsella
224	D Stott
227	Moray Council
231	C Campbell
233	Ballater & Crathie Community Council
237	Aviemore and Vicinity Community Council
250	A Dunlop
251	S Dickie
260	H Quick
264	D Sherrard
267	L MacLean
271	Dalwhinnie Community Council
272	Boat of Garten Resident
273	D Munday
277	Perth and Kinross Council
279	D Windle
283	Ross McGowan Ltd
285	Anonymous
289	Anonymous
292	Munro Surveyors
306	Anonymous
308	Ballater Resident
325	RSPB Scotland

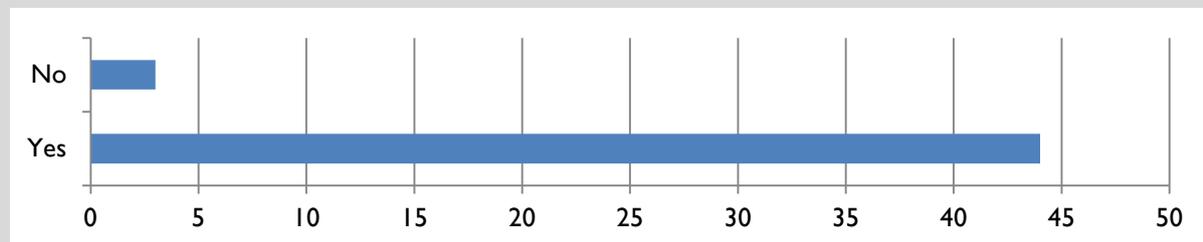
Response Overview

Do you agree that we should increase the affordable housing requirement to 35% in Ballater and Braemar, and to 45% in Aviemore and Blair Atholl?



A total of 58 responders answered this question. 7 did not choose to say whether they agreed or not, but did provide comments on the Main Issue.

Do you agree that we should include policies to require a greater mix of house types and sizes, including more smaller homes?



A total of 47 responders answered this question.

Key points

- Overall support for preferred option on affordable housing and the policy to require a greater mix of housing
- Concerns expressed about site viability

Issues Raised

Affordable Housing Levels

The majority of respondents expressed their agreement with the preferred option (030, 033, 053, 082, 100, 151, 188, 192, 194, 210, 212, 213, 218, 219, 220, 231, 233, 250, 251, 260, 264, 267, 271, 273, 277, 279, 283, 289, 292, 306, 308,). Five respondents disagreed with the preferred option, although none expressed support for the alternative (036, 039, 046, 060, 064, 083, 092, 135, 157, 195, 205, 215, 224, 237, 285).

The preferred option of increasing the affordable housing requirement to 35% in Ballater and Braemar, and to 45% in Aviemore and Blair Atholl was supported by two thirds of those who responded to the consultation. The reasons included:

- Affordable housing needs to be delivered in the most pressurised areas (219)
- To encourage as many economically active people as possible to live in the area which enables tourism and the local economy to flourish (033, 218, 219, 250)
- So that key workers have homes (250)

- To ensure there was housing for carers and other healthcare professionals to meet the needs of the ageing population (033)
- To ensure a healthy population (250)
- The evidence supports the conclusion (053)
- Affordable housing is a key issue (100, 306)
- There is a shortage of affordable housing (194)
- The economy is dominated by low income wages (219)
- To help encourage more balanced communities (219)
- What is most attractive to a developer is not most useful to communities (264)

Some felt that the targets were not high enough and should be raised. Alternatives included:

- All new housing in places where people working currently cannot afford housing (039)
- All new housing in and around Aviemore (including anywhere that is in reasonable commuting distance) (039)
- 60% for Ballater and Braemar and 90% for Aviemore and Blair Atholl (082)
- 50% for all settlements (188)
- 50% in Ballater (233)

One responder felt that the level of affordable housing in Aviemore should be raised, but only to 35% (064). Another responder stated that the affordable housing requirement in An Camas Mor should match that of Aviemore and that there should be no more developments comprising just luxury houses plus the minimum number of affordable houses (083).

Several responders requested further information on how affordable housing would be defined. It was stated that the definition needed to take into account the lower than average wages and salaries available in the National Park, and that it should include sheltered housing (066, 188, 231, 233, 272). The importance of a range of ownership types was highlighted, with shared ownership, housing association and council properties as well as residency / employment criteria for housing put forward as examples (220). It was also asked that clarity be provided on the way the policy would operate and that information be provided on the various options available (188).

The Highland Council (043) asked whether there will be any revisions to the existing commuted sum requirements. They believe consideration should be given to confirming that the existing figure of £1,250 per unit is still accurate and proportionate, with measures put in place for it to be index linked to reflect accurate prices during the lifetime of the plan.

Concern over holiday homes and second homes was raised by a number of responders. It was suggested that the Local Development Plan (LDP) should find a mechanism to prevent new housing becoming second or holiday homes (066, 188, 205, 213, 215, 231, 260, 271, 279, 306). Several examples were given, including the St. Ives Neighbourhood Plan, residency criteria and increased council tax (188, 215, 279). One responder suggested that the provision of social housing could be subsidised by higher council tax on second homes (251).

Some responders expressed a desire for affordable housing to be prioritised for local people and key workers and that it remain affordable in perpetuity. The application of occupancy

conditions was suggested e.g. only available to people that work and / or have lived in the National Park for much of their working lives or have a “social need” (066, 83, 188, 194, 205, 210, 212, 213, 215, 220, 224, 237, 250 306, 308). A slightly different view was that the LDP needed a policy for reserving a large proportion of housing (not necessarily just affordable) for people who want to make this their permanent, full-time home (260). Another responder did not want housing becoming ‘commuter accommodation’ (066).

Several responders objected to the preferred option on the basis of viability concerns and that it could lead to fewer sites being developed and fewer affordable houses being delivered (036, 046, 060, 064, 092, 135, 157, 195, 224, 210, 237). It was argued that:

- It would not be possible to deliver the higher levels on some sites (036, 135)
- It was contrary to Scottish Planning Policy (SPP) and that Aberdeenshire Council had a similar policy in their 2012 LDP, which was not carried forward to the 2017 LDP due to non-conformity with SPP (060, 157)
- There is not significant evidence to suggest that these settlements are suffering from a particularly acute lack of affordable housing (092)
- Viability was affected by the size of the settlement, with smaller settlements experiencing higher build costs (092)
- It could block higher cost developments, like conversions (092)
- It could result in higher rents (092)
- This issue has been examined during the previous LDP examination and the requirement set at 25% because of viability concerns (036)
- A housing authority or housing association would not have the funds to invest in the higher level of affordable housing (195)

Moray Council (227) had concerns regarding 100% affordable housing sites, particularly where the site has been deemed unsuitable for private/mainstream housing. They suggested the promotion of better tenure integration and a move away from 100% affordable housing sites.

The Highland Council (043) stated that in line with their Strategic Housing Investment Plan, Aviemore is the highest priority for affordable housing within the Badenoch and Strathspey Housing Market Area, and as such they recognised the need for an increase in affordable housing. They would encourage careful consideration of the potential increase in the affordable housing requirement, alongside the more stringent approach to developer contributions, and the implications this might have for particular development sites and overall delivery rates. The Highland Council also noted the continuing approach to support ‘rural exception areas’ where the majority of a site is affordable housing and wondered whether this could be expanded to include sites in pressured areas such as Aviemore. They felt this could help to balance out the increasing need for affordable housing with the need for Aviemore to remain an attractive location for developers.

Several responders based their comments around specified settlements and / or areas.

Halliday Fraser Munro on behalf of Reidhaven Estate (060) expressed concerns that in Aviemore, where developer contributions would likely be required towards addressing school capacity issues, the cumulative effects of the additional costs would render development unviable.

Halliday Fraser Munro on behalf of Mar Estate (036) argued that building costs in Braemar are significantly higher than elsewhere in the region and that making development more onerous in Braemar will reduce the likelihood of its delivery.

Urban Animation on behalf of Invercauld Estate (210) assumed the targets to be a minimum and expressed concern that it may be difficult to achieve a higher percentage of affordable housing for various reasons. They expressed their willingness to adopt the targets but noted that delivery will depend to a large extent on the availability of funding via the Rural Housing Fund, Aberdeenshire Council, and Scottish Government resources.

Ristol Consulting on behalf of Atholl Estate (046) questioned the justification for increasing the affordable housing requirement to 45% in Blair Atholl. They argued that the evidence contained within the HNDA does not provide conclusive proof that there is an acute shortage of affordable housing in Blair Atholl that would justify an increase in the current level of provision from 25% to 45%.

Perth and Kinross Council (277) supported the approach to increase the affordable housing requirement in Blair Atholl, but stated that they need further details on how it will operate.

Concern was expressed that if the affordable housing requirement was to be increased in certain settlements, then it would just encourage further development in those areas that it was not (064). Another responder argued that a policy of requiring a proportion of houses to be sold at below a particular price results in developers selling the remaining houses at a higher price in order to achieve an acceptable profit margin (135). It was also argued that an increase in the proportion of affordable housing would mean more sites would be required to meet market housing targets (195).

There was the argument that individual home builders (for example, self-build) should be exempt from contributing towards affordable housing. It was argued that making self-builders pay towards affordable homes made their own homes less affordable (064).

There was a request for flexibility in the application of the policy stating that it would need to take into consideration the financial viability of housing development and associated infrastructure (151, 210, 292). Scottish Land and Estates (092) suggested that there needs to be innovative ideas for the provision of affordable housing; e.g. the use of Rural Burdens or selling homes at an affordable price for 3 months before going on the open market.

One responder (215) observed that the supply of affordable housing seemed to be almost totally linked to provision of Scottish Government funds. They suggested that setting flexible targets linked to available funds from Scottish Government is valid. Scottish Land and Estates (092) were of the opinion that affordable housing normally needs to be subsidised by market housing. The risk, they felt, was that there would be reduced delivery of housing if the appropriate balance could not be struck.

It was asked that the rationale behind the choice of thresholds be made clear. It was also asked about progress made towards increasing the role of community ownership in trying to increase the provision of affordable housing (279).

Alvie and Dalraddy Estates (135) argued that CNPA should persuade the government to encourage an increase in the number of houses available for rent. They also wished to

encourage shared equity schemes where the landowner or developer retains some of the equity. It was also suggested that caravan sites could help meet housing need, particularly for the elderly.

Balavil Estate Ltd (157) advocated the introduction of an “*innovative and progressive policy on affordable housing provision*”. This, they argued, would entail a variety of ways of provision of affordable houses, from self-build, work from home to land owners initiatives.

Urban Animation on behalf of Invercauld Estate (210) highlighted the benefits of collaborative community engagement exercises through master planning, community action plans and charrettes in achieving desired outcomes in small communities, such as Braemar.

It was highlighted that affordable housing must not equate to a cheaper standard of build and the highest standards of design, insulation etc. must be maintained (188).

It was pointed out that the National Park Partnership Plan states that the LDP should identify sites where affordable housing contribution will be more than the national maximum of 25% and therefore rather than having areas in which this was the case, it should be focused on sites, even up to 100% (195).

It was suggested that a target for the ratio of median house price to median household income be set to allow monitoring of the effectiveness of the plan (279).

Mix of House Types

The majority of respondents expressed their agreement with the Preferred Option (030, 033, 039, 043, 053, 064, 066, 082, 083, 089, 100, 151, 157, 188, 192, 194, 195, 203, 205, 212, 213, 216, 218, 219, 220, 227, 231, 233, 237, 250, 251, 260, 264, 267, 271, 272, 273, 277, 283, 289, 292, 306, 308, 325). Eight respondents disagreed with the Preferred Option, although none expressed support for the alternative (215, 224, 285).

Several responders recognised the need to require a greater mix of house types and in particular the focus on delivering smaller homes, because of the likely significant demographic changes. While much of this refers to the aging population, there is also support for supporting younger people trying to get onto the housing market (043, 053, 083, 195, 216, 233, 273, 308).

Support was also offered on the basis that the economic prosperity and sustainability of the National Park depends on ensuring that the needs of all residents are addressed through an appropriate supply of different types and sizes of homes (219). Balavil Estate Ltd (157) believed the policy would be the most effective method of providing for greater numbers of affordable housing.

Both Moray Council (227) and Perth and Kinross Council (277) supported the preferred approach to requiring a greater mix of house types. Perth and Kinross Council added that the proposed approach reflects that being taken through their Local Development Plan review.

The Highland Council (043) stated that they would welcome further discussion as to how delivering a better mix of house types can be achieved and highlighted the requirement

within their emerging Developer Contributions Supplementary Guidance for up to 15% of the affordable housing provision to be accessible. They also asked how the new approach will be applied to small scale developments.

Some responders suggested sizes and types of houses that were particularly needed, including: one bedroom (083, 273); two bedroom (066); three bedroom (220); and small storey apartment blocks (066). One responder suggested that 90% of new dwellings should be two bedroom in size (066). Another asked that the mix of housing include sheltered housing (233). Some responders agreed with the preferred option and felt that smaller properties would be less desirable as second homes (205, 213, 216). Others were concerned that smaller properties would be purchased as second homes (220). One response (216) felt that prices for smaller houses should be in the £125,000 to £140,000 range.

It was suggested by one responder (285) that low cost and smaller homes were needed but not in large numbers. They also stated that they didn't think that National Park should be involved in such matters.

Concern was expressed about the cumulative effects of lots of smaller properties being extended to form larger properties (066).

Savills (UK) Ltd on behalf of Crown Estate Scotland (203) supported the preferred option but were concerned that it carries the risk of deterring private housebuilders in marginal market areas in the Park by requiring them to adapt their market tested products.

One respondent (083) suggested that a move to smaller dwelling sizes should be combined with policies aimed at minimising the carbon footprint of new dwellings both during construction and during the lifetime of their use.

Discussion

Affordable Housing Levels

Definition of Affordable Housing

For the avoidance of doubt, the definition of 'affordable housing' is contained within Scottish Planning Policy (SPP) and Planning Advice Note (PAN) 2/2010 'Affordable Housing and Housing Land Audits'. According to paragraph 126 of SPP, affordable housing is defined broadly as housing of a reasonable quality that is affordable to people on modest incomes. Affordable housing may be provided in the form of social rented accommodation, mid-market rented accommodation, shared ownership housing, shared equity housing, housing sold at a discount (including plots for self-build), and low cost housing without subsidy. The current LDP contains a further definition, which is 'private rented accommodation owned and / or managed by a private sector landlord to approved management and maintenance standards with equivalent registered social landlord rents' (pg 217). The intention is to maintain this definition in the new LDP.

Compliance with SPP and Evidence

According to paragraph 129 of SPP, the level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number

of houses. The key word here is 'generally, which does not set an absolute limit on the affordable housing contribution to be provided. Paragraph 14 of PAN 2/2010 states that 25% is a benchmark figure and that this benchmark does not apply if a different percentage is required locally. This must be justified by the Housing Need and Demand Assessment (HNDA) and identified in the Local Housing Strategy (LHS) and LDP.

Therefore, the simple assertion that the preferred option is contrary to SPP is incorrect. The comparison with Aberdeenshire Council is noted but is not considered to rule out a different approach. Loch Lomond and the Trossachs National Park have, for example, recently adopted an LDP with an affordable housing requirement that exceeds 25%. The key test as to whether the preferred option is compliant with SPP and PAN 2/2010 is therefore the evidence that underlies it, with particular regard to the HNDAs that cover the National Park's area.

The evidence base for the Cairngorms National Park is complicated by the fact that the CNPA does not produce its own HNDA. These factors are well covered in the Housing Evidence Paper, but to summarise, of the areas in which the increased affordable housing contributions are proposed, only Aviemore sits within a Housing Market Area (HMA) that is contiguous with the National Park's boundary, namely Badenoch and Strathspey. Ballater and Braemar sit within the wider Rural Aberdeenshire HMA while Blair Atholl sits within the wider Highland Perthshire HMA.

It is considered that there is sufficient evidence to support the preferred option in these areas. The evidence is derived from a range of sources, with the most important being the Highland, Aberdeenshire and TayPlan HNDAs, housing waiting lists and local house price and income data. A detailed review of this evidence is presented in Annex I, which supplements the evidence already presented in the Housing Evidence Paper that was published alongside the MIR.

Compliance with Cairngorms National Park Partnership Plan 2017-2022

The NPPP agenda for action states that the LDP will identify sites, rather than areas, in which the affordable housing contribution is higher than 25%. While sites are not named specifically in the consultation document, the effect of the policy is essentially the same, since it will affect housing sites in Aviemore, Ballater, Braemar and Blair Atholl. This approach will also help to ensure that windfall developments in the names areas also deliver a higher level of affordable housing. It should be noted that outside of these areas, the LDP has identified two sites (THC003 and THC065) that will deliver 100% affordable housing.

Viability

Several responders have concerns about the impact of the preferred option on the viability of development. These concerns have not been expressed about specific sites but in general. These concerns are acknowledged, however in general terms it is clear that sites with affordable housing in excess of 25% can be achieved. For example, several applications for market led sites have recently been approved, or are in the process of being determined, by the CNPA. These include:

- 2018/0046/DET Land 130M South of Meadow View, Crannich Park, Carr-Bridge. 25 dwelling including 12 (48%) affordable (Decision pending)
- 2016/0158/DET Land 175M SE of Heatherbank, Rothiemurchus, Aviemore. 6 dwellings, 4 (67%) affordable (Approved)

- 2016/0060/DET Land 150M NW of Beachan Court, Grantown On Spey. 43 dwellings, 19 (44%) affordable (Approved)
- 2017/0264/DET Land 40 Metres North of Little Orchard, Blair Atholl. 8 dwellings, 100% affordable (Approved)

These sites range from small to moderate in scale, are located in larger and smaller settlements and demonstrate a range of delivery mechanisms, namely Local Authority investment, cross-subsidy from other housing and the Rural Housing Fund. It is important to note that affordable housing does not rely solely on a housing authority or housing association to deliver.

It is notable that those objecting to the preferred option are mostly the representatives of landowners (036, 046, 060, 092, 135, 157, 210), not developers (i.e. those who purchase land to build houses). As highlighted in a recent paper by the Scottish Land Commission¹, the driving force behind rising house prices in Scotland has not been increasing building costs, but increasing land prices. It is considered that, in general terms, any affordable housing requirements should be reflected in the land value, rather than the development cost or the price of open market housing, and that this should therefore not necessarily preclude the delivery of a higher level of affordable housing.

A settlement specific question of viability was raised by Mar Estate (036), who are concerned that building costs in Braemar are significantly higher than elsewhere in the region. However, since this is something that has been proposed as a 'known quantity' within the context of a development plan consultation, it cannot be argued that it is an unforeseeable expense. Consequently, it is considered that this should be reflected in the land value and should not necessarily preclude a higher affordable housing requirement being achieved. The fact that Invercauld Estate, the other major landowner in Braemar, has not objected to the higher affordable housing requirement lends weight to this view.

It should be noted that the affordable housing requirement was set at 25% in the current LDP (2015) not because of viability concerns, as stated by Halliday Fraser Munro, but because according to the Reporter: "*In the circumstances, and in the absence of a more compelling alternative figure, it is reasonable for the policy to continue to be based on a contribution of 25%*" (pg 145 of the Examination Report). The Housing Evidence Paper has outlined a robust case for a higher figure and the evidence base will continue to be developed as the plan making process proceeds. It will ultimately be the role of the Examination Reporter to determine whether the case is 'compelling' enough to justify a higher affordable housing requirement in the new LDP.

It is however agreed that viability issues need to be treated carefully, particularly in combination with other developer contributions, such as those for education. It recognised that the level of contribution should not be set too high so that it prevents market sites from being developed. It is intended therefore that a study into viability be carried out to inform the policy in the Proposed Plan. A review of the commuted sum level could be carried out at the same time. It is also considered that the full costs associated with individual sites may not be known prior to allocation or the submission of a planning application. Therefore, it is considered that the affordable housing policy will need to have some form of flexibility built in.

¹ The housing land market in Scotland: A discussion paper (December, 2017)

Ineffective Stock and Occupancy Conditions

Discussion around second and empty homes largely centred on ways of preventing the new housing stock becoming second homes.

A request as was also made to see data demonstrating that the settlements named in the preferred option have significantly higher instances of second homes and vacant dwellings. Information on the level and spatial distribution of second homes is presented in the Housing Evidence Paper that was published alongside the MIR. However, new data has since been published, which is summarised in Annex 2. Overall, it is maintained that the data on ineffective stock continues to support the proposed increased affordable housing requirements. However, it should also be noted that the level of second homes is not the sole metric by which the areas are identified since, and as stated earlier in the document, it is the HNDAs that carry most weight.

A number of responders requested the use of residency criteria to control the occupancy of dwellings, and particularly to restrict the number of second homes. However, since the issuing of the Chief Planner's letter on occupancy conditions and rural housing dated 4th November 2011, which states "*The Scottish Government believes that occupancy restrictions are rarely appropriate and so should generally be avoided*", the CNPA does not believe it has a strong case for issuing them. The letter does not allow occupancy restrictions to be issued simply on the grounds of the potential use of the dwelling, the origin of the buyer or the workplace of the buyer. In any event, it should also be noted that the level of development proposed in the LDP is relatively low compared to the existing housing stock. As such, it is unlikely that occupancy conditions on new homes would have any significant impact on the overall level of second homes within the wider housing market. As the planning system has no control over the occupation of the vast majority of the National Park's housing stock, it is considered that the most effective interventions over second homes are likely to lie outside the planning system. One option that is being investigated is a higher council tax on second homes.

Affordable Housing in Perpetuity

It is the ambition of the CNPA that all affordable housing be affordable in perpetuity. To this end, because tenants no longer have the right-to-buy their council houses in Scotland, any new council houses will not be lost to the housing market. The same applies to any dwellings built by a housing association, who in any case, were never subject to the right-to-buy rules. The affordability of dwellings may also be protected through use of a Title Deed, Rural Housing Burden or Section 75 agreement depending on the tenure type or management required.

The LDP cannot control the occupancy of affordable housing. The occupation of social and other types of affordable housing in the ownership of councils or housing associations is determined by those organisations and where required, follows the legal guidelines set out by the Scottish Government.

Building Standards

One responder asked that affordable housing must not equate to a cheaper standard of build. Social housing must be built to stringent requirements set out in the Scottish Housing Quality Standard (SHQS). This ensures that the housing is of a high standard and means social landlords must make sure their tenants' homes: are energy efficient, safe and secure; are not seriously damaged; and have kitchens and bathrooms that are in good condition. All

other forms of affordable housing must meet the same building regulations standards as market housing.

Other Policy Matters

Concerns were expressed regarding 100% affordable housing sites as outlined in Policy I.5 of the current LDP (2015). It is intended that this be carried into the new Plan, however it should be noted that this policy is not relied upon to meet housing need. Furthermore, it is agreed that it should not be on land that been deemed unsuitable for private/mainstream housing, but on land that is excluded from settlement boundaries to avoid market speculation that is unsupported by the LDP's evidence base.

The fear that the preferred option would push development to areas where higher affordable housing levels are not required is interesting and may even be beneficial, since some of these areas have had little in the way of significant development for many years. In some cases they have allocations or extant consents that have existed over several plan periods. It should be noted, however, that overall development levels will not be able to exceed the limits placed by the LDP.

The argument that requiring a proportion of houses to be sold below their market price will result in an increase in housing costs and rents is not accepted as it is expected that the additional cost associated with meeting the increased affordable housing requirements should generally be reflected in the land value.

The CNPA agrees that more housing needs to be made available for rent. The measures outlined in the preferred option should help to meet this aim. However, the LDP cannot be used as a general means of lobbying government and the CNPA is not itself a lobbying organisation.

The CNPA does not agree with the suggestion that caravan sites make good locations to meet permanent housing need for the elderly or any other age cohort.

Mix of House Types

Responders to this question were largely positive and do not require a response. A few points do however need to be picked out.

The need for sheltered and accessible housing was raised by a number of responders, with the Highland Council providing an example of their approach to accessible housing. It is agreed that the policy needs to give consideration to the provision of accessible housing. Sheltered housing is different to accessible housing in that it needs management. It is not therefore appropriate to require general housing developments to provide it. Where proposals for sheltered housing are proposed, the LDP will support these where appropriate.

The CNPA agrees that there is a need for one bedroom, two bedroom and three bedroom properties across the National Park. There is however no evidence to support a policy that requires 90% of new dwellings to be two bedroom (i.e. 405 of the MIR Housing Land Requirement).

The claim that low cost housing is only needed in small numbers ‘here and there’ is not supported by the data in the Housing Evidence Paper.

Concern about the cumulative effects of lots of smaller properties being extended to form larger properties is understandable. However, planning applications must be determined on a case by case basis and a policy preventing extensions would be deemed unreasonable. It is also worth noting that most extensions are relatively minor and do not add significant bedrooms or floorspace.

As discussed earlier in the paper, it is possible that some new dwellings will become second homes. However, one of the intentions of this policy is to ensure that the new dwellings are less attractive to the second home market. Small new build dwellings do not appear as desirable as larger new dwellings or older, character properties of a smaller size. Furthermore, dwelling types such as flats, terraced and semi-detached also appear to be less attractive, while also being more affordable by not carrying the premium of a detached property.

With the exception of discount for sale affordable dwellings, the price of houses will be set by the market. It is not therefore possible guarantee to prices of £125,000 to £140,000.

The concern that the requirement will deter private housebuilder in marginal market areas in the National Park by requiring them to adapt their market tested products is noted. However, CNPA does not feel that 1, 2 or 3 bedroom properties represent untested products in any part of the National Park.

The CNPA agrees that development should seek to minimise its carbon footprint, though planning has limited control in this area as it largely sits within the realms of Building Regulations. Smaller dwellings, particularly terraced or flatted, are however likely to be more efficient and less resource demanding than large ones and in this regard the policy is expected to have a positive effect.

Recommendations

The Proposed Plan should:

- Progress the preferred option to require higher levels of affordable housing for sites in Aviemore, Ballater, Braemar and Blair Atholl, developing a flexible policy to ensure development is not rendered unviable
- Increase the requirement in Ballater and Braemar to 45% in line with new evidence from HNDA
- Include An Camas Mor within Aviemore’s requirement to deliver 45% affordable housing
- Progress the preferred option to require development to deliver a greater mix of housing types

Annex I

The starting point for arriving at the preferred option's affordable Housing requirements are the Local Authority HNDA's.

Highland

The Principle Growth Scenario (the scenario chosen for the Preferred Options) for the Highland HNDA clearly states that for the plan period the Badenoch and Strathspey HMA needs 161 affordable dwellings (Social rent and below market rent) and 140 market dwellings (private rent and owner occupier). This represents an affordable housing requirement of around 53% across the whole HMA. It should be noted that numerically these figures assume that the need identified for the 2015-2019 period is met in full in that period (the discussion on Main Issue 4 looks at different scenarios around this), but the overall assumptions on the proportional affordable housing requirement remain the same.

It is acknowledged that the Highland Council intend to produce a new HNDA soon and the CNPA will consider its findings once found robust and credible by the Centre for Housing Market Analysis (CHMA).

The justification for Aviemore comes from the fact that it is a particularly sought after location for both residents and those seeking second or holiday homes. While Aviemore does not have the highest proportion of these it does have the highest number, with approximately 227 second homes and self-catering holiday homes. It is also the largest settlement with the most services and the most proposed development in the MIR. Therefore, in order to have the greatest impact on affordability within the HMA, it is considered to be the best location to apply a higher affordable housing requirement. The Highland Council's response to the MIR tends to reinforce this view, as they point out that Aviemore is identified in their Strategic Housing Investment Plan as the highest priority for affordable housing provision in Badenoch and Strathspey.

One responder suggested that An Camas Mor should also be required to deliver 45% affordable housing. Given that An Camas Mor is identified to meet a long term strategic need, there is certainly merit in this, particularly in its early stages.

Aberdeenshire

The requirement of 35% for Ballater and Braemar is based on an estimated identified need of 33% in the 2011 HNDA, information from housing waiting lists, and house price data. Since the publication of the MIR a new HNDA for Aberdeenshire City and Shire has been released, so rather than justifying the policy based on the evidence presented in the housing evidence paper, it is worth testing the MIR's assumptions against the new evidence.

The Aberdeenshire City and Shire HNDA (2017) presents Principal, Low Migration and High Migration Scenarios. The CNPA maintains the view that the Principal Scenario is the most appropriate for the National Park; the requirement according to this scenario is presented in Table I.

Table 1 Aberdeen City and Shire HNDA Principal Scenario annual averages for the Rural HMA

	2016-2020		2021-2025		2026-2030		2031-2035	
	No.	%	No.	%	No.	%	No.	%
Social Rent	204	36%	164	31%	107	24%	77	20%
Below Market Rent	100	18%	100	19%	98	22%	93	24%
Total Affordable	304	54%	264	50%	205	46%	170	44%
Private Rent	106	19%	104	20%	95	21%	82	21%
Owner Occupier	157	28%	155	30%	145	33%	131	34%
Total Market	263	46%	259	50%	240	54%	213	55%
Total Requirement	568	N/A	523	N/A	446	N/A	387	N/A

A simple point that can be drawn from this is that across the whole HMA, the affordable housing requirement is likely to be in the region of 50-54%. This is in contrast to the 33% requirement estimated in the 2011 HNDA.

These annual averages may be adjusted to the time frame of the Cairngorms National Park LDP and using the methodology set out within the evidence paper, disaggregated to provide an estimate of the National Park's requirement (Table 2 and Table 3).

Table 2 Disaggregated Aberdeen City and Shire HNDA Principal Scenario annual averages for the Cairngorms National Park area of the Rural HMA based on the 2016 based population statistics presented in the HNDA

	2015-2019		2020-2024		2025-2029		2030-2034	
	No.	%	No.	%	No.	%	No.	%
Social Rent	4.4	36%	3.7	32%	2.5	26%	1.8	21%
Below Market Rent	2.1	18%	2.1	19%	2.1	21%	2.0	24%
Total Affordable	6.5	54%	5.8	51%	4.6	47%	3.8	45%
Private Rent	2.3	19%	2.2	20%	2.1	21%	1.8	21%
Owner Occupier	3.4	28%	3.3	29%	3.1	32%	2.9	34%
Total Market	5.6	46%	5.6	49%	5.2	53%	4.7	55%
Total Requirement	12.1	N/A	11.4	N/A	9.9	N/A	8.5	N/A

Table 3 Disaggregated Aberdeen City and Shire HNDA Principal Scenario covering Cairngorms National Park Plan periods for the Cairngorms National Park area of the Rural HMA, based on the 2016 population quoted in the HNDA

	2015-2019		2020-2024		2025-2029		2030-2034	
	No.	%	No.	%	No.	%	No.	%
Social Rent	21.8	36%	18.4	32%	12.7	26%	8.9	21%
Below Market Rent	10.7	18%	10.7	19%	10.5	21%	10.1	24%

	2015-2019		2020-2024		2025-2029		2030-2034	
	No.	%	No.	%	No.	%	No.	%
Total Affordable	32.6	54%	29.1	51%	23.2	47%	19.0	45%
Private Rent	11.4	19%	11.2	20%	10.4	21%	9.1	21%
Owner Occupier	16.8	28%	16.6	29%	15.7	32%	14.3	34%
Total Market	28.2	46%	27.8	49%	26.1	53%	23.4	55%
Total Requirement	60.7	N/A	56.9	N/A	49.3	N/A	42.3	N/A

There are two key differences between the scenario presented in the 2011 and 2017 HNDAs and consequently the Proposed Housing Supply Targets included in the MIR. These are:

- The overall total requirement is lower in the 2017 HNDA;
- The affordable housing requirement is higher in the 2017 HNDA, both numerically and proportionally.

The new HNDA therefore supports the preferred option and means that it remains compliant with the requirements of SPP and PAN 2/2010. It does however posit the question of whether or not the level set out in the preferred option for Ballater and Braemar is too low, as has been suggested by a number of responders.

Perth and Kinross

The main sources of information for Perth and Kinross is the TayPlan Joint HNDA and the housing waiting list for the Blair Atholl area. According to the HNDA there is a requirement for just over 45% affordable housing in the Highland Perthshire HMA. The Perth and Kinross part of the National Park only represents a small part of this HMA and does not form a functional HMA in its own right. This has resulted in a responder questioning the need to require 45% within the National Park on the basis that those in need of housing may be happy to look elsewhere within the HMA for accommodation. There is likely to be some truth in this since such behaviour is one of the primary means by which a HMA is identified. However, data on council housing applications within the HMA suggest that there is in fact significant demand for accommodation within the Perth and Kinross area of the National Park, with the year 2015 / 2016 seeing 15 first choice applications against just 3 lets. There is a strong social and economic argument for ensuring such accommodation is provided within this area, particularly given the importance of employers such as the House of Bruar, which has an ambition to grow and expand.

Ristol Consulting on behalf of Atholl Estate (046) state that the median house price in Blair Atholl is £129,000 and suggest that house prices therefore compare favourably in terms of affordability with other settlements within the National Park, which indicates that there is a stock of affordable housing available and that house price alone does not indicate a pressured area. The figure is however problematic as it does not:

- Reference a source;
- State a year or time period;
- Provide information on how the geography of Blair Atholl was defined;
- State how many sales the figure is based on; or

- Correlate with information provided to the CNPA by the CHMA and available on statistics.gov.scot.

According to the latest CHMA data, the median house price for the year 2017 in data zone S01011981² is £175,000. This is based on 19 sales, which represents a high figure for the locality, which has an average of 11 sales per annum. It is acknowledged that annual sales represent relatively small numbers and therefore it has been necessary to consider a wider data set to reach a policy decision.

Figure 1 shows the median house price for the Perth and Kinross area of National Park, the Cairngorms National Park as a whole and Scotland from 1993 to 2017. The 2017 data was not available at the time the preferred option was written, though it is worth considering it here. The Perth and Kinross data shows considerable annual variance, which is to be expected from a dataset with a low number of points. While 2017 median house price for the area is lower than the National Park average (£197,375), it is notable that this has been the exception rather than the rule, with local median prices being above the CNPA median in 17 out of 25 years on record. Furthermore, in eleven of those years, median house prices within the Perth and Kinross area were ranked within the top 5 data zones in the National Park. It is also worth noting that median house prices in both the Perth and Kinross area and CNP area as a whole are significantly in excess of those of Scotland as a whole, which for 2017 was £152,355.

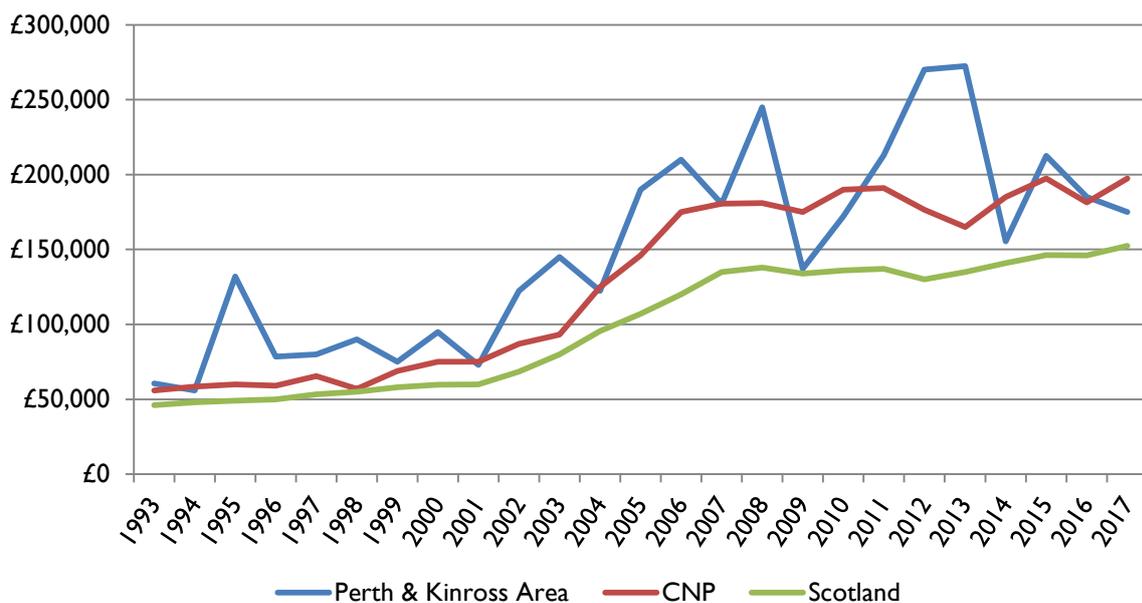


Figure 1 Annual median house prices for Perth and Kinross area of National Park, the Cairngorms National Park as a whole and Scotland.

The £129,000 figure quoted by Ristol Consulting is actually closer to the lower quartile house price, which in 2017 was £125,000 (Figure 2).

² Data zones are the standard statistical unit of the Scottish Government. Data zone S01011981 has its geographically weighted centroid within the National Park boundary and is therefore used as the statistical basis for the Perth and Kinross part of the National Park.

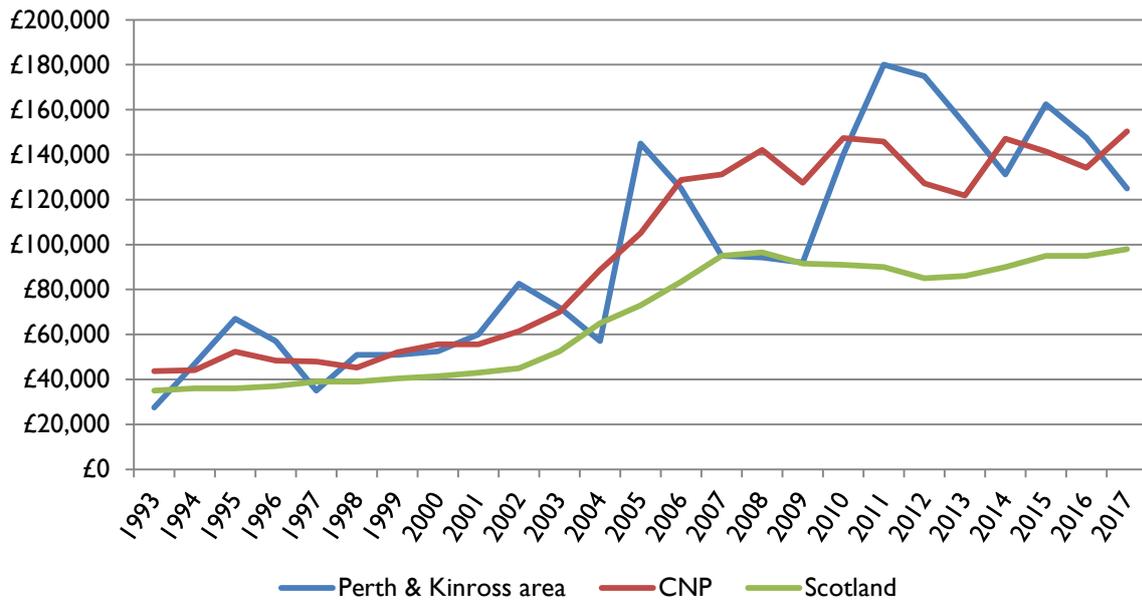


Figure 2 Annual lower quartile house prices for Perth and Kinross area of National Park, the Cairngorms National Park as a whole and Scotland.

The locality’s estimated gross annual income is around £32,000, which gives a house price / income ratio of 5.5. Even taking into account a deposit requirement of 10%, this is well above the maximum 3.5 loan to income ratio most lenders require. The maximum loan such a ratio would allow would be £112,000, which with a minimum deposit of 10% would, allow for the purchase of a property with a value of no more than £123,200. In 2017, this would mean that those on a median income would be excluded from everything above the lower quartile house price.

Overall

It is considered that there is sufficient evidence for the higher levels of affordable housing and locations where it will be delivered to meet the evidential tests of SPP.

With the exception of Ballater and Braemar, suggestions that the affordable housing requirement should be higher than set out in the preferred option are not supported by any of the HNDAs.

Annex 2

Information on the level and spatial distribution of second homes is presented in the Housing Evidence Paper that was published alongside the MIR. However, new data has since been published, which is presented in Table I. It should be noted that due to Storm Frank (29 - 30 December 2015), the level of vacant dwellings in Ballater is much higher than previous years (6% in 2015). The settlement's 28% ineffective stock is therefore likely to be short term and that the level in 2018 is likely to be much closer to the 2015 level, which was 19%. Second Homes, which were also affected by the flooding, are also likely to be closer to the 2015 level, which was 13%.

Table I Ineffective housing stock in 2016 (Source: statistics.gov.scot).

Settlement	Total Dwellings	Occupied Dwellings		Vacant Dwellings		Second Homes		Ineffective stock	
		Count	Percentage	Count	Percentage	Count	Percentage	Count	Percentage
Aviemore	1,905	1,651	87%	27	1%	227	12%	254	13%
Ballater	903	652	72%	160	18%	91	10%	251	28%
Braemar	373	281	75%	6	2%	86	23%	92	25%
Blair Atholl	538	428	80%	38	7%	73	14%	111	21%
CNP	10,117	8,455	84%	1,187	12%	474	5%	1,661	16%

These local levels are set against a National Park level of around 16% and a Scottish level 4%. Figure I shows the spatial distribution of second homes across the National Park.

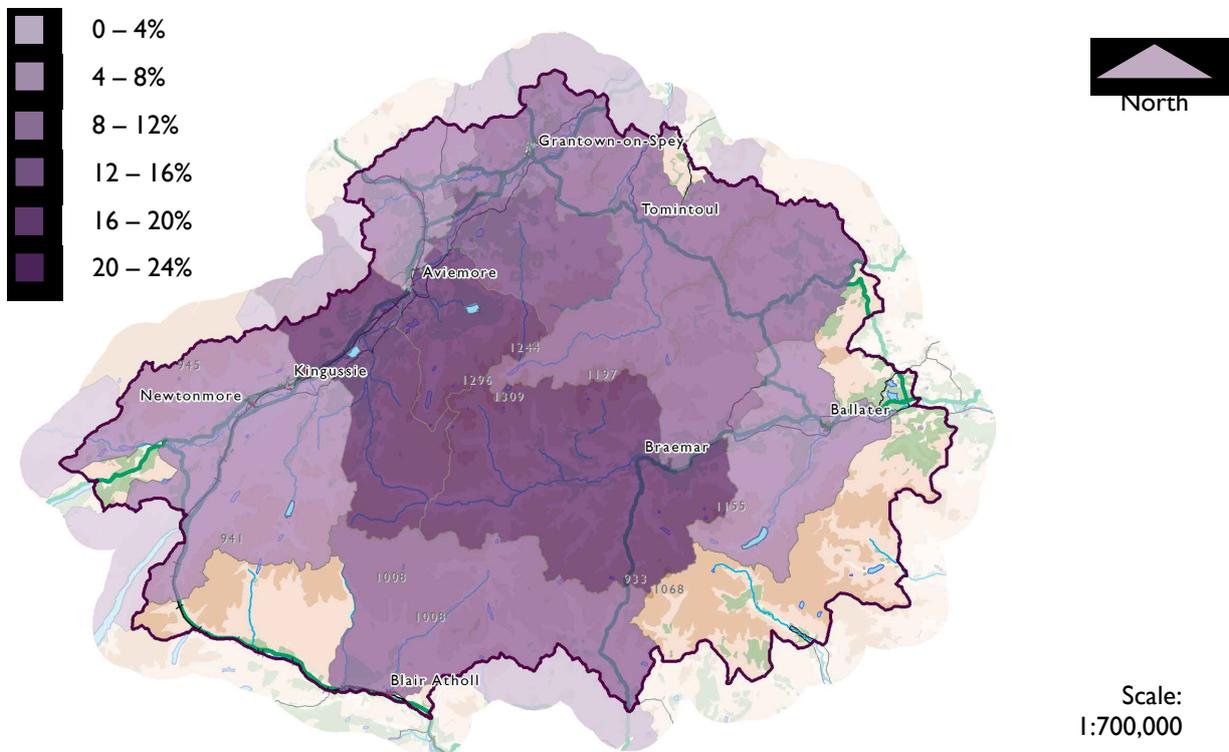


Figure I Proportion of second homes by data zone in 2016 (Source: <http://www.sns.gov.uk/>).

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Main Issue 6 – Economic Development

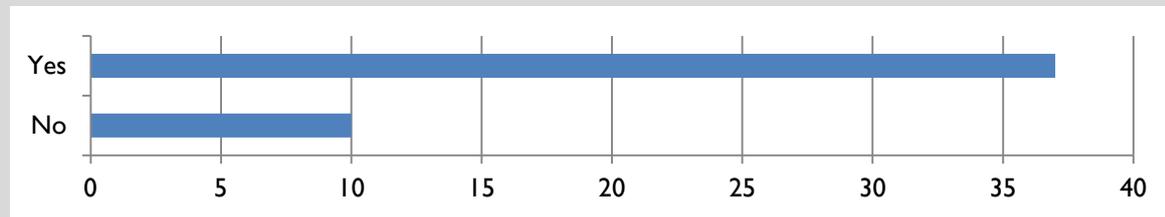
Respondents

Ref	Name / Organisation
001	Scottish Campaign for National Parks
003	Anonymous
012	Mount Blair Community Development Trust
030	Kincraig and Vicinity Community Council
033	Laggan Community Association
036	Halliday Fraser Munro on behalf of Mar Estate
039	N Kempe
043	The Highland Council
048	Glenshee Ski Centre Ltd
049	Grantown-on-Spey and Vicinity Community Council
053	Inveresk Community Council
054	Rothiemurchus Estate
064	Nethy Bridge and Vicinity Community Council
066	Cairngorms Campaign
076	Cairngorms Business Partnership
082	D Morris
083	R Turnbull
089	Cromar Community Council
092	Scottish Land and Estates
100	Kingussie and Vicinity Community Council
116	Paths for All
135	Alvie and Dalraddy Estates
151	Forsyth Accounting Practice Ltd
157	Balavil Estate Ltd
188	Boat of Garten and Vicinity Community Council
192	Aviemore Business Association
194	Quarch Technology
199	Scottish Natural Heritage
200	Highlands and Islands Enterprise
203	Savills (UK) Ltd on behalf of Crown Estate Scotland

Ref	Name / Organisation
210	Urban Animation on behalf of Invercauld Estate
213	S Caudrey
215	G Bulloch
216	Carrbridge Resident
219	Savills on behalf of J and M Forbes Leith Partnership
221	Woodland Trust Scotland
224	D Stott
227	Moray Council
231	C Campbell
233	Ballater & Crathie Community Council
237	Aviemore and Vicinity Community Council
246	Anonymous
251	S Dickie
260	H Quick
264	D Sherrard
267	L MacLean
271	Dalwhinnie Community Council
272	Boat of Garten Resident
273	D Munday
279	North East Mountain Trust
281	Tactran
282	D Bruce
283	Ross McGowan Ltd
284	D Lyle
285	Anonymous
292	Munro Surveyors
293	Braemar Resident
294	A J Angus
306	Anonymous
312	Anonymous
316	Kingussie Resident
319	C McPherson
323	Grantown Resident

Response Overview

Do you agree that the new Local Development Plan should identify a limited number of new economic development sites?



A total of 63 people recommended to this Main Issue. 59% (37) of respondents agreed that the Local Development Plan should identify a limited number of new economic development sites, whilst 16% (10) did not. Some respondents provided comments but did not directly answer the question.

Key points raised:

- Whilst the majority agreed with the allocation of employment sites, many felt that a flexible policy approach is required to meet demand in rural areas
- Strong support for promoting small scale and start-up business units
- Economic development should not negatively impact on the conservation and protection of the National Park's environment

Issues Raised

The majority of respondents agreed that the next Local Development Plan should identify a limited number of new economic development sites (030, 033, 043, 053, 064, 082, 089, 092, 100, 135, 188, 192, 194, 203, 213, 215, 219, 231, 233, 264, 267, 271, 272, 273, 281, 282, 283, 285, 292, 293, 306, 312, 316, 319, 323), whilst a smaller number did not (039, 083, 151, 157, 216, 224, 237, 246, 251, 260).

A number of responses related to the scale and location of new economic development sites. Some felt that all settlements should have employment sites to encourage economic activity (033, 054, 264, 284). One stated that a range of employment land needs to be made available (043), and two did not wish to see provision restricted to a 'limited number' of new sites (092, 284). Many responses wished to see a flexible approach to economic development in rural areas in order to sustain local populations, support land based business, and help respond to demand where it arises (001, 003, 076, 092, 157, 203, 210, 271, 284). However, others felt that sites allocated for economic development should only be located in places where such development already exists (eg existing industrial estates) or where it would help existing businesses expand (048, 064, 246). The Highland Council wished to see a greater focus on town centres and stated that economic development proposals should be directed here in the first instance (043).

Support was expressed for the identification of employment sites close to good transport links and centres of population (200, 219, 281). One respondent highlighted that this approach would also encourage sustainable travel options (281), although others felt that

focusing development in the A9 corridor could negatively impact on visitor impressions or lead to undesirable ribbon development (066, 083).

Other responses related to evidence on the demand for economic development. Some commented that there is limited information on the need/demand for employment land (043, 219), and one was of the view that sites should be identified on evidence of demand (092). Another felt that, in the absence of evidence on demand, flexibility is required to allow economic development allocations to be released for alternative uses if there is insufficient market demand to develop them for employment (219).

A number of responses commented on the types of economic development that they wished to see support for. One felt that further detail about the type of development that is being sought should be set out in the LDP (188). Others wished to see more diversification towards small scale manufacturing (312) and encouraging hi-tech inward investment (151). The high proportion of self-employment in the National Park was highlighted and the need to encourage the provision of small scale and start up units was supported by a number of respondents (151, 194, 210, 213, 215, 264). One respondent felt that specific support for social enterprises is needed (100).

Concern was expressed that development in some places such as villages will impact on their character (064). Others felt that new economic development must not impact on sensitive landscapes, habitats and species (064, 066, 188, 231, 306, 319).

Another respondent felt that CNPA should not be allocating specific sites but instead become a facilitator to help businesses find suitable sites and deliver development (135).

Settlement and Site Specific Issues

Two responses wished to see a wider range of employment land in Aviemore (043, 192). It was queried whether the loss of employment land resulting from the proposed change of site ED2 to community / hospital use should be compensated through an extension to site ED1 (043). However, another respondent did not agree that there is a proven need for economic development, on the basis that ED2 has remained unused for a long time, and did not consider that additional employment land is required, particularly outwith the current settlement boundary (237). The Highland Council noted that Dalfaber has seen a number of proposals for small business start-ups which have involved quasi-class 1 (retail) and class 2 (financial, professional and other services) within a traditional class 4, 5 and 6 industrial estate. They felt that further consideration is required to provide land for start-up businesses of this nature in more suitable locations, for example on site THC061 which should be included within the town centre (043).

One response stated that the proposal to allocate site THC016 in Dalwhinnie is contrary to the overall development strategy, which proposes to reclassify the settlement as 'rural' (227). Other respondents raised concerns about allocating new sites in Dalwhinnie when there is little likelihood of delivery (279, 316). One of these felt that existing brownfield sites in Dalwhinnie should be developed first (279).

Another felt that the availability of employment sites in the east Cairngorms should be considered (233). It was also raised that the provision of small business units in Braemar should be supported (036).

Concern was expressed that there are no employment land allocations in Strathspey around Boat of Garten, Nethybridge, Cromdale or Advie (049). Another respondent suggested a need to identify employment sites in Kingussie and Newtonmore (200).

One respondent did not agree with the proposal to allocate employment sites THC030 and THC069 in Carr-Bridge (216).

Other Issues

Ensuring access to broadband was highlighted as important in supporting economic development (012, 092, 135).

Support for sustainable tourism was expressed (012). Another respondent highlighted the economic benefits of investing in recreation which supports tourism and visitor experience (116). Another felt that the Park's economy is likely to continue to be driven by tourism and recreation however felt that large scale mass-tourism centres should not be encouraged by the Local Development Plan (279).

Discussion

This topic links very closely with Main Issue 3 'Impacts and Opportunities from the A9 and Highland Main Line Upgrades' and some of the issues raised in that section are discussed further here.

Whilst the majority of respondents were supportive of the preferred approach to identify new employment sites, a number appear to be concerned that this approach is too restrictive. There were calls for greater flexibility in respect of economic development, particularly in rural areas. These responses appear to have misinterpreted the preferred approach. The approach aims to identify a number of new employment allocations in existing settlements, including but not limited to locations where they could take advantage of new inward investment as a result of the A9 dualling and Highland Main Line upgrades. However, it does not intend to restrict economic development to these sites alone.

