AGENDA ITEM 11

APPENDIX 1

SUMMARY OF RESPONSES AND RECOMMENDED ACTIONS

Cairngorms NATIONAL PARK
Pàirc Nàiseanta a' Mhonaidh Ruaidh

Cairngorms National Park

Local Development Plan 2020

Post Main Issues Report – New Sites Consultation

Summary of Responses and Recommended Actions

Contents

Aviemore: ED1 Extension	1
Aviemore: New Community Site	3
Aviemore: Additional Economic Development Allocation	6
Calvine: Former Struan School	8
Carr-Bridge: Landmark Extension	10
Grantown-on-Spey: Caravan Park Extension	13
Tomintoul: Extension to Existing Tourism Allocation	17
Other Issues	18

Aviemore: ED1 Extension

Respondents

Ref	Name / Organisation
26	R Tozer
53	C Cadden
55	A Tilston-Eastaway

Ref	Name / Organisation
66	Badenoch & Strathspey Conservation Group
73	Scottish Natural Heritage (SNH)

Issues Raised

Respondents raised the issue that the site already seems to be in use (26, 53, 55, 66) and that they had the following issues and concerns:

- The site is already being used without consent (26, 66);
- The site hosts noisy operations, well outside normal working hours (26, 55);
- The level of the land needs to be lowered to match the coach park on the opposite side of the entrance road (26, 55);
- Screening is needed along its western edge and towards the mountains (26, 55);
- Space and empty units already exist in the Dalfaber Industrial Estate (53);
- The site is rich in biodiversity, supporting flowers such as devil's bit scabious (66);
- The proposal will have negative effects on people's quality of enjoyment on the Speyside Way (66); and
- The proposal will increase the risk of negative effects on water quality in the River Spey SAC (66).

Responder 26 considered the site suitable for allocation, providing that the issues outlined by them above were addressed.

SNH (73) provided technical details and further information on natural heritage to be taken into account during the production of the Proposed Plan.

Discussion

As pointed out by a number of responders, the site was granted consent for a temporary compound in January 2018 (2017/0465/DET / 17/05717/FUL), which was conditioned to cease to have effect on 31 July 2018. The CNPA and the Highland Council are aware that the site is currently being used without authorisation and the latter is currently pursuing an enforcement case against the landowner. However, this does not affect the CNPA's assessment of the site for its suitability as an economic development allocation.

It is agreed that landscaping, including screening and the levelling of the site, is likely to be required as part of the development and these can be added to the site information presented within the LDP. The LDP cannot itself place conditions on the operating hours of uses, since it does not set out what the exact uses are. However, conditions around working hours may be applied and enforced through the planning application process.

The natural heritage concerns are not considered to be of a significant enough magnitude or risk to prevent development taking place. However, these issues would also be subject to further detailed consideration through the planning application process.

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

Recommendation

The Proposed Plan should:

- Allocate the site as part of ED1, as outlined in the new sites consultation document, and include landscaping requirements in the supporting text for the allocation

Aviemore: New Community Site

Respondents

Ref	Name / Organisation
2	J Kirby
3	D Streeter
7	K Barley
14	Lochan Mor Residents Committee
15	C McMitchell
16	M Arbuthnot
17	G Welsh
18	M Hutchison
19	J and B Harris
22	I Wallace
24	WG, VF and DE Smith
25	A Brattey
26	R Tozer
27	Ross & Liddell Ltd
28	J and S Barker
29	BR Doughty
30	M Brattey
31	J Furie
33	Aviemore and Vicinity Community Council

Ref	Name / Organisation
34	C Johnstone
37	RJ Foot
39	K and W Best
41	D Barr
42	S Barr
43	J and M Pope
44	A Johnstone
46	J Creber
50	M Deveci and D Ross
51	K Ingram
53	C Cadden
55	A Tilston-Eastaway
57	A Bell
59	I and W Fraser
64	N Ackerley
68	J Goldsworthy
69	M and E MacEwen
70	N MacEwen
71	D Chapman and M Gilfillan

Issues Raised

This proposal originated from Aviemore and Vicinity Community Council and the Aviemore Community Enterprise Company, who requested the change from protected open space to a community allocation, for the development of a community hall, during the Main Issues Report consultation. Aviemore and Vicinity Community Council (33) chose not to comment on this site in response to this consultation.

The proposal generated a considerable amount of objection. The points made were (summarised):

- Land was greenbelt (2)
- Land is currently an important and well used open space, catering for a range of informal groups and events (2, 3, 7, 14, 16, 22, 27, 29, 30, 34, 37, 39, 41, 42, 43, 44, 55, 64, 68, 69, 70)
- It is the only free public area of green space in the Aviemore area for children to play on and there is nowhere else in Aviemore where informal use for sports can be carried out (14,15, 16,18 19, 22, 25, 26, 28, 30, 34, 37, 39, 44, 46, 50, 51, 53, 55, 57, 59, 71)
- Very limited open space in Aviemore (27, 29, 31, 50, 68)
- It is used by adults and children for dog exercise, recreation, play and sports such as football, shinty and running (2, 3, 7, 16, 22, 25, 26, 27, 28, 29, 31, 34, 37, 39, 41, 42, 50, 51, 53 ,55, 59, 68)

- Recreational space should not be reduced (3)
- Open space is beneficial for both physical and mental health and wellbeing (24, 25, 27, 29, 30, 31, 37, 41, 43)
- The proposal will result in increased traffic (7)
- Significant work was carried out to make the land usable as a sports pitch (14, 27, 29, 51)
- Crowd funding has provided a set of goal posts (26, 68)
- Many houses and flats on Paterson Road are for holiday use, either rental or second home. As tourism is so vital for the local economy, then such spaces need to be preserved for local amenity (50)
- Young people would no longer have anywhere to meet (51)
- Allocation will open up opportunity for further housing development (50)
- Finance for a new Community Hall is not available (50)
- Development of the site would damage the fabric of local area (64)
- The land was paid for by a levy of £500 on each house sold on Locahin Mor on the condition it was to be a communal open space for all the community and maintained by Highland Council (14, 15, 19, 22, 24, 27, 29, 34, 39, 43, 44, 50, 53, 57, 68, 71)

The need for a new Community Hall was questioned and it was pointed out that Aviemore is already very well catered for terms of in public venues that can be used by the community (7, 14, 24, 26, 27, 29, 30, 34, 37, 39, 41, 42, 44, 46, 50, 51, 53, 55, 57, 69, 70, 71).

It was suggested that better sites exist for a community hall, such as the Aviemore Highland Resort site (26).

It was suggested that more environmentally friendly solutions could be suggested if Highland Council really feels that it can no longer maintain this land:

- A community garden cared for by local volunteers
- A wild flower garden
- Sporting facilities - a bike track for example.
- Allotments (50)

It was asked who Aviemore Community Enterprise were (2).

It was noted that the road name is Frank Spaven Drive, not Spaven Drive (26).

Discussion

The level of objection to this site is noted. In particular, the fact that homeowners on Lochan Mor have been required to pay a missive of £500 to maintain the land as recreation space is of significance.

No further information or evidence has been submitted in support of the delivery of a new community hall on this site. In light of the consultation comments, and in the absence of any more firm proposals for the development of a hall facility, it is considered that the site is unsuitable for allocation for such a use. Instead, it should be maintained as a protected open space (as per the designation in the 2015 Local Development Plan). The Proposed Plan will

include an objective to support the delivery of a new community hall in Aviemore, however it is likely that alternative locations will need to be considered.

Recommendation

The Proposed Plan should:

- Not allocate the site for community uses and maintain it as a Protected Open Space

Aviemore: Additional Economic Development Allocation

Respondents

Ref	Name / Organisation
11	Historic Environment Scotland (HES)
56	Highland Council

Ref	Name / Organisation
66	Badenoch & Strathspey Conservation Group
73	Scottish Natural Heritage (SNH)

Issues Raised

HES (11) requested that the environmental assessment for this site recognise that there is a scheduled monument (SM5899 Loch Nan Carraigean, Chambered Cairn & Stone Circle) in the vicinity. While they do not consider that significant effects on the setting of the monument are likely, there is potential for some impact. They therefore recommend that the mitigation measures proposed for landscape impacts should take account of the setting of the monument.

The Highland Council (56) highlighted that they are currently reviewing waste management options in Badenoch and Strathspey. Granish will continue to operate as a landfill site to a point in 2020 (the current planning permission for landfilling expires in March 2020) with restoration to take place within a year thereafter. Once landfilling is no longer permitted at Granish, the Council will need to continue to provide a waste collection service to the local community. There will be a requirement for a municipal waste transfer station in Badenoch and Strathspey, with the Granish site being the most logical location. They therefore propose that the allocation boundary be revised slightly to provide an additional area for the development of a waste transfer station. They enclose a map with a suggested boundary, which is shown in Annex 1.