Existing policy 2 (Supporting Economic Growth) is supportive of economic development proposals across the National Park, including in rural areas. The policy includes broad criteria that are intended to provide an open and welcoming approach to economic development on sites that are not specifically allocated in the Local Development Plan. The aim of policy 2 is to support a broad range of economic development proposals without being overly prescriptive, and many of the suggestions put forward through the consultation would benefit from support in principle under this policy. This policy approach will be carried forward into the Proposed Plan, and this will enable appropriate economic development to take place in response to demand. Improved clarity on the range of support offered by the policy could be provided through supplementary guidance / planning advice.

The comment regarding increasing the focus of economic activity to within town centres is noted and in line with Scottish Planning Policy. The Monitoring Statement published alongside the Main Issues Report identified the need to update existing policy 2 to address this issue and this change will be made in the Proposed Plan.

Concerns about focusing economic development on the A9 corridor because of potential impacts on visitor impressions again appear to have misinterpreted the preferred approach. As set out under Main Issue 3 'Impacts and Opportunities from the A9 and Highland Main Line Upgrades', the preferred approach does not propose any presumption in favour of economic development along the entire A9 corridor.

Concerns about the lack of evidence on the demand for economic development are noted. As highlighted in the Main Issues Report, it remains difficult to establish accurate requirements for employment land within the National Park, although there is anecdotal evidence of unmet demand. Our early engagement with stakeholders such as Highlands and Islands Enterprise confirmed the importance of providing sufficient land that is suitable for economic development. The preferred approach remains an appropriate response in light of these circumstances, although the evidence base will be monitored and reviewed over the lifetime of the Proposed Plan. The existing wording of policy 2 allows for economic development land to be released for alternative uses in exceptional circumstances, including where it is demonstrated that it is not practical for financial reasons to retain it for economic development or employment use. This approach will be carried forward into the Proposed Plan and no further change is required in response to the comment on this issue.

The calls for support for specific types of economic development are noted. However, as outlined above, the existing wording of policy 2 aims to support a broad range of economic development proposals without being overly prescriptive. Many of the suggestions would benefit from support in principle under this policy and no further change is required in response to these comments.

The concerns expressed in relation to the potential environmental impacts of new economic development are noted, however proposals will be subject to all policies in the Local Development Plan which include assessing impacts on natural heritage, landscape and sustainable design.

Settlement and Site Specific Issues

The requests for a wider range of employment land in Aviemore are noted, and it is agreed that there is a need to provide new economic development land within the settlement. The Main Issues Report identified a proposed new economic development site (THC059) to address this need. However, the additional proposals to extend site ED1 and to extend the town centre boundary to include site THC061 are considered reasonable. These issues are considered in more detail in the Aviemore section of this report.

It is not agreed that there is any conflict between the preferred approach, which includes the potential allocation of a small economic development site (THC016) at Dalwhinnie, and the reclassification of Dalwhinnie as a rural settlement. See Main Issue 1 'Over-Arching Development Strategy' for further consideration of Dalwhinnie's status within the settlement hierarchy.

The various calls for employment sites and small scale business units in other locations of the National Park are noted. However, as outlined above, the economic development policy already provides a flexible approach to economic development and would therefore support

the development of new businesses and small-scale business units in these locations should appropriate proposals come forward.

The merits of the proposed employment site in Carr-Bridge (THC030/THC069) are considered in the Carr-Bridge section of this report.

Other Issues

It is acknowledged that broadband plays an important role in helping to support business development within the National Park. Considerable work has been done to date to improve the service and work is now ongoing through the Government's 'Reaching 100' programme. However, other than continuing to ensure there is an appropriate policy for the siting and design of digital communications equipment (which is currently in place and will carry over into the Proposed Local Development Plan), this is not a matter that the Local Development Plan can directly influence.

The comments in support of the value of investment in recreation and the importance of tourism are noted. Tourism continues to be an important industry within the National Park and the Local Development Plan will continue to support proposals that encourage and enhance visitor experience. Specific proposals for tourism centres will be assessed on their merits.

Recommendations

The Proposed Plan should:

- Identify a limited number of new economic development sites as outlined in the Main Issues Report
- Retain the current Local Development Plan's general and flexible policy approach to economic development, and provide greater clarity about how the policy should be interpreted (and the types of proposals that could be supported) through supplementary guidance / planning advice

Main Issue 7 – Impact on Natura Designations

Respondents

Ref	Name / Organisation
001	Scottish Campaign for National Parks
003	Anonymous
030	Kincraig and Vicinity Community Council
031	John Muir Trust
033	Laggan Community Association
034	Braemar Resident
036	Halliday Fraser Munro on behalf of Mar Estate
039	N Kempe
040	Badenoch and Strathspey Conservation Group
043	The Highland Council
044	Scottish Environment Protection Agency
052	Scottish Wild Land Group
053	Inveresk Community Council
054	Rothiemurchus Estate
060	Halliday Fraser Munro on behalf of Reidhaven Estate
064	Nethy Bridge and Vicinity Community Council
066	Cairngorms Campaign
076	Cairngorms Business Partnership
082	D Morris
083	R Turnbull
086	An Camas Mor LLP
089	Cromar Community Council
092	Scottish Land and Estates
100	Kingussie and Vicinity Community Council
116	Paths for All
135	Alvie and Dalraddy Estates
151	Forsyth Accounting Practice Ltd
188	Boat of Garten and Vicinity Community Council
192	Aviemore Business Association
194	Quarch Technology
199	Scottish Natural Heritage

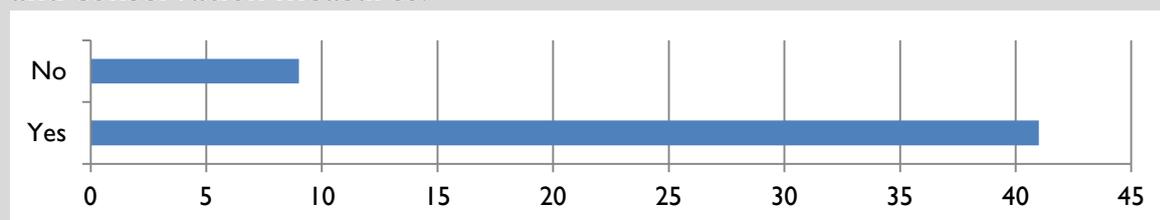
Ref	Name / Organisation
210	Urban Animation on behalf of Invercauld Estate
211	National Trust for Scotland
212	Carr Bridge Resident
213	S Caudrey
215	G Bulloch
216	Carr Bridge Resident
220	M Kinsella
221	Woodland Trust Scotland
224	D Stott
227	Moray Council
231	C Campbell
233	Ballater & Crathie Community Council
237	Aviemore and Vicinity Community Council
251	S Dickie
260	H Quick
264	D Sherrard
267	L MacLean
271	Dalwhinnie Community Council
272	Boat of Garten Resident
273	D Munday
279	North East Mountain Trust
282	D Bruce
283	Ross McGowan Ltd
285	Anonymous
292	Munro Surveyors
293	Braemar Resident
294	A Angus
306	Anonymous
312	Anonymous
316	Kingussie Resident
319	C McPherson

200	Highlands and Islands Enterprise
203	Savills (UK) Ltd on behalf of Crown Estate Scotland (Interim Management)

321	J Finnie
325	RSPB Scotland

Response Overview

Do you agree that the new Local Development Plan should include a more co-ordinated approach towards delivering wider packages of capercaillie mitigation and conservation measures?



A total of 66 responders answered this question. 16 did not choose to say whether they agreed or not, but did provide comments on the Main Issue.

Key points

- General support for the preferred option, with the majority recognising that some form of intervention was needed to support capercaillie and freshwater pearl mussel numbers.
- Landscape scale conservation seen as a key tool in delivering preferred option
- Small number of respondents did not feel that potential effects on capercaillie should be mitigated
- Some arguments for less development and the removal of An Camas Mor as a preferred option
- Some concern about potential for access being restricted to countryside

Issues Raised

The majority of respondents expressed their agreement with the preferred option (034, 043, 044, 052, 053, 060, 064, 082, 083, 089, 100, 151, 188, 192, 199, 211, 212, 213, 216, 220, 221, 224, 227, 233, 237, 251, 260, 264, 267, 271, 272, 273, 283, 292, 293, 306, 312, 316, 319, 321, 325). Nine respondents disagreed with the preferred option, although none expressed support for the alternative (030, 031, 033, 054, 135, 194, 215, 231, 282, 285). Other responders made broader comments which expressed both support and concern without explicitly agreeing or disagreeing with the options presented in the Main Issues Report (MIR).

Many who agreed with the preferred option highlighted the need to carefully balance nature conservation objectives with development. This included ensuring development was proposed in the right places (001, 221, 233, 292). Several responders were keen to highlight the importance of the outdoors and wildlife to the local economy (200, 216). One responder was concerned that recreation with dogs and mountain bikes was having a negative effect and that strong measures were required to protect habitats (213).

Several respondents highlighted the importance of landscape scale conservation as a means of achieving the mitigation measures required by the Local Development Plan (LDP) and felt habitat enhancement away from settlements was the best way of mitigating negative effects. Planting more native woodland was identified as a good measure of supporting capercaillie (031, 052, 211, 221, 279, 325). In addition to this several responders felt that the creation of woodland corridors should be promoted (271, 279). However, one response cautioned that there should be a presumption against afforestation on arable land as it would reduce landscape diversity (064).

One of the reasons the preferred option was supported was that the delivery of mitigation needed to operate at a broader level than single development sites and the CNPA should take a leading role in coordinating intervention. It was also suggested that the approach should be consistent across the National Park and involve other stakeholders (060, 076, 089, 100, 325).

RSPB (325) agreed that one of the biggest issues for the next LDP is ensuring that development does not adversely affect capercaillie populations and the associated Special Protection Areas (SPAs). They supported proposals to design a strategic package of mitigation measures to address the cumulative impacts of development and cited the example of strategic mitigation in the Thames Basin Heaths (TBH) SPA in England. The TBH model involves the provision of Suitable Alternative Natural Greenspaces (SANGs) and Strategic Access Management and Monitoring (SAMM) to avoid increased recreational use of the TBH by residents of new housing developments. Both SANGs and SAMM are funded by developer contributions from housebuilders. RSPB offered to assist in the design and implementation of a similar scheme to mitigate recreational disturbance to capercaillie from new development within the Cairngorms. However, they cautioned that such a strategic mitigation scheme may be difficult to justify under current legislation in light of a recent Supreme Court judgment regarding the Aberdeen City and Shire Strategic Transport Fund. They also argued that site specific mitigation measures will still be necessary in some cases.

SNH (199) agreed that a coordinated and proactive approach would be more effective than the current reactive approach. They suggested that taking a more proactive approach forward may have to rely less on the Capercaillie Framework, however, until it is fully funded and operational.

The John Muir Trust (031) felt that the preferred option suggested the issue would be managed through “offsetting” impacts by providing compensatory habitats and argued that priority habitats should be protected in situ if at all possible. Badenoch and Strathspey Conservation Group (040) also felt that too much weight was placed on the value of creating new habitat for capercaillie away from settlements. They felt that the time it took to create additional suitable habitat would lag too far behind the time it took to develop a site. They also felt that these new woodland areas would become recreational resources in their own right and that disturbance would occur there too.

It was suggested that the CNPA should be doing more to restrict development near capercaillie habitat while also facilitating the restoration of their numbers and range to former levels. Therefore, it was argued, the CNPA needs to consider disturbance and other factors in woodland that has the potential to support capercaillie, but in which they are absent at present (040, 083).

Scottish Land and Estates (092) highlighted the need to engage landowners and land managers in considering the implementation of the Capercaillie Framework or other mitigation measures at an early stage. They also argued that authorities should focus on enforcing the Outdoor Access Code rather than placing restrictions and further burdens on proposed developments. This approach was supported by Alvie and Dalraddy Estates (135) who recommended building paths and tracks and controlling predators. Rotheimurchus Estate (054) agreed that the new LDP should include a coordinated approach to the achievement of conservation goals, but did not think the preferred option was necessary to achieve it. They argued that Scottish Natural Heritage already had duties to publicise and promote understanding of the Outdoor Access Code. They also argued that the impacts on Natura designations could already be mitigated through the delivery of the Capercaillie Framework.

Concern was expressed by a number of respondents about limiting people's rights to access the countryside. Some also suggested that access and recreation did not have the most significant effect on the health of protected species, but that land management and other practices such as maintaining high deer numbers and erecting deer fences were to blame (039, 076, 082, 116, 231, 260, 285).

Several responders did not believe CNPA could effectively implement the preferred option or that mitigation measures were the best means of protecting species and habitats because they might prove ineffective (040, 066, 215).

A number of respondents also questioned the need to protect capercaillie at all. Arguments ranged from capercaillie not being endangered in Europe, that the protection of pine martin has contributed to capercaillie decline, that capercaillie numbers were not problematic, and that other non-planning related factors such as deer fences were the main cause for capercaillie decline (030, 033, 135, 231, 282, 285, 294). One response argued that development planning in the National Park should not be driven by one species (210).

SNH (199) agreed with the preferred option in relation to freshwater pearl mussel and the approach to tackling issues affecting water quality and quantity for the River Spey and River Dee Special Areas of Conservation (SACs). SEPA (044) also supported the preferred option for freshwater pearl mussel and added that policies would need to underpin the requirement for water efficiency measures to help achieve environmental protection not only for freshwater pearl mussel but water habitats as a whole. They underlined that potable water provision should come from within Scottish Water's existing consented abstraction limits and suggested that CNPA should liaise with Scottish Water to confirm this is achievable.

Others felt that applying legal limits to water quality was not enough because freshwater pearl mussel numbers were declining in the River Spey and so the limits appeared inadequate (040, 083). Boat of Garten and Vicinity Community Council (188) expressed concern about the impact of sewage flowing into the River Spey from the new treatment works, and that this could be negatively affecting freshwater pearl mussel. Alvie and Dalraddy Estates (135) stated that water quality and quantity can be improved by mitigating flooding, particularly of farm land.

Several responders were concerned that the preferred option only mentioned Capercaillie and freshwater pearl mussel. They argued that it should include reference to other species and habitats, including protection for:

- Other flora and fauna (e.g. native woodland, juniper) and protected habitats (e.g. Ramsar Sites and SSSIs) (001,039, 040, 052, 082, 188, 215, 279);
- Ancient and semi-natural woodlands (083);
- Species that were not listed as threatened or protected (066, 273);
- Flower and fungi rich meadows (083);
- Wild cat (040);
- Red squirrel (188, 273);
- Crested tits (188);
- Rare orchids (188);
- Peewits (294);
- Golden eagle (273, 279);
- Sea eagle (273);
- Crossbill (312);
- Pine martin (312);
- Caledonian pine (312);
- People (003, 030, 054); and
- Livestock (054).

Scottish Wild Land Group (052) felt it was understandable that further species and habitats had not been mentioned in the MIR but asked that attention be given in the Proposed Plan.

Several responders felt that the main issue only existed because of the identification of An Camas Mor as a preferred site, or because the proposed level of development was too high. They generally felt that the need for large scale mitigation measures could be avoided by not allocating An Camas Mor or by reducing the overall amount of proposed development (001,031, 039, 040, 083, 211, 212, 215, 221, 251, 316, 319).

Highlands and Islands Enterprise (200) suggested a change in the wording of the main issue to read: "*...significant areas of suitable woodland that is further from existing towns and villages and development sites, be they areas of woodland and other land, already designated in the existing local plan...*"

One response stated that the failure to identify valuable natural heritage sites in addition to statutory designations produces a situation in which it is in developers' interest to damage the natural heritage aspects of their property to increase the chance of a planning consent. They argued that these temptations would diminish if the planning authority identified and designated 'second tier conservation sites' (083). Another response argued that the main issue should also include reference to Wild Land Areas because they have special ecological qualities (031). One respondent supported the preferred option but not if it resulted in endless committees and more CNPA employees (220).

Discussion

The preferred option was largely supported by responders, though this was with the caveat that further work was needed to set out what this would look like in policy terms. CNPA

agrees with this and the purpose of the MIR consultation was not just to ascertain whether or not there was broad agreement on the approach, but also to see if there were suggestions on how it might work.

It is agreed that landscape scale conservation can play a significant role in delivering the mitigation required by development. The National Park Partnership Plan outlines ambitious targets in relation to landscape scale collaboration. This is not only likely to deliver mitigation but also enhancement and will have benefits for capercaillie, freshwater pearl mussel and other species, both protected and unprotected.

As was suggested by a number of responders, it will require working with a range of stakeholders to achieve an effective suite of capercaillie mitigation measures. It is therefore welcomed that RSPB has offered to support the development and implementation of mitigation. CNPA agrees with RSPB about the necessity to consider cumulative effects and this is one of the reasons for the preferred option was proposed. CNPA welcomes RSPB's provision of examples of possible models for a strategic mitigation scheme as well as highlighting risks related to its delivery. CNPA will consider these issues as it develops the option into a policy.

Some responders were concerned that the preferred approach places too much emphasis on the creation of new capercaillie habitats at the expense of protecting existing habitats and/or that there may be a lag between development and the ability to mitigate negative effects through the implementation of the preferred option. It is not agreed that this will be the case. Existing SPAs and priority capercaillie habitats will continue to be rigorously protected. The ability to effectively mitigate any adverse impacts of development on capercaillie will also be thoroughly tested through the Habitats Regulations Appraisal (HRA) that is required for the LDP. In addition, the Capercaillie Framework has now received Heritage Lottery Funding and will therefore be implemented in parallel with the LDP.

The management of access and recreation is likely to be a key element of any mitigation package. Concern was expressed about this and it should be noted that no policy included within the LDP will prevent anyone from accessing land under the rights bestowed to them by the Land Reform (Scotland) Act 2003. However, it may be necessary to alter the path network and access points to ensure that sensitive areas are avoided. Conversely, it may also mean that new paths and access points are created to enable and encourage people to access areas that are less sensitive. Any such changes will be carefully considered.

The various suggestions that capercaillie do not require protection are not supported by evidence gathered by CNPA and its partners. The HRA for the MIR identifies likely significant effects (LSEs) arising from the LDP on capercaillie as a qualifying feature of Natura sites. Therefore, mitigation is required to ensure that these LSEs are avoided. The suggestion that land management practices are contributing to the decline in capercaillie and other species is noted but cannot be addressed here as it falls outside the remit of the LDP. If true however, it is likely that the landscape scale collaboration supported by the National Park Partnership Plan will go some way to addressing some of these concerns.

Freshwater pearl mussel generated less interest than capercaillie, however it is important to note that both SNH and SEPA supported the preferred option. SEPA also highlighted the need for policies to ensure efficient resource use, including water use. CNPA agrees with this and proposes to continue with the approach of Policy 10 in the current LDP. Badenoch

and Strathspey Conservation Group argue that the current legal requirements on water quality are insufficient as freshwater pearl mussel numbers in the Spey are declining. However, the adequacy of current legal standards is not a matter for the LDP.

Many respondents requested that other species and habitats be addressed in the main issue. They have not been included because while there may be issues associated with them, they are not significant enough to be identified as a main issue. It is not denied that other protected species and habitats are important and require conservation, but such species habitats can be dealt on a policy basis, without naming them specifically. Policy 4 of the current LDP already deals with these matters and it is intended that this policy be carried forward into the Proposed Plan, with amendments as detailed in the Monitoring Statement.

A small number of responders took the opportunity to object to An Camas Mor and development in general, claiming that mitigation would not be necessary if development were not to take place, or to take place in different locations. The evidence for the housing land requirement is outlined within the Housing Evidence Paper and the assessment of sites, which explains their choice, is located within the Site Assessment Report. A discussion on the merits of these elements of the LDP is outlined within the relevant sections of this report.

Suggestions of changes to the wording of the main issue will not be taken forward as the MIR is a stage in the LDP process and its contents will not be replicated *verbatim* in future iterations.

It is not considered that the designation of an additional tier of non-statutory protected sites in the LDP would help achieve the main issue's objectives. This is largely because the main habitats of capercaillie and freshwater pearl mussel are already protected by national and international designations, and secondly because the areas that seem to be suggested for protection as 'second tier conservation sites' are allocated development sites.

The John Muir Trust requested that Wild Land Areas form part of the main issue. Whilst this is not considered appropriate, it is agreed that the LDP should identify and safeguard the character of areas of wild land to accord with paragraph 200 of Scottish Planning Policy. This will be reflected in the Proposed Plan.

Finally, it is not expected that the preferred option will result in endless committees.

Recommendations

The Proposed Plan should:

- Continue to develop the preferred option with the aim of including a more strategic approach to capercaillie mitigation in the Proposed Plan.
- Continue to conserve and enhance other designated sites and protected species by carrying forward Policy 4 (Natural Heritage) of the current LDP, with amendments as suggested through the Monitoring Statement.

The Capercaillie Framework should also continue to be implemented in parallel with the LDP.

Main Issue 8 – Planning Obligations

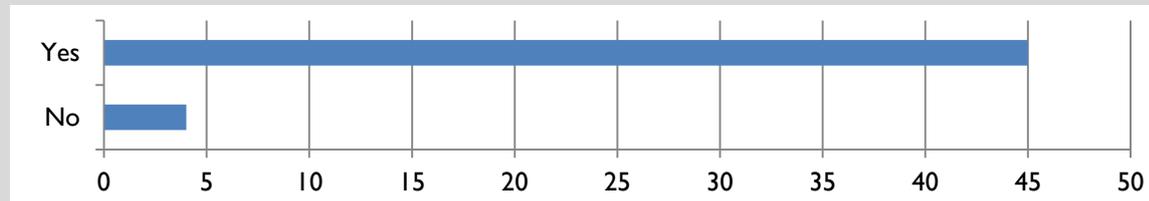
Respondents

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001	Scottish Campaign for National Parks
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033	Laggan Community Association
034	Braemar Resident
036	Halliday Fraser Munro on behalf of Mar Estate
039	N Kempe
040	Badenoch and Strathspey Conservation Group
043	The Highland Council
044	SEPA
049	Grantown-on-Spey and Vicinity Community Council
053	Inveresk Community Council
059	Savills on behalf of Invercauld Estate
064	Nethy Bridge and Vicinity Community Council
076	Cairngorms Business Partnership
082	D Morris
083	R Turnbull
089	Cromar Community Council
092	Scottish Land and Estates
100	Kingussie and Vicinity Community Council
116	Paths for All
135	Alvie and Dalraddy Estates
151	Forsyth Accounting Practice Ltd
157	Balavil Estate Ltd
188	Boat of Garten and Vicinity Community Council
192	Aviemore Business Association
194	Quarch Technology
199	SNH
200	Highlands and Islands Enterprise
203	Savills (UK) Ltd on behalf of Crown

Ref	Name / Organisation
	Estate Scotland
210	Urban Animation on behalf of Invercauld Estate
213	S Caudrey
215	G Bulloch
216	Carrbridge Resident
218	NHS Grampian
224	D Stott
227	Moray Council
233	Ballater & Crathie Community Council
237	Aviemore and Vicinity Community Council
251	S Dickie
260	H Quick
264	D Sherrard
267	L MacLean
271	Dalwhinnie Community Council
272	Boat of Garten Resident
273	D Munday
277	Perth and Kinross Council
279	North East Mountain Trust
281	Tactran
282	D Bruce
283	Ross McGowan Ltd
285	Anonymous
292	Munro Surveyors
293	Braemar Resident
294	A J Angus
305	Anonymous
306	Anonymous
316	Kingussie Resident
323	Grantown Resident
325	RSPB

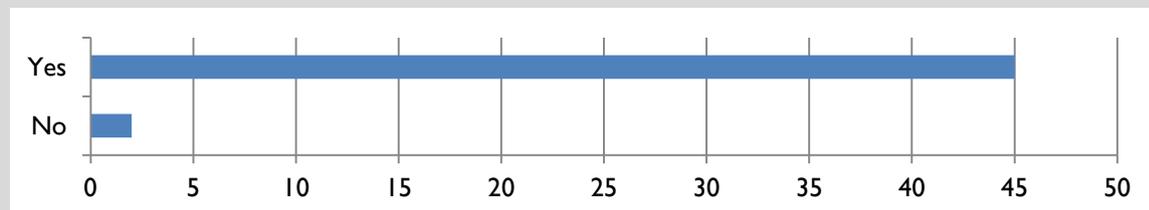
Response Overview

Q1: Do you agree that the new Local Development Plan should include a revised and more rigorously justified policy on planning obligations?



49 respondents answered this question. A significant majority of 92% answered 'yes', whilst just 8% answered 'no'.

Q2: Do you agree that this should be supported by more specific guidance in the Plan about what planning obligations will be required in different locations?



47 respondents answered this question. There was even greater consensus with 96% saying they agreed there is a need for specific guidance for planning obligations, whilst 4% said no.

Key points raised:

- Significant support for the preferred approach of providing greater clarity on likely planning obligation requirements in the Proposed Plan
- Concerns about the impact of planning obligations on development viability and delivery

Issues Raised

The majority of respondents agreed that the new Local Development Plan should include a revised and more rigorously justified policy on planning obligations (034, 039, 043, 044, 053, 064, 082, 083, 089, 100, 116, 135, 151, 157, 188, 192, 194, 203, 210, 213, 215, 216, 218, 224, 227, 233, 237, 251, 260, 264, 267, 271, 272, 273, 277, 279, 281, 282, 283, 292, 305, 306, 316, 323), whilst a small number did not (030, 036, 092, 285).

The majority also agreed that the Plan should provide more guidance about what planning obligations will be required in different locations (030, 034, 039, 043, 044, 053, 064, 082, 083, 089, 116, 135, 151, 157, 188, 192, 194, 203, 210, 213, 215, 216, 218, 224, 227, 233, 237, 251, 260, 264, 267, 271, 272, 273, 277, 281, 282, 283, 292, 293, 305, 306, 316, 323), whilst a smaller number did not (092, 285).

A number of respondents did not answer the questions directly but provided general comments.

Many agreed that greater clarity was needed to help provide certainty for all involved, including consultees (199, 218), developers (200, 203, 210), and communities (210). One respondent felt that greater clarity would make the process easier to understand (192) and another felt it would support delivery (277). SNH felt the policy should clarify the scales of development for which contributions would apply (199), whilst another response thought there should be guidance for the five local authorities and specific stakeholders (279).

Some were of the view that planning obligations should remain flexible (030, 059, 092, 135). Concerns were also expressed that developer obligations increase the cost of development which has the potential to impact on viability and delivery rates (033, 036, 064, 135, 157, 203, 292). It was felt that this would not be desirable and may discourage development (036, 064, 092, 135). A number of respondents argued that planning obligations need to be sensible, proportionate (with scope to negotiate on the basis of viability), legally required and enforced (036, 059, 188, 210, 215, 306). One felt that developments are already impacted by restrictions and delays and the Local Development Plan should require fewer planning obligations (135).

One respondent felt that there is no recognition of the increased costs of developing sites in remote settlements (036), whilst another emphasised the need to manage expectations in respect of contributions that can be achieved in more rural and marginal parts of the Park (203). It was also suggested that planning obligations should be reduced in specific circumstances to support certain types of development for example on brownfield sites or to bring derelict buildings back into use (092).

Another respondent highlighted that developer obligations should be monitored and must be compliant with *Circular 3/2012: Planning Obligations and Good Neighbour Agreements* (059).

Contributions towards education and health were highlighted as being important (233). One local authority raised that health and education contributions should take an area wide view which should be reflected in policy (277). They also noted that each local authority has their own approach to education contributions and that it would be useful to develop a standardised approach across the Park (277). Another respondent requested clarity over how education contributions are calculated (157).

One respondent felt that there is confusion over contributions for healthcare and queried whether this should be the responsibility of the developer (157). NHS Grampian supported the preferred approach but emphasised that more detail is required. They explained that they have strict processes to follow when identifying funding for new development which requires more accurate build out information of sites from developers (218).

A number of respondents highlighted that the active/sustainable travel, outdoor recreation (paths, cycle tracks and bus stops), open space and green infrastructure should be incorporated within the planning obligations policy (001, 039, 040, 116, 233, 277). Tactran added that mitigating the impact of development on existing transport networks and supporting the delivery of sustainable travel continues to be a crucial part of the development management process (281). It was also requested that contributions continue to be required for waste and recycling facilities (044, 233, 277). One local authority noted that these elements are generally site specific and may not need to be as rigorously justified, but that the approach for assessing these elements should be clear in the plan (277).

Another respondent agreed with the proposed approach, but felt providing up-to-date guidance for different settlements may be hard to sustain over the lifetime of the LDP (089).

RSPB highlighted that the policy should include guidance on when and where contributions towards mitigation for effects on natural heritage will be required. They proposed a strategic mitigation scheme for capercaillie and possible new infrastructure levy (325).

Other

The Highland Council supported the proposed approach and would welcome the opportunity to work in partnership to develop an improved shared understanding of timing of development, infrastructure and funding (043). Perth and Kinross Council stated that early discussions with relevant education and healthcare authorities should be used to inform the overall strategy (277). Tactran also stated that they would welcome the opportunity to be involved and consulted on the infrastructure needs assessment (281).

Reference was made to the recent court ruling on the Strategic Transport Fund associated with the Aberdeen City and Shire Strategic Development Plan, where money may have to be paid back to developers, to highlight that developer obligations must be legal (157).

One respondent felt that use of the 'facilities' within the developer obligations main issue should more accurately be referred to as 'infrastructure' (001).

Another respondent highlighted that development should happen where existing infrastructure is, using the example of An Camas Mor where pupils will have to travel down to Kingussie to go to High School (316).

Others felt that communities should be more involved in planning decisions regarding developer obligations (100, 237, 271).

Discussion

The significant level of support for the preferred approach is noted.

It is understood that developer obligations carry a financial cost, however it is necessary to mitigate the impacts that additional development will put on services, facilities and infrastructure. Planning obligations will only be required in cases where they meet the criteria set out in Circular 3/2012. This states that obligations should only be sought where they: are necessary to make the proposed development acceptable in planning terms; serve a planning purpose; relate to the proposed development either as a direct consequence of the development or arising from the cumulative impact of the development in the area; are fairly and reasonably related in scale and kind to the development; and are reasonable in all other respects. In most cases, the cost of any developer obligations should be reflected in the price of land rather than adding directly to the cost of development. Providing more clarity on the cases where planning obligations will be required should enable this process to work more effectively.

The concerns in respect of development viability, including in relation to brownfield development proposals and sites in more remote areas, are noted. However, as outlined above, developer obligations will only be required where a need has been demonstrated and

the level of any obligations will be reasonably related in scale to the development proposed. The policy and/or any supplementary guidance/planning advice could also be worded to allow economic viability to be taken into account in cases where there are exceptional unforeseen site costs (eg through the submission of a viability assessment).

Education contributions are only requested where a school is over capacity or projected to exceed capacity as a consequence of development. This requirement currently only applies to developments affecting a small number of schools within the National Park. Healthcare contributions have been more difficult to quantify and work is ongoing with the relevant Health Boards to establish appropriate contributions within their respective areas. Whilst it was suggested that an area wide approach should be taken for education and health, it is considered more appropriate for this to be done with the respective education and health authorities to ensure an appropriate and tailored approach. The aim of the policy will be to provide clarification in respect of contributions for these aspects which will be proportionate to the scale of development being proposed.

It is acknowledged that sustaining an accurate and up-to-date picture of necessary obligations required over the course of the five year plan period will be challenging. Therefore it is proposed that the policy and settlement statements will provide overarching policy principles and set out what type of contributions will be required and where whilst the Action Programme which is updated annually will be used to maintain accurate and up to date details of the contributions required at site and settlement level. A link within the policy will be made to the Action Programme to ensure this carries weight.

A number of respondents felt that the planning obligations policy should refer to active travel, outdoor and green space and green infrastructure. It is acknowledged that these are important aspects that should be included in new developments. In many cases, aspects such as landscaping, open space and some green infrastructure will need to be included and delivered as an integral part of the application plans. However, a requirement will be included within the policy to enable contributions towards active travel and path infrastructure where a development is related to or will have an impact on existing routes or to ensure that a connection between relevant routes is established as part of the proposed development. In addition, contributions could be required towards established projects to deliver active travel. In Aviemore specifically, there is a project being taken forward to develop active travel infrastructure through the town and this will be highlighted in the relevant settlement section.

RSPB also highlighted the need to mitigate impacts on capercaillie in a more strategic manner. This issue is considered in detail under Main Issue 7 'Impacts on Natura Designations'.

Other

CNPA welcome continued partnership working with The Highland Council, and all other local authorities within the National Park to ensure a shared understanding of development delivery and planning obligations. This also applies for Tactran.

The comment regarding the Aberdeen City and Shire Strategic Transport fund is noted. The intention of the planning obligations policy will be to only request contributions where they are necessary to mitigate the impacts of a proposed development. Any strategic approaches

required in the National Park – which are only likely to be in respect of mitigation for recreational disturbance to capercaillie (see Main Issue 7) – will be properly evidenced and justified.

The comment in respect of replacing the term ‘facilities’ with ‘infrastructure’ is noted. It is considered appropriate to use both terms as some contributions are required towards facilities, and others include infrastructure. The comment in respect of locating development where there is existing infrastructure is also noted. Whilst the overarching principles of where development should be located are contained in the Development Strategy section, settlements have different facilities and infrastructure and it is not feasible to locate all development in the places that have a High School, for example.

Whilst it is acknowledged that communities wish to have greater involvement in decision making in respect of planning, and specifically developer obligations, the Scottish Government has set out the specific criteria that planning obligations must meet. Contributions can therefore only be sought to mitigate the impacts of a development and cannot be used to leverage funds for wider community benefit unless there is a specific project that the development relates to or has the potential to impact on.

Recommendations

The Proposed Plan should:

- Include a revised and more rigorously justified policy on planning obligations detailing the types of planning obligations required in what circumstances
- Include more specific guidance, where possible, detailing the planning obligations required in different locations and settlements

Main Issue 9 – Flood Risk & Climate Change Resilience

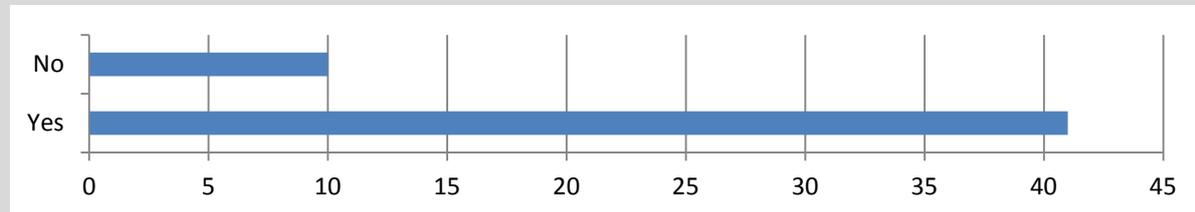
Respondents

Ref.	Name/Organisation
001	Scottish Campaign for National Parks
003	Anonymous
007	Scottish Water
030	Kincraig and Vicinity Community Council
033	Laggan Community Association
034	Braemar Resident
036	Haliday Fraser on behalf of Mar Estate
039	N Kempe
040	Badenoch and Strathspey Conservation Group
043	The Highland Council
044	Scottish Environment Protection Agency
053	Inveresk Community Council
054	Rothiemurchus Estate
059	Savills on behalf of Invercauld Estate
064	Nethy Bridge and vicinity Community Council
076	Cairngorms Business Partnership
082	D Morris
083	R Turnbull
089	Cromar Community Council
092	Scottish Land and Estates
100	Kingussie and Vicinity Community Council
135	Alvie and Dalraddy Estates
151	Forsyth Accounting Practice Ltd
157	Balavil Estate Ltd.
188	Boat of Garten and Vicinity Community Council
192	Aviemore Business Association
194	Quarch Technology
199	Scottish Natural Heritage
200	Highlands and Islands Enterprises
203	Savills Ltd on behalf of Crown Estate Scotland
205	Ballater Resilience Group
206	J Walker

Ref.	Name/Organisation
210	Urban Animation on behalf of Invercauld Estate
211	National Trust For Scotland
213	S Caudrey
215	G Bulloch
216	Carr Bridge Resident
218	NHS Grampian
221	Woodland Trust Scotland
224	D Stott
226	L Johnson
227	Moray Council
233	Ballater and Crathie Community Council
237	Aviemore and Vicinity Community Council
251	S Dickie
260	H Quick
264	D Sherrard
267	L Maclean
271	Dalwhinnie Community Council
272	Anonymous
273	D Munday
279	North East Mountain Trust
282	D Bruce
283	R McGowan Ltd.
285	Anonymous
292	Munro Surveyors
293	Braemar Resident
294	A Angus
306	Anonymous
316	D Lintern
319	C McPherson
321	J Finnie
325	RSPB Scotland

Response Overview

Do you agree that the new Local Development Plan should include a stronger policy requirement for Sustainable Drainage Schemes (SuDS) to be considered in all new development proposals?



Key points

- Majority of support for the preferred option of including a stronger policy requirement in relation to SuDS
- However, some concerns about the potential impact of SuDS requirements on the viability of new developments

Issues Raised

The majority of respondents agreed with the presumption for SuDS to be considered in all new development proposals (007, 034, 036, 044, 053, 054, 064, 082, 083, 092, 151, 188, 192, 194, 203, 205, 206, 210, 211, 213, 215, 216, 218, 221, 224, 226, 227, 233, 237, 251, 260, 264, 267, 271, 272, 273, 293, 306, 316, 321, 325), whilst there were some who did not agree (030, 039, 059, 089, 135, 157, 283, 285, 292, 319).

Others did not directly say whether they agreed or disagreed but provided general comments (001, 003, 033, 040, 043, 076, 100, 199, 200, 279, 282, 294).

Viability impact / Proportionality

Of those who agreed with the preferred option, some expressed concerns about the viability of SuDS in new developments and were of the view that an element of proportionality in the policy is required (092, 203). Others highlighted that the requirements for SuDS should be reasonable (036), and relate to the scale of development and type of application, for example, the level of detail required for a planning permission in principle application should not be the same as a full application (210).

A number of those who disagreed with the preferred option supported the alternative option to continue using the existing policy as they believe it covers the topic sufficiently without risking increased viability issues for new sites, in particular smaller sites and small scale developers (059, 089, 157). Others questioned whether the preferred option is appropriate for every new development and felt the CNPA should consider applying it proportionately or only where required (030, 285, 292).

A number of those who offered general comments suggested that the preferred option could negatively impact site viability and become a disincentive or inhibit development (003, 076, 200).

Implementation / Application

Of those who agreed with the preferred option, one suggested the policy should be expanded to apply to changes of use and the redevelopment of existing sites (044), whilst another felt that it should apply to all development however small (237). Other respondents suggested that developers should be encouraged to submit detailed SuDS plans and, if necessary, flood risk assessments early in the process to ensure an objective appraisal can take place (210, 215). One expressed concern for areas downstream of SuDS schemes (271) and another suggested that the policy should allow for local geology where soakaways are not possible (233). RSPB requested that their SuDS guidance be taken into account (325). Scottish Water advised that where a scheme is not adopted the developer must indicate how the scheme will be maintained in the long term and also urged the CNPA to think about SuDS on a catchment level and not just an individual site basis (007).

Of those who offered general comments, one respondent stated that new SuDS schemes should not impact on existing wetlands (040). Others reiterated the importance of collaborating with stakeholders such as SEPA and Scottish Water to bridge the gap between policy and implementation (100, 279). It was suggested that some supporting text offering examples of appropriate types of SuDS solutions for certain scenarios and scales of development would be highly beneficial (199). Another suggested the consideration of SuDS as an integrated element in the broader design of developments (279). The Highland Council cautioned CNPA to ensure that a site is not at risk from flooding and will not increase flood risk elsewhere when requiring a SuDS scheme for a new development (043).

Limited Impact on a Wider Issue

Of those who agreed with the preferred option, some expressed concerns about wider issues in relation to flood management and climate change and the limited impact SuDS could have on these. Respondents suggested incorporating flood defences to offer protection from river flooding (064), as well as encouraging woodland planting, cessation of large scale burning in the uplands and recreation of natural flood plains (211, 221). Another felt that the policy should address the main problems causing flooding in the Park, which they considered to be overgrazing of upland areas, grouse moor management and deer range (082).

Of those who disagreed with the preferred option, some respondents felt that the policy should be broadened to address issues in the uplands (039). One suggested using blanket bog and the reintroduction of beavers to slow water flow (319). Another felt SuDS are an irrelevant measure for flood management in the Park where the majority of land is not developed (135).

One of the respondents who offered general comments was also concerned about the effect of grouse moor management on flooding (001). Another felt that the policy does not address assessments of changes to floodplain functionality (including connectivity to river and loch systems) caused by development and suggested the policy should incorporate more detail of how floodplain assessments will be included (279).

Additional Issues

A number of additional issues were raised for consideration. Suggestions included: using SuDS as an opportunity to investigate the inclusion of electricity generation and to encourage innovative biological waste water treatment solutions (054); considering river and watercourse management in the policy (218); ensuring the maintenance of existing drainage (251); and including dredging of rivers and clearing of flotsam and jetsom in the policy (033).

One response expressed concern for the proximity of An Camas Mor to the River Spey (260).

The Highland Council suggested that CNPA may not need to strengthen the existing policy as SEPA's policy "The Water Environment (Controlled Activities) (Scotland) Regulations" 2005 already requires all surface water to be treated by a SuDS system. They also felt the section on Flood Risk Management Strategies and Plans in the Background Information of the Main Issues Report could be strengthened to draw attention to CNPA's role in raising awareness of flooding. They also suggested introducing an objective for community resilience to climate change and flood risk, to encourage communities to assess the hazards that may affect them and plan ways to manage the risks (043).

Discussion

While the majority of respondents agreed with the preferred option, there are a few key themes highlighted in the comments. In particular, respondents raised concerns about the proportionality of the proposed SuDS policy and its potential impact on development viability. It is agreed that SuDS proposals should be tailored and proportionate to the scale and nature of the proposed development. For example, applications for planning permission in principle will not require the submission of full details of SuDS schemes. Similarly, smaller scale developments such as single homes will not require the same level of SuDS as larger schemes, and SuDS are not likely to be appropriate at all for some types of development proposal (eg minor householder developments). The policy will therefore be designed to be proportionate and careful consideration will be given to its potential impact on development viability. Supplementary guidance / planning advice will be used, as proposed by some respondents, to clarify requirements and to provide guidance on the type of SuDS solutions that are likely to be appropriate for different scales and types of development. It should also be noted that in many cases SuDS can be a more financially viable option than traditional water management systems as they can be designed to be largely maintenance free.

The following points should be noted in response to the various concerns relating to the implementation of the policy. The calls for the policy to be more restrictive (eg applying to applications for changes of use or to all developments however small) are acknowledged. However, for the reasons outlined above, it is not likely to be proportionate to require SuDS for every development proposal. It is agreed that developers should be encouraged to submit details of their SuDS proposals early in the planning application process, and this requirement could be reiterated in supplementary guidance / planning advice. Developers are encouraged to enter into pre-application discussions, and in cases where a Flood Risk Assessment is required early discussion with key stakeholders such as SEPA and local authority flood risk teams is already recommended. In response to the concern about

potential downstream impacts of SuDS it should be noted that SuDS are designed to collect and slow the flow of water from a development site and should therefore have a positive impact on downstream flood risk. In any event, any potential impacts would be controlled through the Local Development Plan's existing flood risk policy, which does not permit development where it would be at risk of flooding or increase flood risk elsewhere and is proposed to be carried forward into the Proposed Plan. No further change is required in response to these comments.

The comment requesting flexibility to account for local geology in designing SuDS is noted and, as outlined above, supplementary guidance / planning advice could be used to outline the range of different SuDS solutions that could be utilised in different circumstances. RSPB's guidance on SuDS is also noted, and this will be taken into consideration in developing the draft policy and supplementary guidance / advice. It is agreed that it will be important to consider the proposed maintenance arrangements for SuDS and, again, the requirement for maintenance details to be submitted can be incorporated into the policy and or planning guidance / advice.

In response to the other comments on implementation, the CNPA do collaborate and consult with local authority flood risk teams, SEPA and Scottish Water on relevant planning applications, and this approach will continue. Examples of appropriate types of SuDS solutions for certain scenarios and scales of development will be provided through supplementary guidance / advice, as noted above, and this will also help to show how SuDS can be integrated in the broader design of development.

Concerns were expressed about the performance of SuDS in addressing wider issues of flood risk and climate change resilience, with some respondents suggesting the incorporation of flood defence solutions and others wishing to see issues such as deer and moorland management addressed in the policy. It is acknowledged that SuDS are not a single solution to flooding and the impacts of climate change. Flood defences are usually identified in Flood Risk Management Strategies and Plans, which are managed under different legislation, and wider land management issues are also largely outwith the influence of the planning system. Therefore, whilst these issues are important, it is not appropriate to address them within the Local Development Plan.

Most of the additional issues that were raised during the consultation are also largely outside the scope of the Local Development Plan. For example, river and watercourse management is considered within River Basin Management Plans which are governed by SEPA. CNPA work closely with SEPA on these matters, but it is not appropriate to address this issue in the Local Development Plan. Similarly, the maintenance of existing drainage and the removal of jetsom and flotsam falls outside the planning system's direct control.

The merits of An Camas Mor are considered in the settlement section of this report.

The Highland Council's comments questioning the need to strengthen the SuDS policy given the existing Water Environment (Controlled Activities) (Scotland) Regulations are noted. However, paragraph 255 of Scottish Planning Policy makes it clear that the planning system should promote the avoidance of increased surface water flooding through requirements for SuDS and minimising the area of impermeable surface. It is necessary to include the proposed SuDS policy within the Local Development Plan in order to meet this requirement. Their suggestion to introduce an objective for community resilience towards

climate change is not considered to be within the remit of the Local Development Plan, however the CNPA will continue to support communities in addressing these and other issues through the work of our Community Support Manager. The Highland Council's final suggestion to draw attention to CNPA's role in raising awareness of flooding will be addressed within the supporting text of the proposed policy.

Recommendations

The Proposed Plan should:

- Include a stronger policy requirement for SuDS whilst ensuring this allows for proportionality in relation to the scale and nature of different developments
- Include guidance for acceptable SuDS schemes in various forms and scales through supplementary guidance or planning advice
- Outline CNPA's role in the development of Flood Risk Management Strategies and Plans, and in raising awareness of flooding, through the supporting text of the policy

Main Issue 10 – Land Management in Upland Areas

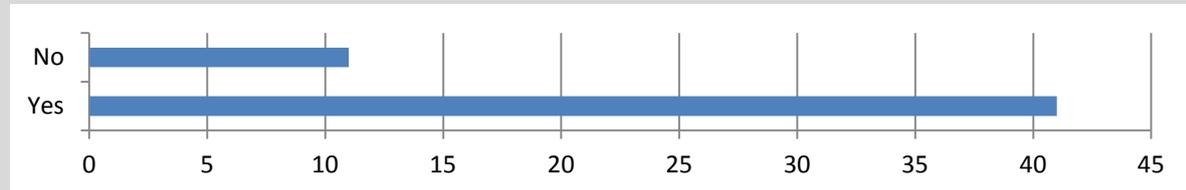
Respondents

Ref.	Name/Organisation
001	Scottish Campaign for National Parks
003	Anonymous
030	Kincraig and Vicinity Community Council
031	John Muir Trust
033	Laggan Community Association
034	Braemar Resident
036	Haliday Fraser on behalf of Mar Estate
039	N Kempe
040	Badenoch and Strathspey Conservation Group
043	The Highland Council
044	Scottish Environment Protection Agency
048	Glenshee Ski Centre Ltd.
049	Grantown-On-Spey and vicinity Community Council
052	Scottish Wild Land Group
053	Inveresk Community Council
064	Nethy Bridge and vicinity Community Council
066	Cairngorms Campaign
071	Edinglassie Estate (Dunecht Estates)
076	Cairngorms Business Partnership
082	D Morris
083	R Turnbull
089	Cromar Community Council
092	Scottish Land and Estates
100	Kingussie and vicinity Community Council
112	Ramblers Scotland
116	Paths for All
135	Alvie and Dalraddy Estates
151	Forsyth Accounting Practice Ltd
157	Balavil Estate Ltd.
188	Boat of Garten and vicinity Community Council
192	Aviemore Business Association
194	Quarch Technology
199	Scottish Natural Heritage
200	Highlands and Islands Enterprises

Ref.	Name/Organisation
203	Savills Ltd on behalf of Crown Estate Scotland
206	J Walker
210	Invercauld Estate – Urban Animation
211	National Trust For Scotland
213	S Caudrey
215	G Bulloch
216	Carr Bridge Resident
217	Mountaineering Scotland
224	D Stott
227	Moray Council
233	Ballater and Crathie Community Council
237	Aviemore and Vicinity Community Council
251	S M Dickie
260	H Quick
264	D Sherrard
267	L Maclean
271	Dalwhinnie Community Council
272	Boar of Garten Resident
273	D L Munday
279	North East Mountain Trust
280	Strathdon Community Development Trust
282	D Bruce
283	R McGowan Ltd.
285	Anonymous
290	A Walker
292	Munro Surveyors
293	Braemar Resident
294	A Jane Angus
306	Anonymous
312	Anonymous
316	D Lintern
319	C McPherson
321	J Finnie

Response Overview

Do you agree that the new Local Development Plan should include an amended policy to reflect the Cairngorms National Park Partnership Plan's presumption against new hill tracks in open moorland areas?



A total of 67 responders answered this question. 15 chose not to say whether they agreed or not, but did provide comments on the Main Issue.

Key points

- A majority of support has been received from respondents. Out of 67 responses, 41 were in favour, 11 disagreed and 15 offered general comments.
- Of the 15 general comments, the majority of those agreed with the presumption against new hill tracks in open moorland areas but were concerned about the implementation of such a policy and felt it needed broadened to encompass other tracks.
- Others felt it would be detrimental to the economy and employment, as well as restricting all-ability access to the uplands.

Issues Raised

The majority of respondents agreed with the presumption against new hill tracks in open moorland areas (031, 034, 036, 039, 052, 053, 064, 066, 071, 082, 083, 089, 112, 116, 151, 188, 192, 199, 211, 213, 215, 216, 217, 224, 227, 237, 251, 260, 264, 267, 271, 272, 273, 282, 285, 292, 293, 306, 316, 319, 321), whilst there were some who did not agree (030, 092, 100, 135, 157, 194, 206, 210, 233, 283, 312).

Others did not directly say whether they agreed or disagreed but provided general comments (001, 003, 033, 040, 043, 044, 048, 049, 076, 200, 203, 279, 280, 290, 294).

Viability Impact

A number of those who disagreed with the preferred option felt there were already adequate measures in place for the creation of new hill tracks and that the preferred option would have a negative effect on factors including: enabling all-ability access to the uplands; operation of mountain rescue services; economy and employment (eg farming, forestry, renewable energy and quarries); and conservation (eg encouraging walkers/cyclists to avoid delicate habitats and environments) (092, 135). Another respondent highlighted that the installation and maintenance of hill tracks provides local employment (312).

Those who offered general comments expressed concern about the potential negative impacts the preferred option might have on businesses that rely on open moorland. It was argued that the CNPA should find a solution that ensures the continuing viability of estates

and also ensures that any new development is of the highest quality with minimum environmental/visual impact (003, 033, 280, 048). Two respondents suggested that the preferred option was unnecessary as the current planning process for tracks was sufficient and the current Local Development Plan's policy approach is working (210, 290).

Implementation

A number of those who agreed with the preferred option offered comments on the practical implementation of the policy. One respondent suggested that supplementary guidance on the good siting and design of hill tracks would be helpful (199). Another cautioned that the new policy should not contradict the National Park's Forest Strategy, as commercial forestry requires tracks (036). National Trust for Scotland similarly suggested that temporary tracks such be allowed where there is no other alternative, for example in woodland areas (211). However, others felt that the scope of the policy should be widened so as not to focus on hill tracks specifically but also to limit other tracks such as those used for commercial purposes in woodlands (039, 083). The Scottish Wild Land Group suggested that all tracks should require full planning permission and raised concern about how the preferred option will be achieved without removing permitted development rights (052). Ramblers Scotland (112) also expressed concern about existing permitted development rights and felt that these offer a lack of democratic oversight.

Of those who disagreed with the preferred option, one respondent suggested that detailed guidance on what constitutes an acceptable track is required (100). Other responders felt that decisions on track applications should be based on merit, possibly using a cost-benefit analysis, rather than having a blanket policy ban (194, 210). One felt that good communication with the CNPA should increase understanding of access requirements and environmental impacts (206). Another suggested there should be a presumption in favour of hill tracks (157).

Of those who offered general comments, some felt the term 'open moorland' required definition (001, 040). Again, some respondents wished to see the approach broadened to cover all hill tracks, not just tracks in open moorland (001, 040). The Highland Council raised concern about how the preferred approach would sit with the prior notification procedure. They felt that, as landscape impacts are put forward as the justification for the preferred approach, these issues could be addressed through good design, regardless of whether planning permission or prior notification is required (043). SEPA proposed that hill tracks should only be permitted where they demonstrate minimal environmental impact and produce a satisfactory maintenance programme (044). Again, two respondents suggested that applications should be assessed on merit using a cost-benefit analysis (076, 203).

Additional Issues

A number of respondents raised issues about the assessment, monitoring and enforcement of tracks. One felt that CNPA's planning department was under resourced and therefore these objectives are not being satisfactorily achieved (052). Some were concerned that tracks are often not being used for their original/stated purpose, for example agricultural tracks were cited as being used for commercial and sporting activities (213, 316). Others agreed and felt that it was difficult to accurately ascertain the true purpose and justification for hill tracks (052, 066). A number felt that the reinstatement of tracks should be more

rigorously enforced (052, 215, 217, 224, 273). There were also suggestions that the CNPA should adopt a mapping tool to monitor all tracks in the Park (052, 066).

Two respondents felt the policy should support the repair and maintenance of existing tracks, particularly where in poor condition (001, 071). Others felt that the policy should support the removal of older, unmaintained tracks (082, 319).

One response encouraged CNPA to consider instituting a byelaw to prevent damage to the land and regulate the use of vehicles (279).

The Scottish Wild Land Group suggested that careless contractor work thwarts the developer's good intentions regarding construction standards (052).

Other comments included: requests for new tracks associated with ski developments to be allowed (200); concerns that the policy should protect peat and carbon rich soils from damage (044, 279); the suggested introduction of a zoning approach to prevent new hill tracks in areas of high landscape value but allow them in other areas (001); allowing a low level of quarrying (294); a desire to see better conformity with the natural landscape in forestry plantations (064); and a desire for wider community consultation in relation to land management decisions (049).

Discussion

The overall support for the preferred option is welcomed.

For the avoidance of doubt, the preferred option intends to modify the landscape policy (policy 5) of the existing Local Development Plan to outline a presumption against new hill tracks in open moorland areas. The existing landscape policy already states that development that does not complement and enhance the landscape character of the Park will not be permitted, and this provides a mechanism for controlling the impacts of new tracks in cases where planning permission is required. The preferred approach simply seeks to provide clarity on the particularly sensitive locations where new hill tracks are unlikely to be acceptable in landscape terms. It reflects the guidance in the recently approved National Park Partnership Plan, which recognises that hill track development in unsuitable locations can have significant adverse effects on the landscape qualities of the Park and states that there should be a presumption against new tracks in open moorland areas. The preferred approach is also consistent with the guidance provided by Scottish Natural Heritage¹. This states that: *“The uplands are a sensitive and valued part of Scotland’s natural heritage. Careful location, design, construction and maintenance of tracks can reduce the magnitude of impacts on the natural heritage. There are, however, many locations where a new track would result in unacceptable impacts. In such situations, construction of a track is inappropriate and it will be necessary to adopt alternative approaches”* (para 1.1.1).

The preferred approach will not affect the existing permitted development rights for tracks associated with forestry and agriculture. It will also not prevent the appropriate maintenance of existing tracks, nor will it apply to planning applications to develop new tracks in other less sensitive parts of the National Park. The policy could also be worded to allow new tracks in open moorland areas where there is an exceptional justification.

¹ Constructed Tracks in the Scottish Uplands

Therefore, the preferred option is not expected to have an overall negative impact on either access, conservation, or the economic viability of estates and land based businesses within the Park.

The comments in relation to the implementation of the proposed approach are noted. It is agreed that supplementary guidance / planning advice would be helpful. CNPA has already published a Planning Advice Note on Planning Permission and Permitted Development Rights for Agricultural and Forestry Tracks, and this could be amended to provide more general guidance on track construction within the National Park. This could help to define terminology and clarify the implementation of the policy, as proposed by a number of respondents. It could also be used to signpost developers to other appropriate guidance, for example SNH's guidance on upland track construction. To address the concerns about potential conflicts between the preferred approach and the National Park's Forest Strategy, it is again noted that legitimate forestry tracks will continue to benefit from permitted development rights. Although some respondents have argued that these permitted development rights should be removed or restricted, this is beyond the scope of the Local Development Plan.

The various calls for tracks in open moorland areas to be considered on merit and on the basis of existing landscape policies are noted. The Main Issues Report identified that this would be a reasonable alternative to the preferred option, but noted that it would not fully reflect the priorities of the recently approved National Park Partnership Plan. This position is maintained. The more extreme request for a presumption in favour of hill tracks would contradict the Partnership Plan and would not be an appropriate approach.

Similarly, it would not be appropriate to expand the proposed policy to cover all hill tracks that are subject to the planning system, as proposed by some respondents. This would represent an unreasonable restriction on track development in areas which are less sensitive in landscape terms.

The various comments in relation to the assessment, monitoring and enforcement of tracks are noted, and whilst these issues are important they are not directly influenced by the Local Development Plan.

As noted above, the preferred approach would not directly influence the repair and maintenance of existing tracks. No change is required in response to the comments on this issue.

Most of the remaining additional issues fall outwith the remit of the Local Development Plan, for example: implementing a byelaw to prevent damage caused by vehicles; addressing perceived problems with contractor construction standards; influencing the nature of forestry plantations; and advocating the requirement for wider consultation within land management decisions. No change is required in response to these comments.

Tracks associated with existing ski developments would benefit from support in principle under policy 2 (Supporting Economic Growth) of the existing Local Development Plan, which is proposed to be carried forward into the Proposed Plan. No further change is required to address the comments on this issue.

The requests from SEPA and the North East Mountain Trust to include the protection of peat and carbon rich soils within the policy are acknowledged. However, this issue is already covered by policy 10 (Resources) in the existing Local Development Plan, which is proposed to be carried forward into the Proposed Plan. Policy 10 applies to all development proposals, and there is therefore no need to repeat its requirements for protecting carbon sinks and stores within the landscape policy. Policy 10 also enables the appropriate consideration of applications for mineral developments such as quarries. There is therefore no requirement for further change in response to the comment on this issue.

Recommendations

The Proposed Plan should:

- Amend policy 5 (Landscape) in the existing Local Development Plan to reflect the National Park Partnership Plan's presumption against new hill tracks in open moorland areas
- Provide supplementary guidance / planning advice to clarify the implementation of the policy and signpost developers to other appropriate guidance such as SNH's 'Constructed Tracks in the Scottish Uplands'

An Camas Mòr

Respondents

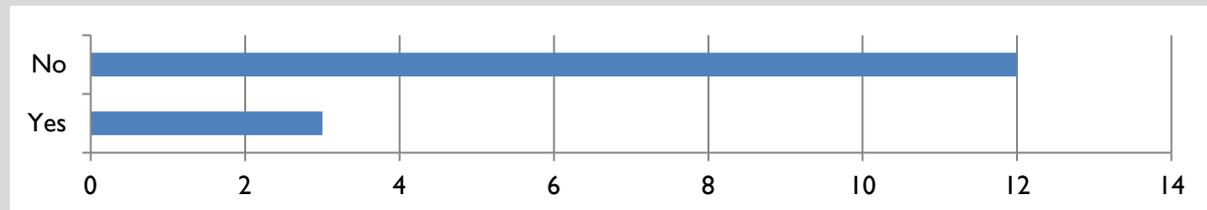
Ref	Name / Organisation
007	Scottish Water
031	John Muir Trust
039	N Kempe
040	Badenoch and Strathspey Conservation Group
044	Scottish Environment Protection Agency
051	Historic Environment Scotland
054	Rothiemurchus Estate
083	R Turnbull
086	An Camas Mòr LLP
192	Aviemore Business Association
199	Scottish Natural Heritage
200	Highlands and Islands Enterprise

Ref	Name / Organisation
215	G Bulloch
217	Mountaineering Scotland
221	Woodland Trust Scotland
231	C Campbell
242	Carr Bridge Resident
248	Carr Bridge Resident
303	Anonymous
306	Anonymous
307	Dalnain Bridge Resident
318	J Kirby
319	C McPherson

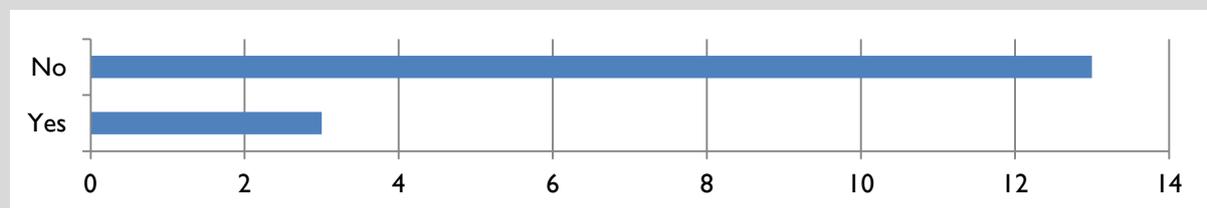
Response Overview

A total of 22 people responded to questions about An Camas Mòr and provided comments.

Do you agree with the proposed settlement objectives?



Do you agree with the preferred site options?



Key points

- Considerable objection to preferred site and settlement objectives
- Comment that CNPA should apply consistent requirements for mitigation measures (especially to address recreational disturbance to capercaillie) between An Camas Mòr and all other developments

Issues Raised

Settlement Issues, Objectives and Preferred Site Options

SNH (199) agreed with the preferred option, which redirects the boundary of THC031 to that of the planning consent. Historic Environment Scotland (059) also supported the preferred option as it excludes scheduled monument SM9337 and is therefore less likely to have negative effects on the heritage asset. However, they would expect the Proposed Plan to include mitigation measures to ensure that any negative effects are avoided.

Rothiemurchus Estate (054) supported the preferred site and believed that the objectives for the settlement are correct. They felt that An Camas Mòr should be expected to meet the needs of Aviemore and vicinity, although other villages will need to grow to meet their demand so An Camas Mòr should not be there to meet the bulk of the housing requirements of the whole National Park. They also believed that An Camas Mòr should not be described as a large development, because at an average of 50 homes a year it is not a large development and as a new community 1,500 homes is small. They added that the alternative site (the remainder of THC031) might provide an opportunity for recreation and other light use.

The majority of consultation responses objected to An Camas Mòr. The reasons included:

- Construction of a new settlement within a National Park is unacceptable and/or contrary to National Park aims (039, 083, 215, 217, 319)
- It would set an inappropriate and damaging precedent (040)
- There is no need for 1,500 new homes based on population and household projections (231)
- It is in the wrong place (039, 083, 215, 307)
- It will not relieve pressure on housing in Aviemore and will lead to an increase in population and demand for housing (040, 083)
- It will have an adverse effect on the town of Aviemore (215)
- Affordable housing should be built in Aviemore (248)
- The North Aviemore sites are better (039)
- It will lead to a higher number/proportion of holiday homes (040, 231)
- It is contrary to the policy of growing existing communities (215)
- New housing would be better delivered on smaller sites (318)
- There are concerns regarding nature and wildlife conservation, including a threat to ecology and protected species (039, 040, 083, 215, 221, 242, 306, 319)
- Part of site is covered in ancient woodland (221, 242)
- It will have a negative effect on landscape quality (319)
- The development favours private gain / developer profit over public use and conservation (217, 319)
- The site has great potential for rewilding (215)
- The mitigation measures required to make it acceptable are too high (083, 217)
- The mitigation measures required to reduce recreational disturbance are unrealistic, undeliverable and ineffective (040)
- It will not meet objectives of being “sustainable”, delivering a “consistently high standard of design”, and being “inclusive, vibrant and demographically balanced” (040, 083)
- Future detailed applications may not reflect the LDP’s aspirations (040)

- The preferred site does not include the proposed community park area for Aviemore and An Camas Mòr (040)
- The bridge location is not included in the allocation (040)
- There is a threat to tourism by over-development of the Aviemore Glenmore corridor (215, 242)
- Do not support the delivery of An Camas Mòr through partnership working (040)
- Lack of transparency (040)

One response argued that a smaller new town should instead be established on THC030 / THC 069 in Carr-Bridge (307).

The Woodland Trust (221) did not support the preferred site but stated that if development does go ahead, they recommend the site be planned around the area of ancient woodland, leaving an appropriate buffer of at least 100m between the development and the area of woodland.

The John Muir Partnership (031) did not support the preferred site but stated that it is critical that there is satisfactory CNPA supervision and monitoring of the An Camas Mòr development to ensure compliance with planning conditions and European and domestic regulations to protect the natural environment.

Highlands and Islands Enterprise (200) supported the alternative option to allocate the full extent of THC031.

An Camas Mòr LLP (086) argued that the CNPA is on course to produce an LDP that will not comply with the requirements of European Natura legislation. They claim that the majority of planning decisions that have been made by the CNPA in support of additional housing and visitor facilities are legally questionable. In their opinion, the CNPA has two choices:

- I. Be consistent in its application of the Appropriate Assessment devised for An Camas Mòr in the full knowledge that the majority of development across the National Park will generate such impossibly high recreational visits to capercaillie habitat that any mitigation is likely to be difficult to achieve for smaller developments and, even where mitigation can be identified, there could be the risk it cannot be secured due to the need for multi-party agreement; OR
- II. The CNPA set aside its complex model and instead engage seriously with An Camas Mòr LLP and other partners to discuss an alternative, proportionate and sensible model that promotes the delivery of alternative recreational opportunities and/or utilises development finance to fund a strategic approach to mitigation where it can be most effective. This has been established in many other areas of the UK where development pressure has potential to cause significant effects on Natura sites. Such a strategic approach can help unlock all housing and visitor related development and avoid the application of the April 2017 Model devised by the CNPA and SNH and applied to An Camas Mòr.

Scottish Environment Protection Agency and Scottish Water provided technical details and further information about the site to be taken into account during the production of the Proposed Plan (007, 044).

Discussion

Settlement Issues, Objectives and Preferred Site Options

Despite receiving a number of representations objecting to the proposals on the grounds of its merits, the merits of An Camas Mòr will not be discussed in this report. The CNPA's Planning Committee has resolved to grant planning permission in principle for the An Camas Mòr development, subject to a Section 75 agreement being signed. The Proposed Plan cannot delete or reduce the size of An Camas Mòr, or 'swap' it for the North Aviemore sites or Carr-Bridge or anywhere else. Due to the scale of the development, the Proposed Plan will need to take An Camas Mòr into account and recognise it as a strategically significant component of the housing land supply.

This section of the report also will not directly address matters relating to population and household projections, housing need and demand, the housing land requirement, housing land supply, affordable housing, or second home ownership; these are all covered in the Housing and Affordable Housing sections of this report.

Objections about the site's sustainability are noted; however SPP (2014) defines sustainable development as "...development that meets the needs of the present, without compromising the ability of future generations to meet their own needs". The need for the housing land is outlined in the Housing section of this report and thus, with the proposed package of mitigation, the preferred site meets this definition.

The CNPA does not agree that An Camas Mòr should not be described as a 'large site'. Such a statement is a relative one and An Camas Mòr is relatively large compared to all other proposals within the National Park. It is also worthwhile noting that the site significantly exceeds the definition of a 'major development' within planning legislation¹. The fact that completion rates are projected to be 50 units a year or that new settlements in other parts of the country are bigger is not directly relevant.

The absence of certain references are noted. The CNPA does not believe the embankment upstream of the Dell Farm needs to be noted on plans; this is consistent with the approach taken to flood defences in all other parts of the MIR. The CNPA does not believe it is appropriate to show the location of the proposed bridge across the River Spey either. This is because the bridge is yet to gain planning consent and its location may need to be changed as part of the planning application process. It is noted that the Community Park requirement is not referred to in the MIR; this is the case for many of the requirements of the pending planning consent. It is not considered necessary to repeat all of the conditions on the pending planning consent in the LDP.

It is not considered appropriate to extend the preferred option to include the whole of THC031 for recreational use, as a means to avoid the loss of ancient woodland, or for any other reason. This area did not form part of the recent planning application for An Camas Mòr and is not needed for site objectives to be met.

An Camas Mòr LLP's arguments about the consistency of the HRA process and strategic mitigation measures to address recreational disturbance to capercaillie are noted. Main Issue

¹ The Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009 define a 'major' housing development as one comprising 50 or more dwellings

7 'Impacts on Natura Designations' was included in the MIR to explore and address this matter. However, it must be noted that there is a significant difference between the HRA requirements for assessing an individual application for planning permission in principle, which offers little detail on how the impacts of a site will be mitigated, and that of a development plan, by virtue of its higher position in the planning hierarchy. The HRA of the Proposed Plan will aim to identify strategic mitigation proposals to address the cumulative impact of development proposed under the new LDP, and it is anticipated that most mitigation will be shared between all developments. Further work is recommended to establish the way this approach will work in practice – see Main Issue 7 for more information.

Although not raised in the comments on this part of the MIR, it is recommended elsewhere in this report that An Camas Mòr should be shown in a different way from existing strategic settlements in the development strategy diagram – see Main Issue 1 'Over-arching Development Strategy'. For consistency, it is therefore recommended that An Camas Mòr be incorporated within the Aviemore settlement section of the Proposed Plan.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives and preferred site options outlined in the Main Issues Report but incorporate An Camas Mòr within the Aviemore settlement section

Aviemore

Respondents

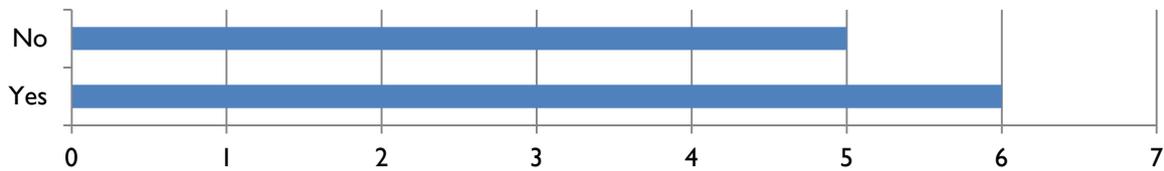
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044	Scottish Environment Protection Agency
054	Rothiemurchus Estate
060	Halliday Fraser Munro on behalf of Reidhaven Estate
086	An Camas Mòr LLP
192	Aviemore Business Association
194	Quarch Technology
199	Scottish Natural Heritage
200	Highlands and Islands Enterprise

Ref	Name / Organisation
221	Woodland Trust Scotland
231	C Campbell
237	Aviemore and Vicinity Community Council
269	Aviemore Resident
283	R McGowan Ltd
296	K Tainsh
306	Anonymous
315	Kinnaird
317	Aviemore Resident
318	J Kirby
325	RSPB Scotland

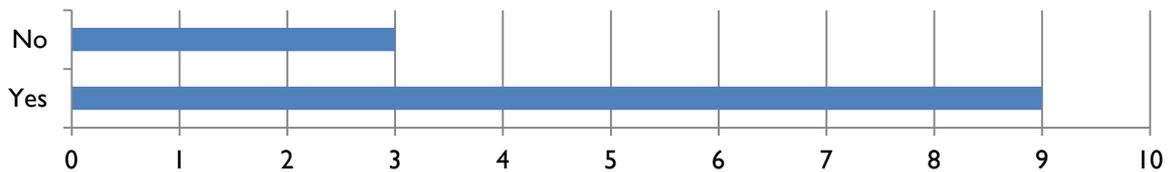
Response Overview

22 respondents answered questions about Aviemore and/or provided comments.

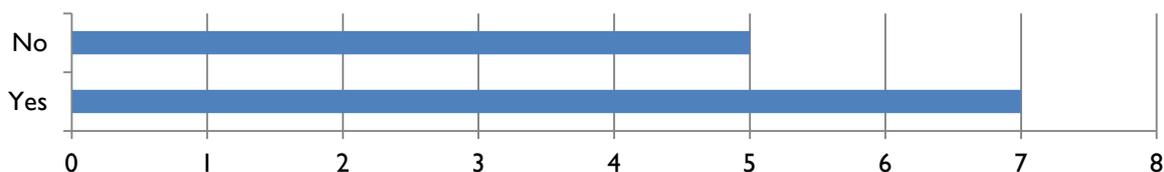
Have we identified the right issues for Aviemore?



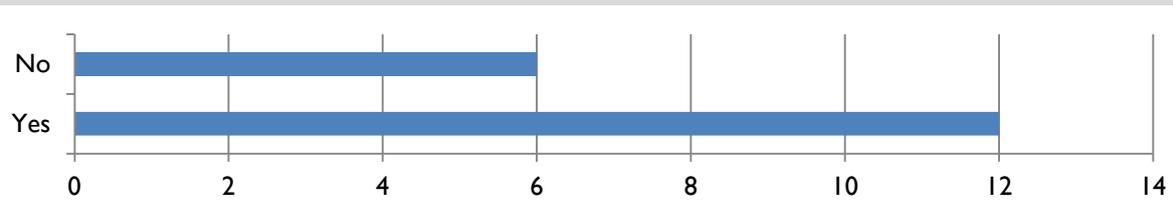
Do you agree with the proposed settlement objectives?



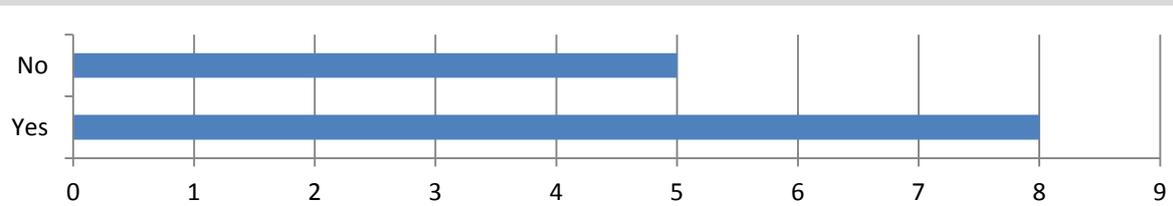
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- Discussion around merits of An Camas Mòr and North Aviemore Sites
- A number of new issues and objectives suggested
- Some discussion about the location of the Settlement Boundary with reference to High Burnside
- Suggestions for a number of new allocations for community and economic uses
- Suggestions for additional areas of Protected Open Space

Issues Raised

Settlement Issues and Objectives

There was general support for the issues and objectives, with a few suggestions for amendments. One responder suggested that more emphasis needs to be given to protecting and enhancing biodiversity in the area (306). It was also suggested that “Encroachment of the Aviemore Settlement by the A9 dualling” and “Lack of off street parking for tour buses and heavy goods vehicles” should be identified as issues (237). An additional objective to “Protect the ‘protected open spaces’ identified on the settlement map” was also suggested (237).

Rothiemurchus Estate (054) highlighted the following problems that have arisen from the town’s development:

- The lack of recreation facilities has led to people having to make their own, such as unauthorised biking trails in woodlands
- Prominent buildings above the tree canopy are an eyesore to people enjoying the National Scenic Area
- Architecturally it lacks a sense of place or coherence
- It does not make it easy for people to meet

They stated that the LDP needs to provide space for community facilities, halls, playing fields, outdoor meeting places, path networks, biodiversity and landscape planning.

Preferred Site Options

Highlands and Islands Enterprise (200) supported all of the Preferred Site Options. SNH (199) also agreed with the CNPA's decisions on the Preferred and Alternative Site Options.

Halliday Fraser Munro on behalf of Reidhaven Estate (060) supported the identification of the North Aviemore sites but argued that parts of these sites should be allocated during the new LDP as An Camas Mòr is unlikely to deliver enough housing to meet short term needs.

One responder suggested that North Aviemore should be allocated for development instead of An Camas Mòr (039).

An Camas Mòr LLP (086) argued that North Aviemore is not needed because they believe CNPA is confused as to the issues facing the delivery of An Camas Mòr and that the North Aviemore sites will not solve or obviate CNPA's responsibilities under the Habitats Regulations. Aviemore and Vicinity Community Council (237) also argued that the North Aviemore sites are not needed and should be removed. They stated that they do not agree with development in North Aviemore in principle because it would lengthen the town, be unsustainable and local facilities would be unable to cope.

Woodland Trust Scotland (221) requested that development be considerate of the native trees and high value woodland that exists on the North Aviemore and ED2 sites.

Ross McGowan Ltd (283) requested a small extension to ED1 at the north end of the site. Another response suggested that parts of ED2 could be suitable for residential development (237).

RSPB (325) stated that development at the North Aviemore, EP2, EP3 and AHR sites needs to consider its potential off-site effects on capercaillie and the conservation objectives of Special Protection Areas (SPAs).

One responder pointed out that all recreational facilities (C1 and C2) are sited on the poorest quality/ boggy ground (315). Another suggested that the greenspace between the new Aviemore Retail Park and Myrtlefield should be identified as a new community allocation (237).

Quarch Technology (194) said they would prefer outward expansion to the continued reduction of green spaces in Aviemore.

Badenoch and Strathspey Conservation Group (040) objected to all of the Preferred Sites on the grounds of landscape and natural heritage impacts.

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Protected Open Spaces

There was general support for the Protected Open Spaces (040, 237, 317, 318).

New Protected Open Spaces were suggested for:

- The Horse Field on the AHR site (040)
- The area of ground to the west of the Horse Field where there is a Tree Protection Order (237)
- An extension of the Protected Open Space between EP2 and EP3 to include the rough grassland and scrub ground to its South West (040)

Aviemore and Vicinity Community Council (237) argued that the Protected Open Space at Spaven Drive should be re-assigned for community uses as the site has been identified by Aviemore Community Enterprise Company as a possible site for a community hall with a kick park and playground. They argued that the existing designation at CI is not big enough and that there would be parking/traffic and sewage problems as a main sewer runs under the site.

Proposed Settlement Boundary

The Community Council (237) did not agree with the identification of the North Aviemore sites but also questioned why, if they are identified, they are not located within the Settlement Boundary.

Badenoch and Strathspey Conservation Group (040) disagreed with the settlement boundary at the north extremity of ED1 due to the high natural heritage, landscape and amenity value of the land that remains between the industrial estate and the fence above the burn.

Neither the Community Council (237) nor Badenoch and Strathspey Conservation Group (040) thought that the settlement boundary should include High Burnside. They cited decisions by Reporters on the 2010 and 2015 development plans, which stated that the A9 forms a robust and defensible boundary to development. They argued that using the A9 as the Settlement Boundary would be more appropriate as it sends a clear signal that development beyond it is unacceptable.

Other Comments

A number of respondents made general comments about the provision of affordable housing, the settlement strategy and the need for economic development (040, 237, 315).

One responder (231) recognised the need for housing and economic development, but felt that this should be met “*while considering those that have purchased houses in the area for the beauty of the area*”.

One respondent commented on NHS decisions in relation to the new hospital and felt that CNPA should be making representations to the NHS and MSPs on the matter (296).

Discussion

Settlement Issues and Objectives

The identification of new issues during the consultation is useful. While it is not agreed that 'protecting and enhancing biodiversity' is a settlement issue, as this issue applies to the whole of the National Park and is addressed through general policies, it would be appropriate to identify the upgrade of the A9 and matters around off street parking as additional settlement issues.

The suggested new objective to "Protect the 'protected open spaces' identified on the settlement map" is not necessary, as this applies to all settlements and will be addressed through policies in the LDP. Appendix I in the MIR recommended a minor change to Policy 8 (Sport and Recreation) of the existing LDP to make a more specific link between the policy and the open space designations in the settlement maps. This change will achieve the outcome sought by the respondent.

The issues raised by Rothiemurchus Estate (054) about the design and development of Aviemore are noted. Design matters were considered in the MIR under Main Issue 2 'Designing Great Places'. The new policies proposed in response to this main issue should help to raise design standards in new developments across the National Park and will help to address the concerns raised by the Estate.

Preferred Site Options

The support for the MIR's conclusions on preferred and alternative (non-preferred) site options is welcomed.

Discussion on An Camas Mòr and the North Aviemore sites, and the policy relationship between them, is set out in detail under Main Issue 4B 'Housing Growth Around Aviemore'. The merits of An Camas Mòr will not therefore not be repeated here.

The request to have parts of the North Aviemore / THC045/059 sites allocated for housing development within the new LDP period is not supported. The CNPA's planning committee has resolved to grant planning permission in principle for An Camas Mòr and currently there is evidence to suggest that the development can commence during the new LDP period. Allocating the North Aviemore sites at the same time would therefore represent a significant over-allocation of land. The North Aviemore sites are only likely to be needed if An Camas Mòr proves to be undeliverable during the new LDP period. It should also be noted that other considerations will also need to be applied, such as the status of the 5-year effective land supply at the time.

However, as set out in the MIR, it is considered appropriate for part of the North Aviemore / THC045/059 sites to be allocated for economic development during the new LDP period. Further assessment has been undertaken since the publication of the MIR, and this suggests that the most appropriate location for economic development would be the northern part of the North Aviemore site. This could also include the adjoining area to the immediate north, which includes a number of operational businesses and has capacity for some additional economic development. It is therefore recommended that an economic

development allocation be included for this area. The remainder of the North Aviemore / THC045/059 sites should be identified as future long-term housing, as proposed in the MIR.

An Camas Mòr LLP complain that the wrong constraints are being used to justify the identification of the North Aviemore sites as long-term housing land. Their comments in relation to the Habitats Regulations are addressed under Main Issue 7 'Impacts on Natura Designations'. Nevertheless, it is maintained that An Camas Mòr is a large development and, as a new settlement, will require significant infrastructure investment to make happen. This will be challenging. Given the significance of the site to the overall land supply in Badenoch and Strathspey, it appears clear that identifying a backup solution remains a prudent action. The responses to Main Issue 4B 'Housing Growth Around Aviemore' support this view. It is acknowledged that the North Aviemore / THC045/059 sites, if developed for housing, would lengthen the settlement. However, it is not agreed that this would be unsustainable or that local facilities would be unable to cope. As outlined in the Site Assessment Report, the sites are well related to the existing settlement, have good access to existing active travel routes, and planning obligations could be sought to address any unacceptable impacts on local services such as schools.

With respect to woodland, the LDP will have policies that ensure trees and woodlands are protected. There is therefore no need to make minor amendments to site boundaries or identify buffer zones on settlement maps to achieve this.

The proposed extension to ED1 (to include the area to the immediate north) appears sensible and will go a little way to mitigating for the economic development land lost through the re-resignation of ED2 to community uses. Subject to a site assessment, it is recommended that this change be included in the Proposed Plan (see Annex I).

It is agreed that parts of ED2 may be suitable for housing. Indeed the change from an economic development designation to a community designation (as proposed in the MIR) would enable this, providing the proposal would provide clear community benefits (eg by providing a significant proportion of affordable housing).

In response to the comments from RSPB, it should be noted that all proposed policies and sites in the LDP are assessed for their potential effects on the environment. This includes off-site effects, such as those on capercaillie.

Community allocations are identified where the land is available. It is often land, such as for C1 and C2, that is either in the ownership of the Local Authority or has been transferred to a Community Company. It is acknowledged that the greenspace between the new Aviemore Retail Park and Myrtlefield is worth recognising in the LDP. It is however recommended that it would be better served as a 'Protected Open Space', as the desired effect is to avoid development (see Annex I for site location).

The position of objecting to all sites within Aviemore taken by Badenoch and Strathspey Conservation Group is considered untenable. As a strategic settlement in the settlement hierarchy, it is important that appropriate new development is allowed to take place in Aviemore. The Site Assessment Report published alongside the MIR, along with the SEA and HRA, demonstrate that the preferred site options can be developed without unacceptable adverse impacts on landscape and natural heritage.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Protected Open Spaces

The CNPA welcomes the suggestions for additional Protected Open Space and notes the following:

- The Horse Field on the AHR site already has an implemented planning consent for housing development (05/306/CP) and is therefore unsuitable for protection
- The area of ground to the west of the Horse Field is identified in the current Aviemore Highland Resort Site Development Brief (2018) as green space. The area is recognised as being important for recreation and providing valuable open space for residents and visitors. There is therefore merit in identifying this area as Protected Open Space and it is recommended that this change be made in the Proposed Plan (see Annex I for site location)
- It has not been possible to identify any rough grassland and scrub ground that is contiguous with the south west of the Protected Open Space between EP2 and EP3. It is therefore not possible to address this comment in the Proposed Plan

There is likely to be merit in identifying the existing protected open space land at Spaven Drive for Community Uses, particularly as CI has been deemed unsuitable by the Community Council for a facility of the nature they aspire to. It is therefore recommended that this change be made in the Proposed Plan (see Annex I for site location).

Proposed Settlement Boundary

The reason for locating the proposed long-term housing sites at North Aviemore / THC045/059 outside of the Settlement Boundary is because they will not be considered appropriate for development unless An Camas Mòr proves undeliverable. A policy will be included in the Proposed Plan to determine the exact circumstances under which they could come forward. It is considered that including the sites within the boundary would weaken the operational ability of the policy as the Settlement Boundary is supposed to show where development is appropriate during the plan period, which may not be the case for the North Aviemore sites.

The arguments for and against the inclusion of High Burnside within the Settlement Boundary have been considered during previous development plan Examinations. However, one significant change has occurred since these arguments were last played out, in that High Burnside is now a completed development. Despite its location on the western side of the A9, it is clearly a contiguous part of Aviemore and now that it is complete, there is little logical sense to exclude it from the Settlement Boundary. It is the Settlement Boundary itself that provides the clear and defensible barrier to any further development – that is its very purpose.

Other Comments

The remaining general comments are addressed elsewhere under Main Issue 1 ‘Over-Archiving Development Strategy’, Main Issue 5 ‘The Affordability of Housing’, and Main Issue 6 Economic Development’. The comments about the NHS are not matters for the LDP.

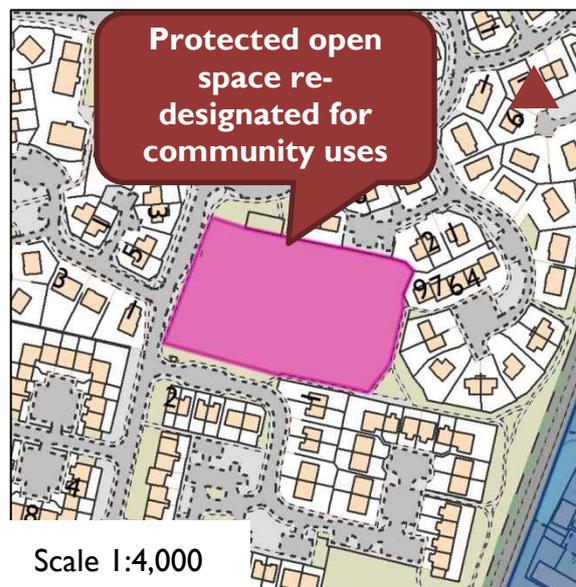
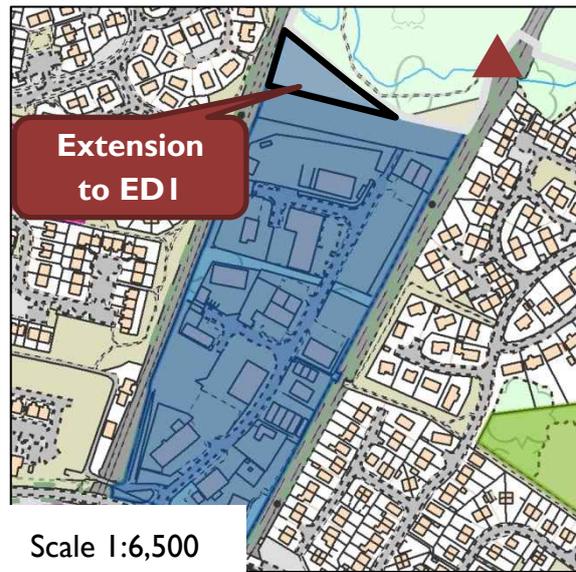
Although not specifically raised in any consultation comments, it is considered appropriate to identify a new tourism allocation to reflect the existing planning permission for a caravan park to the north of the settlement (see Annex I for site location).

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report, subject to the following amendments:
 - Identify the following additional issues/objectives
 - Dualling of the A9
 - Lack of off street parking for tour buses and heavy goods vehicles
 - Identify the southern part of North Aviemore and THC045/059 for Future Long-Term Housing
 - Allocate the northern part of North Aviemore, and the adjoining area including the existing operational businesses to the immediate north, for Economic Development
 - Subject to site assessments, allocate additional land to the immediate north of EDI for Economic Development and land at Spaven Drive for Community Uses
 - Include a new Tourism allocation to reflect the existing planning permission for a caravan park to the north of the settlement
 - Identify ground to the west of the Horse Field as Protected Open Space
 - Identify land between Aviemore Retail Park and Myrtlefield as Protected Open Space

Annex I



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Ballater

Respondents

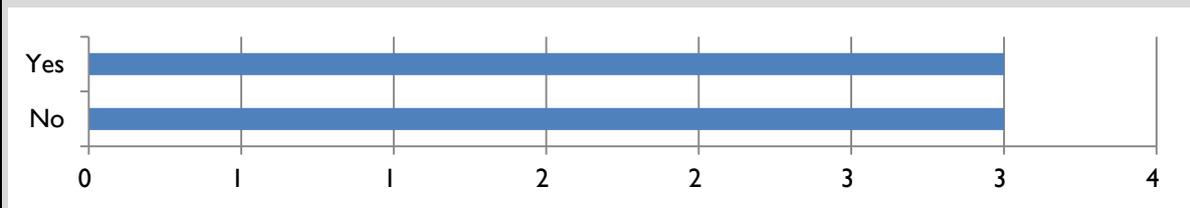
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044	SEPA
059	Savills on behalf of Invercauld Estate
195	V Jordan
199	SNH
205	Ballater Resilience Group
218	NHS Grampian
221	Woodland Trust Scotland

Ref	Name / Organisation
233	Ballater and Crathie Community Council
294	A Angus
295	G Adams
306	Anonymous
308	Ballater Resident
325	RSPB

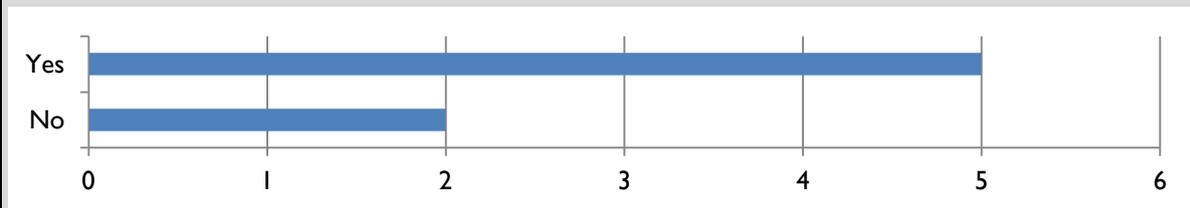
Response Overview

A total of 14 people responded to questions about Ballater and provided comments.

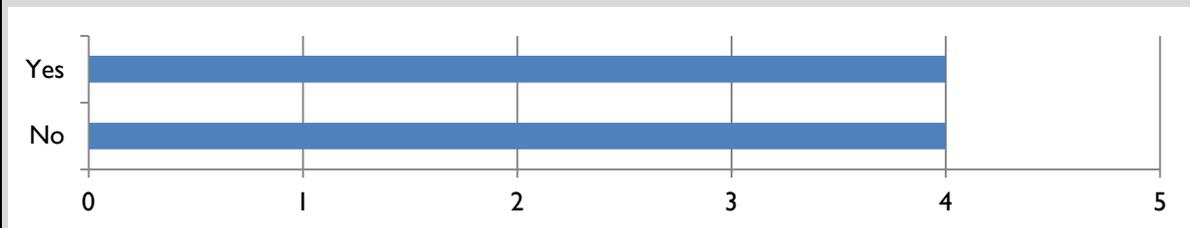
Have we identified the right issues for Ballater?



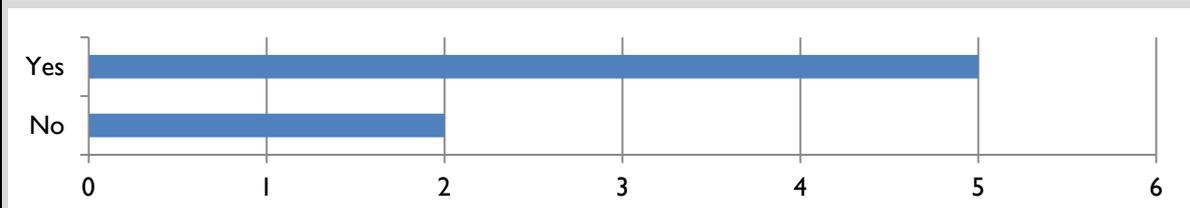
Do you agree with the proposed settlement objectives?



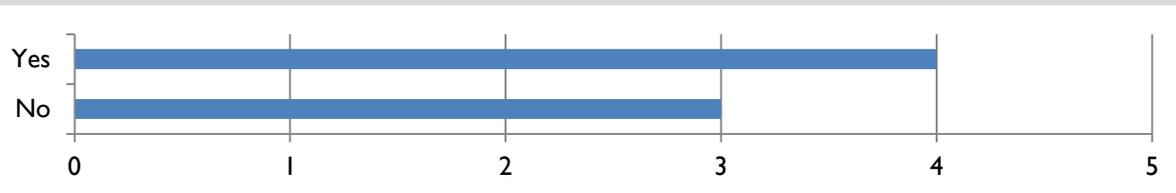
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- Differing views in respect of allocating HI and AB017
- Flooding raised as an issue, however SEPA have confirmed that post Storm Frank flood extents have been prepared and should be used to inform LDP

Issues Raised

Settlement Issues and Objectives

One respondent proposed the following inclusion within the settlement issues: ‘how to ensure housing does not damage the landscape and the attractiveness of the village’s setting’ (195). Another suggested that the issues should include parking, access and road links (233).

One response proposed that the first objective should be amended to read ‘Conserve and enhance the attractiveness of Ballater, its setting and surroundings, its distinctive built heritage and the integrity of its conservation area’ (195). However, another suggested there should be more flexibility in respect of building design away from Victorian heritage (233).

It was suggested that the second objective should include sport and leisure (233). It was also proposed that the third objective be amended to read ‘Deliver affordable housing including especially affordable housing to rent’ (195), whilst another respondent added that it should include sheltered housing (233).

One respondent raised the need for affordable workshop units and queried where the Council Yard could relocate to (308).

NHS Grampian, whilst in support of the settlement objectives, highlighted that Ballater Medical Practice is working at capacity and there is currently no dental provision in the town. The additional housing on HI would have a significant impact on the Medical Practice and an extension to the premises, along with a review of dental and pharmacy provision, would be required at the planning application stage (218).

Sites and Allocations

The promoter of site HI put forward a case that the existing allocation should be retained for a total of 250 units but with the full extent of AB017 being included. They stated that HI is a readily developable site but, as there are potential flood risk issues in the north-eastern part of the site, the allocation requires amendment to include AB017 and the relocation of some of the ‘new open space’ from the south-west to the north-eastern part of the site.

This will provide greater flexibility to deliver the 250 houses that the existing LDP allocates for the site. They provided a Preliminary Concept Masterplan, which indicates the proposed amendments to the proposed site layout. It also includes the creation of a new community 'Hub' in the south-west part of the site and indicates how additional adjacent land to the north east can become an annual car park for the Ballater Games (059).

Another respondent objected to the existing HI allocation on the grounds that it would have an adverse impact on the appearance of the village and the wider landscape, that it would conflict with the first statutory aim of the National Park, and that allocating the site would be contrary to the precautionary approach to flooding required by Scottish Planning Policy (195).

SEPA highlighted that draft flood extents prepared following the Storm Frank events should be used to inform the site capacity and layout for HI (044). The need to ensure development proposals on the HI site do not adversely affect the River Dee SAC or result in recreational disturbance to Capercaillie was also raised (199, 325).

One respondent expressed support for the inclusion of AB017 within the HI allocation (233), whilst SNH noted that the inclusion of AB017 should not pose any obvious issues for matters within their remit (199). However, others were of the view that allocating AB017 would not be appropriate on the grounds that it would negatively impact on the setting and landscape of the town and affect the listed Monaltrie House (195, 308). One respondent felt that the visual impacts of AB017 on Monaltrie House would be limited and argued that this site should be allocated for housing instead of the wider HI site, with the HI site being left as open space (205).

Specific reference was also made to the CI allocation. It was suggested that if there is a need for affordable housing in Ballater, then the allocation should specifically require no less than seven affordable houses (195).

SEPA and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044).

Protected Spaces

It was proposed that the protected spaces should be considered for recreation and allotments (233).

Other Comments

Support was expressed to retain the proposed settlement boundary to avoid encroachment into surrounding woodland (221). Another respondent suggested extending the boundary west, to the junction of the A93 (233).

One respondent suggested zoning for parking, a policy regarding tour bus management and parking. They added that flood defences and path and bridge repairs post Storm Frank should be priority, and that a dedicated 'community person' is needed in Ballater who can provide support for local groups (233).

Discussion

Settlement Issues and Objectives

It was suggested that an additional issue should be added to ensure that new housing does not damage the landscape and setting of the town. Whilst these concerns are acknowledged, the existing LDP contains policies to protect natural heritage and landscape and these will be carried forward into the Proposed Plan subject to the modifications outlined in the MIR. New housing developments will be assessed through the development management process to ensure they comply with these policies. It is unnecessary to include a specific criterion within the settlement statement to achieve these objectives.

Similarly, no changes are needed in response to comments about the need to conserve the attractiveness of Ballater and its surroundings, as these matters are also addressed by relevant LDP policies. The comment seeking greater flexibility for new building design is noted, and whilst new and innovative design is encouraged there is a conservation area in Ballater so new design must be sympathetic to this. The restoration of Ballater Station provides an example of the way in which both traditional and modern building design can be successfully accommodated.

The suggestion to include sport and leisure within the second objective is noted, however the existing wording refers to 'recreation' and this provides a sufficiently broad description to include sport and leisure.

It was also requested that greater emphasis be placed on affordable housing for rent in the third objective, and also for the inclusion of sheltered housing. As affordable housing to rent is already highlighted, it is not considered necessary to add any additional emphasis. Whilst it is agreed that sheltered housing is important, it is considered more appropriate to reword the objective to make a broader reference to 'housing that meets local needs'. This could comprise sheltered housing as well as other forms.

The need for small business units is noted and is discussed in more detail under Main Issue 6 'Economic Development'. Opportunities for economic development including small business units could be supported in Ballater under existing policy which will be carried forward into the Proposed Plan.

Currently there is no proposed location for the Council Depot. Following the flooding, the existing site is no longer suitable on a long term basis and support will be given for a suitable new alternative site if it comes forward.

In respect of healthcare, CNPA will continue to work with NHS Grampian to ensure that the LDP makes appropriate provision for contributions towards healthcare in Ballater and other relevant settlements (see Main Issue 8 'Planning Obligations' for more background information). The specific requirements for Ballater will be identified in the Proposed Plan so that appropriate planning obligations can be sought towards them.

Sites and Allocations

The various comments both supporting and objecting to the allocation of HI and AB017 are noted. In terms of the issues highlighted about flooding and flood risk, SEPA have clarified that draft flood risk extents have been prepared following Storm Frank. These will be used to inform development on the HI site. It is understood that the north-eastern part of the existing HI allocation will no-longer be suitable for development, as it is now shown to be at risk of flooding. However, this area could continue to be included within the allocation and set aside for use as open space / green infrastructure.

The site promoter has put forward the case that, due to the revised flood risk extents, it is necessary to include AB017 within the allocation to provide sufficient flexibility to deliver the 250 units that the existing LDP allocates to HI. This differs from the 'non-preferred' option in the MIR, which would have involved the allocation of an additional 20 houses on the AB017 site (giving a total of 270 houses as part of the wider allocation). This new approach, along with the proposal to relocate some of the 'new open space' to the north east of the site, may be appropriate on the basis that it will help to provide greater certainty in terms of deliverability without increasing the overall capacity of the HI site.

The concerns about the potential impacts on landscape, town setting and on the B-listed Monaltrie House are noted. The Site Assessment Report published alongside the MIR identified some concern about the proposal to allocate an additional 20 houses on AB017 on the basis that the site had the potential to affect the setting of Monaltrie House (category B listed) and is of ecological significance. However, Historic Environment Scotland did not raise concerns about the principle of development on AB017 in their response to the MIR, and SNH's response noted that the inclusion of AB017 should not pose any obvious issues. It is therefore recommended that further consideration be given to incorporating the AB017 site within the wider HI allocation for 250 houses. This will require more detailed site assessment. Annex I shows the recommended changes for the HI site.

The comments regarding the need for affordable housing on the CI site are noted. Any future housing proposals for the site would be required to deliver 25% affordable housing under the current LDP policy or a potentially increased proportion under the Proposed Plan (see Main Issue 5 'The Affordability of Housing').

Protected Spaces

The consultation comments are noted and the intention of identifying protected spaces is to retain them for their existing use, which is largely for recreation and amenity. Allotments could be considered appropriate in some circumstances but would be subject to necessary consents and subject to all other policies of the LDP.

Other Comments

Comments regarding the settlement boundary are noted, however there is no compelling argument to extend the boundary to the junction of the A93 and it is therefore considered appropriate to retain the boundary as proposed.

Parking was also highlighted as an issue. However this cannot be directly addressed through the LDP. The suggestions in respect of prioritising infrastructure repairs following the

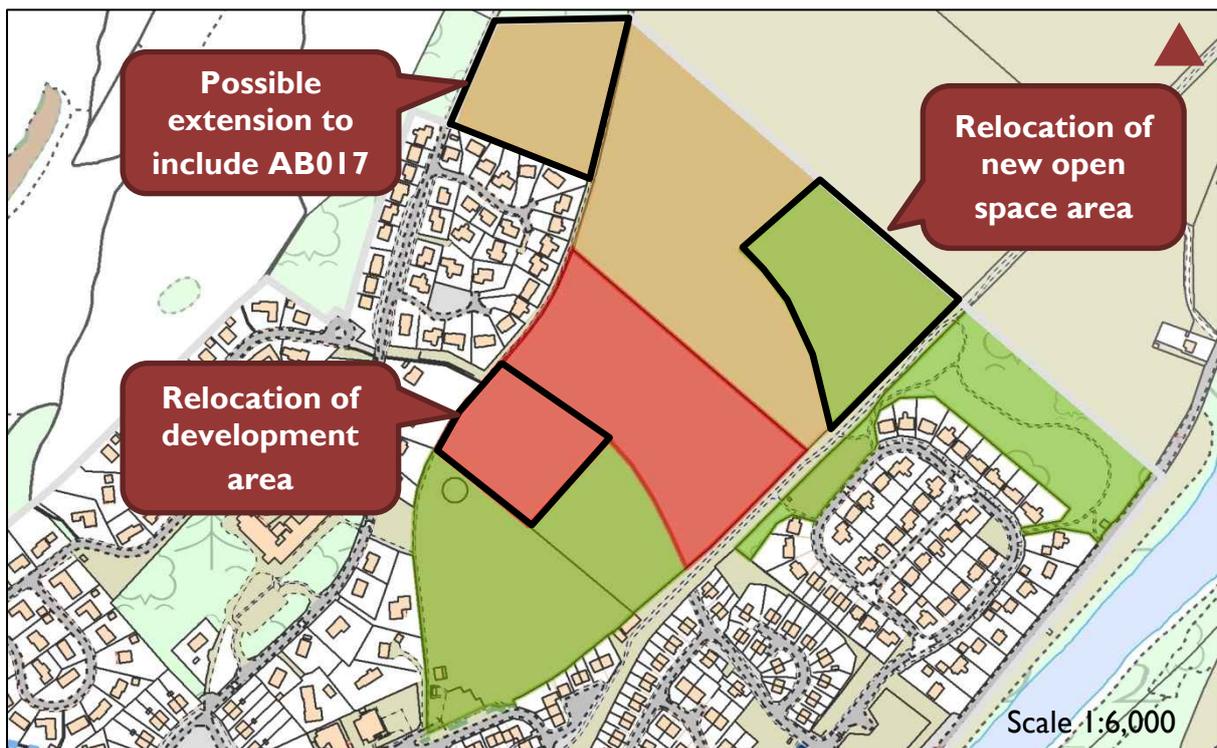
flooding are also noted. CNPA understand the importance of this, however this action will be led by Aberdeenshire Council under the terms of the Local Flood Risk Management Plan. A dedicated 'community person' is not an issue for the LDP. Currently the Marr Area Partnership provides support to local community groups.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report, subject to the following amendments:
 - Reword settlement objective 3 to read “Deliver housing that meets local need and affordable housing, including low cost ownership and affordable housing for rent”
 - Retain the existing HI allocation for a total of 250 houses, but relocate the proposed new open space to the north-eastern part of the site and give further consideration to extending the allocation to include AB017

Annex I



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Grantown-on-Spey

Respondents

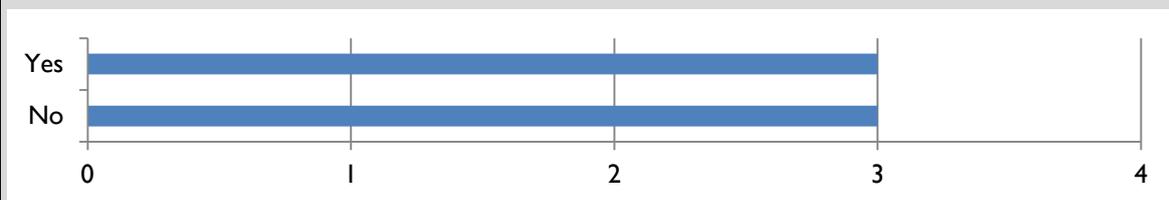
Ref	Name / Organisation
007	Scottish Water
040	Badenoch and Strathspey Conservation Group
044	SEPA
049	Grantown-on-Spey and Vicinity Community Council
050	B Shorter
060	Halliday Fraser Munro on behalf of Reidhaven Estate
144	Dalnain Bridge Community Council
192	Aviemore Business Association

Ref	Name / Organisation
199	SNH
200	Highlands and Islands Enterprise
215	G Bulloch
221	Woodland Trust Scotland
296	K Tainsh
304	Anonymous
307	Dalnain Bridge Resident
323	Grantown Resident
325	RSPB
326	Grantown-on-Spey Caravan Park

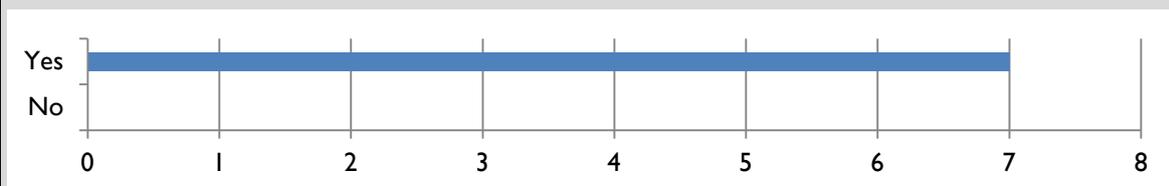
Response Overview

18 respondents answered questions about Grantown-on-Spey and/or provided comments.