Badenoch & Strathspey Conservation Group (066) do not support the settlement boundary being altered to include the proposed additional economic development site. They believe that such a settlement boundary would facilitate the extension of further development north of Aviemore, outside of the site and settlement boundary area. They also believe it facilitates 'ribbon development'. They are concerned that further development at the proposal site will not mix well with the visitor experience at the new caravan site to the west. They note that land surrounding the proposal site (and the proposal site itself prior to development) includes land of high biodiversity value. If it is to retain its value and particular features of interest, it requires connectivity for wildlife with the wider countryside. Already significant areas of this have been lost recently, on both sides of the road (B9152).

SNH (73) provided technical details and further information on natural heritage issues to be taken into account during the production of the Proposed Plan.

Discussion

The CNPA agree to note the Loch Nan Carraigean, Chambered Cairn & Stone Circle scheduled monument in the Strategic Environmental Assessment and ensure that mitigation takes its presence into account.

The CNPA note the Highland Council's duties regarding waste management. The proposed site extension is modest and therefore considered appropriate for inclusion in the allocation.

The representations of the Badenoch & Strathspey Conservation Group are largely based on hypothetical situations that sit outside of the proposals set out of the development plan. Nevertheless, it is important to note that ecology and biodiversity impacts would be subject to detailed assessment through the development management process when any future planning applications are submitted for the site. This would ensure that any adverse impacts are minimised wherever possible and that appropriate mitigation is provided where necessary.

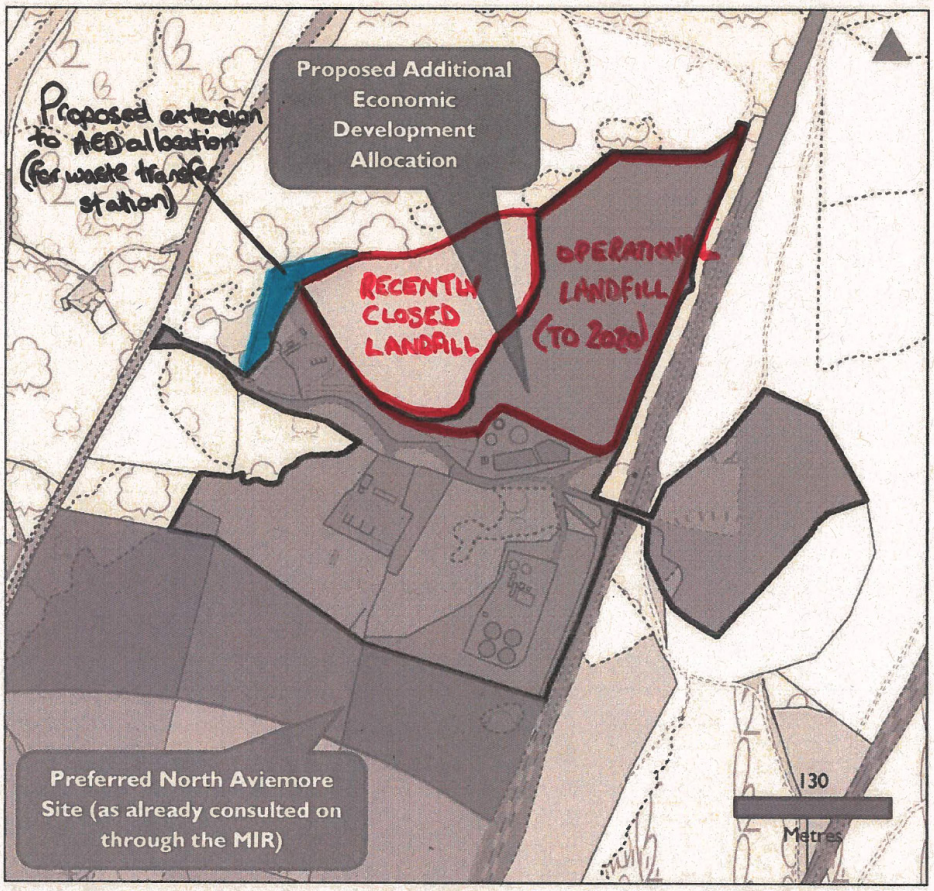
The technical details and further information provided by SNH will be taken into consideration as the Proposed Plan is developed.