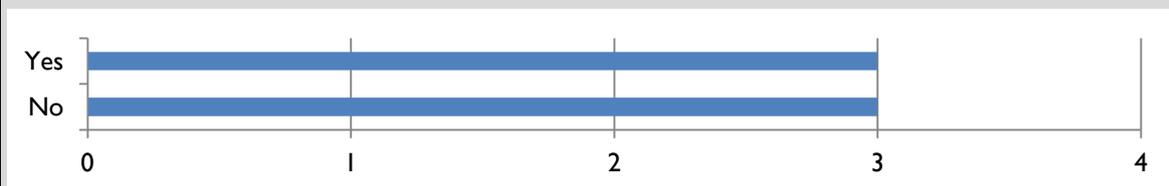
Have we identified the right issues for Grantown?



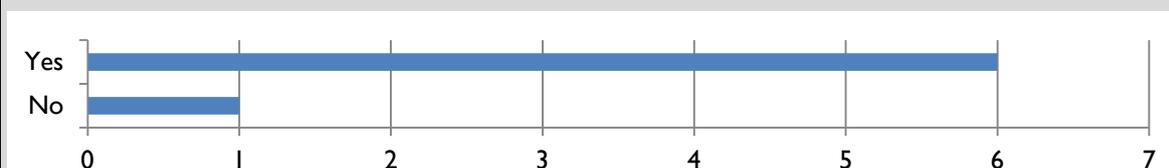
Do you agree with the proposed settlement objectives?



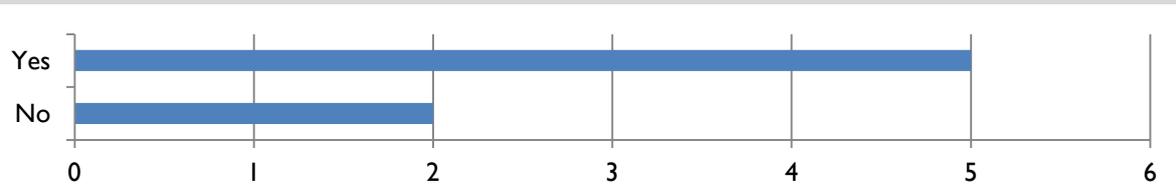
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- Concerns expressed in respect of potential impacts of sites on the Mossie
- Support and objection to proposed allocation of THC039, as well as the other alternative sites

Issues Raised

Settlement Issues and Objectives

Support was expressed for the inclusion of the reference to the Strathspey Railway (296, 307). However, concern was also expressed about the potential impacts that the railway could have on protected habitats and species and it was requested that this be included in the settlement issues and objectives (040). Another respondent suggested the rail terminus should be located near the roundabout on the southern side of Grantown (323).

A number of respondents highlighted that the connection of cycle paths from Carr-Bridge through Dulnain Bridge and onto Grantown would be beneficial for the local area and should be recognised (050, 144, 307).

It was also highlighted that there is no community hall in Grantown (215).

Sites and Allocations

SNH agreed that THC028 is not suitable for development in line with the site assessment report (199). Another respondent highlighted that the THC028 site contains native woodland and felt there should be a strong presumption against developing on high value habitats such as this (221).

One respondent expressed support for preferred sites H2 and THC039 (the proposed extension to H2) on the basis that they form a logical extension in close proximity to existing services and will help to deliver housing to meet local needs (060). However, these sites were not supported by other respondents due to potential environmental impacts and the value of the Mossie (040, 049, 215, 325). Another respondent suggested that the boundary of the proposed allocation should be redrawn to provide a buffer between the adjoining woodland and the allocation (221). HIE felt that the proposed allocation should be expanded further to include the whole of THC039 – including both the preferred and alternative areas (200).

One respondent objected to the allocation of C1 in the absence of further detail about the proposed use for the site (040). The same respondent also objected to C2 on the basis that

parts of the site provide valuable habitat for otter. They proposed that the site be reduced in size to omit the burn and associated wetland near the southern boundary (040).

A number of responses agreed with the MIR's conclusion that THC038 should not be allocated due to natural heritage, landscape and amenity concerns (040, 199, 325).

A number of responses also agreed that THC040 should not be supported due to potential environmental impacts and the value of the Mossie (040, 325). However, one response argued that this site should be identified for housing development as it would help to sustain local services, has no major constraints, and because the care home currently under construction has established the principle of development in this area (060).

One respondent was of the view that THC055 is of less natural heritage value than the other sites (040).

It was also suggested that the boundary of EDI (Woodlands Industrial Estate) be redrawn to avoid the boundary being immediately adjacent to an area of ancient woodland (221).

A proposal was submitted to extend the TI: Caravan Park allocation (326). However, one response stated support for the existing boundary at TI (040).

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Protected Open Spaces

Suggestions for additional protected open spaces were put forward including part of the field beside H1 (west of Revoan) and part of C2 around the burn and associated wetland (040, 215). It was also raised that there is a need to ensure the retention of open spaces in Grantown between the built up areas and the woodland, especially the Mossie (049). One respondent raised that if Grantown has 'protected spaces' they need to be well managed and maintained (323).

Other Comments

One response suggested that much of the housing requirement could be satisfied from improvements to the High Street flats, prioritising the redevelopment of derelict sites, and backland building (049). Others emphasised the role of infill development and re-use of empty premises such as the former Strathspey Hotel and BT building for housing (215, 323).

One response suggested that the MIR is misleading in respect of housing numbers for sites H2 and THC039 as it is not clear that the actual increase in new housing is only 30 units. They added that existing H1 allocation should not be counted towards meeting new housing land requirements (060).

It was also suggested that space for small businesses, tourism and heritage developments are required (049).

It was suggested that the infrastructure improvements required to deliver the developments in the Local Development Plan (including roads, schools, water and healthcare) should be included within the settlement statement rather than through individual planning applications (049).

It was suggested that the new care home should be represented on the map (040).

Two respondents suggested that some form of protection is required for the Mossie (049, 215), and one proposed that it should become a Local Nature Reserve (040).

Discussion

Settlement Issues and Objectives

The various comments in respect of the Strathspey Railway are noted. The MIR reflects the current proposals for the railway route and terminus. A detailed planning application will be required for the terminus site and therefore the necessary detailed assessments will be undertaken in respect of natural heritage through that process.

The comments regarding the cycle path to Dulnain Bridge / Carr-Bridge are noted and it is considered that this could be included as a settlement objective.

The need to maintain a range of community facilities is identified as an issue for Grantown-on-Spey. Whilst there are no proposed projects to provide a new community hall it is considered that the maintenance of a range of community facilities could be included as a settlement objective in the Proposed Plan.

Sites and Allocations

The support for preferred sites H2 and THC039 is welcomed. The concerns of objectors in respect of impacts on the Mossie are noted, however it is maintained that the preferred partial extension to H2 is appropriate for the reasons set out in the Site Assessment Report published alongside the MIR. Any planning applications for the site will be subject to all policies of the LDP, including policies on natural heritage. This will ensure that the development will not have an unacceptable adverse impact on the environment and that appropriate mitigation is provided where necessary. Although some responses have called for the proposed allocation to be expanded to include the whole of THC039, this would not be appropriate for the reasons set out in the Site Assessment Report.

Site C1 is allocated for community use in the existing LDP. It is identified as an allocation for development that supports the needs of the community. Although there are no firm proposals for its use at present, it is considered appropriate to retain the allocation in the Proposed Plan to provide scope for future development needs. Any future development proposals would be subject to assessment against all relevant policies of the LDP to ensure there would be no unacceptable adverse impact on natural heritage or local amenity.

The concerns about the importance of parts of site C2 for protected species are noted. However, as stated above, all necessary detailed assessments (including protected species

surveys) will be undertaken through the development management process as and when detailed proposals emerge for the site.

The comments agreeing with the MIR's conclusions in respect of the remaining alternative (non-preferred sites) are acknowledged.

It has been argued that THC040 should be allocated for development as it would help to sustain local services and because it adjoins the care home site which is currently being developed. However, it is maintained that this site is not appropriate for development for the reasons outlined in the Site Assessment Report. There is also sufficient housing land in Grantown through H2 and the proposed extension into THC039, which are more appropriate sites for development.

The comments in respect of redrawing EDI so the boundary is not immediately adjacent to woodland are noted. However, the principle of the EDI site was challenged through the examination of the current LDP, and the Reporter was satisfied that the boundaries of the site are appropriate and that the allocation is necessary to support the economic development of the town. It is also generally not appropriate to provide buffer zones between site allocations and adjoining woodland, as this approach would be inconsistent with the guidance in paragraph 196 of SPP, which states that 'buffer zones should not be established around areas designated for their natural heritage importance'.

In respect of the proposal to extend the Caravan Park, it is noted that there is an existing planning permission on the Caravan Park which extends outwith the existing allocation. It is therefore considered appropriate to extend the caravan park to cover this area and it may be appropriate, subject to assessment, to extend the boundary further to the north east as requested (see Annex I for site location). The Caravan Park is an existing and established business and supporting and extending this use is considered appropriate.

Protected Open Spaces

The suggestions put forward for protected spaces are noted, however the exact areas that are being referred to are unclear. As noted above, development of C2 will be subject to a detailed planning application and appropriate measures will be required to ensure there are no adverse impacts on the waterway along the edge of the site.

Other Comments

Comments in respect of utilising existing buildings / sites to provide affordable housing are noted, however re-using high street properties and backland building is unlikely to be a feasible option for local authorities and affordable housing providers. Nevertheless, the principle of re-development of an existing building would be supported subject to other policies and could be progressed under the current LDP; however it is not appropriate to make it a specific requirement within the Proposed Plan.

Comments in respect of the actual increase in housing numbers is noted and will be clarified through the Proposed Plan.

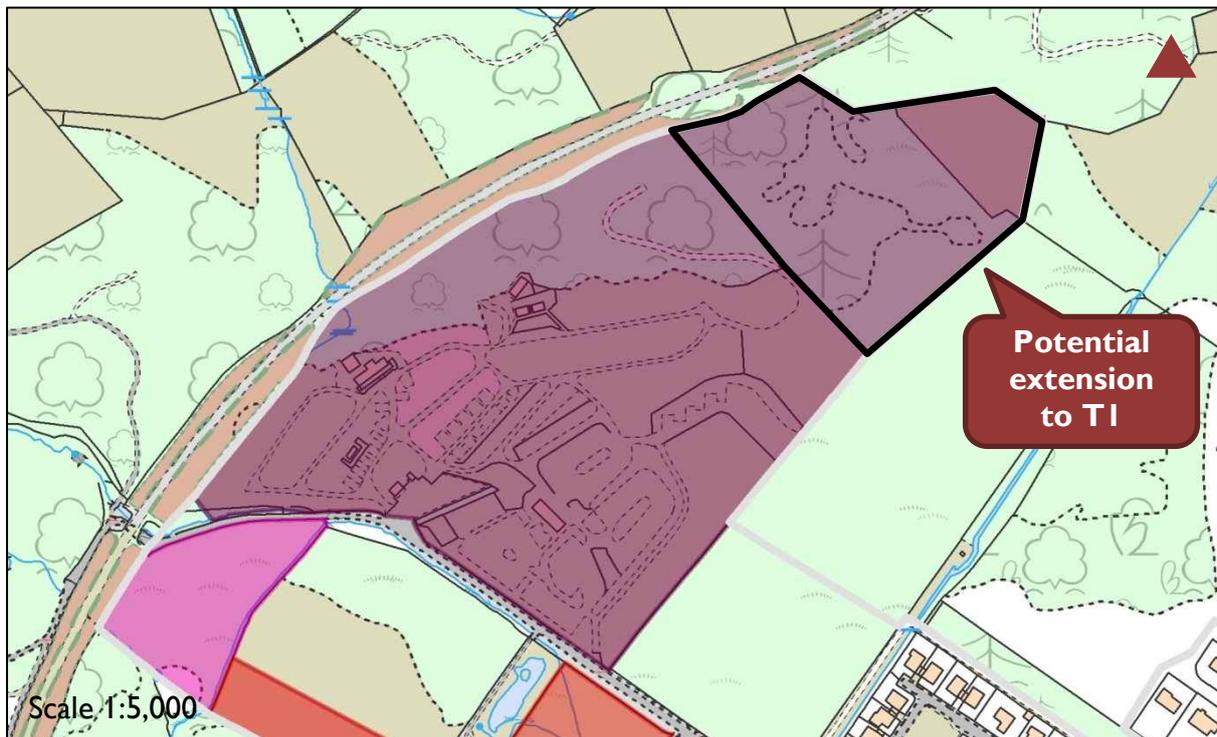
Designating a Local Nature Reserve is outwith the scope of the Local Development Plan.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report, subject to the following amendments:
 - Include additional objectives to “Support proposals for safe active travel around Grantown and beyond to Dulnain Bridge and Carr-Bridge” and “Maintain a range of community facilities”
 - Subject to site assessments, extend T1 to the north east

Annex I



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Kingussie

Respondents

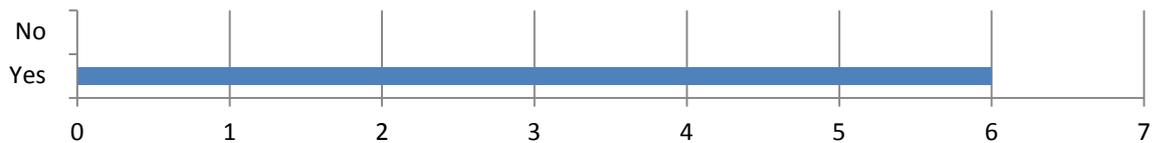
Ref	Name/Organisation
003	Anonymous
007	Scottish Water
044	Scottish Environment Protection Agency (SEPA)
100	Kingussie and Vicinity Community Council
192	Aviemore Business Association
199	Scottish Natural Heritage (SNH)
200	Highlands and Islands Enterprise

Ref	Name/Organisation
221	Woodland Trust Scotland
222	Kingussie Resident
274	Kingussie Golf Club
315	Kinnaird
316	Kingussie Resident
325	RSPB

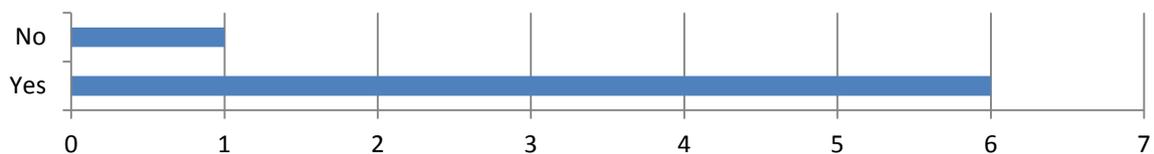
Response Overview

13 respondents answered questions about Kingussie and/or provided comments.

Have we identified the right issues for Kingussie?



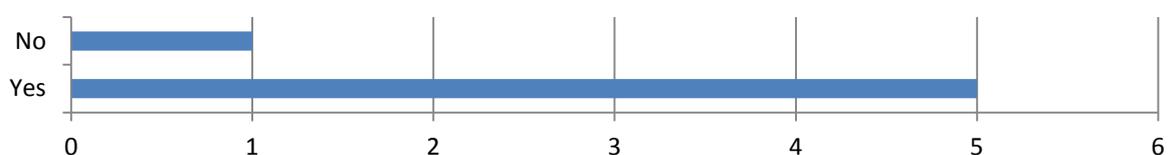
Do you agree with the proposed settlement objectives?



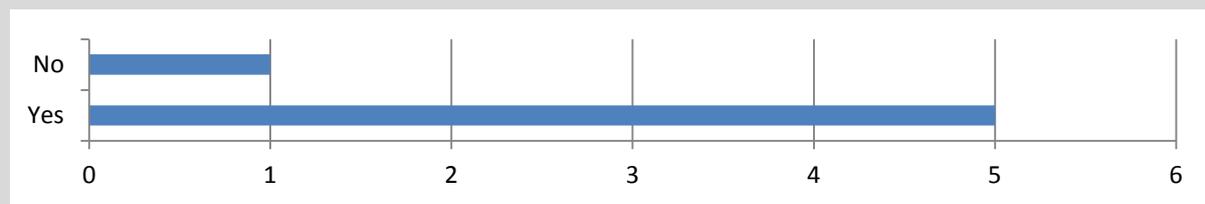
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- The majority of respondents agreed with the issues identified, settlement objectives, preferred site options, protected open spaces and the settlement boundary
- Aspiration to extend T1 site
- Proposed new open space allocations for the tennis courts and bowling green

Issues Raised

Settlement Issues and Objectives

Concern was raised about the lack of sheltered housing (003). Further concern was raised for the increased pressure on infrastructure and local facilities through the allocation of 300 houses at EPI (316).

The Woodland Trust identified the land to the north and west of the settlement to be an area of long established woodland of plantation origin (LEPO) and therefore recommended that development should not happen beyond the current settlement boundary in those areas. They suggested introducing a settlement objective to protect and enhance the natural environment around Kingussie (221).

Sites and Allocations

A number of respondents agreed with the MIR's conclusion that THC053 should not be allocated for development, primarily on the grounds of flood risk (003, 044, 199, 325).

One response disagreed with the identification of the Am Fasgadh site for community uses and felt it should be allocated for affordable housing instead (222).

One respondent noted that a pre-application enquiry has been submitted to Highland Council for a south-westerly extension to the T1 site and proposed that the settlement boundary should be altered to accommodate this (274). Two other respondents felt there is potential to extend the T1 site (003, 222).

The Woodland Trust felt that the boundaries of sites EPI and T1 should be reviewed to incorporate an appropriate buffer zone to protect the adjacent woodland (221).

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Other Comments

One respondent raised concerns about a number of issues including: the amount of vacant retail and business units in the town centre; the lack of mention of transport links and the risk that some trains will not stop in Kingussie when new train timetables come into effect; and the lack of facilities for motor homes to park and link up (003).

One response suggested designating the old shinty pitch off Dunbarry Road for community use (100), and others suggested that the tennis courts on Ardbroilach Road should be allocated for recreational use (003, 222).

Another respondent commented that a growth in housing units in the village is preferable to increasing housing elsewhere, for example An Camas Mòr (316).

Discussion

Settlement Issues and Objectives

The fourth objective proposed for Kingussie supports 'the delivery of housing to meet local needs'. This objective would provide broad support for all forms of housing that would meet local need. There is therefore no requirement to specifically include sheltered housing within the objective.

The comments about the potential for housing site EPI to increase pressure on existing infrastructure and local facilities are noted. These matters are taken into account through the development management process for all significant new housing developments, and can be mitigated through the use of planning obligations where appropriate. Planning permission has already been granted for the EPI site and these issues were specifically considered when the application was determined.

In response to the Woodland Trust, woodland is currently subject to protection under policy 4 of the existing LDP. This policy will be carried forward into the Proposed Plan with minor changes to enhance the protection of ancient woodland. No further change is needed to achieve the protection of this important resource.

Sites and Allocations

As identified in the MIR, site EDI (Am Fasgadh) is proposed to be reallocated for community use. This is to reflect community aspirations for the redevelopment of the site, which are based around the creation of a 'community hub' facility. Significant work has been undertaken to progress these proposals and it would therefore not be appropriate to allocate the site for affordable housing. However, it should be noted that a community use allocation would not necessarily preclude the development of affordable housing if this was deemed to be a preferable alternative at some point in the future.

The comments proposing the extension of site T1 are noted. This proposal would be broadly in line with the proposed settlement objective to improve tourist and recreation facilities. It is therefore recommended that this change be included within the Proposed Plan subject to the findings of more detailed site assessments (see Annex 1 for site location).

It would not be appropriate to review existing site allocations EPI and T1 to provide a buffer to protect the adjoining woodland. Such an approach would be inconsistent with the guidance in paragraph 196 of SPP, which states that ‘buffer zones should not be established around areas designated for their natural heritage importance’.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Other Comments

The health and vitality of town centres is currently monitored through regular town centre health checks, which identify actions to improve vitality where appropriate. This approach will continue during the lifetime of the Proposed Plan. The concerns about public transport and amended rail timetables are noted. However, as Transport Scotland has pointed out, it should not be the case that any settlements will see a reduction in services as a result of the Highland Main Line upgrades (see responses to Main Issue 3 ‘Impacts and Opportunities from the A9 and Highland Main Line Upgrades’). The proposed extension to the T1 site is likely to help address the concern about the lack of facilities for motor homes in the area.

The shinty pitch off Dunbarry Road is already designated as a protected open space. This designation will continue to protect the site from pressure for other forms of development. In the absence of any specific proposals, it would not be appropriate to re-designate the site for community uses.

It is agreed that the tennis courts on Ardbroilach Road should be designated as protected open space. Although not directly suggested by respondents, it is also considered that the bowling green on Spey Street should be designated as protected open space. Annex 1 shows the location of these new protected open space designations.

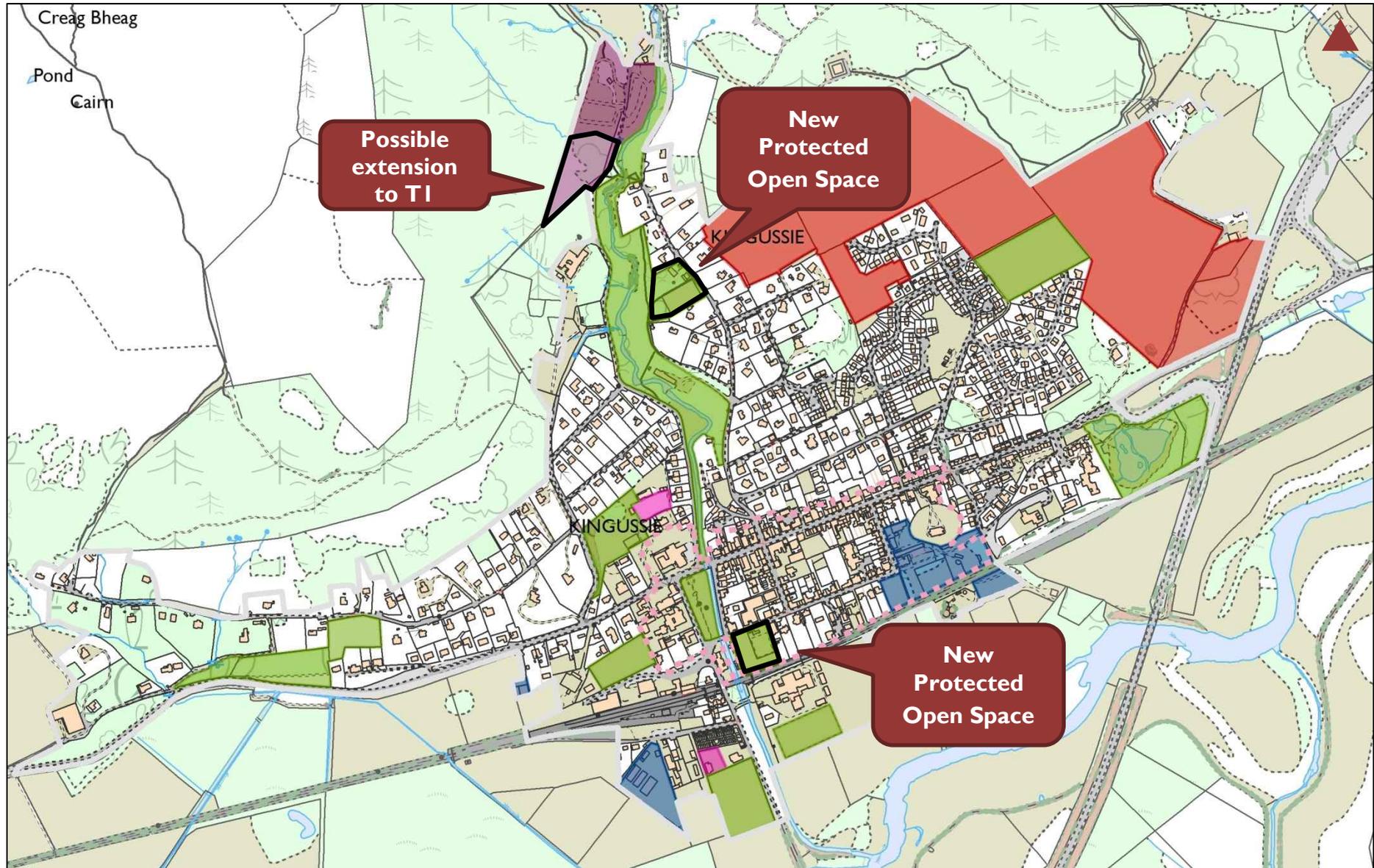
The support for housing growth within Kingussie is acknowledged. However, there is still a need for housing development in other locations in the National Park.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report, subject to the following amendments:
 - Subject to site assessments, extend T1 to the south
 - Identify the tennis courts at Ardbroilach Road and the bowling green at Spey Street as Protected Open Space

Annex I



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Newtonmore

Respondents

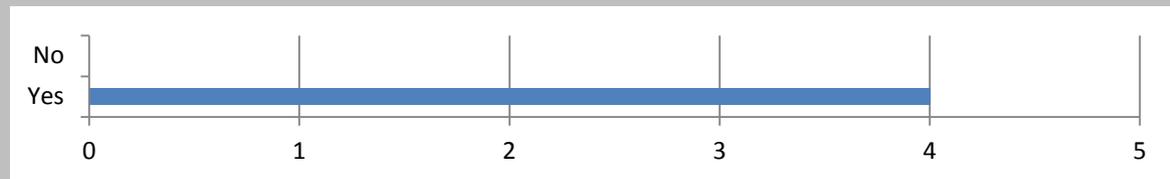
Ref	Name/Organisation
007	Scottish Water
009	Galbraith on behalf of Mr Haywood
037	Newtonmore Business Association
040	Badenoch and Strathspey Conservation Group
044	Scottish Environment Protection Agency (SEPA)
192	Aviemore Business Association

Ref	Name/Organisation
199	Scottish Natural Heritage (SNH)
200	Highlands and Islands Enterprise (HIE)
221	Woodland Trust Scotland
255	Tulloch Homes Ltd.
325	RSPB

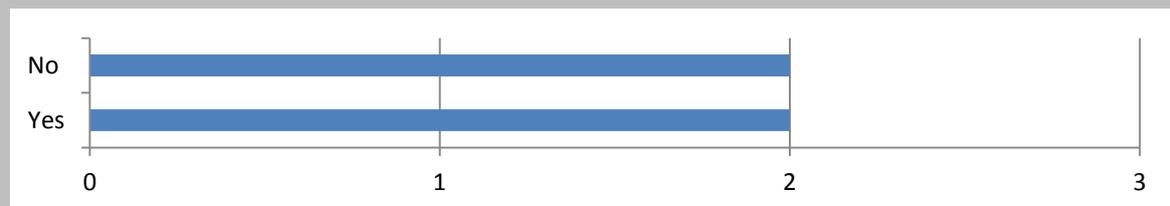
Response Overview

A total of 11 people responded to questions about Newtonmore and provided comments.

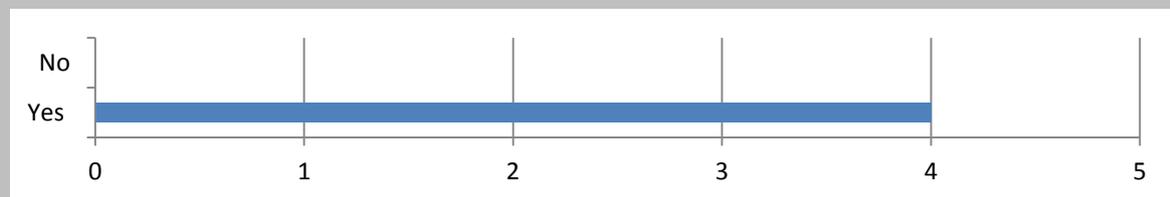
Have we identified the right issues for Newtonmore?



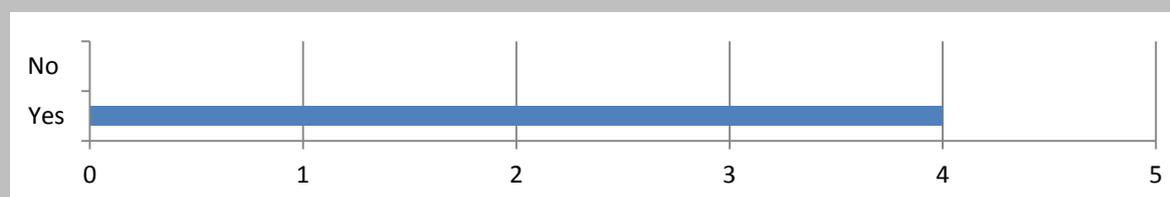
Do you agree with the proposed settlement objectives?



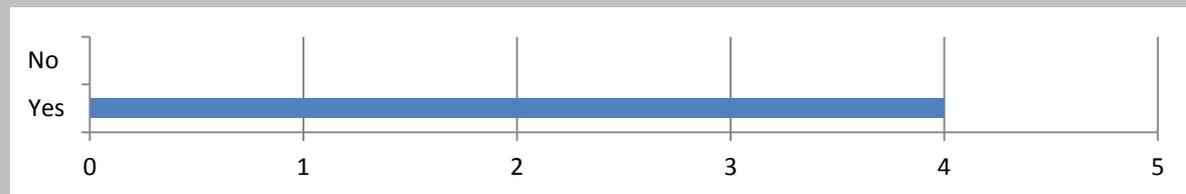
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- The majority of respondents agreed with the issues identified, the preferred options, protected open spaces and the proposed settlement boundary
- Equal split in opinion for the proposed settlement objectives

Issues Raised

Settlement issues and objectives

One respondent expressed concern for the lack of small scale business units and also felt that a range of housing options with supporting infrastructure, visitor facilities and transport provision should be identified for Newtonmore (037).

Sites and allocations

The promoter of site THC022 argued that the site should be allocated for housing development on the basis that it would meet housing need for Newtonmore in the next plan period, ensuring it remains vibrant and sustainable (009). HIE also supported the allocation of THC022 (200). However, SNH agreed with the MIR's conclusion that the THC022 site is not required at present but may have potential for development in the longer term (199).

One response raised concern for the infrastructure, in particular the roads servicing site ED2, suggesting the junction between Station Road and Perth Road will need to be adapted to cater for an industrial development (037).

Both SEPA and SNH agreed with the MIR's conclusions that sites THC004 and THC051 are unsuitable for development (044, 199). RSPB noted that THC051 site is important for breeding waders and stated that measures should be put in place to mitigate or offset the impacts on them if the site is allocated for development (325).

HIE (200) and Tulloch Homes (255) supported the continued allocation of the HI site. One respondent disagreed and felt that an allocation as large as HI is not required (040). RSPB noted that the HI site is important for breeding waders and falls within the 1:200 year flood extent. They stated that measures should be put in place to mitigate or offset the impacts on breeding waders if the site is allocated for development (325).

The Scottish Woodland Trust stated that the TI site should be developed with high regard for the native woodland present on the site. They also asked that the native woodland be protected in the event the site is not required for development (221). SNH advised that any

development on the T1 site should be subject to assessment of its impact on the River Spey Special Area of Conservation (SAC) (199).

SEPA and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044).

Other comments

Newtonmore Business Association (037) raised a number of concerns/suggestions, including:

- Ensure trains stop regularly
- Traffic calming measures should be put in place
- Provide more off-road walks and market/promote them
- Improve visitor experience in Badenoch, for example greater Ranger Activity Walks
- Assess the impact on current facilities to ensure they can cope with increasing visitor numbers
- Concern about budget given to local communities to enhance facilities
- Concern about how visitor experience will be managed during A9 dualling works

Discussion

Settlement issues and objectives

The comments in relation to small business units, housing options and visitor facilities are noted. However, the current LDP identifies two economic development sites in Newtonmore (ED1 and ED2) that are proposed to be carried forward into the Proposed Plan. These provide scope for further economic development, which could include the provision of units for small businesses. The other allocations that are proposed to be included within the Proposed Plan (H1 and T1) will meet local housing need and help to increase the attraction of Newtonmore for tourism and recreation. No further changes are required.

Sites and allocations

The comments seeking the allocation of site THC022 are acknowledged. However, as outlined under Main Issue 4a 'How much new housing do we need and where should it be built?', there is no shortfall in the overall housing land supply within the National Park. The land that is already identified for housing development in Newtonmore (H1) will make a significant contribution towards meeting overall housing needs during the next plan period and ensure the vibrancy and sustainability of Newtonmore. Whilst the THC022 site is likely to represent a suitable location for meeting longer term housing needs, it is maintained that the site is not needed for development at this stage.

Regarding the roads infrastructure that services ED2, part of the site already operates as an industrial estate and there has been no objection to the proposed allocation from The Highland Council as Roads Authority. Detailed access arrangements for any future development proposals will be considered through the development management process as and when planning applications are submitted.

The support for the continued allocation of the HI site is welcomed. Although some concern was expressed about the scale of this allocation, Newtonmore is defined as a strategic settlement within the settlement hierarchy. As such, it is one of the settlements which are the focus for most new development within the Park. It should also be noted that the HI site is an existing allocation and that part of the site already has an extant planning permission for 81 houses. Some concern was also raised about the site's partial location within the 1:200 year flood extent. However, this issue has been addressed in the existing development brief for the site, which acknowledges that the south eastern part of the site is located within the 1:200 year flood extent and therefore states that this area will form a SuDS/wetland zone. This is also likely to have biodiversity benefits, including in terms of mitigating impacts on breeding waders.

Due to the proximity of T1 to the River Spey SAC, any future planning applications for the site will be subject to rigorous assessment through the development management process. The woodland in and around the T1 site would also be subject to the general protection offered by policy 4 of the existing LDP, which will be carried forward into the Proposed Plan.

The technical details and further information provided by SEPA and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Other comments

Whilst noted, the comments raised by the Newtonmore Business Association relate to matters that lie outside of the scope of the LDP.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report

Blair Atholl

Respondents

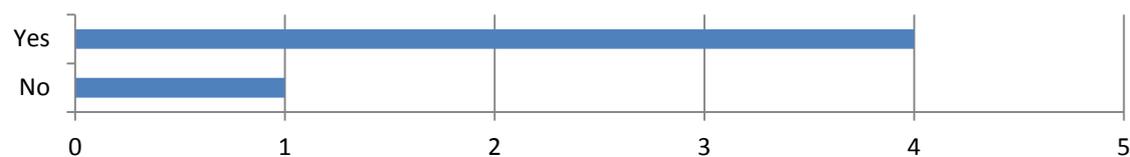
Ref	Name / Organisation
004	Xander McDade Ward Councillor (Highland Perthshire) Perth and Kinross Council
007	Scottish Water
044	SEPA
046	Ristol Consulting on behalf of Atholl Estates
051	Historic Environment Scotland

Ref	Name / Organisation
199	SNH
208	G & L Muirhead
221	Woodland Trust Scotland
223	Blair Atholl Resident
281	Tactran
325	RSPB

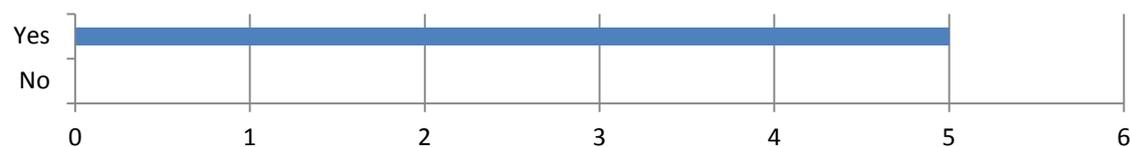
Response Overview

11 respondents answered questions about Blair Atholl and/or provided comments.

Have we identified the right issues for Blair Atholl?



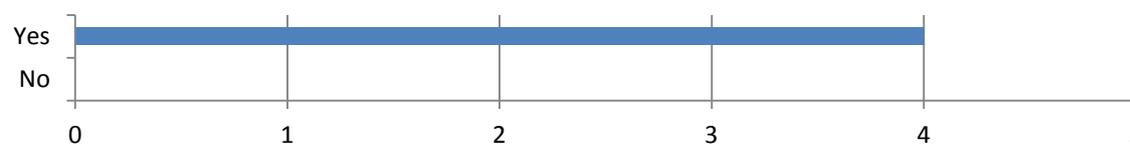
Do you agree with the proposed settlement objectives?



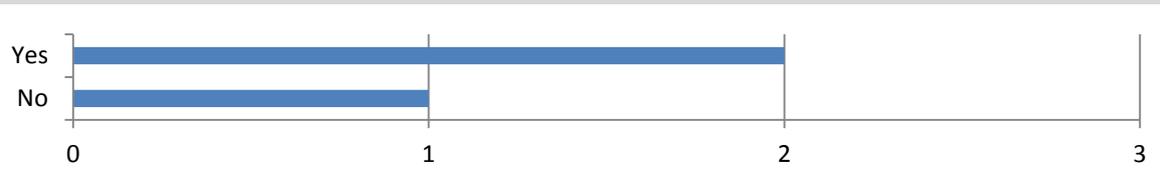
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- Some minor amendments to settlement objectives proposed
- Some disagreement with the preferred site options
- General agreement with the MIR's conclusions about 'non-preferred sites'

Issues Raised

Settlement Issues and Objectives

It was raised that Blair Atholl should be the 'hub' of the group of settlements in Highland Perthshire, that active travel routes, particularly connecting to the train station, should be improved and this should be included within the settlement objectives. It was also noted that the upgrading of the Village Hall is important for the village (004).

It was suggested that consideration should be given to protecting the visual setting and impact of the village from the main tourist route (223).

It was also noted that the impacts and opportunities of the Highland Mainline upgrades should be considered (281).

Sites and Allocations

One respondent commented that the 'non-preferred' part of PKC003 did not seem appropriate and appeared 'out on a limb' (208).

RSPB highlighted that PKC003, PKC005 and PKC006 lie in close proximity to the River Tay SAC and that PKC006 is adjacent to the Glen Tilt Woodlands SSSI. They therefore agreed with the MIR's identification of these sites as 'not preferred' (325).

Historic Environment Scotland noted that PKC004 is adjacent to a scheduled monument (Clach na h'lobairt standing stone) and stated that mitigation measures would be required in the event that this site is brought forward in the Proposed Plan (051).

Two respondents agreed with the MIR's conclusion that PKC007 is not appropriate for development. They argued that the site is close to the sewage works, would impact on the landscape setting of the village, is highly visible, is at risk of flooding, and has inadequate access (208, 223).

One respondent suggested that a more suitable location for development would be land to the east of the preferred part of PKC003 (208).

One response queried why existing permission EP2 is proposed to be amended to a tourism allocation (046).

It was highlighted that part of an existing planning permission forming an extension to the north of the TI site has been removed from the proposed settlement boundary. It was requested that this area be reinstated within the TI allocation and included in the settlement boundary (046). Another respondent objected to the allocation of the proposed area for additional woodland lodges to the north of TI as it lies within an area of long-established woodland of plantation origin (LEPO) (221).

It was also highlighted that the CI site contains a strip of LEPO. It was requested that if this site is allocated an appropriate buffer zone between the caravan park site and the area of woodland should be required (221).

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Other Comments

One respondent was of the view that Blair Atholl could accommodate more housing, particularly affordable housing to sustain younger people in the village. It was argued that this is needed to support the primary school, improve amenities, and to support local employers and businesses (004).

Discussion

Settlement Issues and Objectives

The role of Blair Atholl is recognised in the LDP's settlement hierarchy, with Blair Atholl being identified as an 'intermediate settlement' and other surrounding settlements – Calvine, Bruar & Pitagowan and Killiecrankie – being identified as 'rural'. It is agreed that there is a connection between these settlements and the need to improve active travel routes is noted. This could reasonably be included as a settlement objective. The issue of upgrading the Village Hall is acknowledged and this can also be included as a settlement objective.

The importance of protecting the setting of Blair Atholl is noted. In order to reflect this, the proposed objective to "conserve and enhance Blair Atholl's distinctive built heritage, the integrity of its Conservation Area and the setting of the village in relation to the Castle" could be amended to refer to the setting of the village more generally.

It is also agreed that Blair Atholl could benefit from the proposed Highland Mainline improvements and this could be recognised in conjunction with the A9 dualling.

Sites and Allocations

The proximity of some sites in relation to the River Tay SAC and the Glen Tilt Woodlands SSSI are noted. The response from RSPB expressed agreement that PKC003, PKC005 and PKC006 are not preferred sites. It should be noted that the MIR identified a small part of

both PKC003 and PKC005 as preferred site options. It is not clear whether RSPB's comments were intended to refer to the whole of sites PKC003 and PKC005 or just the non-preferred parts. Nevertheless, consideration of any potential environmental impacts will be assessed through the Habitats Regulations Appraisal and any future development proposals will be subject to assessment against all LDP policies, including those which protect natural heritage.

Historic Environment Scotland's comments in respect of PKC004 are welcomed, although no action is required in response as PKC004 is not a preferred site option.

The support for the MIR's conclusion that PKC007 should not be allocated for development is acknowledged.

The suggestion was put forward that land to the east of the preferred part of PKC003 would be a more suitable location for housing development. However, no further detail was submitted in support of this suggestion. It is considered that the preferred site options already provide an appropriate level of housing land for the village and no change is recommended in response to this suggestion.

The MIR proposed to amend the EP2 site to a tourism designation as this is considered to best reflect its existing and proposed use as a visitor gateway centre.

In respect of the extension to T1, it is agreed that the allocation and the settlement boundary should be extended to include the extant planning permission (see Annex I for site location). In respect of concerns regarding woodland at T1 and C1, these sites are either already developed with operational businesses or have extant planning permission. Therefore it is not possible to remove or change the development allocations in these locations.

Other Comments

The comment that Blair Atholl has the potential to accommodate more housing to sustain the local population and services is noted. However, the need for additional housing was reflected in the MIR, which identified two preferred housing sites in Blair Atholl where previously there were none. It also included a proposal to require a higher proportion of affordable housing from new developments in the village at 45% (see Main Issue 5 'The Affordability of Housing' for more information). Opportunities for the delivery of additional housing through infill development may also arise during the plan period. It is therefore not considered appropriate to identify additional housing allocations for Blair Atholl at present.

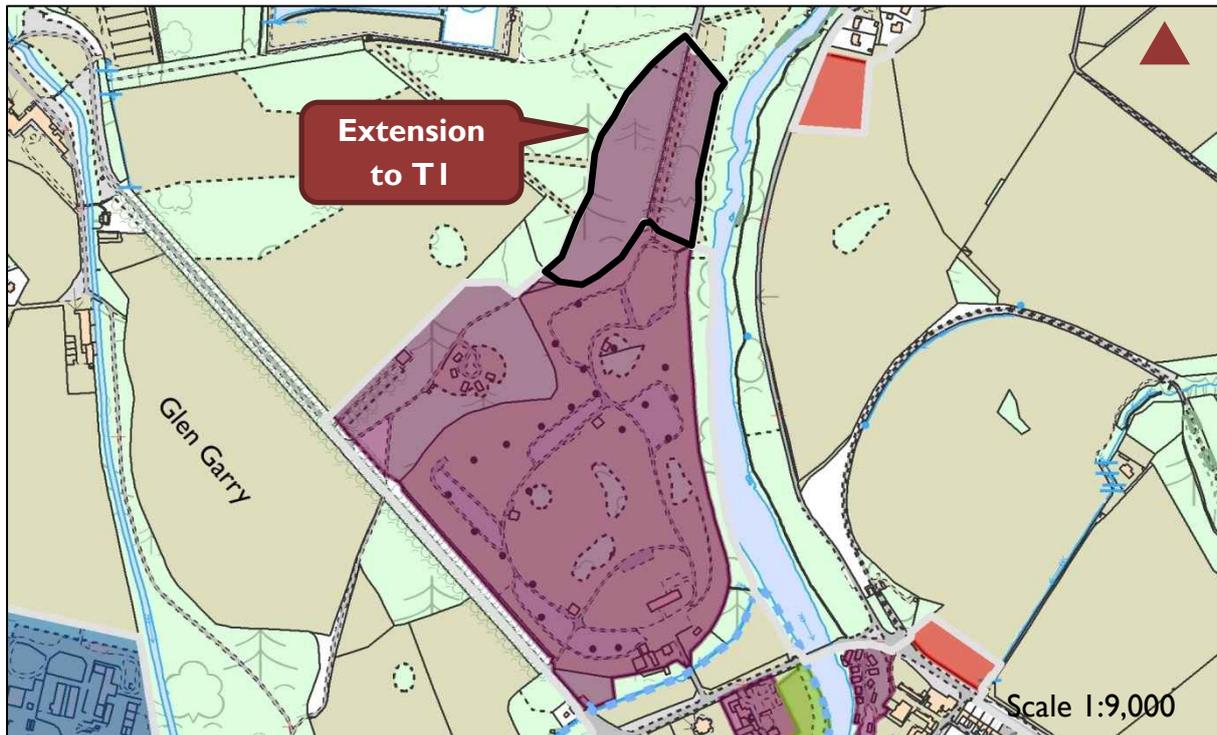
Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report, subject to the following amendments:
 - Include additional settlement objectives to read
 - "Support upgrades to the Village Hall"
 - "Support proposals for safe active travel around the village and to surrounding settlements"

- “Support appropriate inward investment opportunities arising from the A9 and Highland Main Line improvements”
- Amend the second settlement objective to read “Conserve and enhance Blair Atholl’s distinctive built heritage, the integrity of its Conservation Area and the setting of the village”
- Extend the boundary of T1 to reflect the in principle planning consent for additional woodland lodges

Annex I



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Boat of Garten

Respondents

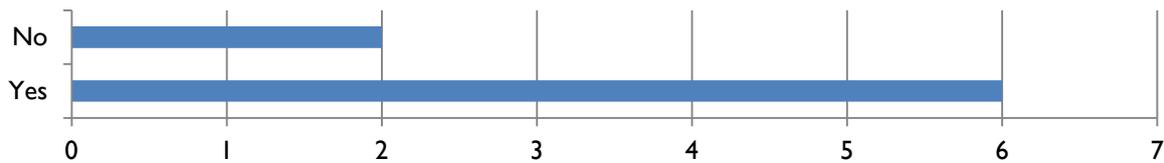
Ref	Name / Organisation
032	Anonymous
040	Badenoch and Strathspey Conservation Group
044	Scottish Environment Protection Agency
060	Halliday Fraser Munro on behalf of Reidhaven Estate
188	Boat of Garten and Vicinity Community Council

Ref	Name / Organisation
192	Aviemore Business Association
199	Scottish Natural Heritage
200	Highlands and Islands Enterprise
221	Woodland Trust Scotland
272	Boat of Garten Resident
319	C McPherson
325	RSPB Scotland

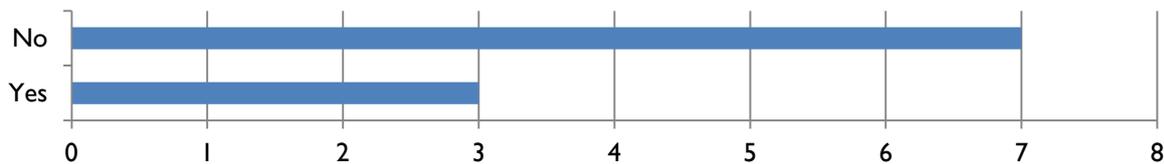
Response Overview

12 people responded to questions about Boat of Garten and/or provided comments.

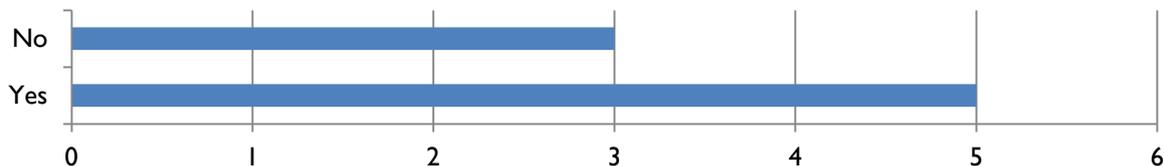
Have we identified the right issues for Boat of Garten?



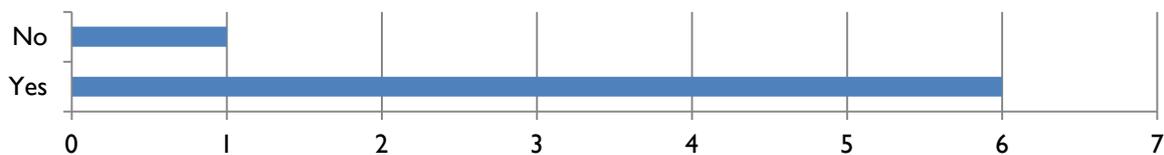
Do you agree with the proposed settlement objectives?



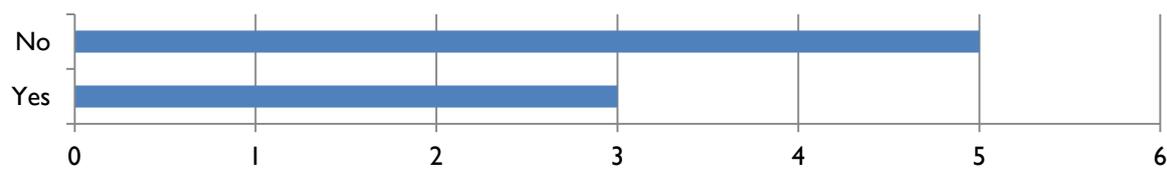
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- General agreement with issues, objectives and preferred site options
- Request by landowner to allocate THC044

Issues Raised

Settlement Issues and Objectives

Boat of Garten and Vicinity Community Council (188) commented that the number of holiday homes and enhancing the provision of affordable housing were issues for the community. They added that the settlement needs to be economically sustainable and have a population size that supports local services and businesses. They also highlighted that digital connectivity remains a high priority and are disappointed that the mobile mast for which planning permission was granted on the railway yard has not gone ahead.

Two additional objectives were suggested:

- The village should be a pleasant, supportive, safe, accessible place to live in a sustainable environment (188)
- To protect and enhance the natural environment and adjacent area of ancient and native woodland to the south-west (221)

It was suggested that the obvious place for the cyclepaths identified in the issues would be to follow the line of the railway (032).