Recommendation

The Proposed Plan should:

- Allocate the site for economic development as outlined in the new sites consultation document, but with the addition of the small area proposed by the Highland Council

Annex 1



Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2018. All rights reserved. Ordnance Survey Licence number 100040965 Cairngorms National Park Authority

Calvine: C1: Former Struan School

Respondents

Ref	Name / Organisation
21	I Mackinlay
72	A Walker

Issues Raised

Two consultation responses were received in response to this site. One was supportive in principle, but suggested that the site should be allocated for affordable housing, which should be prioritised for young families and others already in the area (21).

The other response was an objection (72). It listed the following reasons for the objection (summarised):

- poor public transport links;
- far from local shops;
- no school in the village;
- poor infrastructure, including no mains drainage;
- low demand for housing;
- already a site for sale in the village;
- an empty property in the village;
- site is close to the A9;
- questionable long term employment opportunities; and
- better sites in Pitlochry.

Discussion

The site is currently occupied by the buildings of the old Struan School. It is unclear whether any of these buildings can be reused and, if they can, what their most suitable and sustainable use would be. The proposed community designation allows a variety of uses to be considered and delivered, including affordable housing. There are other examples in the National Park where this is the case, for example site C1 in Ballater. One of the aims of the community designation is to preclude the site from being redeveloped entirely with open market housing. Therefore, if the site is deemed suitable for residential properties, they would need to include one of the affordable housing tenures outlined in Scottish Planning Policy. However, the Local Development Plan does not have the ability to impose occupancy conditions or directly influence the allocations policy for any affordable housing that is developed.

The objection raises a number of issues which relate to the site's potential use for housing. While some of the points related to access (i.e. poor public transport, far from local shops etc.) have some merit, they are not of such an order of significance to render the site completely unsuitable, particularly in light of the fact that publically owned buildings are already present on the site and need to be re-used or replaced or risk succumbing to the effects of entropy and decay, at cost to the tax payer.

The points about the site's close proximity to the A9 and the availability of alternative sites might have more relevance if the site were in a greenfield location. However, it is not and, for the reasons already stated, it is considered appropriate to consider the future use of this previously developed site.

Recommendation

The Proposed Plan should:

- Allocate the site for community uses, with affordable housing being listed as a potentially suitable use, as outlined in the new sites consultation document

Carr-Bridge: Landmark Extension

Respondents

Ref	Name / Organisation
4	J Buttress
5	A Kernaghan
6	M Green
8	R Ferguson
9	D Stott
20	L Anderson
36	CK Miller
38	A Buttress
40	Carr-Bridge and Vicinity Community Council
45	Woodland Trust Scotland
47	M&J Campbell

Ref	Name / Organisation
48	L McInnes
49	D Gasking
52	L Vallance
54	A McInnes
58	R Williams
60	P Robertson
62	J Rice
65	D Henderson
66	Badenoch & Strathspey Conservation Group
67	J Roberts
73	Scottish Natural Heritage (SNH)

Issues Raised

A significant number of respondents felt the scale of the extension shown in the consultation document was excessive and disproportionate, with a number raising concern that an allocation of such size might provide scope for an alternative tourism operator to occupy the site more intensively in the future (4, 9, 20, 36, 38, 40, 47, 48, 52, 54, 62, 65, 67). One stated that an extension of the proposed scale had not been appropriately justified (62).

A number of comments stated that the proposed extension would have a negative impact on woodland / forestry (52, 58, 60, 62), with one objecting on the grounds that it would damage a large area identified as ancient semi-natural woodland (45).

Respondents also raised concern that the proposal would be detrimental to the community's use of the woodland for recreation, with a number pointing out that the area contains core paths (5, 6, 8, 20, 36, 38, 45, 47, 52, 65, 66, 67). One felt this would increase recreational pressure and associated damage in remaining woodland areas (45). Another felt it would be detrimental to the community's health and the enjoyment of the local area (8).

Respondents also raised concern about the potential impact on biodiversity and wildlife (52, 58, 60). One stated that important habitats and sites within the woodland, and the habitat connectivity provided by the woodland, should be retained if the T1 site is extended (66).

A number of responses were concerned that the proposal would have a negative impact on capercaillie (6, 38, 45, 52, 65, 67). Some felt the proposed extension would restrict recreational access to an area that is not currently used by capercaillie and that this might cause existing recreation patterns to be re-routed to more sensitive areas for capercaillie (36, 66, 67).

Additional concerns related to: the impact on the amenity and setting of the village (52); failure to accord with the current Local Development Plan's aspiration to protect the special qualities of the village (62); and the likelihood of more vehicles resulting in a less friendly environment for walkers and cyclists (62).