Preferred Site Options

A number of respondents expressed support for the preferred site options (188, 200, 325). The Community Council (188) agreed with the importance of the railway and caravan park for tourism.

Alternative Sites

The MIR's conclusion not to allocate the alternative sites was supported by a number of responders, who raised various concerns about potential impacts on natural heritage, landscape, amenity and woodland (040, 199, 221, 325).

The Community Council (188) highlighted the importance of affordable housing. They noted that, because of the settlement's wooded surroundings, it is hard to identify housing sites other than THCO74 and THCO75 for 100% affordable housing.

Halliday Fraser Munro on behalf of Reidhaven Estate (060) stated that THC044 should be included in the Proposed Plan. They argued that the absence of a housing allocation is contrary to the objective to support the delivery of housing to meet local needs. They consider that housing can be delivered within the woodland, either in conjunction with a Community Housing Initiative or as plots for self-build, and believe that the Plan's approach to capercaillie conservation would mitigate any negative effects caused by this development. However, SNH (199) and RSPB (325) supported the MIR's conclusion that THC044 is unsuitable for development for the reasons given in the Site Assessment Report.

Protected Open Spaces

The Community Council (188) stated their support for the protected open spaces identified in the MIR.

Proposed Settlement Boundary

The Community Council (188) suggested that Street of Kincardine, Mains of Garten, Drumuillie and Chapelton should be included in the settlement boundary. They felt that their absence causes confusion and added that there could be scope for affordable housing in some of these outlying areas.

Other Comments

Woodland Trust Scotland (221) requested that ancient woodland to the south west of the settlement should be a constraint for future development.

One responder felt that population growth in Boat of Garten is constrained by the property provision and cost of property. They commented that data on occupancy levels and style of occupancy would provide a valuable evidence based approach to planning (032).

One respondent felt there should be no new development or expansion (319).

The Community Council (188) noted that there are babies and toddlers in the village, for which the nursery school will be short of places. They added that the village has a speeding working group which, in liaison with Highland Council and the Police, is seeking to promote safe, active travel for all members of the community.

Discussion

Settlement Issues and Objectives

The support for the issues and objectives in the MIR is welcomed. The proposed objectives reflect the importance of meeting local housing need, including for affordable housing, and ensuring the economic sustainability of the village. The importance of good digital connectivity is acknowledged. Considerable work has been done to date to improve the service and work is now ongoing through the Government's 'Reaching 100' programme. The existing LDP includes a policy to ensure the appropriate siting and design of new digital communications equipment and this will be carried forward into the Proposed Plan.

The requests for additional objectives are noted. However, as these suggestions refer to general issues that are addressed through other policies in the LDP, it is not considered necessary to include these as additional objectives.

The LDP will not contain any specific proposals for the development of cyclepaths, though the proposed settlement objective will provide for support them in principle.

Preferred and Alternative Sites

The support for the MIR's conclusion not to allocate the alternative site options for development is welcomed.

The importance of providing affordable housing and the challenge of identifying appropriate housing sites in the settlement are both noted. As set out in the Site Assessment Report, although sites THC074 and THC075 are not proposed to be allocated for housing development in the Proposed Plan, proposals for 100% affordable housing on these small sites could be progressed through the submission of a planning application. Any such proposals would benefit from support in principle through the housing policies of the LDP, which enable small scale 100% affordable housing developments to take place in locations where open market housing would not normally be permitted.

It is maintained that THC044 is unsuitable for inclusion in the Proposed Plan as a housing allocation. As outlined in the Site Assessment Report, its development would result in significant loss of woodland, including ancient woodland. This would be contrary to Scottish Planning Policy and the Scottish Government's Policy on Control of Woodland Removal. Development of this site would also be expected to result in a significant impact on capercaillie and, notwithstanding the MIR's proposed strategic approach to capercaillie mitigation, this is unlikely to be justifiable through the Habitats Regulations Appraisal.

Protected Open Spaces

The support for the protected open spaces is welcomed.

Proposed Settlement Boundary

Street of Kincardine, Mains of Garten, Drumuillie and Chapelton are not contiguous with Boat of Garten itself, and are mostly several miles away. It would therefore not be appropriate to include these areas within the settlement boundary. Given their size, it is not considered that these areas merit settlement boundaries of their own. However, there is still some scope for development in these areas because the LDP contains general policies to support appropriate development outside defined settlements. For example, policy 1.2 of the current LDP enables small scale new housing development which adds to an existing rural group (defined as three or more buildings). This policy will be carried forward into the Proposed Plan and this will provide flexibility to enable appropriate development in these locations.

Other Comments

The ancient woodland to the south west of the settlement is already a constraint to development by virtue of its identification on the ancient woodland inventory. Its presence has been taken into account during the assessment of the site options presented in the MIR.

All available data on second home ownership and occupancy has been analysed and is presented within the Housing Evidence Paper. Further discussion on second homes can be found in this report' section on Main Issue 5: Affordable Housing.

The remaining comments, whilst noted, raise issues that are largely outside the scope of the LDP.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report

Braemar

Respondents

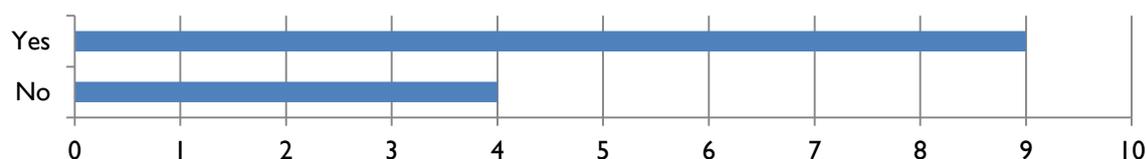
Ref	Name / Organisation
007	Scottish Water
013	C Muirhead and 24 others
024	Braemar Resident
034	D Snare
035	D Ramsay
036	Halliday Fraser Munro on behalf of Mar Estate
041	I Fleming-Boyd
044	SEPA
045	Highlands Hospitality
051	Historic Environment Scotland
130	Braemar Community council / Invercauld Estate / Marr Estate
179	Braemar Community Council
199	SNH
210	Urban Animation on behalf of

Ref	Name / Organisation
	Invercauld Estate
218	NHS Grampian
221	Woodland Trust Scotland
226	L Johnson
245	Anonymous
262	Girlguiding Kincardine & Deeside
264	D Sherrard
265	R Wood
268	Anonymous
278	P Mulvey
282	D Bruce
293	C Chamberlain
294	A J Angus
306	Anonymous
325	RSPB

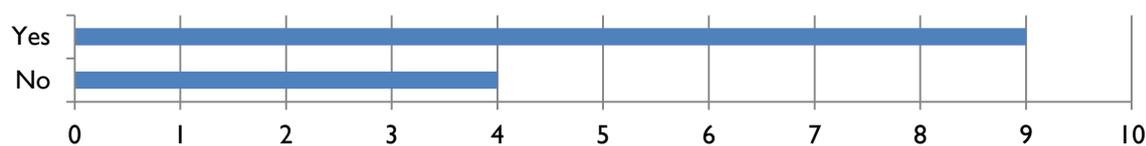
Response Overview

28 respondents answered questions about Braemar and/or provided comments.

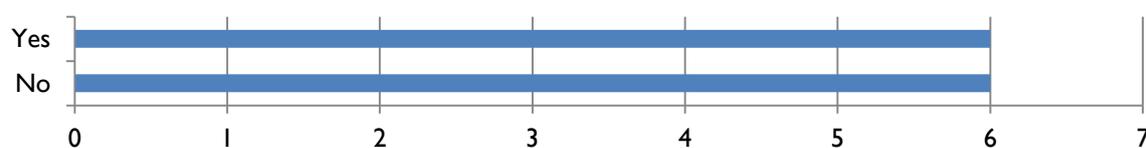
Have we identified the right issues for Braemar?



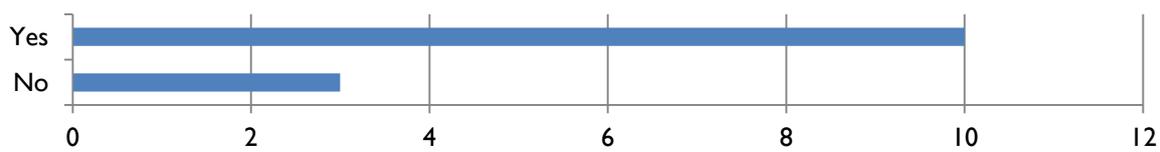
Do you agree with the proposed settlement objectives?



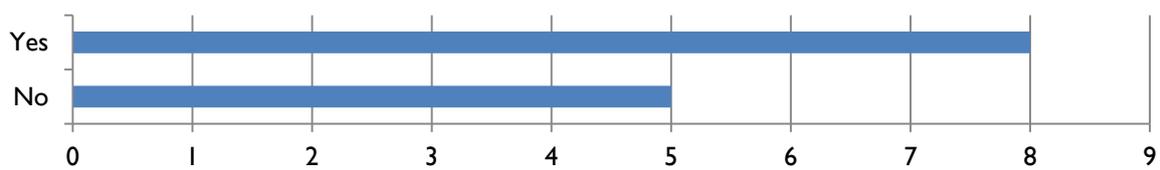
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- Both support for and objection to more development in Braemar
- Community and landowner led masterplanning project highlighted
- Preferred housing site AB023 unlikely to be appropriate for development on flood risk grounds. An alternative option may therefore be required.

Issues Raised

Settlement Issues and Objectives

There was some agreement with the settlement issues for Braemar (218, 265).

In respect of the settlement objectives, it was suggested that Braemar's heritage, character and setting should be safeguarded and promoted (013, 045), and that the design and scale of development should complement Braemar's character (013, 045, 265). It was also suggested that there should be an additional objective to 'protect and enhance the natural environment' (221). Two responses felt that the LDP should include an objective to support the delivery of the Community Action Plan (130, 210).

Two responses felt that there is an over emphasis on tourism which is putting pressure on the natural environment (013, 265). It was therefore suggested that tourism related developments should be supported where they will not adversely affect the environment, community or local economy (013).

Principle of Development in Braemar

A number of respondents expressed general views about the level of development they thought was needed and/or appropriate for Braemar.

The majority of these comments related to housing, with a number expressing the view that there is a need for more appropriate housing in Braemar, particularly affordable (013, 035, 045, 130, 179, 210, 268). It was highlighted that there is a need for a range of affordable housing, particularly smaller units that are suitable for young people and families, to help to sustain/stabilise the population (013, 045, 179, 210, 268). It was also raised that housing

should be intended to meet local needs (013, 041, 130), with one response suggesting it should be for people who are in employment locally and not the second home market (013). It was added that the challenge of accommodating the staff for existing developments in Braemar is putting pressure on existing houses in the village (265).

Some respondents felt that the issues and objectives for Braemar need to be more ambitious as there is a significant need for not only housing but also services and economic/business space to meet local needs (036, 045, 130, 179, 210). It was also suggested that additional camping areas are needed, particularly for campervans (265).

It was suggested that planning policies and/or additional development sites are needed (036, 130, 179, 210). Some were of the view that Braemar needs a planned long term approach to growth (130, 179, 210). It was added that this should happen through the allocation of larger sites instead of 'piecemeal' development (179, 210).

As a result, a number of respondents felt that the settlement boundary should be redrawn to support more growth in the village (036, 045, 179, 210, 265) whilst another requested the inclusion of existing houses around 'Craigview' (278).

However, concerns were also expressed about the scale of development and the potential for this to impact on the character of the village (035, 265). Some felt that Braemar either does not need or cannot accommodate more development, particularly until the impacts of the new Heritage Centre and the Fife Arms Hotel opening are better understood (013, 035, 265). It was suggested that existing derelict buildings in the Braemar area should be utilised first (179), whilst another respondent was of the view that HI in Ballater should be able to provide sufficient affordable housing for the area (265).

Some felt that the existing facilities and infrastructure in the village are inadequate to support the proposed level of development and improvements are needed (035, 179, 265).

Sites and Allocations

Concern was raised about the deliverability of existing permissions on sites EP2 and EP3. It was felt that more needs to be done to support the delivery of these existing sites to establish the likelihood of them coming forward or whether additional sites will be needed (179).

One response suggested that the existing ED1 site could be suitable for affordable housing but supported the continued allocation of ED2 (210).

Support in principle was expressed for the continued allocation of T1 with the proposed extension onto the preferred part of AB019 (210). However, another respondent suggested that the boundary of T1 should be reviewed to allow an appropriate buffer between the allocation and ancient woodland to the north (221).

One response supported the identification of AB023 as a preferred site in the MIR and felt it would provide a possible opportunity for a low cost housing development (179). However, SEPA raised concerns about flood risk and stated that they would object to the allocation of this site in the Proposed Plan in the absence of further information to demonstrate that flood risk does not affect the principle of development (044). Others also commented that

this site is a flood risk area and is not suitable for development (265, 278). One response suggested the AB023 site would be better as a tourism / camping site (265).

Some respondents felt that all the sites identified in the MIR as non-preferred options should be permanently excluded for development and identified as protected greenspace - particularly AB002, AB003, AB005, AB006, AB007, AB008, AB009 (041, 262, 265). RSPB agreed with the MIR's conclusions that AB002, AB003, AB005, AB006 and AB007 should not be preferred development sites due to potential impacts on Morrone Birkwoods SAC and SSSI (325).

One response supported the identification of AB002 as a non-preferred site in the MIR (221). Historic Environment Scotland identified that this non-preferred site contains A-listed Tomintoul Croft (051).

SEPA noted that non-preferred site AB005 is at risk from flooding (044).

It was highlighted that a small part of AB006 contains the Girlguiding Sheiling (privately owned) and is being renovated as a community facility (262). Another respondent felt that AB006 should not be considered for development due to flooding issues (278).

One respondent felt that some development on AB002, AB005 and AB007 would be possible at a smaller scale to minimise impacts on natural heritage, landscape and avoid flood risk (179).

Two respondents suggested that non-preferred sites AB019 and AB022 would be suitable for housing development (179, 265).

Two responses felt that non-preferred site AB021 should be allocated in the Proposed Plan for car parking to accommodate the additional traffic from developments in Braemar (179, 210)

One respondent stated that they would object to any development on non-preferred site AB022. They felt that the land at the entrance to Braemar on the A93 should be protected and enhanced (045). However, another made the case that AB022 provides significant development potential for the longer term and that there are no viable alternatives. They highlighted that there should be a requirement to review open space / play provision as part of a collaborative masterplanning exercise for this site (210). Two further respondents felt that AB022 would be suitable for housing development (179, 265).

One respondent stated that there is scope for tourism-related development on AB024 (210). The same respondent was also of the view that there is scope for tourism development on the part of AB019 that is identified as non-preferred in the MIR (210).

It was highlighted that Invercauld Estate is co-operating with the Community Council, local groups and other landowners on a masterplanning exercise for two areas they have identified for potential long-term village growth – one at the south east of the village (including T1, AB019, AB023, AB024 and surrounding land and woodland) and the other in the north east (including AB021 and AB022 and surrounding land). In respect of the north east area, the proposal comprises mixed use development including housing, employment, community, tourism, open space and parking. In respect of the south east extension, the

proposal will comprise the expansion of the Caravan Park, tourism related development, housing and a southern gateway to the village. A flood risk and alleviation study is being undertaken to allow the masterplanning study to fully assess options for land in this area. It is proposed that the masterplanning exercise will be completed in advance of the Proposed Local Development Plan (210).

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Protected Open Spaces

One respondent agreed with the MIR's proposal to retain the area of protected open space between the Games Park and Mar Road (041).

Other Comments

Improving public transport and parking provision were highlighted as issues (045, 179, 210).

NHS Grampian noted that the Medical Practice in Braemar is working at capacity but given the small number of preferred sites, this is unlikely to be an issue. However, they commented that further review would be required should the level of proposed development change (218).

It was also expressed that the natural heritage section is too heavily focused on capercaillie and there are other natural features which are relevant to Deeside and Braemar (179).

It was highlighted that Braemar is attractive as an area of 'dark skies' and that future lighting should seek to preserve this (041).

Discussion

Settlement Issues and Objectives

The support for the proposed settlement objectives is noted.

In respect of the desire to safeguard Braemar's heritage, the proposed settlement objectives include 'Conserve and enhance Braemar's distinctive built heritage and the integrity of its conservation area'. In addition, future development proposals will be subject to all LDP policies including sustainable design, cultural heritage and natural heritage to ensure they do not adversely impact on the built heritage or environment in Braemar.

The need to support the delivery of the Community Action Plan is noted. The Proposed Plan will seek to ensure that the settlement objectives reflect appropriate planning-related actions set out in current Community Action Plans.

The concerns in respect of tourism are noted. However, tourism plays an important role in the local economy and must be acknowledged. The settlement objectives, whilst seeking to enhance the role of tourism, also support opportunities to diversify the local economy. All

proposals for tourism related development proposals will be subject to LDP policies which will assess any potential impacts on the environment and require appropriate mitigation where necessary.

Principle of Development in Braemar

It is acknowledged that there is a need for additional housing in Braemar, particularly affordable housing. The MIR identified the provision of affordable housing as an issue for Braemar and a proposed settlement objective was also included to 'Deliver housing to meet local needs particularly affordable housing'. This objective will be retained. The settlement objectives also include support for opportunities to enhance and diversify the local economy and enhance the role of tourism, as well as including specific support for small-scale business development. In terms of aspiration, it is agreed that the settlement objectives could include more about what is happening in Braemar and the major investment it is currently seeing.

There was both support for and objection to the idea of more development in Braemar. Whilst a number of people felt that more development sites should be allocated to achieve greater aspirations for the village, others felt that this would have a negative impact on its character. It is acknowledged that there is currently significant investment and activity in Braemar, including the redevelopment of the Fife Arms, and that this has the potential to create additional housing pressures. However, this must be balanced with Braemar's classification as an intermediate settlement within the settlement hierarchy. The MIR proposed a level of new development which is commensurate with this classification and identified a number of preferred site options to address development needs over the plan period. The majority of these sites are still considered appropriate for inclusion in the Proposed Plan. However, it is unlikely to be possible to allocate preferred site AB023 for housing development as a result of flood risk concerns (see further discussion below). This means there is a need to consider other development options and an alternative is recommended below. The recommended alternative makes provision for an appropriate level of development during the plan period but also takes into account longer term development needs in the Braemar.

Whilst the HI allocation in Ballater will make a substantial contribution towards meeting the overall housing land requirement for Deeside, it does not remove the need for a range of sites that can help to meet local needs in Braemar.

The request to include houses around 'Craigview' within the settlement boundary is noted, however it is not considered that this is appropriate as this cluster of buildings lies some way outwith the main settlement.

Sites and Allocations

Concerns in respect of the deliverability of sites EP2 and EP3 are noted. However, both sites have full planning permission which has been implemented and there is no evidence at this stage to suggest that development of the sites will not be progressed. CNPA will continue to monitor the progress of these sites through the LDP Action Programme.

The suggestion that ED I could be suitable for affordable housing is noted. However, on the basis that there are a number of preferred housing allocations, it is not considered necessary for this site to be allocated for affordable housing. The support for the continued

allocation of ED2 is welcomed and this site allocation will be carried forward to the Proposed Plan.

The support for the continued allocation of T1, along with the proposed extension to include the preferred part of AB019, is welcomed. It would not be appropriate to review the allocation boundary to provide a buffer to protect the adjoining woodland as this would be inconsistent with paragraph 196 of SPP, which states that 'buffer zones should not be established around areas designated for their natural heritage importance'.

The support for the MIR's proposal to allocate AB023 for housing development is welcomed. However, a number of respondents expressed concerns in respect of flood risk at this site. In particular, SEPA stated that they would object to the allocation of this site in the Proposed Plan in the absence of further information to demonstrate that flood risk does not affect the principle of development. In light of these comments, it is not considered appropriate to allocate this site in the Proposed Plan unless satisfactory additional flood risk information is provided.

The general support for the MIR's conclusions in respect of non-preferred sites is welcomed. However, it would not be appropriate for these sites to be 'permanently excluded' from development as proposed by some respondents.

The comments that AB002 contains the A-listed Tomintoul Croft, that AB005 is at risk of flooding, and that AB006 contains the Girlguide Sheiling are noted. No further action is required in response to these issues as none of these sites are identified as preferred site options.

The comment that some small scale development may be possible on AB002, AB005 and AB007 is noted. However, for the reasons set out in the Site Assessment Report that was published alongside the MIR, it is maintained that these sites as a whole are not suitable for development.

Although it is acknowledged that AB021 is already used for informal car parking at specific times, it is not considered appropriate for the site to be formally allocated for this use. As outlined in the Site Assessment Report, the site lies in a prominent position on the entrance to the settlement and its scale is extensive. It is also located in a flood risk area and although this would not preclude its use for car parking it would present a significant constraint to any associated built development, land raising etc.

There were mixed views about AB022, with some responses agreeing with the MIR's conclusion that it should not be a preferred site option and others arguing that it should be allocated for development, particularly to meet development needs into the longer term. The Site Assessment Report raised concern about the potential landscape impact of development on the upper slopes of this site and highlighted its overall sensitivity because of its location at the entrance to the village. However, it concluded that impacts could be mitigated by restricting development to the lower parts of the site. It also identified opportunities to integrate development into the landscape through woodland planting and to establish the character of the village through high quality building design and good landscaping.

Consideration has therefore been given to allocating a small part of AB022 for housing development as an alternative to AB023, which despite being identified as a preferred site in the MIR is unlikely to be appropriate for development due to flood risk concerns (see comments above). However, taking into account the constraints on other development options in Braemar, the AB022 site is likely to represent the most appropriate option for the long-term growth of the village. As a result, and due to the landscape sensitivities noted above, it is considered that any development on this site would be more appropriately undertaken as part of a master-planned approach which has regard to the longer term development potential of the wider AB022 area. This approach would be preferable to a series of smaller developments taking place over time in a piecemeal manner. It is therefore recommended that consideration be given to identifying AB022 in the Proposed Plan as a long-term development site to be delivered over several phases. If this approach were taken, the Proposed Plan could require the submission of a master-plan for the wider site area and also include an indicative first phase housing allocation for the plan period. An indicative first phase allocation of 20 houses is recommended as part of this approach (Annex I shows the possible location of the first phase allocation).

It is maintained that the non-preferred parts of AB019 and AB024 are not appropriate for allocation in the Proposed Plan for the reasons set out in the Site Assessment Report.

The proposals to undertake masterplanning exercises with the community are noted. No further detail is available at present and it is therefore only possible to consider the site options contained within the MIR. The situation will be kept under review as the Proposed Plan is developed, particularly in relation to the AB022 area (see comments above). However, consideration of development areas in addition to those noted above is unlikely to be necessary unless this emerging work provides new evidence of unmet housing or other development need in Braemar.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Protected Open Spaces

The existing area of protected open space adjacent to EP3 and the Games Field will be retained in the Proposed Plan.

Other Comments

Whilst the concerns about public transport are understood, the LDP has limited influence over this issue. This matter would be more appropriately addressed by the regional transport body. Parking is also an issue that is largely managed by Aberdeenshire Council.

NHS Grampian's comments will be considered in the preparation of the Proposed Plan.

The comments from RSPB are noted and the impacts of any proposals on capercaillie will be assessed through the Habitats Regulations Appraisal process for the Proposed Plan.

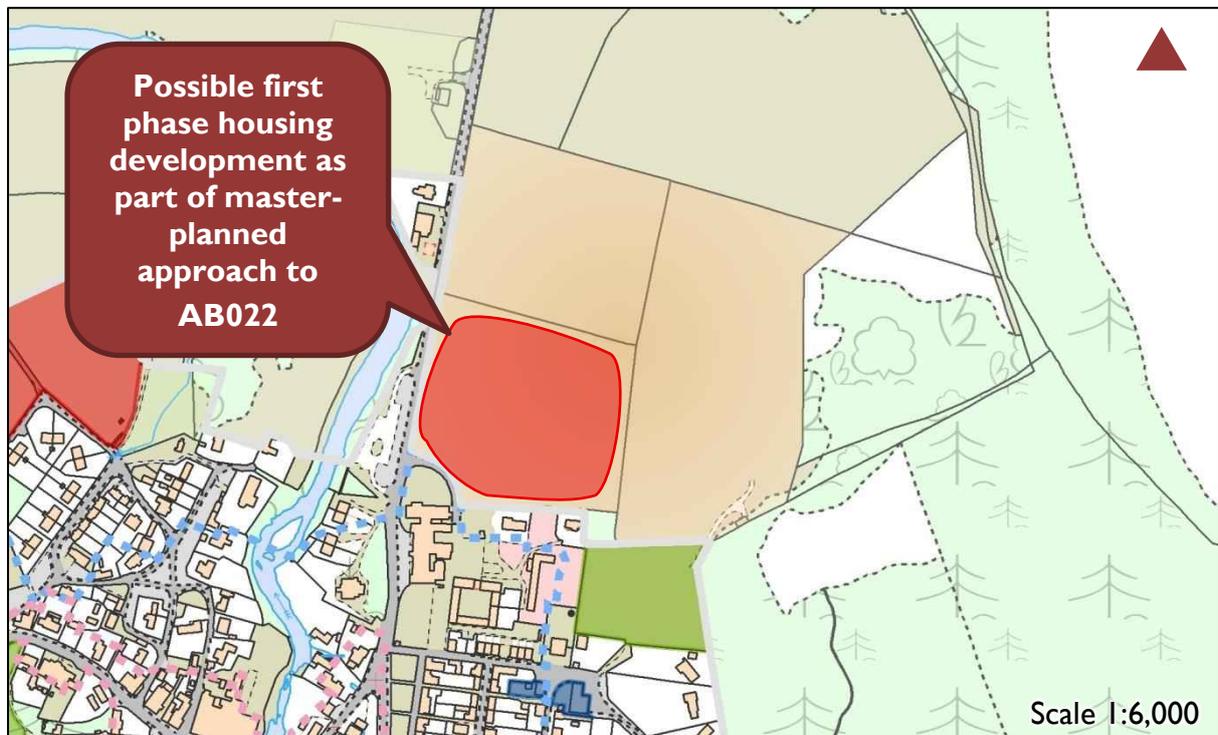
The need to preserve Braemar's dark skies is acknowledged. This is addressed through policy 5 in the existing LDP, which will be carried forward into the Proposed Plan. There is no requirement to include a specific reference to this issue within the settlement statement.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report, subject to the following amendments:
 - Amend settlement context and objectives to reflect current projects in Braemar, specifically the Fife Arms re-development
 - Do not carry forward preferred site AB023 unless additional flood risk information is provided to demonstrate that the site is suitable in principle for housing development
 - Consider identifying AB022 as a long-term development site to be delivered over several phases, including an indicative first phase allocation of 20 houses

Annex I



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Carr-Bridge

Respondents

Ref	Name / Organisation
002	L Anderson
005	Carrbridge & Vicinity Community Council
006	L and I Bishop
007	Scottish Water
014	P Burley
015	A Kelly
016	C Turnbull
017	D Brown
018	M Brown
019	Anonymous
020	J Smith
021	Anonymous
022	Mr and Mrs T A Dunston
023	Dr Boxx
025	J and F Newman
040	Badenoch and Strathspey Conservation Group
044	Scottish Environment Protection Agency
050	B Shorter
055	Margaret
056	P Bates
058	C Clark
061	T Burley
063	R Brown
065	H Moody
067	A McInnes
070	M Corser
072	J Kant
073	R Draig
074	T Mooby
075	K Macdonald
077	D Robertson
078	E Urquhart
079	T Prouse
080	W Drysdale
081	G Bruce
083	R Turnbull
084	P Bruce

Ref	Name / Organisation
085	J Hastings
087	G Stephen
088	M Stephen
091	S Paterson
093	A Roberts
094	C Paterson
095	S Burley
096	A Blair
097	S Blair
098	S Galbraith
099	J Hunter
101	P Robertson
102	S Hunter
103	M Kinnaird
106	J M Kinnaird
107	K Henderson
108	N Turnbull
110	J Roberts
111	B Whale
113	N Doherty
114	C I Blease
115	D Doherty
117	J Forsyth
118	P Rattray
119	Mrs McNeish
120	V Riley
121	S McNeish
122	Carr Bridge Resident
123	S Hastings
124	W Hastings
125	D Hastings
126	P Charlton
128	D Henderson
129	J Roberts
131	J Doherty
132	N Doherty
133	E Rothney
134	R Rothney
136	K Dickson

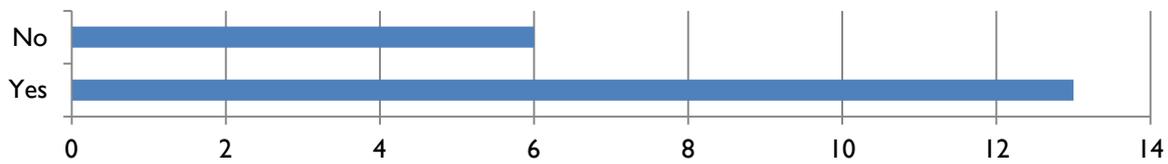
Ref	Name / Organisation
137	C Rothney
138	F Patrick
139	P Whilham
140	C Stirling
141	S Robb
142	C Stitt
143	Crofting Commission
146	I McFarlane
147	L McInnes
148	M Campbell
149	M A Langridge
150	L Frew
152	J Walsh
153	C Walsh
154	GH Johnston Building Consultant
155	R Wheatley
156	S Hibbard
158	J Wheatley
159	K J Girvan
160	J Girvan
161	G McKnight
162	D White
163	P White
164	R F Langridge
165	M D P Carstairs
166	J M Campbell
167	Mr and Mrs R Telfer
168	M and J Campbell
169	I McInnes
170	V Blair
171	D Simpson
172	J Waring
173	M Barry
174	J Jennings
176	R Kant
178	B J Williams
180	R Williams
181	N Anderson
182	D Murray

Ref	Name / Organisation
183	A Schofield
184	L Schofield
185	M Stirling
186	K Stirling
187	I Stirling
189	M Carnegie
190	Finlay Jennings
192	Aviemore Business Association
196	G Carnegie
197	M Stitt
198	S MacDonald
199	Scottish Natural Heritage
200	Highlands and Islands Enterprise
206	J Walker
212	Carr Bridge Resident
213	S Caudrey
216	Carr Bridge Resident
221	Woodland Trust Scotland
224	D Stott
229	Anonymous
240	P Charlton
241	H Bendstrup-Charlton
242	Carr Bridge Resident
243	P Hastings
247	M Corser
248	L Frew
255	Tulloch Homes Ltd
256	Anonymous
261	S Kirk
263	A Kirk
267	L MacLean
276	Landmark Forest Adventure Park
285	Anonymous
286	Anonymous
289	Anonymous
325	RSPB
331	Carr Bridge Hotel

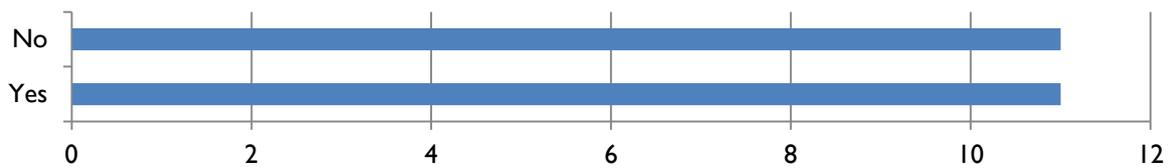
Response Overview

151 respondents answered questions about Carr-Bridge and/or provided comments.

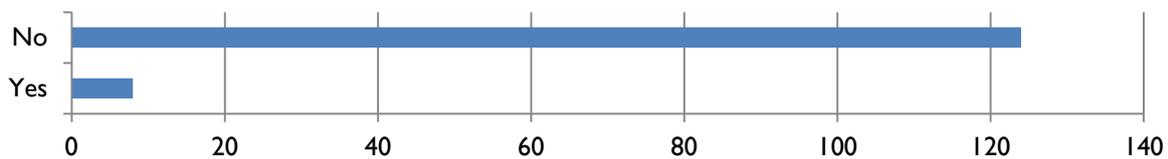
Have we identified the right issues for Carr-Bridge?



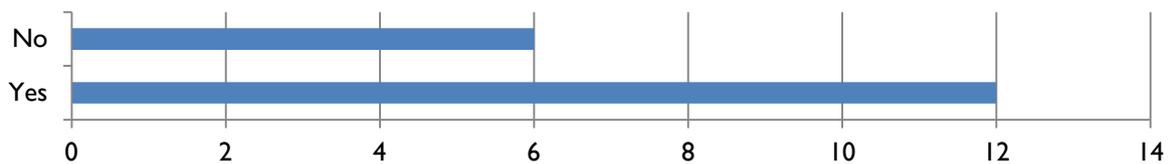
Do you agree with the proposed settlement objectives?



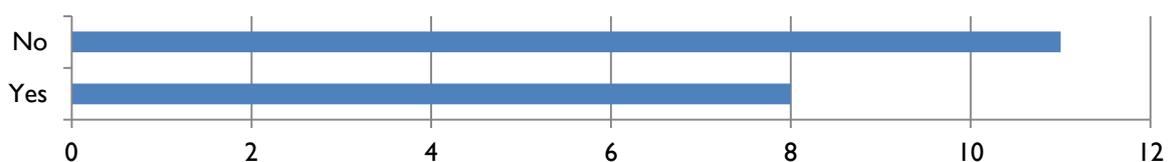
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- Most responses were objections to site H1, primarily due to the impact on Carr-Road

Issues Raised

Settlement Issues and Objectives

Although there was little specific discussion around issues and objectives, a number of comments expressed general agreement with the identified issues and objectives (005, 050, 189, 198).

Several comments were received about the need to address the dilapidated state of the Struan Hotel (005, 050, 189, 229, 261, 263).

There was general agreement with the objective about connecting cycle paths to Aviemore and there were suggestions that connecting to Dulnain Bridge and Grantown-on-Spey should also be considered (005, 050, 189, 229, 261, 263). However, one responder felt the references to active travel were too vague and that the ideal would be for a traffic free cycle route to Aviemore alongside the old A9 not parallel to the new A9 (286).

One responder agreed with all the objectives except the one to support small business units (198). Another asked how much demand there was for small business units (206).

Woodland Trust Scotland (221) suggested an additional objective “*to protect and enhance the natural environment*”

Preferred Site Options

Most responses were objections to site H1, and most of these took the form of an identical letter (002, 014, 015, 016, 017, 018, 019, 020, 021, 022, 023, 025, 055, 056, 058, 061, 065, 067, 070, 072, 073, 074, 075, 077, 078, 079, 080, 081, 084, 085, 087, 088, 091, 093, 094, 095, 096, 097, 098, 099, 101, 102, 103, 106, 107, 108, 110, 111, 113, 114, 115, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 128, 129, 131, 132, 133, 134, 136, 137, 138, 139, 140, 141, 146, 147, 148, 149, 150, 152, 153, 155, 156, 158, 159, 160, 161, 162, 163, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 176, 178, 180, 181, 182, 183, 184, 185, 186, 187, 190, 192). To ensure the rest of this summary remains readable, the points these responders made will be referenced collectively as ‘Standard Letter’. Some responders supplemented this letter with additional comments while others submitted their own unique responses; these will be referenced using individual responder reference numbers.

H1

Tulloch Homes (255) supported the continued identification of the H1 site for 72 dwellings.

However, a large number of responses objected to the continued allocation of H1. The objections raised a variety of concerns, which can be broadly summarised as follows:

- The impact of development on traffic, cycling and pedestrian safety on Carr Road (Standard Letter, 005, 006, 014, 015, 016, 050, 061, 063, 142, 189, 196, 197, 198, 206, 212, 224, 229, 240, 241, 242, 248, 261, 263, 285)
- The ability of Carr Road to accommodate 72 houses, particularly as previous planning applications for the site were based on access being from the B9153 (Standard Letter)
- The effectiveness and adequacy of any traffic calming measures that may be required (005, 016, 285)
- The impact of construction traffic and the difficulty of access for construction vehicles (Standard Letter, 005, 014, 058, 248)
- The scale of development and its impact on the overall character of the village (Standard Letter, 005, 014, 070, 224, 241, 247, 248)
- The impact of development on wildlife and natural heritage (040, 065, 083, 213)
- Drainage issues (285)
- Lack of water, sewage, telecommunications and electricity capacity (017, 065)

- Lack of capacity in the school and nursery (015, 017, 065, 248)
- No evidence of need or demand for the level of development proposed (005, 017, 040, 243)
- The approval of the 25 dwellings on site H2 will provide for all of Carr-Bridge's needs (017)
- Smaller scale developments of low cost houses are possible and better suited for local building firms to take on (Standard Letter, 229)
- Members of community would welcome self-build plots (Standard Letter)
- Strong feeling within community that the development is not appropriate (Standard Letter, 005)
- It was previously recognised by the CNPA, on the recommendation of the Reporter on the current LDP, that the number of dwellings on H1 should be 36 (Standard Letter, 050, 198, 261, 263, 285)
- The impact of development on tourism in Carr-Bridge (016, 241)

A number of suggestions for a lower number of dwellings on H1 were made:

- 10 to 15 (240)
- 10 to 20 (014)
- 12 (standard letter, 006, 248)
- 24 (005, 050, 189, 261, 263)
- 25 (224)

One response commented that whatever number of dwellings was proposed for H1, a safe route to school would need to be created (067). However, another stated that they would not use such a path in the dark (285).

One respondent suggested a contraflow system for traffic management at key points and proposed that a contraflow system could also be implemented coming in from Inverness and Dulnain Bridge directions (267).

SNH (199) stated that H1 has potential for some housing in the non-woodland area, subject to demonstration that there would not be an adverse effect on capercaillie. They stated that the current Development Brief should be retained and updated if necessary to reflect any changes as a result of the proposed LDP. RSPB (325) also commented that the development requires assessment of its potential impact on Capercaillie.

A number of comments related to affordable housing, with responders asking for H1 to deliver 25% affordable housing with the rest being mid-market rent and low cost homes (Standard Letter, 005). Another response suggested that most of the site should be affordable and wished to avoid new properties becoming second homes (240).

The proposed removal of the woodland area from H1 was supported by some (040, 083). However, it appeared that there was confusion about the status of the alternative (non-preferred) site options in the MIR (198, 221, 240, 241, 325). A number of respondents objected to H1 on the grounds that it would damage an area of native woodland (221, 240, 241, 325).

H2

There was general support for the continued allocation of H2 (189, 196, 251, 255, 261, 263). One response supported the H2 site providing it only had 22 houses (198). Tulloch Homes (255) noted that H2 is the subject of a current planning application for 25 units, including 12 affordable homes.

However, several responders objected to all or aspects of the H2 site (040, 083, 242). One respondent suggested that the wet meadow and woodland edge should be removed from the site area (083). Another thought that too many houses were proposed (242).

SNH (199) stated that H2 has potential for housing providing it can be demonstrated that it does not have a negative effect on capercaillie. RSPB (325) stated that development on H2 should be subject to robust assessment which considers all potential recreational impacts.

Other Preferred Options

GH Johnston Building Consultant (154) welcomed the identification of THC030 and THC069 as preferred site options for economic development. However, one respondent did not agree with the proposal to allocate this site due to the scale of recent development in the village (216). Another asked whether parts of the site could be used for housing (198). The Woodland Trust (221) stated that the allocation would cover an area of ancient semi-natural woodland and requested that this area be removed from the allocation.

The Woodland Trust (221) also requested that an appropriate buffer area be established between ED1 and the area of ancient woodland to the east.

One response objected to economic development on ED2 (216).

Alternative Sites

A number of responses agreed with the MIR's conclusion that the alternative (non-preferred) site options are unsuitable for allocation (005, 199, 198, 213, 216, 221, 242, 325).

One respondent suggested that THC066 would be a better development site than H1 (285). Another response requested that part of THC066 be allocated for car parking and housing development for workers at Carr-Hotel (331).

Highlands and Islands Enterprise expressed support for the allocation of non-preferred site THC067. Another respondent thought that THC067 and THC068 would make good locations for small scale development (242). However, one comment pointed out that THC067 is still a curling pond and should not have been referred to as 'former' or 'disused' in the assessment documents (198).

New Site Proposals

Landmark Forest Adventure Park (276) identified land they wish to see allocated for economic development to provide room for extra car parking and future park expansion. RSPB (325) stated that the expansion of T1 for tourist development is likely to be acceptable provided that there are measures in place to ensure it does not result in increased recreation in the surrounding woodland.

One respondent suggested some other sites that might be allocated – one on the A938 and another two on the floodplain that is identified as Protected Open Space in the current LDP (198).

All Sites

Badenoch and Strathspey Conservation Group (040) objected to both H1 and H2. They argued that there should be no housing allocations made for Carr-Bridge in order to allow for a “*root and branch*” review of housing provision that takes “*proper account of such factors as scale, location and affordability*”. They also do not support the alternative sites due to impacts on important natural heritage, landscape and amenity.

RSPB (325) stated that the woodland and farmland around Carr-Bridge are important for capercaillie and breeding waders. They stated that they would not support further development in this settlement without rigorous assessment to determine the impacts of development on protected and priority species, and identification of robust mitigation.

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Protected Open Spaces

Although there was little specific discussion on the proposed Protected Open Spaces, two responses expressed their support (198, 199).

One respondent suggested that other areas could also be identified e.g. Golf Course, Curling Pond, the field bounded by Mannfield Place (198).

A couple of responders were concerned about the area between the A938 and the River Dulnain (below Bogroy) having its Protected Open Space removed (199, 213). SNH (199) advised that it would likely be beneficial for this area to be reinstated as protected open space (and included in the settlement boundary), to avoid inappropriate development.

One response was also concerned about the removal of a small field within the village at grid ref NH 90680 22749 stating that it was currently a pleasant green area along the main street through the village (213).

Proposed Settlement Boundary

Two responses suggested an extension to the Settlement Boundary to include land and buildings west of Bogroy. (198, 206)

SNH (199) felt that it would likely be beneficial for the 2015 LDP settlement boundary to be retained, so that the previously included protected open space between the A938 and the River Dulnain is included.

Other Comments

It was suggested that any development in the village of more than two houses should have conditions attached whereby they are required to put something back into the community

(229). It was suggested that serviced pitches were needed for campervans (229). Speeding was also identified as a problem in Carr-Bridge (286).

Discussion

Settlement Issues and Objectives

Support is noted for the issues identified and the objectives proposed to address them. These have been informed by the Carr-Bridge Community Action Plan.

The Carr-Bridge Action Plan does not identify a cycle network connecting Dulnain and Grantown-on-Spey as a priority, therefore it has not been identified as an issue. These objectives are not policy statements so will not go into detail about how they will be achieved e.g. the route that cycle path will take.

The desire to provide small business units had come up at a number of community meetings in Carr-Bridge. While no specific evidence is identified for economic development need in Carr-Bridge itself, consultation with Highlands and Islands Enterprise and the Cairngorms Business Partnership suggests that there is a need for units and land across Badenoch and Strathspey. As outlined under Main Issue 3 of the MIR, Highlands and Islands Enterprise are also leading the development of a strategic approach to ensure the economic development potential of the improvements to the A9 is maximised. Since Carr-Bridge is close to a key junction it is thought that it can play an important part in this strategy. Consequently, the MIR identifies three preferred site options in Carr-Bridge for economic development, namely ED1, ED2 and THC030 / THC069.

Preferred Site Options

H1

H1 is allocated for 72 dwellings in the current LDP and is subject to a Development Brief that outlines the way in which the site should be developed. The change proposed in the MIR, which removes the area of woodland from the existing allocation, brings the allocation in line with the approved Development Brief.

The issues relating to the increase in traffic are well rehearsed and The Highland Council, as the responsible authority for roads in the area, have been consulted at numerous points to gain a view as to whether or not this issue is mitigatable. It is important to note that The Highland Council have not raised any objection to the H1 allocation on traffic grounds. In their previous comments on the Development Brief, they estimated that Carr Road currently services 65 dwellings and that an additional 72 dwellings would result in around 48 extra two-way vehicle trips during the am peak from 8am to 9am, and an extra 57 two-way trips in the pm peak between 5pm to 6pm. Based on previous advice from The Highland Council, it is expected that any development proposal to come forward will need to include measures on Carr Road that would better support the safe integration of vehicles with more vulnerable road users, including cyclists, walkers and children. These measures will need to promote suitable design speeds with appropriate physical characteristics that helped keep general traffic speeds at or below that design speed. A maximum speed limit 20mph should be promoted, but design speeds should be sufficiently below this figure to ensure actual vehicle speeds are kept to a sufficiently low level. The Highland Council have

previously indicated that they would not support a traffic calming scheme that relied entirely on vertical speed humps, with a more holistic approach being needed recognising the current attractive rural nature of the road. Because Carr-Road is publicly adopted, any proposals to change and enhance it will need to be done to an adoptable standard. It will therefore still be useable by construction vehicles, agricultural machinery etc. As proposed in the current Development Brief, site requirements will also still include the provision of a footpath to the school.

Reference has been made to a previous consent on the site, and the planning application that was refused in March 2015 (07/400/CP), which included access directly on to the B9153. This application was however for up to 117 dwellings over a much larger area, which partly lay along the B9153 (see EPI in the current LDP for area). A through road was therefore necessary to provide access to dwellings on the southern side of the site. Such a situation no longer exists and, as The Highland Council have pointed out in previous comments relating to the H1 site, Carr Road can accommodate the traffic from an additional 72 dwellings with mitigation.

Concerns were also expressed about construction traffic using Carr Road. This can be managed as part of the planning application process. For example, journeys can be limited to certain times of the day or directed to use or not use certain roads or access points.

Taking into account the above, there are no reasonable grounds to conclude that traffic or road safety issues present a constraint to the development of 72 dwellings on the H1 site.

The site is known to have had a high botanical and fungi value, though nothing that would prevent development. However, it was ploughed for arable use in 2017, which is likely to have had a significant adverse effect on its ecology. In terms of wider impacts, the area of woodland is proposed to be removed from the H1 allocation, so the claim that recreation will be pushed deeper into the forest is unlikely to be accurate. However, as with all sites and the Plan as a whole, the potential negative effects of development need to be considered and this will be subject to robust examination through the Strategic Environmental Assessment and Habitats Regulations Appraisal.

Drainage issues are not an absolute constraint on development. Although some of the site is affected by surface water, the affected area is not significant and does not prevent development. SEPA advised that a Drainage Water Assessment may be required to address surface water issues but have not objected to the principle of development on flood risk grounds.

Scottish Water have not objected to the principle of development on the grounds of water or sewage capacity and these matters would not prevent development. Similarly, telecommunications and electricity supply issues would not prevent development, although some upgrading of existing supply networks may be required.

Carr-Bridge Primary School has a total capacity of 75 pupils and is currently operating at 80% capacity. Highland Council forecast that in 2023/24 the total capacity will be exceeded by 12%. These forecasts assume that H1 and H2 will have been mostly completed by this point. School roll forecasts are reviewed on an annual basis however, and if there remains a capacity issue at the time of application then a developer obligation will be required to address the issue. This is standard practice.

Several responders raised questions about the level of need and demand in Carr-Bridge. These questions have also been raised at various consultation events within the Carr-Bridge community, and it is worth repeating that this is an essentially unknowable number. There are several reasons for this, not least being the volatile nature of small area population estimates on which a model of housing need and demand would need to rely. Consequently, any estimates of need and demand would carry with them such a broad margin of error that they would be of little value for policy making within the LDP. Some responders appear to advocate a survey based approach. However, these are also limited by the small sample size from which they can draw and while they may offer a detailed picture of the intentions and needs of individuals and households at the time of the survey (assuming the sample size is large enough), the value of results diminishes quickly over time and they cannot be used to form assumptions that span the whole plan period (10 years). They may also be limited by geography, because a survey that covers just Carr-Bridge will miss out on need that exists but is currently being met elsewhere. Finally, it is important to note that Carr-Bridge does not form its own Housing Market Area (HMA) as households in Carr-Bridge and other nearby settlements will consider a range of local and regional locations to buy or rent. The most reliable estimates of housing need and demand therefore come from HNDAs. The HNA covering Carr-Bridge is the Highland Council HNA (2015). This has been found to be robust and credible by the CHMA and provides a good estimate of housing need and demand for the Badenoch and Strathspey HMA (see Main Issue 4 'Housing' for more information). The amount of housing that is allocated to Carr-Bridge and other settlements within the HMA is a policy decision for the LDP.

Notwithstanding the above, it is acknowledged that 72 dwellings is a relatively high number of new houses for Carr-Bridge. It is also acknowledged that the Reporter who undertook the Examination of the current LDP recommended that the number of dwellings on H1 be reduced to 36. Although the CNPA accepted this recommendation, Scottish Ministers directed that the allocation be increased to 72 dwellings in the final version of the plan as there was a live planning permission covering the H1 site at the time the LDP was adopted.

This is no longer the case, and consideration must therefore be given to whether 72 houses remains an appropriate number for the H1 site. When considering this, it is necessary to take account of what other housing is likely to be delivered during the current and next plan periods. The existing H2 allocation is currently subject to a planning application for 25 houses. If approved, the majority of these houses are likely to be delivered during the remaining part of the current LDP period (2015-2019). The H2 site is therefore unlikely to deliver significant levels of housing during the new plan period (2020-2029). As there are no other existing housing allocations in Carr-Bridge, it is necessary to consider what level of new housing growth on H1 would be appropriate for the settlement over the 10 year plan period. This decision needs to have regard to Carr-Bridge's status as an intermediate settlement in the settlement hierarchy. It is not agreed that the provision of only 12 dwellings on H1, as proposed by many respondents, or the slightly higher proposals of 24 or 25 houses put forward by others, would be appropriate to serve Carr-Bridge or the wider area over the ten year plan period to 2029.

Carr-Bridge has a relatively high level of services compared to other intermediate settlements, including a primary school, fuel station and garage, several hotels, bars and cafes, a local shop and a mainline railway station. It is therefore recommended that the 36 dwellings recommended in the Examination Report on the current LDP be allocated to the H1 site. This means that the proposed density would drop from 30 units per hectare to 15

units per hectare and so consideration should also be given to reducing the site size, as this lower density does not represent an efficient use of land (see Annex I for proposed amended site area).

The remaining comments about the H1 site are noted. As outlined previously, a safe route to school will be required as part of the development of the site. Potential traffic mitigation measures have also been indicated above. Impacts of the development on capercaillie will be subject to robust assessment through the Habitats Regulations Appraisal process for the LDP, and the development will require to comply with the LDP's affordable housing policy, which currently requires 25% affordable housing provision in Carr-Bridge. The support for the proposed removal of the woodland area from the H1 site is welcomed.

H2

An application for 25 dwellings (including 12 affordable) on site H2 (2018/0046/DET) is currently under consideration. The potential effects of the proposal on capercaillie have been considered through the Habitats Regulations Appraisal of the current LDP.

Other Preferred Options

THC030 / THC069 was submitted by the landowner for consideration for a number of uses; economic development was considered the most suitable. Housing was not considered appropriate because the former use of the site means that there are potential contamination issues. The location of the site, on the opposite side of the A9 to the rest of the settlement, also means that housing here would not relate particularly well to the rest of the village.

Part of THC030 / THC069 does fall within an area identified on the Ancient Woodland Inventory, and this was acknowledged in the Site Assessment Report. However, the site has previously been developed and the trees present on it, which do not offer significant cover, are all relatively young. The ecological value of the woodland in this area is not considered to be high and therefore does not present an absolute constraint to development.

The existing ED2 site is already occupied by a fuel station and garage. No change is required in response to the single objection to this site.

Alternative Sites

The reasons why Alternative Sites have not been identified for allocation are outlined in the Site Assessment Report published alongside the MIR. The general support for these conclusions is welcomed.

THC066 is a boggy wooded piece of land with deep peat. It has significant constraints that mean it cannot be relied upon to deliver housing. With respect to the proposals from respondent 331, which only affect part of the site, the development of housing here is considered inappropriate as it would have a significant negative effect on the landscape of the locality and the setting of the village and golf course. An LDP allocation for car parking is also unlikely to be appropriate. This element of the proposal would be better dealt with through the submission of a planning application, where any proposals will be judged on its merits through the development management process.

THC067 is owned by Carr-Bridge Curling Club and is not available for development.

THC068 forms part of site ED I in the current LDP. However, this area is a steep wooded slope with a bog at the bottom of it. It is unsuitable for housing development and is also proposed to be removed from the ED I allocation in the Proposed Plan.

New Site Proposals

Landmark Forest Adventure Park make a reasonable case for an extension to their site being allocated. It is therefore recommended that this be included in the Proposed Plan providing that further site assessments, including SEA and HRA, do not identify any constraints that would prevent it. Annex I shows the proposed extension.

The sites on the floodplain suggested by respondent 198 would not be appropriate for development as Scottish Planning Policy makes clear that development in flood risk areas should be avoided. The site on the A938 has been considered as a potential allocation in the past. However, development on this site would have a significant landscape impact. It is therefore unsuitable for allocation as other more appropriate sites are available.

All Sites

Combined, the Highland HNDA (2015), Housing Evidence Paper, HRA, SEA and Site Assessment process, take “*proper account of such factors as scale, location and affordability*”. No change is required in response to the comment on this issue.

The assessment of the potential impacts of development on protected and priority species, and the identification of mitigation is taking place at a Plan level and through the HRA process.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Proposed Settlement Boundary and Protected Open Spaces

The purpose of the settlement boundary is to delineate between areas where LDP policies are generally more permissive of development (within the settlement boundary) and areas where more restrictive policies apply (outwith the settlement boundary). The MIR’s proposed modifications to the settlement boundary and protected open spaces in Carr-Bridge were made in conjunction with one another. It was considered that the protected open space between the A938 and the River Dulnain (below Bogroy) was unnecessary because it does not serve any formal recreation purpose and protection from inappropriate development could be more appropriately achieved by simply excluding this area from the settlement boundary. It is therefore not necessary to reinstate this protected open space designation to achieve the outcomes sought by SNH.

Other suggestions for protected open space were made. It is not considered necessary to identify areas such as the golf course that already have protection by being located outside of the settlement boundary. It is also not considered appropriate to identify the curling pond as a protected open space, for while its use as a curling pond is acknowledged, the concrete slab on which this activity occasionally takes place does not positively contribute to the setting of the area. However, it is recognised that there is merit in identifying the field at Mannfield Place as protected open space, as it is agreed that it plays an important role in the village’s setting – see Annex I for the location of this site.

The various other changes which respondents sought to the Settlement Boundary are not considered appropriate as they would result in significant areas of land deemed inappropriate for development being included within the Settlement Boundary.

Other Comments

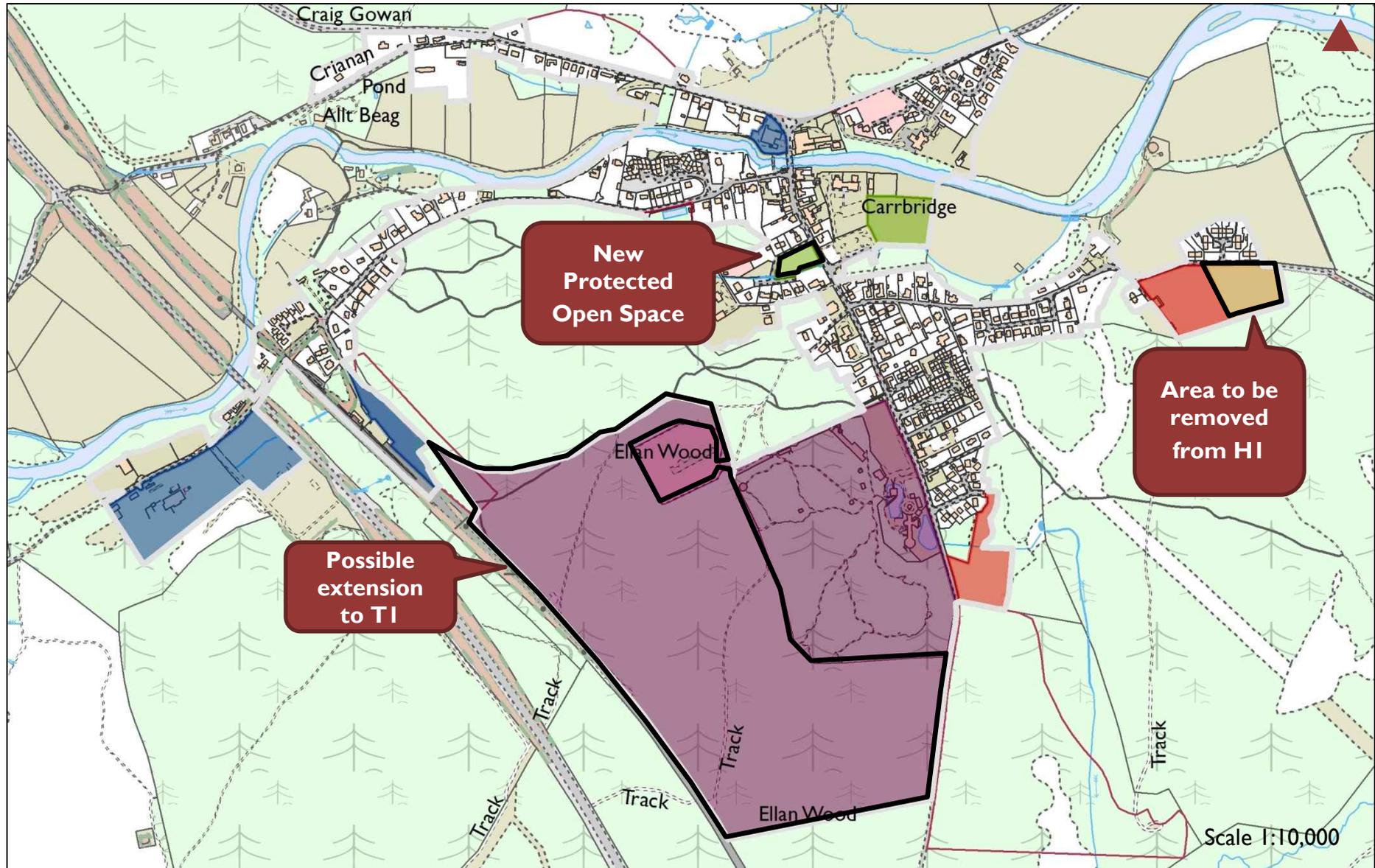
Developer contributions cannot be levied for anything that is not directly related to the development. Serviced pitches for campervans can already be delivered through the policies of the LDP. It is not necessary to have specific proposals, particularly as none have been forthcoming. Speeding is not a matter for the LDP.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report, subject to the following amendments:
 - Reduce the number of dwellings on HI from 72 to 36 for the plan period and reduce the site area accordingly
 - Subject to site assessment, extend the existing TI allocation to provide additional land for Landmark Forest Park
 - Identify the field at Mannfield Place as Protected Open Space

Annex I



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Cromdale

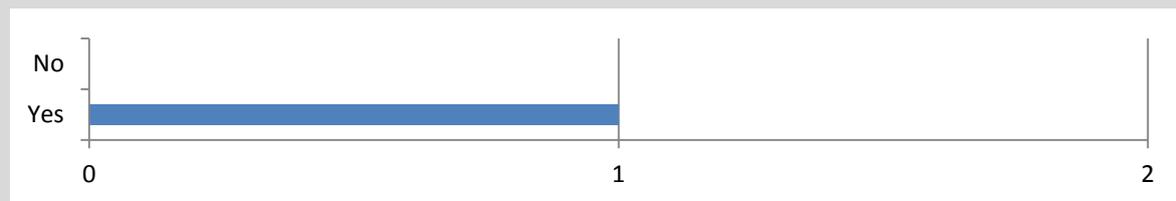
Respondents

Ref	Name/Organisation
007	Scottish Water
040	Badenoch and Strathspey Conservation Group
044	Scottish Environment Protection Agency (SEPA)
051	Historic Environment Scotland
199	Scottish Natural Heritage (SNH)
200	Highlands and Islands Enterprise (HIE)

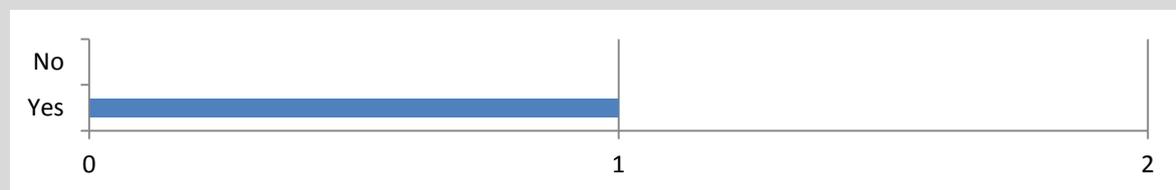
Response Overview

A total of 6 people responded to questions about Cromdale and provided comments.

Have we identified the right issues for Cromdale?



Do you agree with the proposed settlement objectives?



Do you agree with the preferred site options?

No respondents answered this question

Do you agree with the protected open spaces?

No respondents answered this question

Do you agree with the proposed settlement boundary?

No respondents answered this question

Key points

- No respondents disagreed with the settlement objectives
- Those who offered more general comments raised issues about protected open space, the proposed settlement boundary and the allocation of additional housing land

Issues Raised

Settlement issues and objectives

SNH expressed concern for open space in the village, highlighting the proposed reduction of the larger north eastern protected open space area identified in the current LDP. They would like to see this area reinstated as protected open space in the Proposed Plan. They also expressed concern for the associated revision to the settlement boundary and felt the boundary should also remain as defined in the current LDP to retain the buffer between development and the Burn of Cromdale (199).

Sites and allocations

A number of respondents agreed with the MIR's conclusion that the alternative sites should not be allocated for development due to negative impacts on natural heritage and landscapes, in particular the Battle of Cromdale site (040, 051, 199).

HIE (200) wished to see part of THC021 allocated for mixed use development.

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Discussion

Settlement issues and objectives

The purpose of the settlement boundary is to delineate between areas where LDP policies are generally more permissive of development (within the settlement boundary) and areas where more restrictive policies apply (outwith the settlement boundary). The MIR's proposed modifications to the settlement boundary and protected open spaces in Cromdale were made in conjunction with one another. It was considered that the protected open space adjoining Cromdale Park football pitch (as defined in the current LDP) was unnecessary because it does not serve any formal recreation purpose and protection from inappropriate development could be more appropriately achieved by simply excluding this area from the settlement boundary. It is therefore not necessary to reinstate this protected open space designation to achieve the outcomes sought by SNH.

Sites and allocations

The comments agreeing with the MIR's conclusions in respect of the alternative (non-preferred sites) are acknowledged.

The request for part of the THC021 site to be allocated for mixed use development is noted, but it is maintained that this site is inappropriate for development. As noted in the Site Assessment Report that was published alongside the MIR, "the scale of the site is extensive" and "there are more suitable existing allocations in Cromdale". There is therefore no need to allocate this site for development.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report

Dulnain Bridge

Respondents

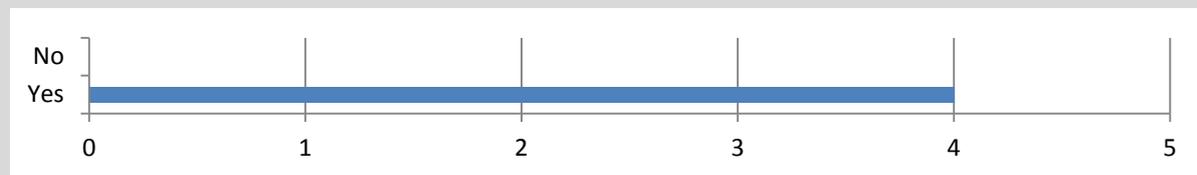
Ref	Name/Organisation
007	Scottish Water
040	Badenoch and Strathspey Conservation Group
044	Scottish Environment Protection Agency (SEPA)
050	B Shorter
060	Halliday Fraser Munro on behalf of Reidhaven Estate
104	Savills on behalf of Muckrach Estate
144	Dulnain Bridge Community Council

Ref	Name/Organisation
199	Scottish Natural Heritage (SNH)
200	Highlands and Islands Enterprise
221	Scottish Woodland Trust
225	Anonymous
307	Dulnain Bridge Resident
321	J Finnie

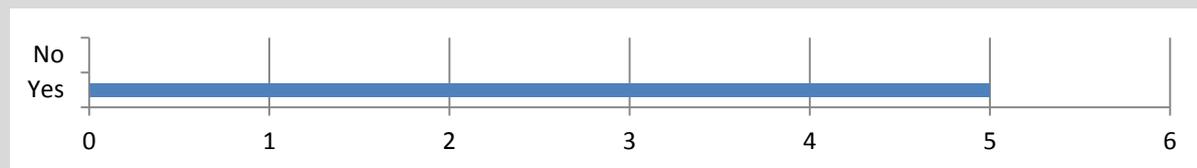
Response Overview

A total of 13 people responded to questions about Dulnain Bridge and provided comments.

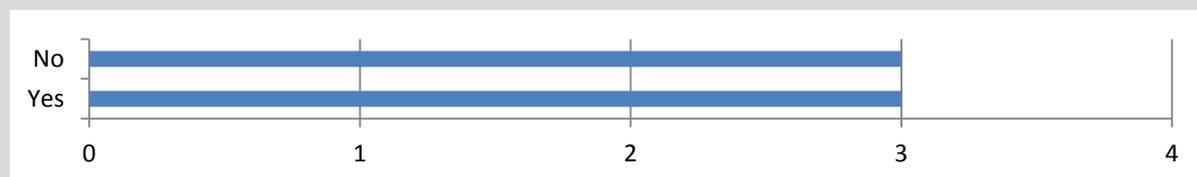
Have we identified the right issues for Dulnain Bridge?



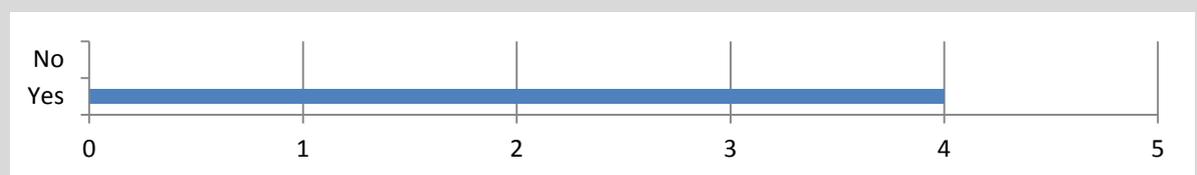
Do you agree with the proposed settlement objectives?



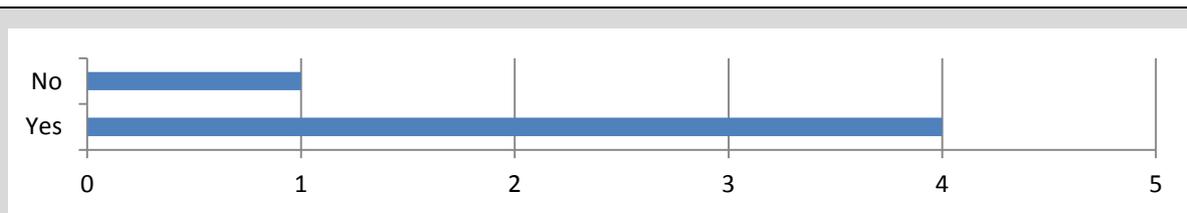
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- The majority of respondents agreed with the issues identified, proposed objectives, protected open spaces and proposed settlement boundary
- There was a division of opinion on the preferred site options, with some respondents promoting the allocation of additional housing sites

Issues Raised

Settlement issues and objectives

A number of respondents supported the proposed objective to encourage active travel links around Dulnain Bridge to Grantown-on-Spey and Carr-Bridge (050, 104, 144, 307). Dulnain Bridge Community Council also suggested that this could be widened to allow for further path links and a tourism cycle link to Broomhill (144).

Muckrach Estate (104) and the Community Council (144) agreed with the remaining settlement objectives, in particular the delivery of affordable housing.

Sites and allocations

HIE supported the preferred option sites (200), and two further respondents supported the proposed boundary revision for the HI site (040, 221).

Two responses agreed with the MIR's conclusions that the alternative site options should remain unallocated on the grounds that they would negatively impact on the natural heritage, landscape, wildlife and amenity of the village (040, 221).

However, two respondents argued that the existing housing sites (EPI and HI) would be completed soon and that additional housing sites were therefore required to provide a sufficient effective land supply in the settlement (060, 104). One suggested that the THC032 site should be allocated for housing to meet immediate and longer term housing requirements over the 10 year period of the new plan (104). The other argued that sites THC041 and THC042 should be allocated for housing as they relate well to the village and could offer an alternative form of housing as well as the opportunity to include low density housing/self build plots, whilst retaining the woodland (060).

One respondent expressed concern that EPI contains a wetland area that should be protected from development and would not be appropriate for a SUDs scheme (040).

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Other issues

The Community Council requested that Dulnain Bridge be added to all CNPA literature, maps and plans where appropriate (144).

Discussion

Settlement issues and objectives

The comments about active travel links extending from Dulnain Bridge to settlements in the wider vicinity are acknowledged. It is recommended that the wording of settlement objective 3 be amended to ensure that further active travel link options are not excluded from future consideration.

Sites and allocations

The support for the MIR's preferred options is welcomed. The comments agreeing with the MIR's conclusions in respect of the alternative (non-preferred sites) are also acknowledged.

The comments seeking allocation of sites THC032, THC041 and THC042 suggest that the existing housing allocations (EPI and HI) will be completed shortly and will therefore not contribute towards meeting housing needs during the new plan period from 2020 onwards. This argument is not supported by the latest Housing Land Audit, which anticipates that these existing housing allocations will not be completed until the latter part of the new plan period. They will therefore provide an appropriate supply of housing land for the settlement and it is maintained that sites THC032, THC041 and THC042 are not required for development. In any event, these alternative sites raise concerns in terms of landscape and ecology impacts, as outlined in the Site Assessment Report that was published alongside the MIR. They are therefore unsuitable for allocation.

The EPI site has planning permission and the principle of development on this site has therefore already been established.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Other issues

Where possible, Dulnain Bridge will be identified on relevant maps in the Proposed Plan.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report, subject to the following amendments:
 - Amend the wording of objective 3 to read: “Support proposals for safe active travel around Dulnain Bridge and beyond, including to Grantown-On-Spey and Carr-Bridge.”
 - Where possible, identify Dulnain Bridge on relevant maps and plans in the LDP

Kincraig

Respondents

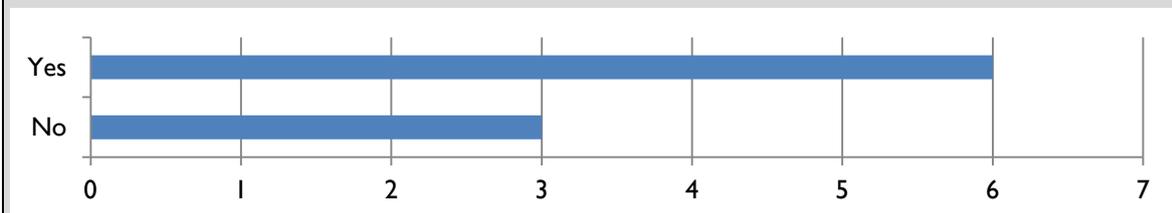
Ref	Name / Organisation
007	Scottish Water
028	E Mcalman
030	Kincraig and Vicinity Community Council
040	Badenoch and Strathspey Conservation Group
043	The Highland Council
044	SEPA
090	L Dudgeon
135	Alvie and Dalraddy Estates
191	J Knox
192	Aviemore Business Association
199	SNH
200	Highlands and Islands Enterprise

Ref	Name / Organisation
202	D Leadbetter
204	J Mackay
219	Savills on behalf of J and M Forbes Leith Partnership
228	H Brown
230	Kincraig Resident
238	G Stewart
254	MacBean Road Residents Association
258	Allan Munro Construction Ltd
325	RSPB
327	L Day
328	K Duncan
329	L Hansler Ross
330	A Newbery

Response Overview

25 people responded to questions about Kincraig and/or provided comments.

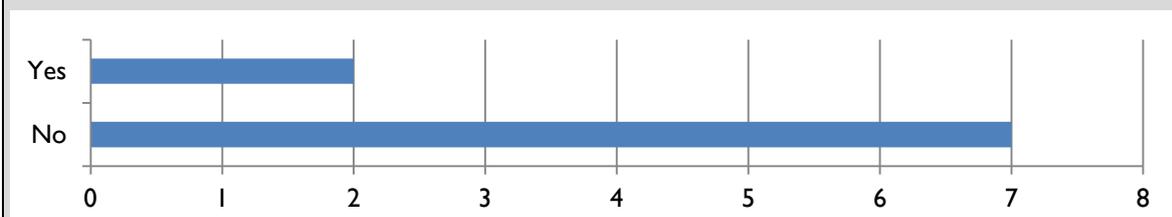
Have we identified the right issues for Kincraig?



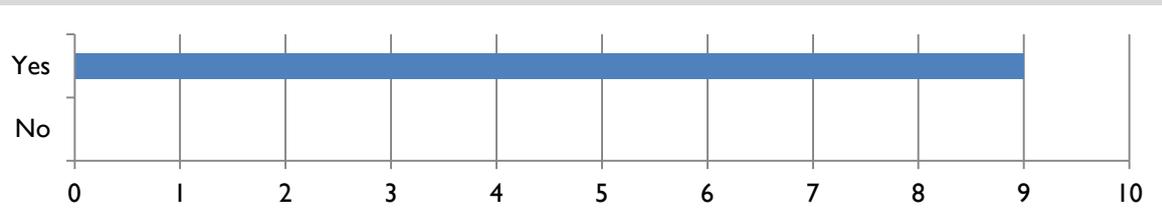
Do you agree with the proposed settlement objectives?



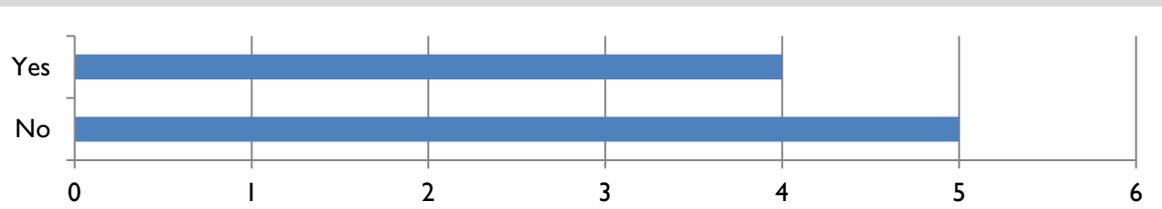
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- Support and objection expressed for preferred economic development site THC046/THC054
- Strong support for allocation of THC062 as protected open space

Issues Raised

Settlement issues and objectives

One respondent agreed with the settlement issues and objectives but highlighted that flexibility is required in planning policies to allow further development (including economic and housing) where there is local demand (219).

The need for affordable housing (including rented, shared equity, sheltered and retirement homes) was raised as an issue (090, 135). Another response stated that the village does not need any more expensive housing (330). It was also suggested that additional housing near the primary school would help to better integrate the school with the community (135).

The demand for small business units in Kincaig was questioned as most businesses in the area are located in the surrounding countryside (135).

The lack of public transport provision was raised as an issue (135). Another response highlighted the need for services and facilities, particularly if more housing is delivered (328).

One respondent was of the view that the settlement boundary should have been extended to the north and west (219).

Sites and allocations

A number of responses supported the proposed new economic development allocation on part of THC046/THC054 (200, 219, 329). One respondent stated that the site provides a logical extension to the village, is on a bus route and is not constrained (219). One response

felt that the whole of THC046/THC054 should be allocated for economic development (200).

However, others objected to the allocation of all or any part of THC046/THC054 for reasons including: its scale; impacts on natural heritage, character, landscape and amenity; and traffic safety concerns due to its proximity to the primary school (028, 040, 191, 202, 204, 228, 230, 238, 254). Some respondents stated that the site should not be allocated for development as it requires to be reinstated following its temporary use as a site compound for the A9 dualling (191, 202, 204, 228, 238). It was also argued that the preferred part of THC046/054 cannot be justified as there is already a sufficient employment land supply (mostly located in strategic settlements) which has not yet been taken up (191, 230). One response argued that the access to the site will be off the B9152 so the A9 cannot be used to justify this proposal (191). Another suggested a suitable alternative use would be for a school playground (238).

Support for the retention of existing allocation H1 was expressed (202, 254). The retention of existing allocation ED1 was also supported (202).

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Protected open spaces

A number of respondents supported the identification of THC062 – ‘The Knoll’ – as a protected open space (030, 040, 043, 199, 202, 254).

A proposal was put forward for the allocation of 3 houses on part of THC062. It was argued that: the proposal would comply with current housing policy and help provide modest sized homes; any effects on the setting, visual amenity and character of the area would be minimal; the site is not currently protected; and any impacts on core paths can be addressed (258).

Other comments

RSPB noted that developments in Kincaig could potentially impact on Capercaillie in Inshriach Forest (325).

Discussion

Settlement issues and objectives

The need for flexibility in planning policies to allow development where there is local demand is noted. Flexible policy principles apply to enable appropriate developments across the National Park. These are discussed in more detail within the policy sections of this report.

The requirement for a range of housing types to meet local needs is also acknowledged. The MIR included a settlement objective for Kincaig to ‘Support the delivery of housing to meet local needs, particularly affordable housing’ and this will be retained in the Proposed Plan.

The existing HI allocation, which will be carried forward into the Proposed Plan, is located to the immediate south of Alvie Primary School. This allocation will have the effect of extending the settlement towards the school and will meet the outcome sought by respondent 135 in terms of better integrating the school with the community. No further change is required.

The provision of services and public transport in the village cannot be directly influenced or addressed through the Local Development Plan. Opportunities to promote and encourage active travel and connections with public transport provision will be encouraged through the sustainable design policy, which will be relevant for all new development – see Main Issue 2 ‘Designing Great Places’.

The existing and proposed housing and economic development allocations will provide an appropriate supply of development land for Kincaig during the plan period. There is therefore no requirement to further extend the settlement boundary as proposed by respondent 219.

Sites and allocations

The support for and objections to the allocation of part of THC046/THC054 are noted.

For clarification, the existing consent for the use of the site as a temporary compound for the A9 dualling is not directly related to the Main Issues Report or the allocation of the site for employment use in the next Local Development Plan. This is a separate process. Under the site’s current permission, it must be reinstated. However, this does not preclude it from future development or allocation within the Local Development Plan.

Concerns in respect of impacts on landscape and natural heritage are noted. As set out in the site assessment, it is acknowledged that allocating the whole of THC046/THC054 would have significant landscape impacts. However, it is maintained that containing development to the northern part of the site will limit the likely landscape impacts to an acceptable level. In addition, any impacts in respect of natural heritage will be considered through the development management process as and when planning applications are submitted. Arguments were made that the development of the site will increase traffic near the school. However, it should be noted that The Highland Council has not objected to the proposed allocation in their capacity as local roads authority. Detailed impacts on traffic will be assessed through the development management process and, if necessary, appropriate measures will be required to ensure that safety is not compromised.

It is recognised that there is limited evidence in relation to the demand for employment land. However, it is important to ensure that there is an appropriate provision of employment land across the National Park that is not restricted to strategic settlements. The preferred part of THC046/054 provides an appropriate opportunity for modest scale economic development that can benefit Kincaig and the local economy. It is therefore considered appropriate to allocate this part of the site for economic development within the Proposed Plan.

The support for the retention of existing sites HI and EDI is welcomed.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Protected open spaces

The support for the identification of THC062 as protected open space is welcomed. The proposal to allocate a site for three houses on part of this area is not supported on the basis that THC062 makes an important contribution to the character of the settlement and that there is already an existing allocation (HI) which will provide an appropriate level of housing for Kincaig.

Other comments

The potential impacts of development on capercaillie will be assessed through the Habitats Regulations Appraisal.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives and preferred site options outlined in the Main Issues Report.

Nethy Bridge

Respondents

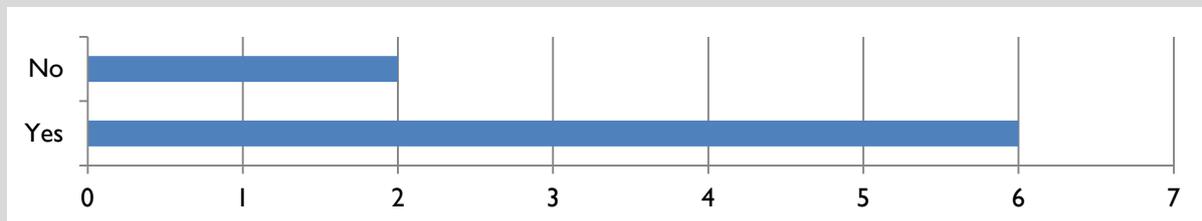
Ref	Name / Organisation
007	Scottish Water
040	Badenoch and Strathspey Conservation Group
044	Scottish Environment Protection Agency
060	Halliday Fraser Munro on behalf of Reidhaven Estate
064	Nethy Bridge and Vicinity Community Council
083	R Turnbull
143	Crofting Commission
192	Aviemore Business Association

Ref	Name / Organisation
199	Scottish Natural Heritage
200	Highlands and Islands Enterprise
221	Woodland Trust Scotland
255	Tulloch Homes Ltd
291	Anonymous
292	Munro Surveyors
298	W Paterson
302	Nethy Bridge Resident
306	Anonymous
325	RSPB Scotland

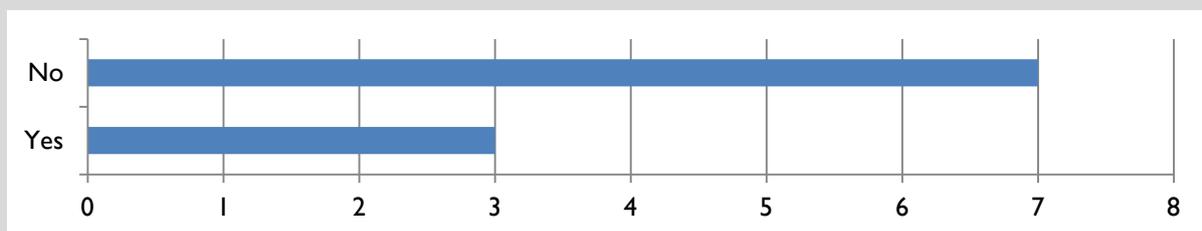
Response Overview

18 respondents answered questions about Nethy Bridge and/or provided comments.

Have we identified the right issues for Nethy Bridge?



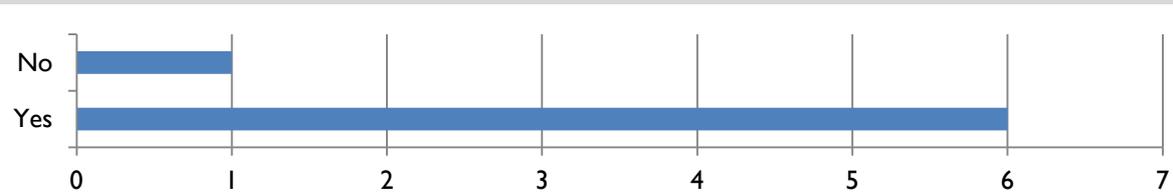
Do you agree with the proposed settlement objectives?



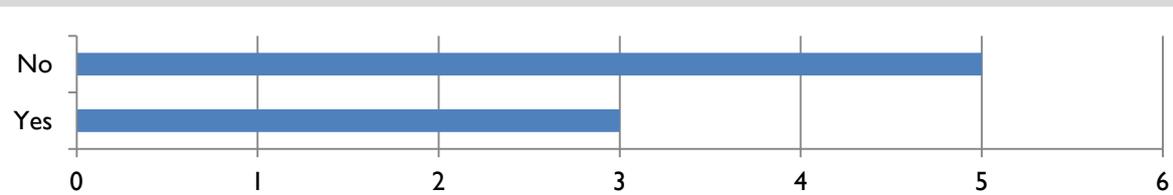
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- General agreement with preferred options and issues and objectives
- Some objection to THC002

Issues Raised

Settlement Issues and Objectives

Settlement issues were broadly agreed with but a few additional ones were suggested.

Nethy Bridge and Vicinity Community Council (064) stated that one of the main issues affecting the community is concern about flooding on the River Nethy.

Several responders questioned the need for small-scale business development (064, 302).

One response argued that past housing development has not met local needs and that without occupancy conditions it will fail to do so in the future (083). The Community Council (064) agreed that housing must meet local needs over that of holiday and tourism markets. Another respondent believed the need for new housing in smaller settlements is debatable and that Nethy Bridge does not have the infrastructure to cope with new housing (302).

Several concerns were expressed about the objectives:

- That any provision for small-scale business development must not compromise the natural and cultural heritage of the settlement (083)
- That the objective of housing that meets local needs is too vague as to what is meant by local needs (040)
- Concern that the issues and objectives could be used to help justify inappropriate housing (040)

Preferred Site Options

RSPB (325) stated that development will increase recreation in surrounding forests, including to the west and south, into Abernethy Forest SPA. They added that developments

would require to be subject to long term recreational management measures to ensure they do not adversely affect Capercaillie.

There was some objection to the choice of THC002, and indeed development in Nethy Bridge in general. The reasons for this were:

- Substantial numbers of new houses built in the village in recent years (040)
- No need as lots of planning consents across Badenoch and Strathspey (298, 302)
- Nethy Bridge has already 60% plus holiday homes (298)
- Urban sprawl needs to be avoided (302)
- There are still plots within the village that could be infilled with housing (298)
- Nethy Bridge Sewage Works does not have capacity (298)
- This site is part of an exceptionally attractive landscape (040)
- There are natural heritage features including grassland fungi (040)
- Would create a barrier for wildlife movement (298, 302)
- Would affect riverside habitat (298)
- Issues of cumulative impact (040)
- Twenty dwellings too large (083)
- Extension of the settlement boundary in that direction will encourage future expansion (083)
- Land frequently has standing water (298, 302)
- Development would allow water to swamp the gardens at 2 and 3 Lynstock Park (298, 302),
- Potential conflict with the Flood Management objective stated in the Plan (302)
- Will cause an increase in vehicle traffic on a small road which is in frequent use by walkers and cyclists (302)

Munro Surveyors (292), who represent the site owners, consider that the whole of THC002 should be allocated for around 50 houses, with around 20 affordable homes for rent and 30 private homes for sale. They argue that the proposed mix would enable the scheme financially, because there are significant infrastructure costs which apply to all housing developments, but that the site would not be viable with the MIR's preferred option of 20 houses. Highlands and Islands Enterprise (200) also argued that the whole of THC002 should be allocated, possibly with part identified for mixed uses.

The Crofting Commission (143) stated that THC002 might be crofting land. Woodland Trust Scotland (221) supported the exclusion of the wooded parts of THC002.

Deleted Sites

There was some support for the MIR's preferred option to delete the existing HI allocation (which is allocated for 15 houses in the current LDP) (040, 083, 221).

Tulloch Homes (255) argued that the HI site is capable of accommodating 25-30 units inclusive of affordable homes and having due regard to natural heritage constraints. They stated that it is their intention to progress a planning application shortly and requested that the site is not deleted in the Proposed Plan.

Nethy Bridge and Vicinity Community Council (064) felt that the site could be sympathetically developed and could provide space for a mix of housing styles to suit the local market with some plots being sold to self-builders to build their own homes.

Alternative Sites

THC005

A number of responders agreed with the MIR's conclusion that this site should not be allocated for development (040, 083, 302). One respondent pointed out that the site is currently subject to a planning application (298).

THC017

There was general agreement that THC017 should not be allocated (040, 044, 064, 083, 199, 221, 302, 325). The Crofting Commission (143) stated that the site might be crofting land.

THC 036

There was general agreement that THC036 should not be allocated (040, 083, 199, 221, 302). However, Halliday Fraser Munro on behalf of Reidhaven Estate (060) argued that it should be allocated for housing development, potentially to include self-build plots to provide housing opportunities for local people. They stated that the retention of the path could be accommodated within a low density development, and that woodland would be retained where possible.

THC037

There was general agreement that THC037 should not be allocated (040, 064, 083, 199, 221, 302). However, Halliday Fraser Munro on behalf of Reidhaven Estate (060) requested that the site be allocated to ensure a choice of housing within the settlement. They commented that Nethy Bridge requires growth to sustain local services and argued that THC037 offers a better location than preferred site THC002 for expansion of the settlement. They added that the landowner would be willing to consider a community housing initiative on this site.

THC052

There was some agreement that THC052 should not be allocated (040, 064, 083, 302). The Crofting Commission (143) stated that the site might be crofting land.

THC 060

There was some agreement that THC060 should not be allocated (040, 064, 083, 199). However, Highlands and Islands Enterprise (200) argued that the site should be an allocation in the Proposed Plan. The Crofting Commission (143) stated that the site might be crofting land.

THC063

There was some agreement that THC063 should not be allocated for the proposed use (040, 083, 199). The Crofting Commission (143) stated that the site might be crofting land.

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Protected Open Spaces

Nethy Bridge and Vicinity Community Council (064) supported the proposed Protected Open Spaces.

SNH (199) noted the reduction in the amount of protected open space proposed in the MIR compared with that in the existing 2015 LDP. They advise that it would likely be beneficial for these areas to be reinstated as protected open space (and included in the settlement boundary), to avoid inappropriate development.

Proposed Settlement Boundary

The Community Council (064) agreed with the Settlement Boundary with a few adjustments around Lettoch Road.

Two respondents objected to the proposed extension of the settlement boundary to include part of THC002 because they disagree with the principle of development on the site (083, 302).

SNH (199) asked why the proposed settlement boundary has been reduced in the MIR (this comment related to their comments on the change to Protected Open Space above).

Other Comments

One responder commented that development should be minimised to sustain the community but not expand it (306). Another argued that with 300 houses having been built over the last forty years Nethy Bridge has now reached its maximum size (083).

One respondent stated that housing in this area is out of the reach of local workers and suggested that around 60% of new houses should be council homes for reasonable rent (208).

One response noted that there is a planning permission for 5 houses at Nethy Station which is not shown in the MIR (298).

Discussion

Settlement Issues and Objectives

Concerns over flood risk are noted. Flood risk management is largely outside the scope of the LDP and is instead addressed through the Flood Risk Management Strategies and Local Flood Risk Management Plans prepared by SEPA and local authorities. However, the LDP has a role in ensuring that new development is not at risk of flooding, and flood risk issues have been taken into consideration when assessing proposed site allocations.

While no specific evidence is identified for economic development need in Nethy Bridge itself, consultation with Highlands and Islands Enterprise and the Cairngorms Business Partnership suggests that there is a need for business units and land across Badenoch and Strathspey. No specific economic development sites are identified in Nethy Bridge, however this does not mean that the CNPA would not want to support appropriately scaled and located economic development should future proposals arise. This kind of development could provide a significant benefit to the local community and it is therefore appropriate to retain the proposed settlement objective.

The notion that Nethy Bridge does not have the infrastructure to cope with a modest level of new housing development is not supported. In any event, planning obligations could be sought towards infrastructure improvements should these prove to be required as a consequence of new development proposals. More broadly, matters relating to affordable housing, second homes and occupancy conditions are covered under Main Issue 5 'The Affordability of Housing'.

It is worth noting that the proposed settlement objectives are broad statements so, by definition, lack detail. Local need is largely for smaller dwellings and affordable housing and relates to the whole of the Badenoch and Strathspey Housing Market Area.

Preferred Site Options

A number of objections were made against THC002. With reference to matters relating to the overall need for housing, these are covered under Main Issue 4 'Housing'. It is considered that the proposed 24 new dwellings over a period of ten years is a relatively modest level of growth for Nethy Bridge and will not have unacceptable adverse impacts on the natural environment.

It is recognised that the THC002 site may possess species rich grassland which has the potential to support a diverse range of plant and fungal species. However, this is not unusual in the Cairngorms National Park and does not prevent development from occurring. Mitigation is likely to be required and detailed proposals would be considered at the time of a planning application. The road network in the area is considered to be capable of accommodating the proposed development of 20 dwellings, and The Highland Council has not objected to the proposed allocation of THC002 in its capacity as local roads authority. Nethy Bridge waste water works has capacity for approximately 70 additional dwellings and is therefore able to accommodate the proposed development. Flooding and surface water issues have been considered. The preferred site boundary reflects the fact that approximately 30% of the wider THC002 site is located within the 1:200 flood plain. While the site owners argue that the allocation should be expanded to cover their full submission, with the housing level being increased to 50 dwellings, this constraint makes delivery unlikely. It is also maintained that 50 units would have a high impact on the landscape value of the area. It is therefore considered appropriate to retain the proposed allocation for 20 dwellings, restricted to the northern part of the site only. With appropriate screening, this could also help to soften the existing settlement edge.

While Tulloch homes express their intention to deliver H1, it is maintained that this site is not the most appropriate development option in Nethy Bridge and that there are reasonable grounds to remove it from the Proposed Plan. The site could be progressed under the current LDP if an application were to be submitted in the meantime.

The general support for the MIR's conclusions in respect of the alternative (non-preferred) site options is welcomed. Although there were some calls for THC036, THC037 and THC060 to be allocated for development, it is maintained that these sites are unsuitable for allocation for the reasons set out in the Site Assessment Report that was published alongside the MIR. Moreover, it is not considered that additional housing sites are necessary given the generous land supply already available in the National Park (see Main Issue 4 'Housing'). The 24 new housing units already proposed on preferred sites THC002 and THC003 will provide a sufficient level of growth for Nethy Bridge over the plan period.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Protected Open Spaces and Proposed Settlement Boundary

The purpose of the settlement boundary is to delineate between areas where LDP policies are generally more permissive of development (within the settlement boundary) and areas where more restrictive policies apply (outwith the settlement boundary). The MIR's proposed modifications to the settlement boundary and protected open spaces in Nethy Bridge were made in conjunction with one another. It was considered that the existing protected open space on the south eastern edge of the settlement (as defined in the current LDP) was unnecessary because it does not serve any formal recreation purpose and protection from inappropriate development could be more appropriately achieved by simply excluding this area from the settlement boundary. It is therefore not necessary to reinstate this protected open space designation to achieve the outcomes sought by SNH.

Other Comments

The remaining general comments about the overall level of development proposed for Nethy Bridge, the capacity of the settlement to absorb additional development, and the need for affordable housing have already been addressed in the settlement issues and objectives section above.

The LDP is not required to show all existing planning consents so no further change is required in response to the comments about the potential existence of a planning permission at Nethy Station.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report

Tomintoul

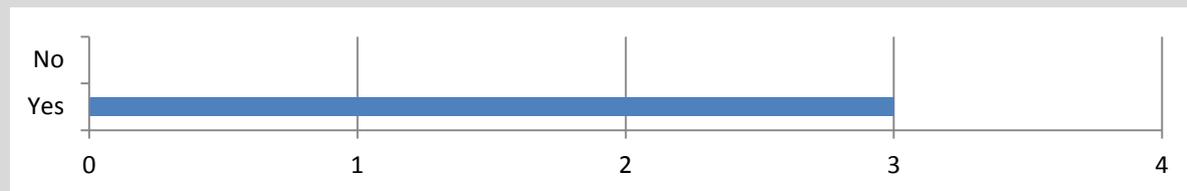
Respondents

Ref	Name/Organisation
007	Scottish Water
044	Scottish Environment Protection Agency (SEPA)
199	Scottish Natural Heritage (SNH)
200	Highlands and Islands Enterprise (HIE)
203	Savills on behalf of Crown Estate Scotland
227	Moray Council
325	RSPB

Response Overview

7 respondents answered questions about Tomintoul and/or provided comments.

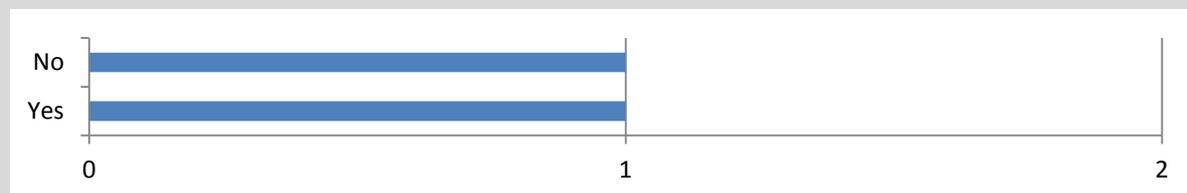
Have we identified the right issues for Tomintoul?



Do you agree with the proposed settlement objectives?



Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- Majority of respondents agreed with the issues identified, the proposed settlement objectives, the protected open spaces and the proposed settlement boundary
- Some concern about the shortfall of housing allocations against the housing land requirement
- Request for the existing ED3 allocation to be removed
- Request for the existing T1 site allocation to be retained

Issues Raised

Settlement Issues and Objectives

The Crown Estate Scotland (CES) supported the proposed objective to encourage development that supports the community and local economy. They also agreed with the current allocations but wished to see flexibility to enable the development of alternative sites should proposals arise through a collaborative community planning process (203).

Moray Council agreed with the proposed settlement objectives and protected open spaces. However, they suggested there may be a need to identify additional housing land allocations in order to fully meet the housing land requirement for the Moray part of the Park (227).

Sites and Allocations

HIE supported the preferred site options (200). SNH did not wish to make any specific comments on the preferred sites as the principle of development has already been established for them within the current LDP (199).

CES supported the H1 and H2 allocations (203). RSPB highlighted that the land adjacent to H1 and H2 is important for breeding waders and noted that the development of these sites will require careful planning to avoid detrimental impacts on these birds (325).

Moray Council and CES expressed concern about the proposed removal of the existing T1 allocation. They felt the removal of this allocation would conflict with the proposed objective of 'supporting the community and local economy' (203, 227).

RSPB expressed concern about the existing ED3 allocation. They noted that Heritage Lottery Funding was recently received to establish the site as a wild flower meadow and install a bird hide to view breeding waders in the surrounding area. They argued that the development of the site could compromise the outcomes of the Tomintoul and Glenlivet Landscape Partnership project and significantly reduce the biodiversity of the area (325).

SEPA and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044).

Discussion

Settlement Issues and Objectives

The support for the settlement objectives is welcomed.

In response to the comments about the need for additional/alternative housing sites, it should be noted although demand for housing in Tomintoul is relatively limited there is scope for further infill development on sites within the settlement boundary (for example on land to the rear of Cults Drive). Policies in the existing LDP provide support in principle for development on such sites, and these policies will be carried forward into the Proposed Plan. Existing LDP policies also provide support in principle for small-scale housing development on appropriate sites outside settlements. Again, these policies will be carried forward into the Proposed Plan. This approach provides a level of flexibility and will ensure that the housing land requirement for the Moray part of the Park is met through a combination of site allocations and unallocated 'windfall' developments.

Sites and Allocations

The concerns about the potential impact of H1 and H2 on breeding waders can be addressed through the development management process as and when detailed planning applications are submitted for these sites.

The comments seeking the retention of the existing T1 site are acknowledged. It is agreed that the Proposed Plan should retain the T1 site, with the site boundary being redrawn to reflect the recent wigwam development – see Annex I.

The argument for the deletion of the existing ED3 allocation is also noted. Given the current use of the ED3 site, and taking into account the availability of other economic development land allocations within the settlement, it is considered reasonable to delete the ED3 allocation in the Proposed Plan.

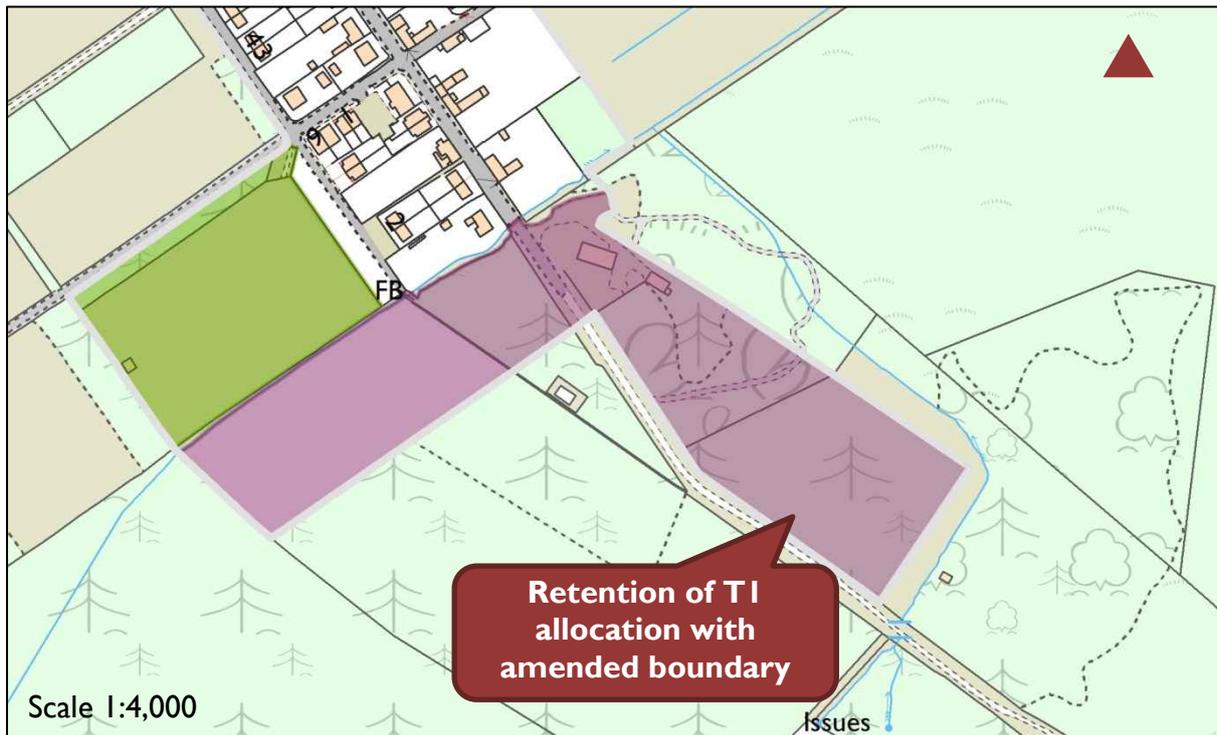
The technical details and further information provided by SEPA and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report, subject to the following amendments:
 - Retain site T1 as an allocation for tourism development, with the boundary being redrawn to reflect the recent wigwam development
 - Delete site ED3

Annex I



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Angus Glens

Respondents

Ref	Name / Organisation
053	Inveresk Community Council

Response Overview

One respondent provided comments about the Angus Glens.

Key points

- Agreement with the proposed objectives
- Suggestion that Glen Esk should be referenced

Issues Raised

Settlement objectives

Inveresk Community Council (053) noted that Glen Esk seems to have been forgotten. They argue that it is just as significant an Angus Glen as Glen Clova, though only the top part of it and its tributary glen, Glen Mark, lie within the National Park. They commented that considerations such as infrastructure associated with public access (car parking etc), nature conservation and land management generally are important to the area.

Discussion

Settlement objectives

Inveresk Community Council's comments are welcomed. It is agreed that there is merit in referencing Glen Esk and the other Angus Glens in the settlement statement. The remaining considerations for the area are noted, and these issues will continue to be addressed by other policies in the LDP.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives outlined in the Main Issues Report
- Make reference to all the Angus Glens within the settlement statement

Bruar and Pitagowan

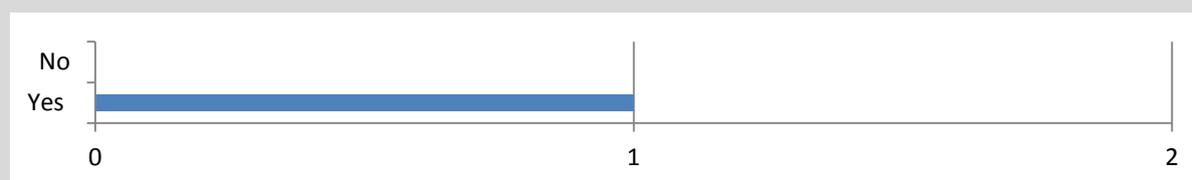
Respondents

Ref	Name/Organisation
004	X McDade
047	Ristol Consulting on behalf of House of Bruar
277	Perth and Kinross Council
281	Tactran
325	RSPB

Response Overview

5 people/organisations responded to questions about Bruar and Pitagowan and/or provided comments.

Do you agree with the proposed objectives?



Key points

- No respondents disagreed with the proposed objectives.
- Concern raised for the impact of The House of Bruar on neighbouring communities.

Issues Raised

One respondent raised concern about the lack of affordable housing to help support the staffing of House of Bruar. They suggested that locating housing sites in neighbouring settlements such as Blair Atholl and Calvine and implementing improved travel links to Bruar would help address this issue (004).

The House of Bruar (047) suggested the site should be allocated as a key employment/economic development site. They argued that this would align with the overarching development strategy and would support the company's resilience plans in response to the A9 dualling project.