Notwithstanding the above concerns, respondents also highlighted the importance of Landmark to the local economy and the community generally (8, 9, 40, 47, 58, 60, 66, 67). A significant number of responses indicated that they would not object to a smaller area being allocated for Landmark to expand and provide for more car parking (6, 8, 9, 20, 36, 38, 40, 48, 52, 54, 58, 60, 66, 67).

SNH (73) provided technical details and further information on natural heritage issues to be taken into account during the production of the Proposed Plan.

Discussion

The concerns about the scale of the proposed extension to the T1 site, as shown in the consultation document, are noted. This area was put forward by Landmark in their response to the Main Issues Report (MIR). However, their representation also made clear that it was not their intention to develop the whole site (their stated development aspirations amounted to approximately a quarter of the total area) and that they aimed to undertake environmental improvement works across much of the area. More detail can be found in Landmark's MIR submission at: http://cairngorms.co.uk/wp-content/uploads/2018/06/276LandmarkForestAdventurePark.pdf).

The wider site was included in the new sites consultation document as, at the time of publication, no firmer detail on the likely location of development was available. However, following the close of the new sites consultation, discussions have been held with Landmark and a smaller, more focussed extension to the existing T1 site is now proposed. This is shown in Annex 1.

The more focussed extension now proposed will enable the appropriate expansion of Landmark, which is an important employer and makes a significant contribution to the local economy, whilst helping to address the majority of concerns raised through the consultation. In particular, it will help to ensure that:

- any woodland loss is minimised;
- recreational access to the wider site can be retained to avoid damage in more sensitive areas of woodland surrounding the village (particularly those that are more important for capercaillie);
- the habitat connectivity provided by the existing woodland is retained as far as possible; and
- that there will be no significant adverse impact on the amenity, setting or special qualities of the village.

It should be noted that the proposed smaller extension will still have an impact on an existing core path which would need to be diverted and appropriate alternative / enhanced provision made. This requirement can be specifically identified in the Proposed Plan to ensure it is subject to careful consideration through the subsequent development management process.

Remaining issues, including detailed assessment of the impact of development on natural heritage and road safety, will be addressed through the subsequent development management process.

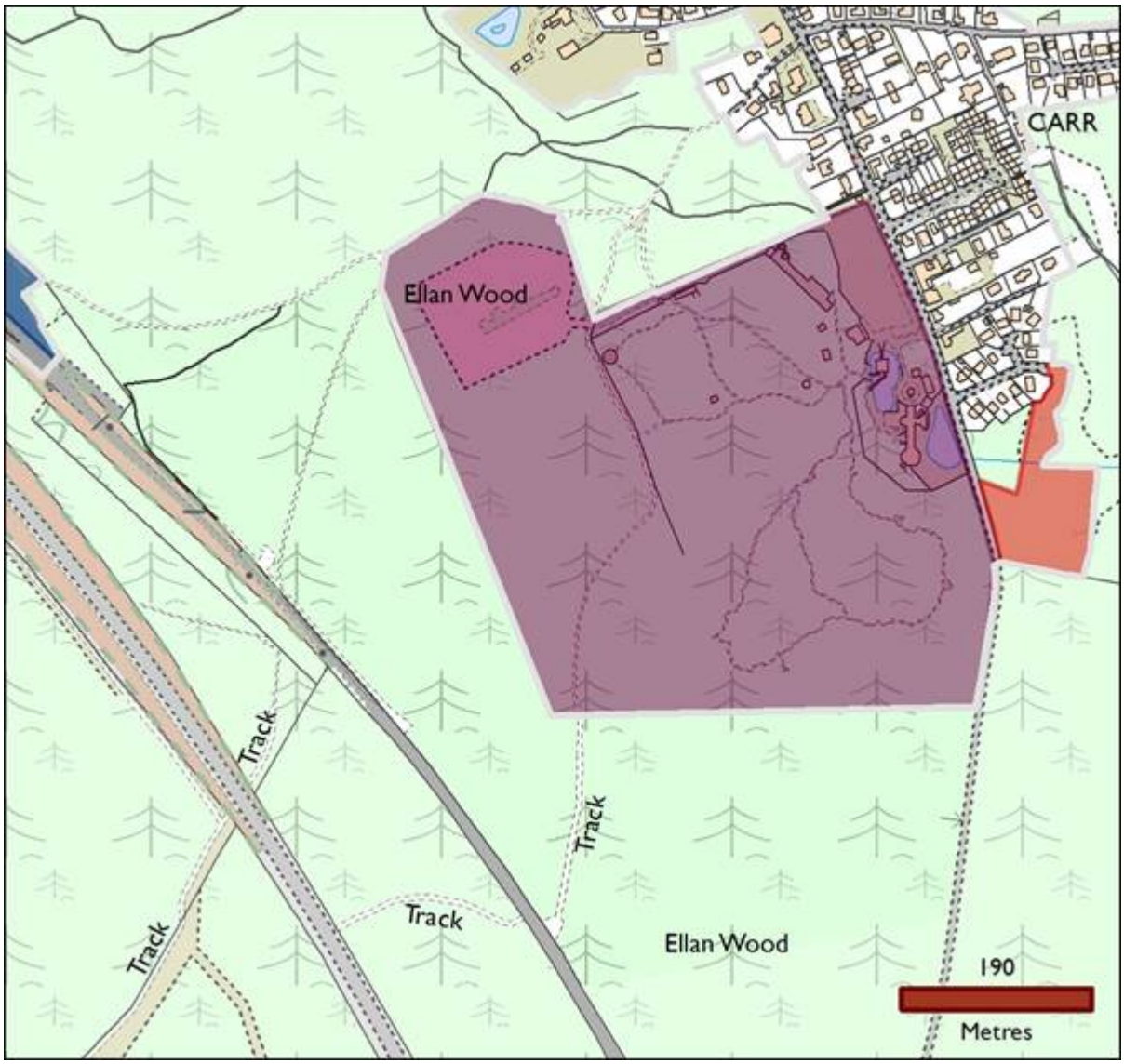
The technical details and further information provided by SNH will be taken into consideration as the Proposed Plan is developed.

Recommendation

The Proposed Plan should:

- Allocate a smaller extension to the existing T1 allocation, as shown in Annex 1

Annex 1



Grantown-on-Spey: Caravan Park Extension

Respondents

Ref	Name / Organisation
12	Grantown-on-Spey and Vicinity Community Council
35	G Bulloch
45	Woodland Trust Scotland

Ref	Name / Organisation
66	Badenoch & Strathspey Conservation Group
73	Scottish Natural Heritage (SNH)

Issues Raised

One respondent supported the proposed extension but felt there is an issue with traffic congestion at the corner of Seafield Avenue and the Square. They suggested this could be alleviated by the provision of a new link road from Seafield Avenue (between the caravan site and the care home) to the junction of Castle Road East and Cromdale Road (12).

The remaining respondents objected to the proposed extension.

One response stated that the consultation did not provide an adequate justification for the proposal and was therefore in breach of Circular 6/2013, para 80, which requires that "*Planning authorities should be able to demonstrate the underlying reasons for their preferred development locations and policies. This stage should not be used to 'test the water'*" (35).

Two respondents felt the proposal would represent an inappropriate extension to the existing settlement boundary. They raised concern about the elevated and prominent position of the site, as well as its impact on visual amenity and the setting of Grantown (35, 66).

Concerns were also raised about ecology, with one comment stating that the site is of considerable ecological benefit (35) and another that its development would result in biodiversity loss and the loss of habitat connectivity (66). One response added that the proposal would increase recreational pressure on green spaces in Grantown, particularly those used by capercaillie, therefore causing further damage to natural heritage (66).

One respondent objected to the proposal on the grounds that the site (and the existing T1 allocation) appears on the Ancient Woodland Inventory as woodland of Long Established Plantation Origin. They argued that it is therefore of high nature value and should be protected from development (45).

One respondent had additional concerns regarding the potential for chalets to be developed and occupied inappropriately as permanent dwellings, and the potential for drainage and waste water issues (66).

One response argued that the site is currently being used for the storage of waste materials and other equipment in breach of planning legislation (35), whilst another commented that there have been longstanding and repeated enforcement issues with the existing site (66).

Another respondent pointed out that there does not appear to be an existing planning consent on the site, despite the consultation document suggesting one exists (45).

SNH (73) provided technical details and further information on natural heritage issues to be taken into account during the production of the Proposed Plan.

Discussion

Grantown-on-Spey and Vicinity Community Council's support in principle for the proposed caravan park extension is welcomed. Their comments in relation to the provision of a new link road are noted. However, The Highland Council has not objected to the proposed extension in its capacity as local roads authority. Although the detailed transport impacts of any future development on the site would need to be assessed through the subsequent development management process, a new link road is not considered necessary to facilitate the proposed extension.