However, Perth and Kinross Council (227) felt the House of Bruar development has exceeded its original purpose to serve passing trade. They suggested it has become a destination in its on right and so any further development should give consideration to the impact on nearby communities.

Tactran supported the proposed objectives and felt CNPA should give consideration to the impacts and opportunities of the A9 dualling project for Bruar and Pitagowan (281).

RSPB (325) highlighted the issue of increased tourism and irresponsible recreation in the woodland around Bruar and the urged the CNPA to ensure capercaillie conservation is advocated.

Discussion

Whilst the concern about the lack of affordable housing is noted, the proposed objectives support the delivery of small scale, organic growth within Bruar and Pitagowan. This would enable small-scale housing development to take place during the plan period. The same provisions also apply in Calvine. Blair Atholl also contains two new proposed housing allocations. Taken together, these measures are expected to address local housing need and will help to provide housing for the staff of local employers such as House of Bruar. The suggestion for improved travel links between these settlements is noted, and although transport issues are largely outside the influence of the Local Development Plan, this could be included as an additional settlement objective in the Proposed Plan.

In response to the allocation request from House of Bruar, the economic development of the site is already supported in the proposed settlement objectives. It would also be supported in principle under policy 2 (Supporting Economic Growth) of the current Local Development Plan, which is proposed to be carried forward into the Proposed Plan. It is therefore not felt that an allocation is appropriate, particularly in light of the comments from Perth and Kinross Council.

The support from Tactran is welcomed.

RSPB's comment regarding capercaillie conservation is noted. This issue will be addressed through other policies in the Proposed Plan (see Main Issue 7 'Impacts on Natura Designations' for more detail).

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives outlined in the Main Issues Report, subject to the following amendments:
 - Include an additional objective to read "Support proposals for safe active travel around the village and to surrounding settlements"

Calvine

Respondents

Ref	Name / Organisation
004	X McDade, Ward Councillor (Highland Perthshire), Perth & Kinross Council
281	Tactran

Response Overview

2 respondents provided comments about Calvine.

Key points

- New sites suggested at Struan Primary School, land north of Struan Primary School and Old Calvine Garage.

Issues Raised

Tactran (281) supported the proposed objectives. They noted that the impacts and opportunities of the A9 dualling project for Calvine are likely to be from the proposed grade separated junction at Bruar, with the existing A9 junction stopped up.

One respondent (004) suggested that there should be an active travel link between Calvine and Bruar. They also commented that Calvine has potential for development and proposed the following three sites for allocation:

- *Struan Primary School*
It was argued that the former school site is owned by Perth & Kinross Council and is an ideal site for around 6 affordable houses as it would be eligible for Scottish Government grant funding.
- *Land North of Struan Primary School*
It was suggested that this site could provide both affordable and market housing.
- *Old Calvine Garage*
It was suggested that there would be strong support locally to see this site brought back into use, but as it is unlikely that any business will begin trading on this site again its best contribution to the community would be for housing.

If housing allocations are made in Calvine then it was also suggested that a recycling point and play area for children should be included in the settlement's objectives.

Discussion

The support for the proposed objectives is welcomed.

It is recognised that active travel routes are important means of promoting connectivity and encouraging active lifestyles. The LDP does not contain any specific proposals, but would encourage the development of such infrastructure in principle. It is therefore recommended that the following objective be added to the settlement statement: “*Support proposals for safe active travel around the village and to surrounding settlements.*”

It is also agreed that the former Struan Primary School site provides an appropriate redevelopment opportunity which could incorporate affordable housing. Subject to appropriate site assessments, it is recommended that the site be included in the Proposed Plan as a community allocation, in which affordable housing is listed as one of the potential uses that could deliver significant community benefits (see Annex I for site location). However, it is not considered that the additional land to the north is needed during this plan period.

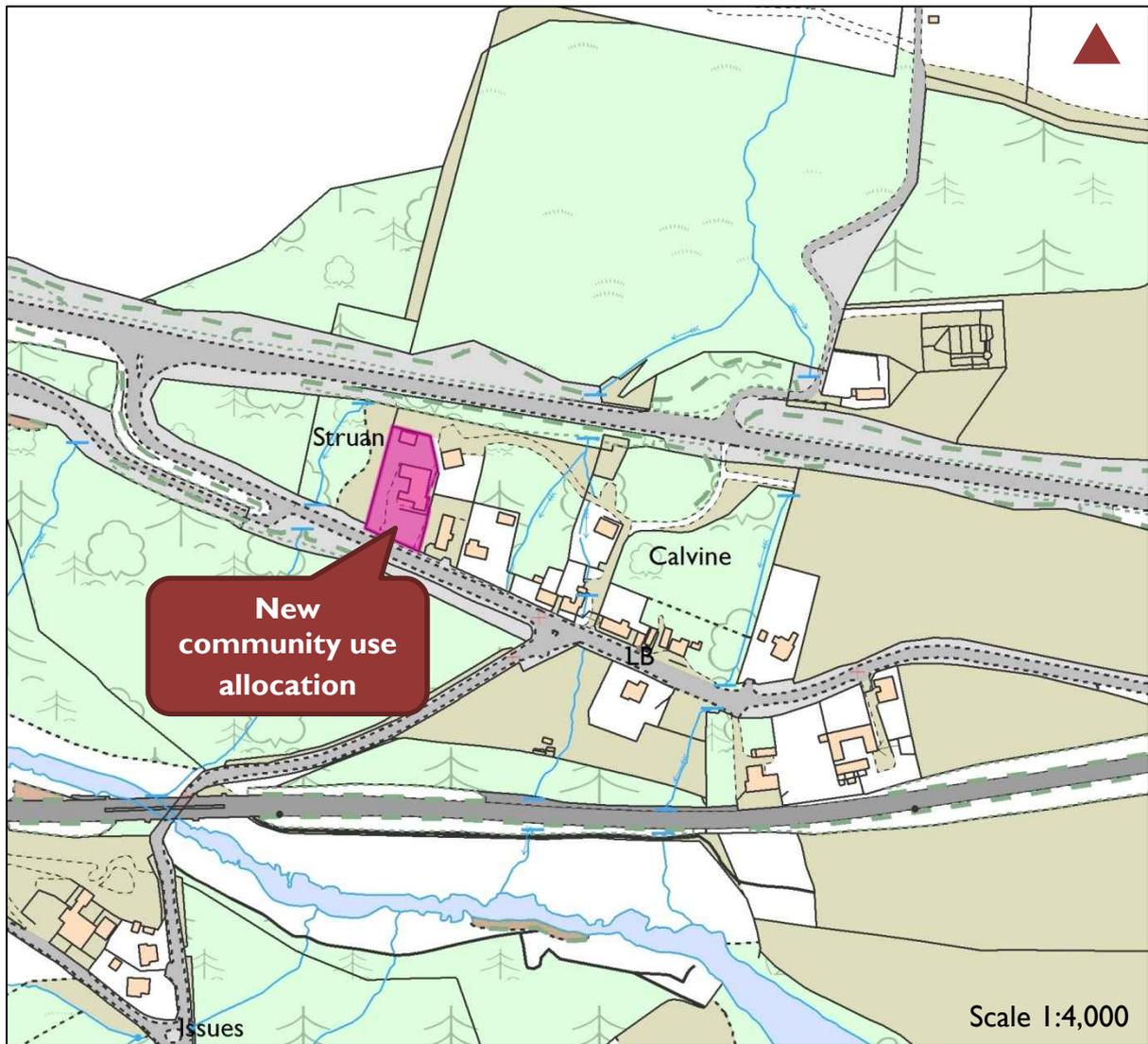
Whilst the comments in relation to the former Calvine Garage are noted, it is not considered that this site requires an allocation within the Proposed Plan. Any specific development proposals for its redevelopment are likely to be best progressed through the submission of a planning application, which would be assessed against relevant policies in the LDP.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives outlined in the Main Issues Report, subject to the following amendments:
 - Include an additional objective to read “Support proposals for safe active travel around the village and to surrounding settlements”
 - Subject to site assessments, allocate the former Struan Primary School site for community uses

Annex I



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Dalwhinnie

Respondents

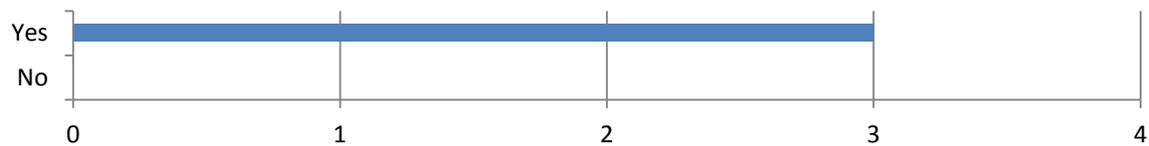
Ref	Name / Organisation
007	Scottish Water
008	Galbraith on behalf of Ardverikie Estate
010	Galbraith on behalf of Mr Dawson
044	Scottish Environment Protection Agency
199	Scottish Natural Heritage

Ref	Name / Organisation
200	Highlands and Islands Enterprise
271	Dalwhinnie Community Council
273	D Munday
279	North East Mountain Trust
325	RSPB

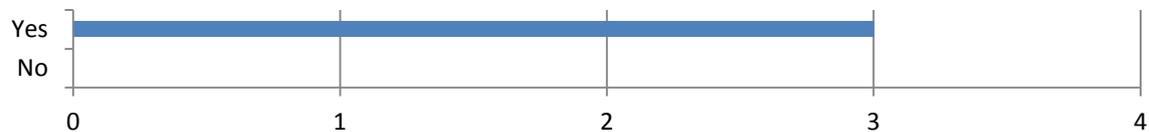
Response Overview

10 respondents answered questions about Dalwhinnie and/or provided comments.

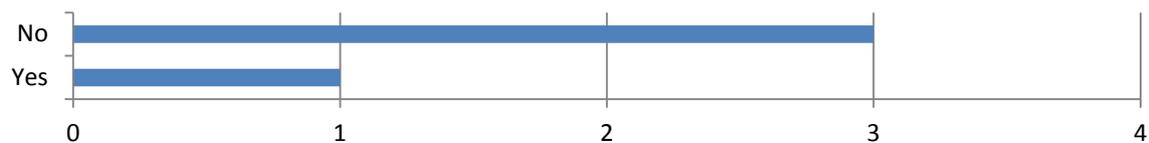
Have we identified the right issues for Dalwhinnie?



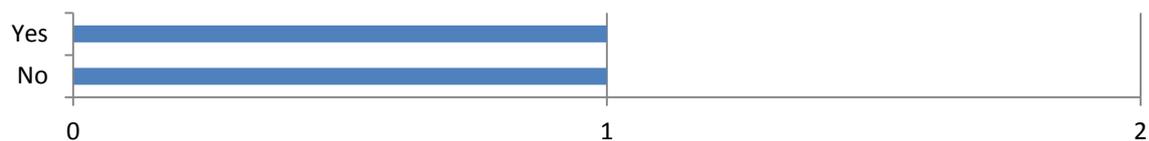
Do you agree with the proposed settlement objectives?



Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Key points

- Flooding a major constraint in the village
- Review of preferred site THC016 required due to flood risk
- Settlement boundary broad which supports a more organic approach to growth in the village.

Issues Raised

Sites and allocations

One respondent argued that THC015 should be allocated for housing development as there is a need to maintain an appropriate supply of housing land in Dalwhinnie. They noted that there is a risk of fluvial flooding and expressed a willingness to work with SEPA to address this issue (008). However, another respondent was of the view that THC015 is subject to flooding and supported the MIR's conclusion that it should not be developed (271).

Two responses supported the identification of THC016 as a preferred site for economic development (010, 200). The site promoter acknowledged that there are flood concerns on the site and stated that they would be willing to work with SEPA to address these issues (010). However, one respondent objected to the allocation of THC016 due to flood risk (271). SEPA also expressed concern about flooding and stated they would object to the allocation of THC016 in the Proposed Plan in the absence of further information to demonstrate that flood risk does not affect the principle of development (044).

One response agreed with the MIR's conclusion that THC056 should not be a preferred site. They were of the view that brownfield sites in Dalwhinnie should be used before allocating other sites such as THC056 (279).

Two respondents agreed with the MIR's conclusion that HI should be deleted from the Proposed Plan. One stated that it is at risk from flooding (271) and the other commented that there have been failures to comply with previous planning conditions (273).

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Protected open spaces

SNH and others queried the removal of an area of greenspace within Dalwhinnie and the amended settlement boundary. They felt that this area (which includes THC056) should be reinstated as protected open space and included within the settlement boundary to avoid any inappropriate development (199, 271, 273). An alternative suggestion was to divide Dalwhinnie into three separate areas (273).

Other comments

It was noted that an existing planning permission for homes on Station Road is not shown in the MIR (273).

RSPB highlighted the potential for development in Dalwhinnie to impact on the River Spey Special Area of Conservation (SAC) and Drummochter Hills Special Protection Area (SPA) (325).

Discussion

Sites and allocations

The support for the MIR's conclusion that THC015 is not appropriate for development is welcomed. Whilst it is acknowledged that maintaining an appropriate level of housing land in Dalwhinnie is important, flooding is a significant constraint on THC015 and in the absence of any further flood risk assessment it is not considered appropriate for allocation. There is an existing allocation at H2 for 6 houses and it should be noted that THC015 remains within the settlement boundary so could be progressed as a potential infill development should the flood risk issues be satisfactorily addressed.

The support for and objection to the allocation of THC016 for economic development is noted. Although this site was identified as a preferred option in the MIR, it is acknowledged that flood risk issues are likely to pose a significant constraint to its development. In light of the comments from SEPA, it is not considered appropriate to allocate this site in the Proposed Plan in the absence of further information to demonstrate that flood risk does not affect the principle of development. However, as highlighted for THC015 above, the site will continue to lie within the settlement boundary and could therefore still be progressed as a windfall development should the flood risk issues be satisfactorily addressed.

The support for the MIR's conclusions in respect of H1 and THC056 is noted. These sites will not be allocated for development in the Proposed Plan.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Protected open spaces

The purpose of the settlement boundary is to delineate between areas where LDP policies are generally more permissive of development (within the settlement boundary) and areas where more restrictive policies apply (outwith the settlement boundary). Contrary to the assertions of SNH, the undeveloped area of greenspace between Station Road and the Distillery is not identified as protected open space within the current LDP. It is unnecessary to identify this area as a new protected open space because it does not serve any formal recreation purpose and protection from inappropriate development can be more appropriately achieved by simply excluding this area from the settlement boundary (as proposed in the MIR).

Other comments

It was stated that an existing planning permission for housing development on Station Road is not included in the settlement statement. This is a historical permission that does not appear to have been implemented and has therefore lapsed. Any future proposals on the site would be required to obtain planning permission.

The comments from RSPB are noted and the impacts of any proposals will be assessed through the Habitats Regulations Appraisal process for the Proposed Plan.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives and preferred site options outlined in the Main Issues Report, subject to the following amendments:
 - Do not carry forward preferred site THC016 unless additional flood risk information is provided to demonstrate that the site is suitable in principle for economic development

Dinnet

Respondents

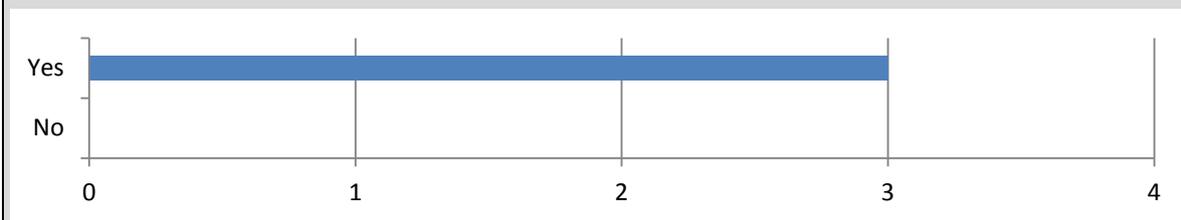
Ref	Name / Organisation
007	Scottish Water
038	Galbraith on behalf of Dinnet & Kinord Estate
044	Scottish Environment Protection Agency
089	Cromar Community Council

Ref	Name / Organisation
199	Scottish Natural Heritage
218	NHS Grampian
221	Woodland Trust Scotland
306	Anonymous
325	RSPB

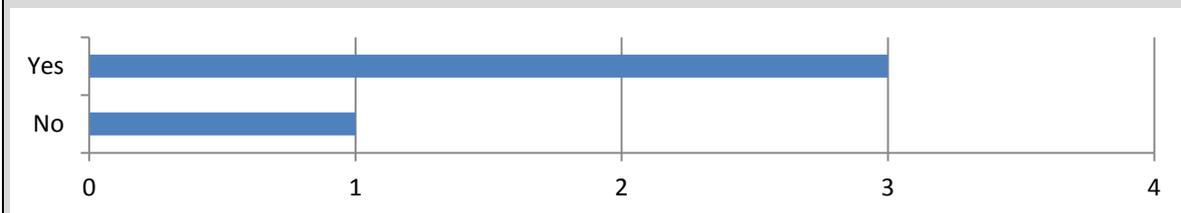
Response Overview

9 people responded to questions about Dinnet and/or provided comments.

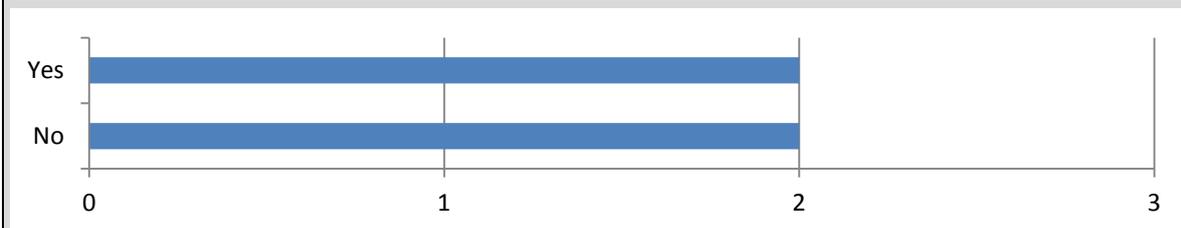
Have we identified the right issues for Dinnet?



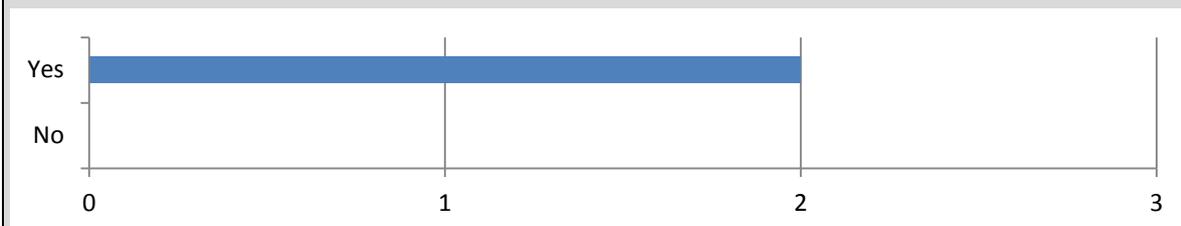
Do you agree with the proposed settlement objectives?



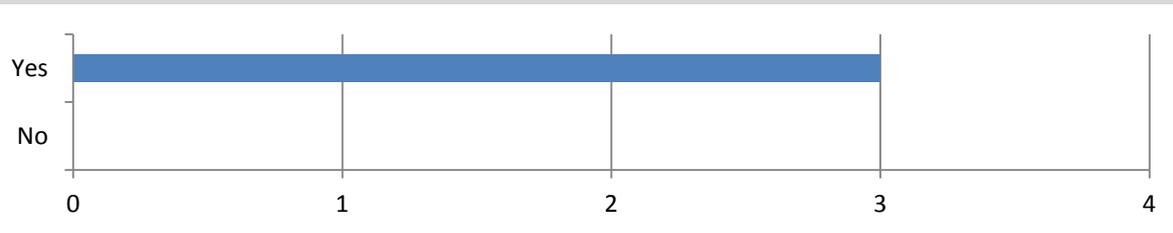
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- General support for the settlement objectives and preferred sites, although mixed views about the need for additional site allocations

Issues Raised

Settlement issues and objectives

One respondent was keen that families are attracted to live in Dinnet to support the local school in Logie Coldstone (089).

Another respondent felt that development should be kept to a minimum to protect important habitats (306).

Sites and allocations

Support was expressed for the MIR's proposal to allocate AB015 for economic development (038). Another respondent requested specific requirements for the retention of as many native trees on the site as possible (221).

Support was also expressed for the retention of the existing H2 allocation for 15 houses (038). Again, another respondent requested specific requirements for the retention of as many native trees as possible (221).

One respondent agreed with the MIR's proposal to delete the existing H1 allocation in the Proposed Plan (221). However another argued that H1 should be retained as an allocation for 3 houses. They made the case that further detailed work has been done which has established that 3 houses could be delivered on the site (038).

One respondent stated that non-preferred site AB011 should be allocated for 5 houses – potentially for self-build plots. They argued that allocating the site would help to bring a brownfield site back into use, that the scale of the proposal is appropriate, and that the focus of development would be in the cleared area where there are existing buildings (038). However, another respondent agreed with the MIR's conclusion that the site should not be a preferred option for development (221).

It was also suggested that non-preferred site AB013 should be allocated for housing. It was argued that the proposal would provide a mix of housing types to meet local needs and would be delivered in phases to provide long-term certainty for housing land supply (038).

However, another respondent agreed with the MIR's conclusion that the site should not be a preferred option for development (221).

It was requested that non-preferred site AB014 be included as an allocation for economic development. It was argued that there is a pressing need for flexible business space in the Upper Dee Valley, that there is existing interest in the site, and that the site provides a logical addition to the settlement (038). However, another respondent again agreed with the MIR's conclusion that the site should not be allocated for development (221).

A case was put forward that AB016 should be allocated for tourism uses which the owner is keen to progress. It was argued that the site would connect well to the existing settlement if allocated along with AB013, that the proposal would not require significant tree felling, and that the existing access and tracks could be utilised (038). However, another respondent felt that the site was not appropriate for development (221).

SEPA, SNH and Scottish Water provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (007, 044, 199).

Protected open spaces

SNH queried the removal of two areas of greenspace in Dinnet and suggested that they should be reinstated as protected open space to avoid any inappropriate development (199).

Other comments

NHS Grampian expressed general support for settlement objectives but noted that Aboyne Health Centre is currently working at capacity (218). Another respondent highlighted that public transport should be improved (306). RSPB highlighted the potential for development in Dinnet to impact on woodland nearby which is home to capercaillie (325).

Discussion

Settlement issues and objectives

It was raised that there is a need to attract families to the area to support the local school. The MIR included a proposed settlement objective to 'support the delivery of housing that meets local needs, particularly affordable housing'. There is also an existing allocation for 15 houses (H2) and a proposed new allocation for economic development (AB015) within the settlement. These measures will provide for a suitable level of development during the plan period, which should help to support local services including the school.

Sites and allocations

The support for the allocation of AB015 and the retention of H2 is noted. The request for the retention of as many native trees on these sites as possible is noted. This issue will be addressed through the development management process as and when detailed planning applications are submitted for these sites.

The request to retain HI as an allocation for 3 houses is noted. Whilst it was argued that the site can accommodate 3 units, the topography constraints of the site remain as set out in the Site Assessment Report which was published alongside the MIR. It is unclear whether reducing the number of units is likely to significantly increase the likelihood of delivery. Further information demonstrating the deliverability of the site would be required for it to be retained as an allocation. In the absence of this, it is maintained that the HI allocation should be deleted in the Proposed Plan.

Whilst one response sought the allocation of AB011, it is maintained that this is not necessary. There is an existing housing allocation in Dinnet which is still considered appropriate to meet local needs and an additional site is not required. The smaller brownfield part of AB011 could potentially be progressed under the existing LDP policies without the need for a specific allocation in the new plan.

The case was also put forward that AB013 should be allocated for housing. Whilst it was argued that the site would provide housing land over a longer period, again it is not considered that this scale of housing is appropriate or required in Dinnet. It is maintained that this site is not appropriate for allocation for the reasons set out in the Site Assessment Report.

It was also requested that AB014 be allocated for economic development. Whilst it was expressed that there is a pressing need for employment sites, there is a proposed new employment site (AB015) for Dinnet which is considered more appropriate. It should also be noted that AB014 is an existing operational site. Further business development / redevelopment could therefore potentially be pursued under existing LDP policies without the requirement for an allocation in the new plan.

For the reasons set out in the Site Assessment Report, AB016 is not considered appropriate for allocation as a tourism site. The location of the site, particularly without the allocation of AB013, is disconnected from the rest of the village and its development would raise significant ecological concerns.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Protected open spaces

Contrary to the comments from SNH, the MIR did not propose to make any changes to protected open spaces in Dinnet. The two existing protected open spaces in the centre of the settlement will be retained in the Proposed Plan.

Other comments

In respect of healthcare, CNPA will continue to work with NHS Grampian to ensure that the LDP makes appropriate provision for contributions towards healthcare in Dinnet and other relevant settlements (see Main Issue 8 'Planning Obligations' for more background information). Any specific requirements for Dinnet will be identified in the Proposed Plan so that appropriate planning obligations can be sought towards them.

Whilst the concerns about public transport are understood, the LDP has limited influence over this issue. This matter would be more appropriately addressed by the regional transport body.

The comments from RSPB are noted and the impacts of any proposals will be assessed through the Habitats Regulations Appraisal process for the Proposed Plan.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives and preferred site options outlined in the Main Issues Report

Glenlivet

Respondents

Ref	Name/Organisation
203	Savills on Behalf of Crown Estate Scotland (CES)

Response Overview

One respondent provided general comments for Glenlivet.

Do you agree with the proposed settlement objectives?

No respondents specifically answered this question.

Key points

- Request that the LDP incorporates flexibility to enable affordable housing and community led housing developments

Issues Raised

The Crown Estate Scotland offered their general support for the proposed objectives and stated that they would like to explore an affordable housing project for Glenlivet. They suggested there should be a level of flexibility built into the plan to allow scope for such development, subject to a collaborative community planning process (203).

Discussion

The support for the proposed objectives is welcomed. Policies in the existing LDP already provide a flexible approach to small-scale housing proposals outside settlements, especially where these would deliver affordable housing. These policies will be carried forward into the Proposed Plan and this would provide support in principle for appropriate affordable housing and community-led housing developments.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives outlined in the Main Issues Report.

Glenmore

Respondents

Ref	Name / Organisation
040	Badenoch and Strathspey Conservation Group
044	SEPA
192	Aviemore Business Association

Ref	Name / Organisation
199	SNH
221	Woodland Trust Scotland
269	Aviemore Resident
325	RSPB

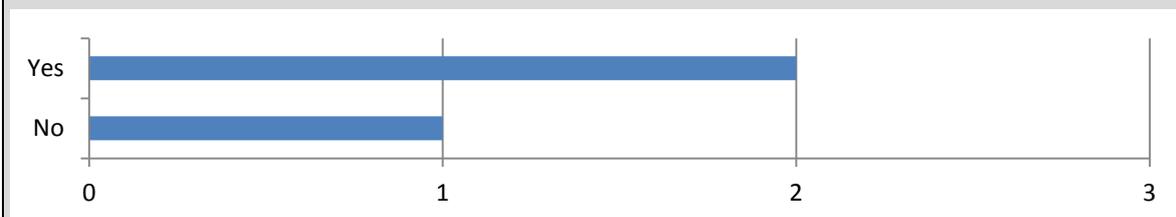
Response Overview

7 people responded to questions about Glenmore and/or provided comments.

Do you agree with the proposed settlement objectives?



Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- Some concern expressed over potential for visitors to impact on surrounding woodland and protected sites

Issues Raised

Settlement issues and objectives

One response expressed concern that there is too much activity at Glenmore which is negatively impacting on visitor experience (040) and another stated that the settlement objectives should not support further economic and tourism development (221).

It was also requested that the settlement objectives should include the protection and enhancement of the ancient semi-natural and native woodland in the area (221).

Sites and allocations

One respondent felt that the T1 site is not appropriate for development as it contains ancient woodland. They therefore requested that the allocation be deleted. The same respondent also noted that the T2 site is surrounded by native woodland and is close to ancient woodland. They requested that the site boundaries should therefore not be expanded (221).

RSPB highlighted that there are sensitive areas for capercaillie surrounding T1 and T2, however there is good opportunity here to inform people of responsible recreation. They stated that any future development will require careful assessment and should adhere to Glenmore and Cairngorm Strategy (325).

SEPA and SNH provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (044, 199).

Discussion

Settlement issues and objectives

Glenmore is a strategically important tourist destination within the National Park and the proposed settlement objectives seek to ensure that visitor experience at Glenmore is enhanced. The need to protect and enhance the surrounding woodland is noted, however the protection of woodland is achieved through specific policies in the LDP and it is therefore unnecessary to repeat this as a settlement objective.

Sites and allocations

The comments relating to T1 are noted, however this is an established business and it is therefore appropriate to retain the allocation. The MIR did not propose to expand the boundaries of T2 so no change is required in response to the comment on this issue.

The comments from RSPB are noted and the impacts of any proposals on capercaillie will be assessed through the Habitats Regulations Appraisal process for the Proposed Plan.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report

Glenshee

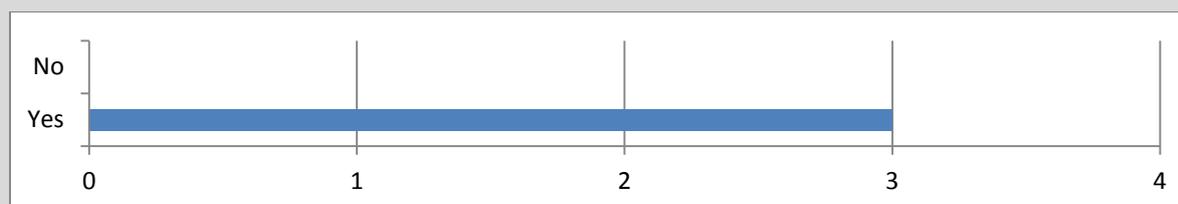
Respondents

Ref	Name/Organisation
007	Scottish Water
012	Mount Blair Community Council
044	Scottish Environment Protection Agency (SEPA)
199	Scottish Natural Heritage (SNH)
281	Tactran
306	Anonymous
325	RSPB

Response Overview

7 people responded to questions about Glenshee and provided comments.

Do you agree with the proposed objectives?



Key points

- General support for the proposed objectives

Issues Raised

The Mount Blair Community Development Trust supported the proposed objectives (012).

Tactran also supported the proposed objectives and encouraged CNPA to consider the impact of the Snow Roads project on the area. For example, increased tourism provides economic benefits, however consideration should be given to road infrastructure and supporting infrastructure such as provision for mobile home accommodation with electric vehicle charging (281).

RSPB agreed with the MIR's conclusion that sites PHC008, PKC009 and PKC010 should not be allocated for development because of their potential impact on native bird populations (325). Another respondent agreed that development in the area should be kept to a minimum (306).

SEPA, SNH and Scottish Water provided technical details and further information about the site options to be taken into account during the production of the Proposed Plan (007, 044, 199).

Discussion

The support for the proposed objectives is welcomed. Tactran's comments regarding the impacts of the Snow Roads project are noted, although these issues fall largely outside the scope of the LDP. Any specific future development proposals, including for mobile home accommodation, could be considered through the development management process and assessed against the relevant policies of the LDP.

The comments agreeing with the MIR's conclusions in respect of the alternative (non-preferred sites) are acknowledged.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives outlined in the Main Issues Report

Insh

Respondents

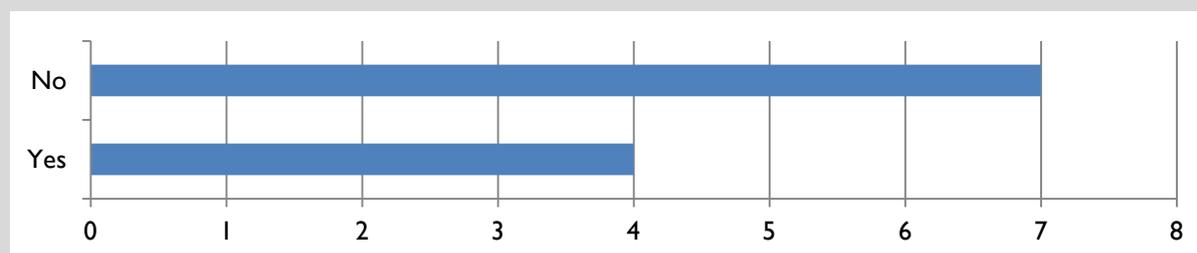
Ref	Name / Organisation
026	R Green
027	C Anderson
029	W Anderson
042	B Murdoch
044	Scottish Environment Protection Agency
057	Spey Building and Joinery Ltd.
062	Mr & Mrs C Burden
068	C Richardson
069	J Gibbons
090	Kingussie and Vicinity Community Council
105	S Bunyan
109	H Bunyan
127	R Purcell
145	N Johnston
175	Mr J and Mrs J Cushing
193	B Russel
199	Scottish Natural Heritage

Ref	Name / Organisation
200	Highlands and Islands Enterprise
220	M Kinsella
249	C Winter
251	S Dickie
253	Anonymous
259	K Toynbee
260	H Quick
266	A Mitchell
270	Insh Resident
287	D Carr
288	Mr and Mrs Buckingham
295	G Adams
297	P Staniforth
299	R and H Swan
309	Insh Resident
310	Anonymous

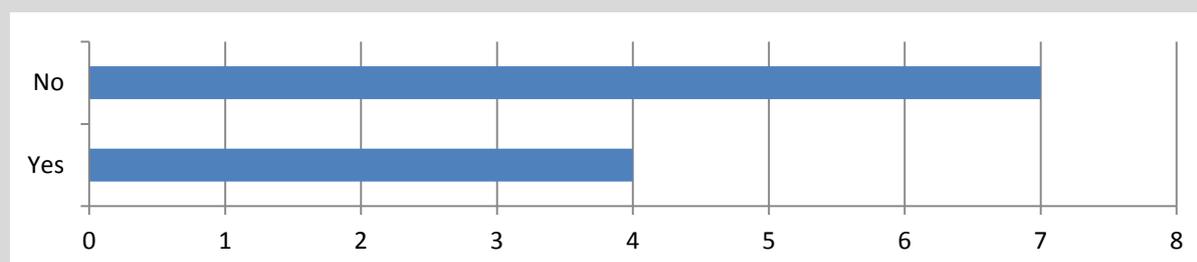
Response Overview

33 respondents answered questions about Insh and/or provided comments.

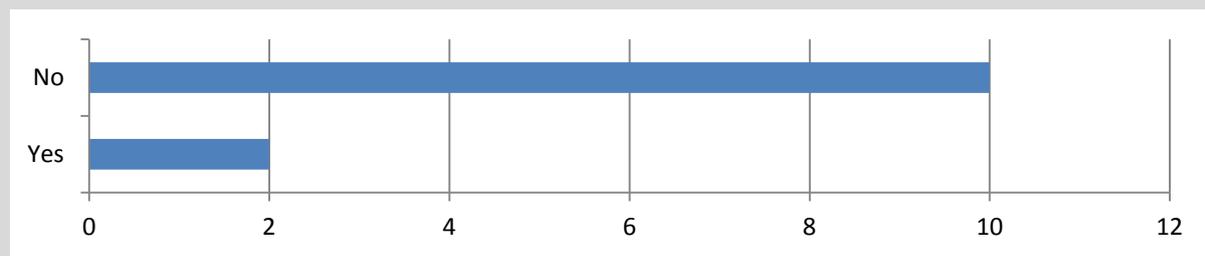
Do you agree with the proposed settlement objectives?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- Support for the inclusion of THC001 and land west of Insh Schoolhouse in Settlement Boundary
- Confusion about how and why Protected Open Space has been identified

Issues Raised

Settlement Issues and Objectives

Several responders were unhappy with the settlement objectives. Reasons included:

- It was asked what the outdoor leisure facilities in Insh were (026, 105)
- The statement that the economy was based on tourism and leisure was questioned. It was suggested that the economy was much more varied (026, 090, 105, 109, 145, 220, 249)
- It was suggested that the objective to “Facilitate economic growth that supports the local community” was a bland statement that could be applied anywhere (090, 145)
- The economic growth objective was also disagreed with, as it was claimed that “many residents are retired, some work from home, others travel to work”. Economic growth in Insh itself was therefore considered undesirable (127)
- It was asked what “small-scale organic growth” meant (090, 105, 109, 145)

The recent provision of fast broadband was credited as delivering economic growth (026, 105, 109).

There was some agreement with the objective for “small-scale organic growth”. It was felt that ‘estate’ style development was inappropriate (127).

Sites, Allocations and Settlement Boundary

A number of responders questioned the identification and purpose of the Settlement boundary, with some stating that it appeared to be based upon out-of-date information (026, 027, 105, 109, 127, 220, 249).

Further comments were received to promote or support the extension of the settlement boundary at various points. These were:

- To include THC001 (029, 057, 175, 193, 200, 259, 266, 270, 287, 288, 297, 299)
- To include a small area of land to the west of the property called The School House (027, 042, 062, 068, 069)

- To include properties called Singita and Waney Edge (057, 193, 259, 270, 295)

Some responders stated that although they were content with the settlement boundary, they would not object to it including THC 001 (090, 127, 145).

A few responders stated that they would object to the development of THC001 (109, 249, 251, 253). One felt that the site would contribute to an unsightly ribbon of development along the B970 (251). Another felt the land should be identified as Protected Open Space (249).

There was also confusion about what THC001 represented in the MIR and why it was outside of the settlement boundary (026, 027, 105, 109, 220, 249, 260). One respondent noted that “*There are already three homes outwith the boundary and these are regarded locally as being part of the village of Insh*” (209). Another stated that the settlement boundary “*seems to move with the wind*” and felt that the boundary needed to be established and maintained (220). A third was concerned about the potential pressure for further development on sites beyond the village boundary (251).

Protected Open Spaces

A number of respondents questioned the nature and purpose of the protected open spaces identified in the MIR. Respondents raised questions about what the land was protected from (026, 109) as well as ownership of the protected open spaces (026).

The following questions were asked about specific protected open spaces:

- The area immediately behind Skara Brae and Cluanach is a bog and not really accessible to residents. What threatens this area? (026, 109, 220)
- Why are two pieces of land at the eastern end protected and not other areas throughout the village? (026, 109)
- Why is none of the land on the north side protected? (026, 109)

A number of amendments were also suggested:

- The land east of the largest Protected Open Space should also be protected (127, 249)
- Protected Open Space should be expanded to include the shelterbelt on the eastern boundary (029, 109)
- The land between the settlement boundary and THC001, and THC001 itself, should be Protected Open Space (026, 105, 109, 249)

Several responders noted that the smaller of the two Protected Open Spaces covers parts of the gardens of several properties and did not feel this was appropriate (105, 109, 220, 249).

SEPA (044) recommend retaining the use of the existing Protected Open Spaces to maintain the storage and conveyance capacity of the functional floodplain.

Other Comments

One respondent suggested that the path between Insh schoolhouse and Inveruglas should be included within the Settlement boundary and identified as Protected Open Space (253).

Another felt that the future development of Insh should be directed by the residents and did not wish to see the village radically altered in the future (145).

Discussion

Settlement Issues and Objectives

The MIR makes no mention of leisure ‘facilities’ in Insh, but says: “*The village is a small community with an economy focused on tourism and outdoor leisure*”. However, it is acknowledged that Insh’s economy is more diverse than tourism and outdoor leisure. The following change to the wording is recommended to reflect this: “*The village is a small community with **an small but diverse** economy ~~focused on tourism and outdoor leisure~~*”.

Although the economic growth objective is one that can also be found in the settlement statements for other rural settlements it is considered important to support the sustainability of the community. The statement adds value as it can be used to inform decisions on future development proposals that are outwith the purview of the LDP.

Small-scale organic growth means that there are no allocated sites proposed for the settlement and that development will take place on an application by application basis. Most of this development is likely to be for one or two dwellings and larger scale development will be resisted. This is considered an appropriate approach for Insh.

Sites, Allocations, Settlement Boundary and Protected Open Spaces

The proposed Settlement Boundary and Protected Open Spaces in the MIR are exactly the same as those in the adopted LDP. The MIR consultation is however the main opportunity by which the public can comment on these and suggest changes.

There was some confusion about the status of THC001. THC001 was proposed for development during the Call for Sites and Ideas, which took place between December 2016 and February 2017. However, it was not considered appropriate for allocation due to its small size. A full site assessment can be found in the Site Assessment Report that was published alongside the MIR. The CNPA is required to show all sites submitted during the Call for Sites Consultation in the MIR, regardless of whether or not they are considered appropriate for allocation. Sites that are considered appropriate for allocation were referred to as ‘Preferred Site Options’ in the MIR, and that those that are not considered appropriate for allocation were referred to as ‘Alternative Site Options’. THC001 was identified as an Alternative Site Option. The MIR is the first opportunity that members of the public can make comments on such sites.

The purpose of the settlement boundary is to delineate between areas where LDP policies are generally more permissive of development (within the settlement boundary) and areas where more restrictive policies apply (outwith the settlement boundary). Protected Open

Spaces identify areas of recreational, ecological, cultural or landscape value within settlements in order to protect them from inappropriate development. It is agreed that the Settlement Boundary needs amending to take account of changes that have occurred since it was last drawn. It is also agreed that changes need to be made to the Protected Open Spaces.

Responders have suggested a number of changes to the Settlement Boundary. It is considered that two of these proposals are minor in nature and provide the opportunity for small scale windfall development. It is therefore recommended that the boundary be extended to include THC001 and the land to the west of Insh Schoolhouse. It is maintained that THC001 does not merit a specific housing allocation, and it is not believed that the land west of Insh Schoolhouse merits an allocation either. This is on the basis of that they only intend to deliver one dwelling each. Planning applications for these sites would therefore be judged on their merits against the policies of the LDP once adopted. It is not considered appropriate to extend the Settlement Boundary to include the properties called Singita and Waney Edge. To do so would add in a significant area of land (relative to Insh's current size) that is considered inappropriate for development.

The various comments about the Protected Open Spaces are noted, and it is considered that a review of the proposed Protected Open Spaces in Insh should be carried out alongside the review of the Settlement Boundary.

The concerns about the land east of the largest Protected Open Space are acknowledged. To address this it is recommended that the Settlement Boundary be redrawn to tightly follow the curtilages of the dwellings on the southern edge of the village (thereby removing this area from the settlement boundary).

It is acknowledged that the smaller area of Protected Open Space covers the gardens of several properties, and it is agreed that this is inappropriate. It is therefore recommended that this Protected Open Space area be removed from the Proposed Plan. The Settlement Boundary should be redrawn to tightly follow the curtilage of these properties.

It is also considered that the larger Protected Open Space merits review. It is agreed that this boggy area is unsuitable for development and therefore unlikely to be in need of additional protection. It is also considered that the area as a whole could be protected simply by being outside of the Settlement Boundary. It is therefore recommended that the Protected Open Space be removed from the Proposed Plan and the Settlement Boundary be redrawn to closely match the curtilages of the dwellings on the southern edge of Insh.

Due to these boundary changes, which are summarised in Annex I, it is not felt that the identification of further Protected Open Spaces is necessary.

Other Comments

The path between Insh schoolhouse and Inveruglas, which is a Core Path, is already within the Settlement Boundary and Protected Open Space. The changes proposed above would, however, place it outside both. Nevertheless, there is no reason for it to be located within either. Core Paths are already protected from inappropriate development by other policies in the LDP.

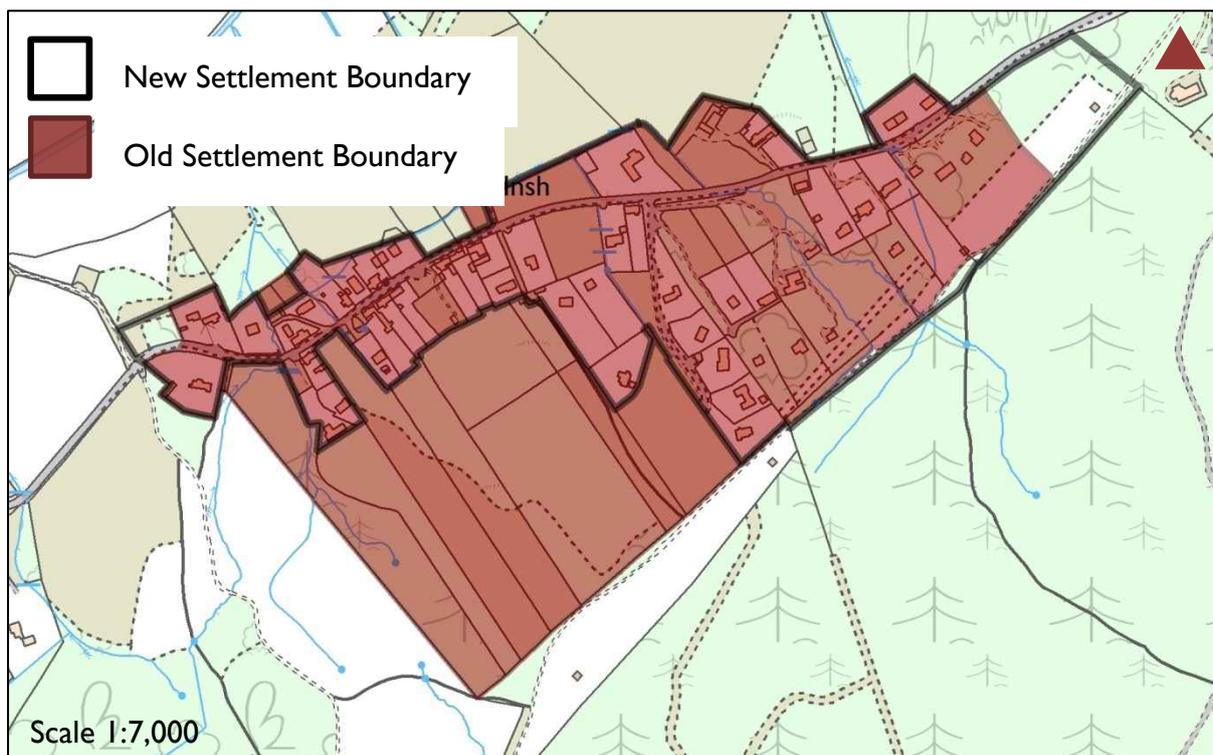
The MIR does not propose any changes that would significantly alter the character of Insh. The minor changes recommended above do not alter that position.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives and preferred site options outlined in the Main Issues Report, subject to the following amendments:
 - Amend the supporting text to read “*The village is a small community with an **small but diverse** economy focused on tourism and outdoor leisure*”
 - Extend the Settlement Boundary to include THC001 and land to the west of Insh Schoolhouse
 - Delete the two Protected Open Spaces and redraw the Settlement Boundary to tightly follow the curtilages of the dwellings on the southern edge of the village

Annex I



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Inverdrue & Coylumbridge

Respondents

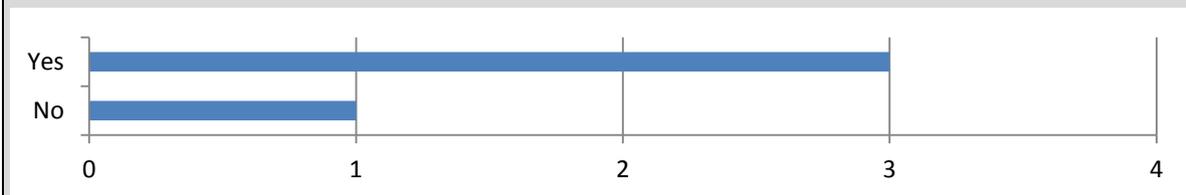
Ref	Name / Organisation
040	Badenoch and Strathspey Conservation Group
044	SEPA
051	Historic Environment Scotland
054	Rothiemurchus Estate

Ref	Name / Organisation
192	Aviemore Business Association
199	SNH
221	Woodland Trust Scotland
318	J Kirby
325	RSPB

Response Overview

9 respondents answered questions about Inverdrue & Coylumbridge and/or provided comments

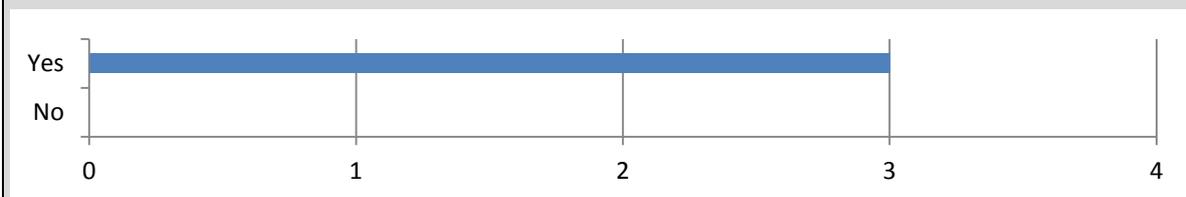
Do you agree with the proposed settlement objectives?



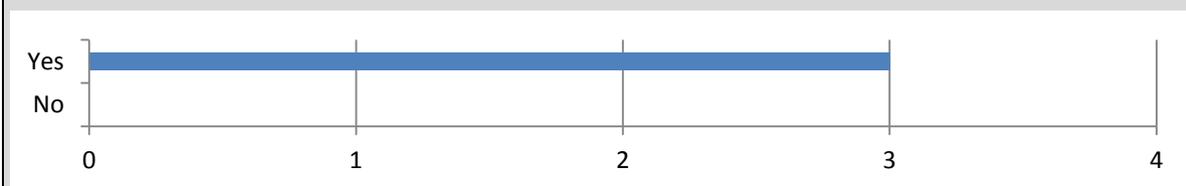
Do you agree with the preferred site options?



Do you agree with the protected open spaces?



Do you agree with the proposed settlement boundary?



Key points

- Some concerns about the potential impacts of the Camping site on surrounding woodland and protected sites

Issues Raised

Settlement issues and objectives

It was suggested that the protection and enhancement of ancient woodland should be added as a settlement objective (221).

Sites and allocations

One respondent stated general support for the proposals in the MIR as they contribute towards small scale services, businesses and visitor attractions which contribute to meeting the aims of the National Park Partnership Plan (054).

A number of responses supported the MIR's conclusion that THC025 should not be a preferred development site (044, 051, 221). SEPA expressed concern about flood risk at the site (044). Historic Environment Scotland highlighted that the site contains a B listed building. They stated that there would be a presumption against its demolition and that further detail would be required to determine acceptability of the proposals (051).

One response highlighted that THC026 contains ancient woodland and agreed with the MIR's conclusion that it should not be allocated for development in the next LDP (221).

One response commented that T1 is located on an area of Ancient Semi-Natural Woodland and felt that the site should therefore not be allocated (221). Another respondent objected to the boundary of T1. They were of the view that the allocation extends beyond the licenced camping site to the south and west which could result in unregulated expansion of camping and have significant impacts on surrounding natural heritage (040). RSPB stated that T1 lies in close proximity to several Special Protection Areas and that development on the site may therefore require mitigation (325).

SEPA and SNH provided technical details and further information about the proposed sites to be taken into account during the production of the Proposed Plan (044, 199).

Discussion

Settlement issues and objectives

The need to protect and enhance the surrounding woodland is noted, however the protection of woodland is achieved through specific policies in the LDP and it is therefore unnecessary to repeat this as a settlement objective.

Sites and allocations

The comments in respect of sites THC025, THC026 and THC027 are noted. These sites were not identified as preferred development options for the reasons set out in the Site Assessment Report that was published alongside the MIR. It is maintained that these sites are not appropriate for inclusion in the Proposed Plan.

The TI camping site is an established business and it would therefore not be appropriate to delete the allocation in response to the comments about woodland. This point was raised at the examination of the current LDP and the Reporter concluded that given the well-established use of the site, it would not be at all reasonable to delete the TI designation. Any further development on the site would require the submission of a planning application and this would be assessed against all LDP policies, including those which protect woodland and other natural heritage assets. The Reporter also considered the extension to the boundary of TI at the examination of the current LDP and concluded that it was appropriate. No change is required in response to the comments on this issue.

The comments from RSPB are noted and the impacts of any proposals will be assessed through the Habitats Regulations Appraisal process for the Proposed Plan.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Recommendations

The Proposed Plan should:

- Take forward the proposed settlement objectives and preferred site options outlined in the Main Issues Report

Killiecrankie

Respondents

Ref	Name / Organisation
004	X McDade, Ward Councillor (Highland Perthshire), Perth & Kinross Council
044	Scottish Environment Protection Agency
199	Scottish Natural Heritage

Response Overview

3 respondents provided comments about Killiecrankie.

Key points

- Some concern about Killiecrankie Battlefield site
- Some concern about reduction in protected open space

Issues Raised

One respondent (004) highlighted the historical importance of the Battle of Killiecrankie and asked whether the battlefield site should be brought into the settlement boundary to offer it greater protection. They also argued that Killiecrankie could benefit from active travel route improvements to link it to the main hub of Blair Atholl.

Scottish Natural Heritage (199) commented that the single area identified as protected open space appears appropriate. However, they noted that a second area to the north-west that was previously included in the 2015 LDP as protected open space has been removed. They felt it would be beneficial for this area to be reinstated as protected open space (and included in the settlement boundary), to avoid inappropriate development.

SEPA (044) commented that the protected open space should not be subject to any land raising and would require a Flood Risk Assessment if land-use changes were proposed.

Discussion

The importance of the Battle of Killiecrankie is recognised by its identification on the Battlefield Inventory. It is protected from inappropriate development by policy 9 (Cultural Heritage) in the existing LDP, which is proposed to be carried forward into the Proposed Plan. Including the battlefield site within the settlement boundary would, if anything, offer less protection because the primary purpose of the settlement boundary is to delineate the area in which development is generally considered appropriate.

It is recognised that active travel routes are important means of promoting connectivity and encouraging active lifestyles. The LDP does not contain any specific proposals, but would encourage the development of such infrastructure in principle. It is therefore recommended

that the following objective be added to the settlement statement: “*Support proposals for safe active travel around the village and to surrounding settlements.*”

The purpose of the settlement boundary is to delineate between areas where LDP policies are generally more permissive of development (within the settlement boundary) and areas where more restrictive policies apply (outwith the settlement boundary). The MIR’s proposed modifications to the settlement boundary and protected open spaces in Killiecrankie were made in conjunction with one another. It was considered that the additional protected open space on the edge of the settlement (as defined in the current LDP) was unnecessary because it does not serve any formal recreation purpose and protection from inappropriate development could be more appropriately achieved by simply excluding this area from the settlement boundary. It is therefore not necessary to reinstate this protected open space designation to achieve the outcomes sought by SNH.

The comments from SEPA are noted.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives outlined in the Main Issues Report, subject to the following amendments:
 - Include an additional objective to read “Support proposals for safe active travel around the village and to surrounding settlements”

Laggan

Respondents

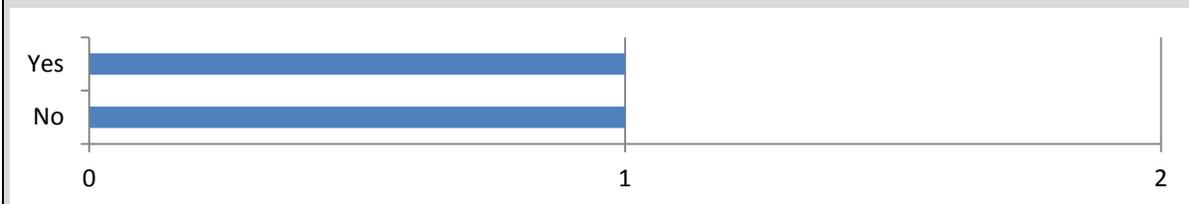
Ref	Name / Organisation
007	Scottish Water
033	Laggan Community Association
044	Scottish Environment Protection Agency

Ref	Name / Organisation
051	Historic Environment Scotland
199	Scottish Natural Heritage
200	Highlands and Islands Enterprise
300	S Slimon

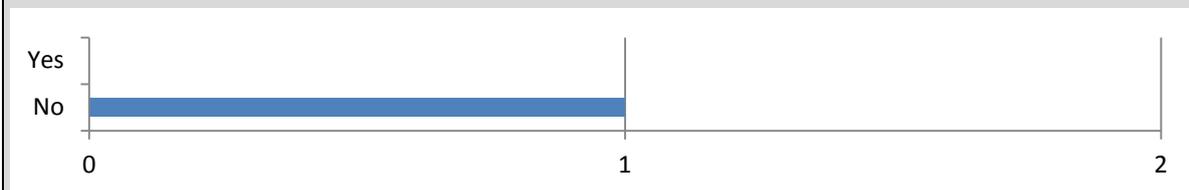
Response Overview

7 respondents answered questions about Laggan and/or provided comments.

Do you agree with the proposed objectives?



Do you agree with the preferred site options?



Key points

- Suggestion that housing should be focused around local amenities in Laggan
- Organic approach to growth considered appropriate in addition to preferred option
- Settlement objectives and allocations should remain unchanged

Issues Raised

Settlement issues and objectives

It was suggested that Laggan's issues should include the lack of public transport and sustaining the local school. It was also suggested that housing around Laggan Bridge, the village and close to local amenities would be more appropriate (033, 300). It was felt that Laggan should be acknowledged for more than just mountain biking (033, 300).

One response suggested that Laggan should have a settlement boundary to inform people where development can happen and so that applications do not get refused due to ancient woodland (033).

Sites and allocations

One response supported the preferred option (200). Another suggested that preferred site THC065 would be more suitable for a couple of crofts, but not suitable for affordable housing (033). Historic Environment Scotland commented that some mitigation on the preferred part of THC065 may be required due to being in the vicinity of a scheduled monument (Dun-da-Lamh Fort) (051).

SEPA, SNH and Scottish Water provided technical details and further information about the site options to be taken into consideration in the development of the Proposed Plan (007, 044, 199).

Discussion

Settlement issues and objectives

Whilst the concerns about public transport are understood, the LDP has limited influence over this issue. This matter would be more appropriately addressed by the regional transport body.

Sustaining the local school is dependent on having enough families in the area. Ensuring there is enough housing for people in the area can help to sustain the local population and support services and facilities such as the school. The proposed objectives already include 'support small-scale organic growth through the Local Development Plan's housing policy', and this provides flexibility for appropriate housing development to take place over the plan period. The proposed housing site (THC065) should also help to sustain the local population and support the school.

The MIR recognises that Laggan is a popular area for visitors. Whilst it mentions mountain biking specifically, it also acknowledges that people visit to enjoy the surrounding countryside.

The request for a settlement boundary is noted. However, due to the dispersed nature of Laggan, it is more appropriate to support small-scale organic development which can be assessed individually on its merits in line with the LDP's housing policy. This approach provides greater flexibility to accommodate appropriate housing development over the plan period. The presence of ancient woodland is a constraint to development irrespective of whether or not a site lies within a settlement boundary, so the definition of a settlement boundary would have no direct bearing on this issue.

Sites and allocations

The comments in respect of THC065 are noted. Whilst one response suggested this site would be more appropriate for crofts, it is considered that affordable housing would make a greater contribution towards meeting local needs and sustaining the local population. The

potential need for mitigation measures to address any adverse impacts on the nearby scheduled monument is acknowledged. This requirement can be identified within the site allocation details in the Proposed Plan.

The technical details and further information provided by SEPA, SNH and Scottish Water will be taken into consideration as the Proposed Plan is developed.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives and preferred site option outlined in the Main Issues Report.

Strathdon

Respondents

Ref	Name/Organisation
071	Edinglassie Estate (Dunecht Estates)
280	Strathdon Community Council
306	Anonymous

Response Overview

3 people responded to questions about Strathdon and/or provided general comments.

Do you agree with the proposed objectives?



Key points

- General support for proposed objectives
- LDP should support delivery of high quality broadband and affordable housing

Issues Raised

Two respondents agreed with the proposed objectives (071, 306). One felt that development in this area should be kept to an absolute minimum (306).

Whilst supporting the proposed objectives, Strathdon Community Development Trust raised concerns about the ability to attract and retain young people, encouraging the growth of existing businesses, and fostering the creation of start-ups. They felt the availability of good broadband and high quality affordable housing is critical to addressing these issues. They suggested that the new LDP should therefore support the provision on broadband infrastructure and that the objectives in relation to affordable housing should be supported by a wider funding strategy to ensure delivery (280).

Discussion

The support for the proposed objectives is welcomed.

It is acknowledged that broadband plays an important role in helping to support business development within the National Park. Considerable work has been done to date to improve the service and work is now ongoing through the Government's 'Reaching 100' programme. The existing LDP includes a policy to ensure the appropriate siting and design of new digital communications equipment and this will be carried forward into the Proposed

Plan. The comments in relation to affordable housing delivery are noted. Although the LDP is not able to directly influence the funding which is available to ensure delivery, the current LDP includes flexible policies to support and encourage the provision of affordable housing and these will be carried forward into the Proposed Plan.

Recommendations

The Proposed Plan should:

- Take forward the proposed objectives outlined in the Main Issues Report

Landward Sites

Respondents

Ref	Name / Organisation
046	Ristol Consulting on behalf of Atholl Estate
157	Balavil Estate Ltd

Ref	Name / Organisation
199	Scottish Natural Heritage
210	Urban Animation on behalf of Invercauld Estates

Response Overview

4 respondents provided comments on landward sites outwith existing settlements

Key points

- Suggestions for a number of new allocations on sites outwith existing settlements:
 - Proposed housing site at Bridge of Gairn
 - Proposed housing and economic development sites at Lynchat
 - Proposal to identify Aldclune as a settlement and include a housing site

Issues Raised

Sites and Allocations

SNH provided technical details and further information about all the landward sites in the Site Assessment Report that was published alongside the MIR (199).

Bridge of Gairn – AB001

One respondent stated that non-preferred site AB001 should be allocated for housing development. They argued that the MIR does not provide sufficient comfort that the site could be progressed under LDP policies, that the Site Assessment Report incorrectly states that the site is poorly related to the existing settlement, and that development should not be restricted to main settlements. The respondent felt that AB001 is well connected to the A93 and that a small amount of development in Bridge of Gairn should be permitted to sustain the settlement and encourage new services (210).

Lynchat – THC029 and Proposed New Sites

One respondent proposed a new site that they wished to see allocated for economic development to enable the relocation of their existing farm building complex. They argued that their existing farm building complex (part of which includes the western area of THC029) would then provide a brownfield redevelopment opportunity which should be allocated for housing. They stated that this could accommodate a well-designed development that would complement the existing hamlet of Lynchat. They also stated that the adjacent field to the east (the remaining part of THC029) could form a future second phase development to accommodate affordable housing and self-build units (157).

Aldclune – Proposed New Site

One respondent suggested that Aldclune should be identified as a rural settlement on the basis that it is of a similar size to Calvine and larger than Killiecrankie (which are both identified settlements in the LDP). They requested that Aldclune be given a settlement boundary and proposed a site for housing to meet local need (046).

Discussion

Sites and allocations

The further information provided by SNH will be taken into consideration as appropriate during the preparation of the Proposed Plan.

Bridge of Gairn – AB001

Although it is agreed that AB001 relates well to Bridge of Gairn, the site assessment considered its relationship with the nearest identified settlement/service centre which is Ballater. It is considered that on account of the small size of Bridge of Gairn, any future development here should happen in a more organic way. The LDP's existing housing policy enables small-scale growth in hamlets such as Bridge of Gairn by permitting small-scale housing additions to existing groups of buildings (subject to compliance with other LDP policies). This enables development proposals to be considered on their merits through the development management process, rather than requiring the allocation of sites in the LDP. It is considered that this remains the most suitable approach to development in Bridge of Gairn. As such, it is not appropriate to allocate AB001 and it is maintained that this proposal would be best considered through the submission of a planning application.

Lynchat – THC029 and Proposed New Sites

Whilst it is understood that the existing farm complex at Lynchat may need to be relocated as a consequence of the A9 dualling, it is not necessary to allocate an economic development site in the LDP to enable this. The LDP's economic development policy would provide support in principle for such a proposal to be accommodated on unallocated land.

The associated proposal to redevelop the site of the existing farm building complex is noted. However, the number of proposed houses has not been specified and the scale of the site is considered extensive in relation to the existing hamlet. Parts of the site also appear to be undeveloped land containing trees and small areas of woodland (the western area of THC029). It is not considered that the whole site would be suitable for housing development and it is therefore not recommended that this site be allocated in the Proposed Plan. Although the more limited part of the site containing the existing farm buildings may be appropriate for future re-development / conversion, a smaller-scale proposal of this nature would be more appropriately progressed as an individual planning application.

The area sought as a future second phase of housing development (the remaining part of THC029) was considered in the MIR and was not identified as a preferred site option,

primarily due to flood risk concerns. It is maintained that this site is unsuitable for allocation for the reasons set out in the Site Assessment Report published alongside the MIR.

Aldclune – Proposed New Site

The case to allocate Aldclune as a settlement and include a new housing allocation is noted. Whilst it was raised that Aldclune is similar in scale to Calvine and Killiecrankie, it is not considered that this is a compelling argument to justify identifying it as a settlement. Although an indicative area for development has been suggested, the proposed scale of housing has not been provided. It is considered that development at Aldclune would be more appropriately delivered as part of a small-scale extension to the existing group (as permitted under the LDP's existing housing policy) and progressed through a planning application subject to assessment against all other relevant LDP policies.

Recommendations

The Proposed Plan should:

- Include no further changes in response to the comments on landward sites

Other Policy Changes

Respondents

Ref	Name / Organisation
030	Kincraig and Vicinity Community Council
033	Laggan Community Association
039	N Kempe
043	The Highland Council
044	Scottish Environment Protection Agency
046	Ristol Consulting on behalf of Atholl Estate
048	Glenshee Ski Centre Ltd
049	Grantwon-on-Spey and Vicinity Community Council
051	Historic Environment Scotland
053	Inveresk Community Council
082	D Morris
083	R Turnbull
089	Cromar Community Council
157	Balavil Estate Ltd
192	Aviemore Business Association
194	Quarch Technology
199	Scottish Natural Heritage
203	Savills (UK) Ltd on behalf of Crown Estate Scotland (Interim Management)
206	J Walker
207	Anonymous
208	G & L Muirhead
209	Anonymous
210	Urban Animation on behalf of Invercauld Estate
212	Carrbridge Resident
213	S Caudrey
215	G Bulloch
216	Carrbridge Resident
218	NHS Grampian
220	M Kinsella
221	Woodland Trust Scotland
222	Kingussie Resident
223	Blair Atholl Resident
224	D Stott
225	Anonymous
226	Braemar Resident
227	Moray Council
228	H Brown

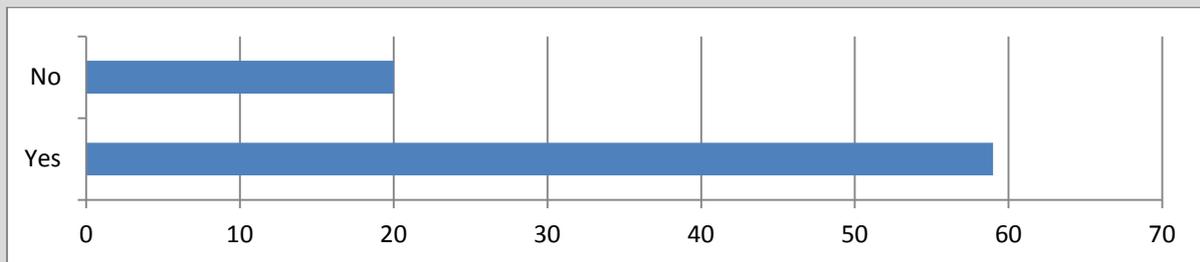
Ref	Name / Organisation
243	P Hastings
244	Anonymous
246	Anonymous
247	Aberdeenshire Resident
248	Carrbridge Resident
249	C Winter
250	A Dunlop
251	S Dickie
254	MacBean Road Residents Association
255	Tulloch Homes Ltd
257	Anonymous
260	H Quick
264	D Sherrard
267	L MacLean
268	Anonymous
269	Aviemore Resident
270	Insh Resident
271	Dalwhinnie Community Council
272	Boat of Garten Resident
273	D Munday
275	Anonymous
281	Tactran
282	D Bruce
283	Ross McGowan Ltd
285	Anonymous
286	Anonymous
289	Anonymous
292	Munro Surveyors
293	Braemar Resident
294	A Angus
302	Nethybridge Resident
305	Anonymous
306	Anonymous
307	Dulnain Bridge Resident
311	Anonymous
312	Anonymous
314	Anonymous

229	Anonymous
231	C Campbell
232	Anonymous
233	Ballater & Crathie Community Council
235	Anonymous
237	Aviemore and Vicinity Community Council
239	Anonymous
241	H Bendstrup-Charlton
242	Carrbridge Resident

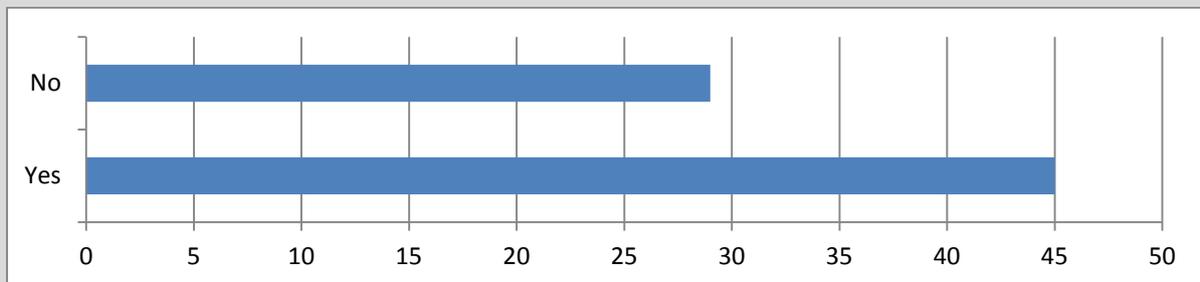
315	Kinnaird
316	Kingussie Resident
319	C McPherson
320	Anonymous
321	J Finnie
322	Anonymous
323	Grantown Resident
324	Anonymous
325	RSPB Scotland

Response Overview

Do you agree with our conclusions about the changes that need to be made to the policies in the existing Local Development Plan?



Do you think any other changes are needed?



92 responders provided comments on the proposed changes to policies in the existing Local Development Plan. Some did not answer the specific questions outlined in the charts above but did provide general comments.

Key points

- There was significant support for the proposed changes to existing Local Development Plan policies
- Notwithstanding the general level of support, a large number of respondents suggested additional and/or alternative policy changes
- A number of these are considered appropriate and are recommended for inclusion within the Proposed Plan

Issues Raised

Comments on the Preferred Option

Around 75% of respondents who answered the question said they agreed with the recommended changes to the policies in the existing Local Development Plan (046, 051, 053, 082, 157, 192, 194, 199, 203, 206, 208, 209, 212, 218, 221, 224, 225, 226, 227, 231, 232, 233, 235, 237, 239, 242, 246, 247, 248, 249, 250, 251, 254, 255, 257, 264, 267, 269, 270, 271, 272, 273, 281, 283, 286, 289, 293, 305, 306, 307, 311, 312, 314, 316, 320, 321, 322, 323, 324).

Approximately 25% of respondents stated that they did not agree with the recommended policy changes (030, 039, 043, 207, 215, 220, 222, 223, 228, 229, 241, 243, 268, 275, 282, 285, 292, 302, 315, 319).

Some 39% of respondents who answered the question felt that no further policy changes are required (053, 192, 206, 218, 222, 225, 227, 231, 237, 239, 246, 248, 249, 250, 254, 255, 267, 269, 271, 272, 281, 283, 286, 305, 307, 314, 320, 321, 324).

Notwithstanding the general support for the recommended changes, around 61% of respondents who answered the question (including a number of those who indicated support for and opposition to the recommended changes) felt that additional and/or alternative policy changes are required (030, 039, 043, 044, 051, 082, 083, 199, 203, 207, 208, 209, 212, 215, 220, 221, 223, 226, 228, 229, 232, 233, 235, 241, 242, 243, 247, 251, 264, 268, 270, 273, 275, 282, 285, 289, 292, 293, 302, 311, 312, 315, 316, 319, 323, 325)

Suggested Additional / Alternative Policy Changes

A wide range of additional / alternative changes to the policies in the existing Local Development Plan was proposed. The proposed changes are outlined (by policy) below:

- Policy 1 (New Housing Development)
 - Support the reduction in the housing land supply targets and requirements (083, 244)
 - Insufficient housing land has been identified (292)
 - Parts 2 and 3 of the policy are overly flexible, encouraging unsustainable dispersed development in environmentally sensitive rural locations. Proposals for housing in the countryside should be assessed against stricter sustainability criteria (325)
 - Part 3 should include 'succession housing' to support retiring farmers wishing to hand over much of their operations while continuing to assist and live on the farm (203)
 - The definition of a rural group should be revised to place more emphasis on existing housing. Clarification on the types of other buildings that could be considered part of a group would also be helpful. The current guidance, which states that groups should not expand into previously undeveloped fields, should be reconsidered as it misses opportunities for 'rounding off' existing groups (043)
 - There should be more flexibility in the policy on replacement housing. Replacing a house on a different site may be more environmentally acceptable than replacing it on the same site, and this should be reflected in the policy (046)
 - The policy should restrict second homes / holiday homes / holiday lets (207, 226, 232, 260, 264, 273, 275)
 - Second homes should be embraced rather than vilified (302)

- A policy to deliver more affordable rented housing is required (264)
- The affordable housing requirement should remain at the current level (046)
- Policy 2 (Supporting Economic Growth)
 - Any supporting text should refer to other policies in terms of protecting resources and not increasing vulnerability to flood risk (044)
 - The support for tourism and recreation under part 2 should not be limited to where there are 'no adverse environmental impacts' but where any environmental impacts are outweighed by the benefits of development (210)
 - Grantown needs more low to medium cost tourist accommodation (049)
- Policy 3 (Sustainable Design)
 - The policy requirements must be proportionate. An alternative approach could require larger developments to demonstrate compliance with the six qualities of successful places but for smaller developments, especially householder developments, the policy could simply indicate that such applications will be assessed on the extent to which they meet these objectives (043)
 - The policy should refer to the opportunity to maximise co-location and deliver district heating as part of resource efficient development. In addition to minimising energy usage, the policy should require new developments to make use of renewable or low or zero carbon energy sources. Point f in the policy should be modified to include 'making provision for electric vehicle charging points' (044)
 - New development should be as carbon neutral as possible (312)
 - The policy should require developments to avoid a specified and rising proportion of greenhouse gas emissions from their use through installation of low and zero carbon generating technology (LZCGT) to meet Section 3F of the Town and Country Planning (Scotland) Act 1997 (325)
 - There should be a return to 1½ storey building in local materials (251)
- Policy 4 (Natural Heritage)
 - Support the increased protection for ancient woodland (043, 083, 221, 244), but this should go further and say development in ancient woodland will not be permitted (221)
 - The current supporting text and supplementary guidance suggests that only developments directly impacting international and national designations require SUDs. We request this policy makes it clear that these requirements are for all developments (044)
- Policy 5 (Landscape)
 - Support the proposed reference to wild land (083, 244)
 - No mention is made of changing this policy to introduce the presumption against new hill tracks within open moorland areas as referred to in Main Issue 10 (043)
 - The policy should be reworded to say development that does not conserve and enhance landscape character will not be permitted (221)
- Policy 6 (Siting and Design of Digital Communications Equipment)
 - CNPA may wish to consider the landscape impacts that could arise from future 5G installations and provide design guidance for any new masts (043)

- Policy 7 (Renewable Energy)
 - Support the changes proposed but recommend additional changes as follows. An additional bullet point should be included in part 1: 'f) they adequately minimise detrimental impact on local air quality', and a requirement for air quality assessments to be undertaken is recommended for inclusion in parts 4 and 5. An additional bullet point should be included in part 2: 'd) the passage of migratory fish, particularly salmonids'. The protection of carbon rich soils and peat should not be restricted to part 2 but should apply to all renewable energy proposals (044)
 - The policy should include specific support for solar energy proposals (203)

- Policy 8 (Sport & Recreation)
 - Support the proposed reference to allotments (083, 244) and open spaces identified within the settlement maps (043)
 - The policy should be amended to include a focus on sport and recreation provision in the eastern Cairngorms (233, 235)
 - Open space benefits are not limited to sport and recreation and include factors such as placemaking and biodiversity. These factors should be reflected in the policy. A review of open spaces should be undertaken for all settlements (199)
 - The support for sport and recreation under part 1 should not be limited to where there are 'no adverse environmental impacts' but where any environmental impacts are outweighed by the benefits of development (210)

- Policy 9 (Cultural Heritage)
 - The proposed changes are not supported. Instead, the second paragraph of part 6 (Demolition – Removal of Asset) should be replaced with the wording at paragraph 3.42 of the Historic Environment Scotland Policy Statement. The term 'ancient monument' should also be used instead of 'scheduled ancient monument' (051)
 - Cultural heritage appears to be dominated by buildings and not people, nor the arts, nor the public realm (049)

- Policy 10 (Resources)
 - Support the consideration of natural flood management (083, 244)
 - Waste management options in Badenoch and Strathspey are currently under review and further discussion should be undertaken with the Council as the Local Development Plan moves forward (043)
 - The following changes are recommended. Part 1: highlight a requirement for the submission of Construction SUDS as part of any Construction Method Statement; place stronger emphasis on improving the water environment where possible; ensure the provision of appropriately sized buffer strips by making buffer strips a requirement; and highlight the requirement for phase 1 habitat surveys where groundwater dependent terrestrial ecosystems are known or likely to be present. Part 2: reword bullet a) to read 'be free from medium to high risk of flooding from all sources taking into account predicted impacts of climate change'; ensure development accords with SEPA's Land Use Vulnerability Guidance and that any development permitted in medium to high risk areas, or adjacent to low to medium risk areas, is built to a water resilient design; and ensure that flood risk assessments are undertaken in accordance with SEPA's Technical Flood Risk Guidance. Part 4: identify the existing waste management sites at Aviemore, Granttown-on-Spey, Blair Atholl and Kingussie on the proposals maps. Part 5: include

additional wording to comply with paragraph 248 of Scottish Planning Policy which states 'The review of mineral permissions every 15 years should be used to apply up-to-date operating and environmental standards'. Part 6: reword the policy to protect peat and carbon rich soils by avoiding disturbance in the first instance by all developments. Where this is not possible development should be informed by an appropriate peat survey and management plan and suitable mitigation measures should be implemented to abate carbon emissions (044)

- The policy does not comply with paragraph 205 of Scottish Planning Policy. It should be amended to require an assessment of the likely effects of development on CO₂ emissions where peat and carbon rich soils are present (325)
- Policy 11 (Developer Contributions)
 - The proposed review of developer obligations is welcomed (049)
- New Policy Proposals
 - There should be a policy on hutting to address the requirements of paragraph 79 of Scottish Planning Policy (203, 210)
 - There should be a clear policy statement on securing and monitoring financial guarantees for restoration of major developments with significant long-term liabilities (325)

Place-Based Comments

A number of comments raised concern about the application of policies in particular locations. One response suggested that development around Aviemore should be constrained (220), with others adding that this would allow future development to be directed towards other settlements (082, 315). One respondent expressed the view that An Camas Mòr should not be permitted (316). Two felt that as Blair Atholl is under the jurisdiction of the National Park but planning applications have to be made to Perth & Kinross Council there is a risk that different policies could be applied (208, 209). Another response stated that the policies may be appropriate for other communities but not for Laggan, which is not thriving at this time (033).

Other comments expressed views about specific sites. One requested that the village boundary in Insh be amended to include site THC001 (270), and another stated that the A9 compound at Kinraig should not be allocated for development (228). One respondent argued that ski centres should be seen as positive and should be allowed, within reason, to develop unhindered within their existing boundaries (048).

General Comments

A number of comments gave views about the relative priority of policies. Some argued that policies should give higher priority to conservation and the protection of the environment, land, and wildlife (212, 215, 247, 293, 319), with one suggesting that the policies should not allow development outside existing settlements (251). Conversely, another respondent argued that policies should be supportive of development rather than restricting it (268).

One respondent stated that the proposed changes should be adequate to future proof the Local Development Plan for the duration of its lifetime (089). However, another suggested that the existing policies may be too vague (223) and one said they were unhappy with the current Local Development Plan and that elements of it needed to change (030). It was also argued that the Main Issues Report identifies major issues (eg flooding and hill tracks) but

proposes only minor policy amendments when more significant changes are required to address these issues (039).

Some respondents felt that there has not been enough local community input (222, 242, 282, 294, 323), and two felt there was insufficient information to enable them to comment on the proposed policy changes (213, 216). Some commented that CNPA should not be responsible for any planning decision making (229, 243, 285).

Discussion

There is significant support for the policy changes recommended in the Main Issues Report, with around 75% of respondents indicating support for the proposed changes. However, a wide range of additional / alternative changes has also been proposed. Many of these proposals involve changes to the detailed wording of existing policies. The merits of the suggested additional / alternative policy changes are considered (by policy) below:

- Policy 1 (New Housing Development)
 - Both the support for and opposition to the proposed housing land supply targets and requirements is noted. These topics are considered under Main Issue 4 'Housing'
 - It is not accepted that Parts 2 and 3 of the policy are encouraging unsustainable dispersed development in environmentally sensitive rural locations. Parts 2 and 3 of the policy form an important part of the strategy to help sustain rural communities in line with paragraph 79 of Scottish Planning Policy. Figures 33 and 34 of the Monitoring Statement clearly show that the vast majority of housing approvals are within settlements, with the number of approvals in rural areas being much more limited. Existing policies 4 and 5 also apply to all housing development proposals outside settlements and this provides a mechanism to ensure there are no unacceptable adverse impacts on natural heritage or landscape. No change is necessary in response to this comment
 - The suggestion that the policy should support 'succession housing' for retiring farmers is reasonable. However, such proposals already benefit from support in principle under criterion a) of the existing policy, which permits developments that are "necessary for or improve the operational and economic viability of an active business". It is therefore unnecessary to amend the policy, but the support for 'succession housing' could be referenced within any associated supplementary guidance/planning advice
 - The comment about the definition of rural groups is noted. However, the existing Local Development Plan policy deliberately introduced a more flexible definition based around existing buildings rather than houses to encourage rural development and help sustain rural communities. It is therefore not considered appropriate to revert to the former definition, but it would be reasonable to clarify the types of rural building that could be considered part of a group through supplementary guidance/planning advice. It would also be reasonable to revise the existing guidance to enable groups to be rounded off by expanding into previously undeveloped fields in appropriate cases
 - In terms of replacement houses, criterion c) of the existing policy already allows replacement on an alternative adjacent site where this "would minimise any negative environmental, landscape or social effects of the development". This provides an appropriate degree of flexibility and further change is unnecessary

- The comments in relation to second homes and affordable housing are noted. These topics are considered under Main Issues 4 ‘Housing’ and 5 ‘The Affordability of Housing’
- Policy 2 (Supporting Economic Growth)
 - SEPA’s request for cross references to other relevant policies is noted. The supporting text will include cross references where appropriate, although in general terms cross references will be kept to a minimum to avoid unnecessary duplication in the plan
 - The argument that part 2 is too restrictive in requiring ‘no environmental impact’ was considered in general terms during the Examination of the current plan. The reporter concluded that “the criteria in the policy wording set an appropriate environmental context for decision making”. Tourism and leisure developments can often occur in particularly sensitive locations and it is therefore appropriate to retain the existing wording
 - Comments about the need for low and medium cost tourist accommodation in Grantown are noted. The policy would support such proposals in principle
- Policy 3 (Sustainable Design)
 - Concerns about the need for proportionality in demonstrating compliance with the six qualities of successful places are acknowledged. It is agreed that the revised policy will need to be proportionate in terms of its requirements, particularly for householder developments. This is considered under Main Issue 2 ‘Designing Great Places’
 - It is accepted that the Local Development Plan will need to include a suitable policy reference to support the development of heat networks in as many locations as possible in order to comply with paragraph 159 of Scottish Planning Policy. This will be included in the Proposed Plan. The request to include a policy criterion requiring the provision of electric vehicle charging points is likely to represent an overly onerous requirement for most development proposals, although this could be encouraged within the supporting text for the policy
 - In response to the comments about carbon neutrality, it is accepted that Section 3F of the Town and Country Planning Act requires Local Development Plans to include policies requiring developers to avoid a specified and rising proportion of CO₂ emissions through the installation of LZCGT. Although Scottish Ministers consulted on a proposal to remove this requirement through their review of the Scottish planning system, this proposal was not carried forward into the recent Planning Bill. The current policy wording in part 1 a), which requires development proposals to minimise their effects on climate change by meeting at least minimum Building Standard requirements should therefore be retained. Although further more stringent policy requirements could be set within the Local Development Plan, experience from other authorities indicates that it is difficult to implement these in practice
 - It is not appropriate to introduce prescriptive policy requirements limiting new buildings to 1 ½ storeys, as these would not be appropriate in all cases.
- Policy 4 (Natural Heritage)
 - The support for the proposed changes in relation to ancient woodland is welcomed. However, it would not be appropriate to go further and reword the policy to

prevent any development in ancient woodland as this would not comply with Scottish Planning Policy or the Scottish Government's Policy on Control of Woodland Removal

- SEPA's comments about the reference to SUDs within the existing supporting text are noted. However, the plan must be read as a whole and policy 10 makes clear that issues such as SUDs should be considered for all developments. This requirement is likely to be strengthened in the new Local Development Plan (see Main Issue 9 'Flood Risk and Climate Change Resilience'). No further change is necessary
- Policy 5 (Landscape)
 - The support for the proposed reference to wild land is welcomed
 - It is accepted that the Main Issues Report omitted a reference to the likelihood of this policy being changed to introduce a presumption against new tracks in open moorland areas. This issue is considered further under Main Issue 10 'Land Management in Upland Areas'
 - It would not be appropriate to reword the policy to say that development that does not conserve and enhance landscape character will not be permitted. This would be an overly onerous requirement that is unlikely to be achievable in all cases
- Policy 6 (Siting and Design of Digital Communications Equipment)
 - The potential implications of 5G technology are currently unclear and it is therefore not appropriate to amend the policy criteria at this stage. The existing criteria comply with paragraphs 295-296 of Scottish Planning Policy and address the main issues that 5G installations may be expected to raise. However, the suggestion that any specific implications could be addressed through planning advice is sensible and the need for such advice will be kept under review
- Policy 7 (Renewable Energy)
 - The additional text recommended by SEPA for inclusion in parts 1 and 2 of the policy is considered appropriate and will be included within the Proposed Plan. However, it is not necessary to include additional text to require air quality assessments under parts 4 and 5 of the policy, as this requirement would be covered by the new text in part 1. Similarly, it is not necessary to include a requirement for all renewable energy requirements to protect peat and carbon rich soils as this requirement is already covered by policy 10 (part 6)
 - Part 1 of the policy is already supportive of all forms of renewable energy generation where the specified criteria are met. There is therefore no requirement to outline specific support for solar energy proposals within the policy, although reference could be made to solar energy within the supporting text
- Policy 8 (Sport & Recreation)
 - The support for the cross references to allotments and open spaces identified within the settlement maps is welcomed
 - It would not be appropriate to reword the policy to only focus sport and recreation provision in the eastern Cairngorms. However, the policy as currently worded would continue to support appropriate proposals within the eastern part of the Park
 - The comments in relation to the wider benefits of open spaces are noted. In addition to the proposed changes outlined in the Main Issues Report, it would be appropriate

- to amend the policy title to 'Open space, sport and recreation', and refer to other forms of open space within the policy wording. Open spaces within settlements will also be reviewed during preparation of the Proposed Plan
- In response to the argument that the wording of part 1 is too restrictive in requiring 'no environmental impact', it is noted that sport and recreation developments can often occur in particularly sensitive locations. It is therefore appropriate to retain the existing wording
- Policy 9 (Cultural Heritage)
 - The wording changes proposed by Historic Environment Scotland are appropriate and will be incorporated into the Proposed Plan in place of the amendments outlined in the Main Issues Report
 - The cultural heritage policy focuses on buildings rather than people as these are the matters which the land use planning system is able to influence. Other aspects of cultural heritage are addressed through different strategies and programmes
 - Policy 10 (Resources)
 - The support for the consideration of natural flood management is welcomed
 - The Proposed Plan will take account of THC's review of waste management facilities in Badenoch and Strathspey
 - SEPA's detailed comments on policy 10 are noted. These comments will be taken into account and addressed as far as possible through changes to either the policy wording or the supporting text
 - The comment about the need for CO₂ emission assessments where peat and carbon rich soils are present will be addressed through the changes required to address SEPA's detailed comments (see above)
 - Policy 11 (Developer Contributions)
 - The support for the proposed review of developer obligations is welcomed
 - New Policy Proposals
 - A specific policy on hutting is not required as any such proposals could be considered against part 2 of existing policy 2. However, a reference to hutting could be made within any supporting text/planning advice
 - Reference is already made to financial bonds in part 1 of policy 7 (Renewable Energy). Part 5 of policy 10 (Resources) also requires the submission of full restoration details for mineral developments. However, it is agreed that this latter requirement could be expanded to include the need for financial bonds in appropriate cases

Place-Based Comments

The relative role and function of different settlements including Aviemore, An Camas Mor and Laggan is considered under Main Issue 1 'Over-Arching Development Strategy'. Similarly, the merits of individual site proposals, including sites THC001 in Insh and THC046/054 in Kincaig, are considered in the settlement section. Proposals for the expansion of ski centres would benefit from support in principle under existing part 2 of policy 2.

In response to the comments about the policies which apply in Blair Atholl, it should be noted that the Cairngorms Local Development Plan applies across the entire National Park. Although planning applications are made to the relevant local authority in the first instance, all planning decisions in the Park are made with reference to the same plan policies.

General Comments

The policies of the Local Development Plan aim to support development in appropriate locations whilst protecting and enhancing the natural and cultural heritage of the National Park. The policies must be read as a whole, and all relevant policies are taken into account when planning applications are determined. Whilst a number of respondents have been critical of the existing policies for being too vague, or for not giving sufficient priority to one or another of the long-term outcomes, they have not suggested any further amendments to address their concerns. No change is needed in response to these comments.

In response to the comments about a perceived lack of community input into the process, it should be noted that the Main Issues Report was a key opportunity to influence the content of the emerging Local Development Plan. There will also be a further opportunity to comment on detailed policies at the subsequent Proposed Plan stage. In response to those that have challenged the role of CNPA in planning decision making, it should be noted that this is outlined in other legislation and is not a matter for the Local Development Plan.

It is accepted that many of the policy changes identified in Annex I of the Main Issues Report were relatively minor in nature. Annex I intended to identify where minor technical changes to policies are needed to take account of the most recent planning guidance and legislation. The main issue topics are likely to result in further more significant policy changes and these are covered elsewhere in this report.

Recommendations

The Proposed Plan should incorporate the policy changes summarised in Annex I of the Main Issues Report, subject to the following minor additions and amendments:

- Policy 1
 - Make reference to the support for ‘succession housing’ within any supplementary guidance / planning advice
 - Clarify the types of rural building that can be considered part of a rural group within any supplementary guidance / planning advice
 - Clarify that existing groups can expand into previously undeveloped fields in appropriate cases through any supplementary guidance / planning advice
- Policy 2
 - Include a reference to hutting in any supporting text / planning advice
- Policy 3
 - Include a reference to supporting heat networks within the policy
 - Retain the current wording in part 1 a)
 - Include reference to encouraging the provision of electronic vehicle charging points within the supporting text

- Policy 7
 - Include an additional bullet in part 1 to read “they adequately minimise detrimental impact on local air quality”
 - Include an additional bullet in part 2 to read “the passage of migratory fish, particularly salmonids”
 - Include a reference to solar energy proposals within any supplementary guidance / planning advice

- Policy 8
 - Amend the policy title to ‘Open space, sport and recreation’ and refer to other forms of open space within the policy wording

- Policy 9
 - Replace the second paragraph of part 6 with the wording at paragraph 3.42 of the Historic Environment Scotland Policy Statement, and replace “scheduled ancient monuments” with “ancient monuments”

- Policy 10
 - Take account of THC’s review of waste management facilities in Badenoch and Strathspey in the final version of the policy
 - Part 1: highlight requirement for submission of Construction SUDS as part of any Construction Method Statement; emphasise improving water environment where possible; ensure provision of appropriately sized buffer strips; and highlight requirement for phase 1 habitat surveys where groundwater dependent terrestrial ecosystems are known or likely to be present
 - Part 2: reword bullet a) to read “be free from medium to high risk of flooding from all sources taking into account predicted impacts of climate change”; ensure development accords with SEPA’s Land Use Vulnerability Guidance and any development permitted in medium to high risk areas is built to water resilient design; ensure flood risk assessments are undertaken in accordance with SEPA’s Technical Flood Risk Guidance
 - Part 4: identify the existing waste management sites at Aviemore, Grantown-on-Spey, Blair Atholl and Kingussie on the proposals maps
 - Part 5: include additional wording to comply with paragraph 248 of Scottish Planning Policy; and include reference to potential need for financial bonds
 - Part 6: reword to protect peat and carbon rich soils by avoiding disturbance in the first instance by all developments. Where this is not possible development should be informed by appropriate peat survey and management plan and suitable mitigation measures should be implemented

General Comments

Respondents

Ref	Name / Organisation
001	Scottish Campaign for National Parks
024	Braemar Resident
031	John Muir Trust
039	N Kempe
040	Badenoch and Strathspey Conservation Group
044	Scottish Environment Protection Agency
046	Ristol Consulting on behalf of Atholl Estate
050	B Shorter
051	Historic Environment Scotland
052	Scottish Wild Land Group
053	Inveresk Community Council
071	Edinglassie Estate (Dunecht Estates)
082	D Morris
092	Scottish Land and Estates
135	Alvie and Dalraddy Estates
143	Crofting Commission
151	Forsyth Accounting Practice Ltd
157	Balavil Estate Ltd
204	J Mackay
215	G Bulloch

Ref	Name / Organisation
216	Carrbridge Resident
221	Woodland Trust Scotland
222	Carrbridge Resident
223	Blair Atholl Resident
227	Moray Council
229	Anonymous
230	Kincraig Resident
231	C Campbell
242	Carrbridge Resident
251	S Dickie
260	H Quick
264	D Sherrard
275	Anonymous
282	D Bruce
290	A Walker
301	G Thomson
308	Ballater Resident
315	Kinnaird
316	Kingussie Resident
319	C McPherson

Response Overview

Do you have any other general comments on the topics you think the Local Development Plan 2020 should address?

40 respondents provided additional general comments on topics or issues that they felt should be addressed in the new Local Development Plan.

Key points

- A number of additional general topics were proposed for inclusion in the Proposed Plan
- However, most of these related to matters that are either already addressed through existing or proposed new policies, or are beyond the control of the planning system

Issues Raised

Some respondents supported the format and content of the Main Issues Report, with views including that the consultation documents were clear, concise, easy to read, engaging and well presented (001, 051, 215, 227, 260, 316). However, others stated that they found the consultation difficult to understand and engage with (024, 216, 229), and one raised concern about the lack of an evening consultation meeting in Kingussie (315). Two respondents expressed general concern about a lack of community input to the planning process (242, 282).

One respondent felt that the introduction to the Main Issues Report was misleading. They stated that greater weight should only be given to the first national park aim if in the opinion of the Park Authority there is a conflict between it and the other aims (135).

Various respondents identified issues which they thought should be prioritised within the new Local Development Plan. These included: a greater emphasis on conservation (319); balancing the protection of landscapes and communities with the need for development (230); protecting and enhancing Wild Land Areas (031); avoiding development on crofting land if possible (143); encouraging enterprise and providing small business units (151); providing low impact tourist accommodation such as huts and camping (092); improving design standards (151); improving standards of construction (231); and supporting the provision of superfast broadband and enhancing digital connectivity (204, 290).

A number of comments were place-based. One felt the Cairngorms should become a World Heritage Site (082). Another requested more prominence for the Angus Glens in Local Development Plan publications, including identifying roads accessing the Park via Glen Esk on maps such as Figure 1 in the Main Issues Report (053). One respondent suggested that the approval of An Camas Mòr should be identified as the highest priority for the Local Development Plan (204), although another described An Camas Mòr as a pipe dream that is restricting development in Aviemore (222). One respondent suggested identifying Aldclune as a rural settlement and proposed a site which they felt should be allocated for development (046). Another wished to see sites at Balavil allocated for development (157).

The affordability of housing was raised in a number of comments. One respondent felt the delivery of more affordable homes should be a key priority (151). Another felt that current delivery models have failed to meet local affordable housing needs whilst using up land at the expense of the special qualities of the Park (040). A third wished to see restrictions on second homes, potentially through changes to the council tax regime (251). It was also suggested that a Government funded 'land bank' be introduced to make land available to housing associations and increase the delivery of affordable housing (264).

Two respondents wished to see more redundant buildings being brought back into productive use. One felt there should be a presumption in favour of both converting existing redundant agricultural buildings to housing and redeveloping brownfield sites in landward areas (223). Another felt it should be made easier to convert redundant commercial buildings to housing and stated that this does not require planning permission elsewhere in the UK (301).

Some respondents raised issues relating to visitor facilities and visitor experiences. One felt that visitors are being put off by the extent of windfarms surrounding the Park (050). Another felt there is a need to address the poor offering at Cairn Gorm Mountain and wished to see provision for recreational facilities covered in the new Local Development Plan (052).

Two responses related to forest and woodland expansion in the Park. One wished to see sites identified in the Local Development Plan for native woodland creation (221), whereas the other drew attention to the importance of heather as a scarce habitat and wished to see a presumption against wholesale woodland expansion on heather moorland (071).

SEPA (044) drew attention to their range of technical publications and recommended that these be used as guides in preparing the Proposed Plan.

Other general comments included a desire for a ban on wood and coal burning and restrictions on the use of diesel vehicles in the Park (275).

Final comments related to the adoption and implementation of the Local Development Plan. One response raised concern about the way in which Local Development Plans can be modified after they have been approved by planning authorities (308). Another stated that CNPA must stick to the Local Development Plan policies once adopted as there have been too many examples of departing from the existing plan without justification (215). A third wanted to see clearer and firmer policies on enforcement (039).

Discussion

Although a small number of respondents found it difficult to understand the consultation, the documents tried to present information in a user friendly and accessible manner and this appears to have been generally well received. The programme of consultation meetings included events at different times of the day to allow as many people as possible to attend. An additional evening event was also held in Newtownmore in response to comments about the lack of an evening event in that part of the Park. In response to the comments about a perceived lack of community input to the planning process, it should be noted that the Main Issues Report was a key opportunity to influence the content of the emerging Local Development Plan. There will also be a further opportunity to comment on detailed policies at the subsequent Proposed Plan stage.

The comment about the introduction to the Main Issues Report is noted. The text of section 9(6) of the National Parks (Scotland) Act 2000 states that “if, in relation to any matter, it appears to the authority that there is a conflict between the National Park aim set out in section 1(a) and other National Park aims, the authority must give greater weight to the aim set out in section 1(a)”. Although it is not agreed that the Main Issues Report misrepresented this provision, the Proposed Plan could make clear that it is the role of the CNPA to determine whether there is any conflict and to give greater weight to the first aim if a conflict is apparent.

The various issues which respondents felt should be prioritised in the new Local Development Plan are largely already covered through existing or proposed new policies.

For example, the existing Local Development Plan already includes robust policies to conserve natural and cultural heritage. These will be carried forward, and in some cases strengthened, in the Proposed Plan. The Proposed Plan will also include policies to protect landscapes and to support development. All of the policies will be applied in a balanced way through the subsequent development management process.

The request for Wild Land Areas to be protected and enhanced is noted. Annex 1 of the Main Issues Report recommended minor changes to the supporting text of existing policy 5 (Landscape) to make more explicit reference to safeguarding the character of Wild Land Areas. This will ensure the Proposed Plan meets the requirements of paragraph 200 of Scottish Planning Policy in respect of wild land. The issue of development on crofting land was considered during the Examination of the current Local Development Plan, when it was concluded that developments on crofting land should be assessed on their merits in the same way as any other development proposals. It is therefore not necessary to include specific policies on crofting land within the Proposed Plan.

The Main Issues Report outlined proposals to support economic development and encourage enterprise, and these matters are considered in more detail under Main Issue 6 'Economic Development'. Existing policy 2 (Supporting Economic Growth) also already supports appropriate tourism and leisure developments. Annex 1 of the Main Issues Report recommended minor changes to this policy which will be taken forward in the Proposed Plan to provide specific support for low-cost tourist accommodation such as camping.

A more detailed discussion about how the Proposed Plan will seek to improve design standards is outlined under Main Issue 2 'Designing Great Places'. However, it is beyond the scope of the Local Development Plan to influence construction standards as these are controlled through the Building Standards process. The comments seeking support for the provision of superfast broadband and enhancing digital connectivity are noted but, again, these are largely outside the direct influence of the Local Development Plan.

It is beyond the scope of the Local Development Plan to consider whether the Cairngorms should be a World Heritage Site and no change is required in response to the comment on this issue. The comment seeking greater prominence for the Angus Glens in Local Development Plan documentation is acknowledged, and the Proposed Plan will address this request as far as possible (eg by including roads into the Park via the Angus Glens on the overall development strategy plan). A more detailed response to comments about the role and status of An Camas Mòr within the settlement hierarchy is outlined under Main Issue 1 'Over-Arching Development Strategy'. The issue of whether or not Aldclune should be identified as a rural settlement is also considered under Main Issue 1 'Over-Arching Development Strategy', and the merits of the site specific development proposals at Aldclune and Balavil are addressed within the 'Landward Site Proposals' section.

Most of the issues raised by those commenting on affordable housing are addressed under Main Issue 5 'The Affordability of Housing'. The suggestion of a government-funded land bank to help increase the delivery of affordable housing is beyond the scope of the Local Development Plan and no action is needed to address this comment in the Proposed Plan.

The comments wishing to see redundant buildings being brought back into productive use are noted. Part 8 of policy 1 in the existing Local Development Plan already supports the conversion of existing traditional and vernacular buildings to housing, whilst part 3 of policy

I also supports housing development on rural brownfield sites. It is therefore unnecessary to amend the existing policy to achieve the outcomes sought by respondent 223. Part 4 of existing policy 2 also enables redundant commercial buildings to be converted to an alternative use providing it can be demonstrated that it is no longer practical for financial or other reasons for the buildings to remain in economic/employment use. The more relaxed approach sought by respondent 301 could result in the loss of existing viable business land/buildings to more valuable uses such as housing and it is not considered appropriate to amend the existing policy in response to this comment.

Policy 7 of the current Local Development Plan already makes clear that large-scale commercial wind turbines are not appropriate within the Park and this policy will be taken forward into the Proposed Plan. However, it is not possible to influence windfarm developments surrounding the Park through the Cairngorms Local Development Plan, as its policies only apply within the Park boundary. Nevertheless, policy 3.3 of the National Park Partnership Plan makes clear that large-scale wind turbines are not appropriate outside the Park if they would have a significant adverse effect on its landscape character. Neighbouring planning authorities must take account of this policy when considering planning applications for windfarms outside the Park boundary. The response wishing to see provision for recreational facilities covered in the new Local Development Plan is noted. Existing policy 2 is supportive of appropriate tourism and leisure related developments and this policy approach will be carried forward into the Proposed Plan.

The responses relating to forestry are not directly relevant to the Local Development Plan as most forms of forestry-related activity fall outside the control of the planning system. These matters will be considered through the emerging Cairngorms National Park Forest Strategy, which was subject to consultation during early 2018 and is expected to be adopted in late 2018.

SEPA's comments in relation to their technical publications are welcomed and these publications will be used as guidance during the development of the Proposed Plan.

The Local Development Plan is not able to influence wood/coal burning or the use of diesel vehicles in the Park. No further action is required in response to the comment on these issues.

The final comments regarding the adoption and implementation of the Local Development Plan are noted. The process for preparing a Local Development Plan is defined in legislation and includes an independent Examination stage. This enables a planning Reporter to consider any outstanding objections to the plan and, if it is deemed necessary, recommend modifications in light of the objections. Although the Examination can therefore change the plan after its initial approval by the planning authority, this process provides a level of independent scrutiny. In response to the comment about the need for adherence to policies in the Local Development Plan once it is adopted, it should be noted that legislation requires all planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. Future planning applications will continue to be determined in accordance with this legal requirement. CNPA will also continue to use appropriate and proportionate measures to ensure compliance with planning controls, including taking enforcement action where necessary. No further actions are needed to address these comments in the Proposed Plan.

Recommendations

The Proposed Plan should address the following additional matters:

- The introductory text should include a more detailed commentary on the four aims of National Parks, and the legislative requirements governing their delivery
- Where possible, greater prominence should be given to the Angus Glens in any maps and figures in the plan (eg by including roads into the Park via the Angus Glens in the overall development strategy diagram)
- SEPA's technical publications should be used as guidance during the preparation of the Proposed Plan