It is accepted that the new sites consultation document did not present a full justification for the proposed caravan park extension. However, the primary rationale for seeking to extend the existing T1 allocation following comments on the Main Issues Report was outlined in the Summary of Responses and Recommended Actions, as presented to Planning Committee in June 2018. In essence, the proposed extension seeks to support the established caravan park which plays an important role in the local economy. The Main Issues Report identified a number of objectives for Grantown. These included supporting opportunities to increase the attraction of Grantown as a tourist and recreation destination, and supporting proposals for business development, growth and diversification. The proposed caravan park extension would contribute directly towards meeting these objectives. The criticism that the new sites consultation breaches paragraph 80 of Circular 6/2013 is unfounded as the guidance in this paragraph of the Circular refers primarily to the form and content of the subsequent Proposed Plan stage.

The objections in respect of the visual impact of the site are noted. The Strategic Environmental Assessment that was published alongside the consultation considers the likely impact of development on this site on the special qualities of the landscape. It identifies that there is likely to be a major adverse effect. However, it should be noted that this assessment considers the position prior to the inclusion of any mitigation measures. The development management process would enable visual impacts to be minimised and mitigated through the sensitive siting and design of any new development within the site.

The concerns about potential impacts on ecology and biodiversity are also noted. The Strategic Environmental Assessment also identified the potential for major adverse effects on biodiversity, primarily as a result of the identification of part of the site as ancient woodland (see further comments below). However, these effects must be balanced against the potential positive economic and social impacts of development. Again, it must also be noted that the Strategic Environmental Assessment considers the position prior to mitigation. Ecology and biodiversity impacts would be subject to detailed assessment through the subsequent development management process. This would ensure that any adverse impacts are minimised wherever possible and that appropriate mitigation is provided where necessary.

As noted above, it is accepted that the proposed extension site (and the existing T1 allocation) are identified on the Ancient Woodland Inventory as woodland of Long Established Plantation Origin. This is acknowledged in the Strategic Environmental Assessment, which notes that part of the site is identified as ancient woodland. However, it also notes that some of this has been damaged through the encroachment of the caravan park into this area. While there is a strong presumption against the removal of ancient woodland, it is not an absolute constraint on development. Any development on the site would be subject to the Proposed Plan's policies on woodland removal, and additional survey work is likely to be required to support any future planning application. Compensation for any loss of woodland is also likely to be necessary, and this could be secured through the development management process.

The comments on drainage and waste water relate to matters of detail that would be assessed through the subsequent development management process. However, it is worth noting that Scottish Water has not raised any objection to the proposed extension on these grounds. Similarly, the concerns about the precise form of any tourist accommodation developed on the site are matters of detail that could be addressed as and when future planning applications are submitted.

The comment that there does not appear to be an existing planning consent on the site is acknowledged. It is accepted that the consultation document was incorrect in making reference to a planning consent extending beyond the boundary of the existing T1 site, as no such consent has been granted. Nevertheless, this does not preclude the site from being included as an extension to the existing T1 allocation. The additional concerns about existing unauthorised uses on the site, and the comments in respect of previous enforcement activity, are not directly relevant to the Local Development Plan. These have no overall bearing on whether or not the site should be allocated for development in the Proposed Plan.

In summary, the development of this site is likely to raise issues in respect of biodiversity and ecology (primarily as a result of the site being identified as ancient woodland) as well as visual impact. However, these issues need to be weighed against the potential positive impacts of development, particularly in terms of the direct contribution it could make towards meeting objectives for Grantown that have been identified and agreed through the Main Issues Report. These include supporting opportunities to increase the attraction of Grantown as a tourist and recreation destination, and supporting proposals for business development, growth and diversification.

It is maintained that the extension site should be included in the Proposed Plan because of these positive benefits. However, any future detailed proposals for the site will need to be sensitively designed and impacts on ecology and the landscape qualities / settlement setting will need to be carefully controlled through the development management process. The supporting text in the Proposed Plan could specifically highlight this requirement.

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

Recommendation

The Proposed Plan should:

- Allocate the proposed extension to the existing T1 allocation, as outlined in the new sites consultation document

Tomintoul: Extension to Existing Tourism Allocation

Respondents

No responses were submitted in respect of this proposal

Recommendation

The Proposed Plan should:

- Allocate the proposed extension to the existing T1 allocation, as outlined in the new sites consultation document

Other Issues

Respondents

Ref	Name / Organisation
1	K Tainsh
10	Transport Scotland
23	Balavil Estates Ltd
32	NHS Grampian
33	Aviemore & Vicinity Community Council
35	G Bulloch
47	M & J Campbell

Ref	Name / Organisation
54	A McInnes
55	A Tilston-Eastaway
57	A Bell
60	P Robertson
61	Turnberry on behalf of An Camas Mòr Development LLP
63	RSPB
72	A Walker

Issues Raised

A number of respondents stated that they either had no objection to the new sites or did not wish to make any specific comments on them (10, 23, 32, 33). One respondent did not wish to make any comments on the understanding that the proposed additional economic development site to the north of 'North Aviemore' would not accommodate any residential development (63).

Other responses related to the consultation process generally. Two respondents felt the consultation had been poorly publicised (35, 57), with another stating that they only found out about it by accident (72). Respondent 35 added that community workshops should have been arranged during the consultation.

One respondent was concerned that as the consultation only included sites that are proposed to be added to the plan in response to comments on the Main Issues Report, and not any sites that are proposed to be removed, this gives the impression CNPA is only listening to landowners and developers (35).

An Camas Mòr Development LLP (61) stated that the decision to change the status of An Camas Mòr from a strategic new settlement to a 'strategic consent' (as recommended in the Summary of Responses and Recommended Actions paper presented to Planning Committee in June 2018) represented a change to the settlement hierarchy without proper consultation. They also stated that their comments on the Main Issues Report had been misrepresented. They argued that the Summary of Responses and Recommended Actions paper made no mention of their comment that recreation pressures on Natura sites are true for all development sites. They argued that this had been ignored within the inclusion of 'North Aviemore' as a preferred site option.

A number of respondents objected to the proposed amendments to the Carr-Bridge H1 site (as set out in the Summary of Responses and Recommended Actions paper) (47, 54, 60).

Further comments included: a request that CNPA should reserve land adjoining the Ian Charles Hospital for future NHS and health centre development in the event of the new

hospital in Aviemore failing to gain planning permission (1); and a request that CNPA should be an advocate for the provision of more social housing (55).

Discussion

A number of consultees, including key stakeholders such as Transport Scotland and NHS Grampian, stated that they did not object to the new sites or did not wish to make any specific comment on them. This is noted. The response of RSPB is also acknowledged and, in line with their understanding, no residential development is proposed for the new economic development site to the north of 'North Aviemore'.

In response to the concerns about publicity arrangements, it should be noted that the new sites consultation was publicised in the local press as well as through CNPA's website and social media. Respondents to the Main Issues Report also received notification of the consultation. No specific workshops or consultation events were organised on account of the more limited focus of the new sites document in comparison with the wider Main Issues Report.

The assertion that CNPA is only listening to landowners and developers is unfounded. The consultation document included new sites that are proposed to be added to the Proposed Local Development Plan following comments on the Main Issues Report as this is a requirement of paragraph 80 of Circular 6/2013. There are other sites that were identified as preferred development options but which, in response to comments on the Main Issues Report, will not now be included in the Proposed Plan (eg sites AB023 in Braemar and THC016 in Dalwhinnie). However, there was no requirement for these to be included in the new sites consultation.

In response to the comments from An Camas Mòr Development LLP, it should be noted that the spatial strategy and settlement hierarchy was subject to full and proper consultation through Main Issue 1 'Over-arching Development Strategy' of the Main Issues Report. The recommendation to change the status of An Camas Mòr from a strategic new settlement to a 'strategic consent' (as set out in the Summary of Responses and Recommended Actions paper) was made in response to comments on this main issue. There will be an opportunity for An Camas Mòr Development LLP to object to the Proposed Plan, and to have any objections considered through the independent Examination process, if they feel this change is inappropriate. The concern that their comments on the Main Issues Report were not properly represented to Planning Committee is also unfounded. Their comments in relation to Natura issues are summarised on page 102 of the Summary of Responses and Recommended Actions paper, and a response is provided on page 103-104.

The comments on the proposed amendments to the Carr-Bridge H1 site do not relate directly to any of the new sites. The new sites consultation document made clear that any comments on other issues or sites from the Main Issues Report would not be considered further at this stage. There will be an opportunity for anyone with an interest in the H1 site to comment on the Proposed Plan, and to have any objections considered through the subsequent Examination process.

In response to the remaining general issues: health care provision is a matter for the NHS and there is no evidence to suggest that land should be reserved for an alternative to the

proposed new hospital in Aviemore; and a series of proposals to increase the provision of affordable housing through the Local Development Plan have already been considered in the Main Issues Report. No further change is required in response to the comments on these issues.

Recommendation

The Proposed Plan should:

- Not include any further changes in response to the comments on other issues