



# Local Development Plan interactive map engagement report

July 2024

## Introduction

The Planning (Scotland) Act 2019 has introduced several changes to the key steps of preparing a Local Development Plan. In the early stages in the preparation of a new-style Local Development Plan, evidence gathering, and early community and stakeholder engagement form an important part informing the Evidence Report.

Delivering a successful Local Development Plan relies on successful engagement and consultation. The Park Authority will continue to adhere to the National Standards for Community Engagement. The standards are good-practice principles that aim to support effective community engagement, which in turn improves the outcomes.

A Participation Statement was produced as part of the Development Plan Scheme (2023) and outlines how the Park Authority are committed to involving the public in the preparation of the next Local Development Plan. The Participation Statement also outlines when consultation is likely to take place, with whom and its likely form, including the steps to be taken to involve the public. The main objectives at this early stage of Local Development Plan preparation and community engagement are:

- Identify and feedback on the key issues we are facing, the big challenges we need to address and areas of consensus and conflict.
- Establish what realistic and planning related actions would make the biggest difference to tackling these.
- Reach a more diverse cross-section of stakeholders, exploring a variety of consultation methods that help reach audiences that are not typically engaged.

As outlined in the Development Plan Scheme 2023 there are a number of engagement approaches being adopted by the Park Authority to ensure communities and people are aware of the Local Development Plan process and the opportunities to comment at key stages in its production.



This report summarises the key findings of the first community engagement via the Park Authority's online consultation platform, Commonplace.

## Purpose of engagement

The map engagement consultation on Commonplace officially launched on the 9 August 2023 and ran for two months until the 9 October 2023. This interactive map on the platform was used to encourage the provision of views from communities and people on two main aspects:

- Views were invited on issues facing places within the National Park.
- Views were invited as to what participants think the Local Development Plan can do to address these issues.

The platform was structured using a spatial element (allowing contributors to reference their comments spatially on a map of the Cairngorms National Park using 'pins'), and through a survey questionnaire format. This allowed capture of a variety of data including a persons' relationship to the National Park (for example, resident or visitor), location and ages of contributors. Using the survey format also allowed for contributors to provide more detailed commentary on issues of importance or concern, and how these could be addressed through the Local Development Plan.

Figure 1 shows the locations of where contributors to the engagement exercise placed pins.



Density of pins placed  
by respondents

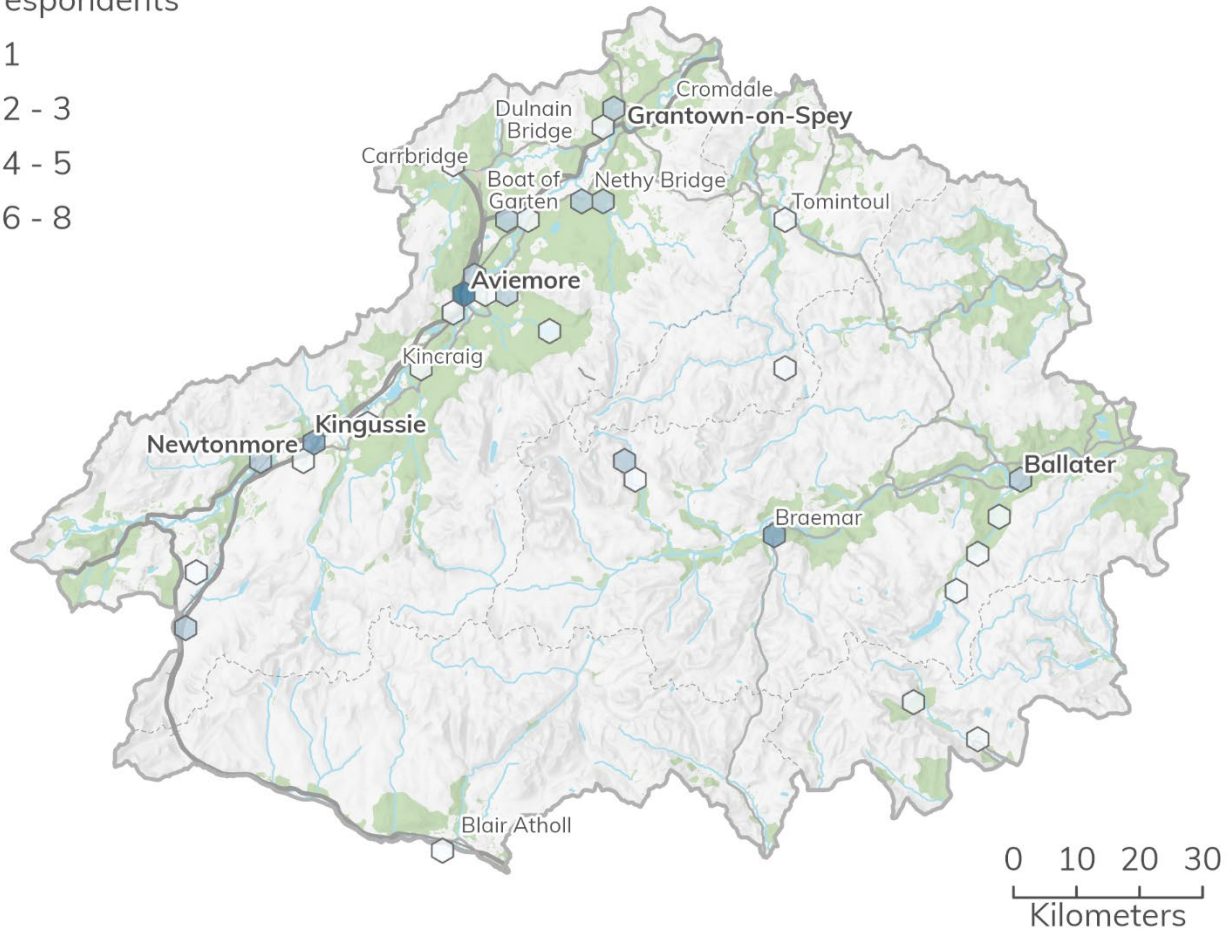
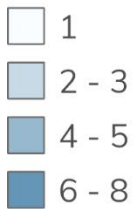


Figure 1 Location of 'pins' placed on the interactive pins<sup>1</sup>.

Contains Ordnance Survey data © Crown copyright and database right 2024.

<sup>1</sup> For exact location of pins see: <https://cairngormsldp.commonplace.is/en-GB/map/local-development-plan-map>



## Promotion

The engagement was promoted and advertised through the Park Authority website, press release, social media and Cairn newsletter (sent to all the residents in the National Park). Over the consultation period the Commonplace website received 2,261 visitors and gained 161 subscribers.

The following infographic summarises the social media campaign that supported the engagement providing combined metrics for all the Park Authority's main social media platforms.



28 posts



1,372 likes /  
reactions



66,727 impressions



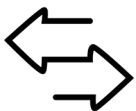
75 shares



54,525 reach



38 comments



5,339 engagements



885 link clicks



## Summary of engagement statistics

Of the 88 contributions made, 61 people left comments and 27 left agreements. Table 1 in Appendix 1 sets out the detailed comments from all participants to the engagement exercise. In addition to detailed comments, participants could indicate 'Agreement' to another person's comment, which usefully captures where these comments are liked and supported.

As illustrated in Figure below of the 61 comments received, just under half were evenly split between positive or neutral comments, with the remaining half of comments being mostly negative or negative.

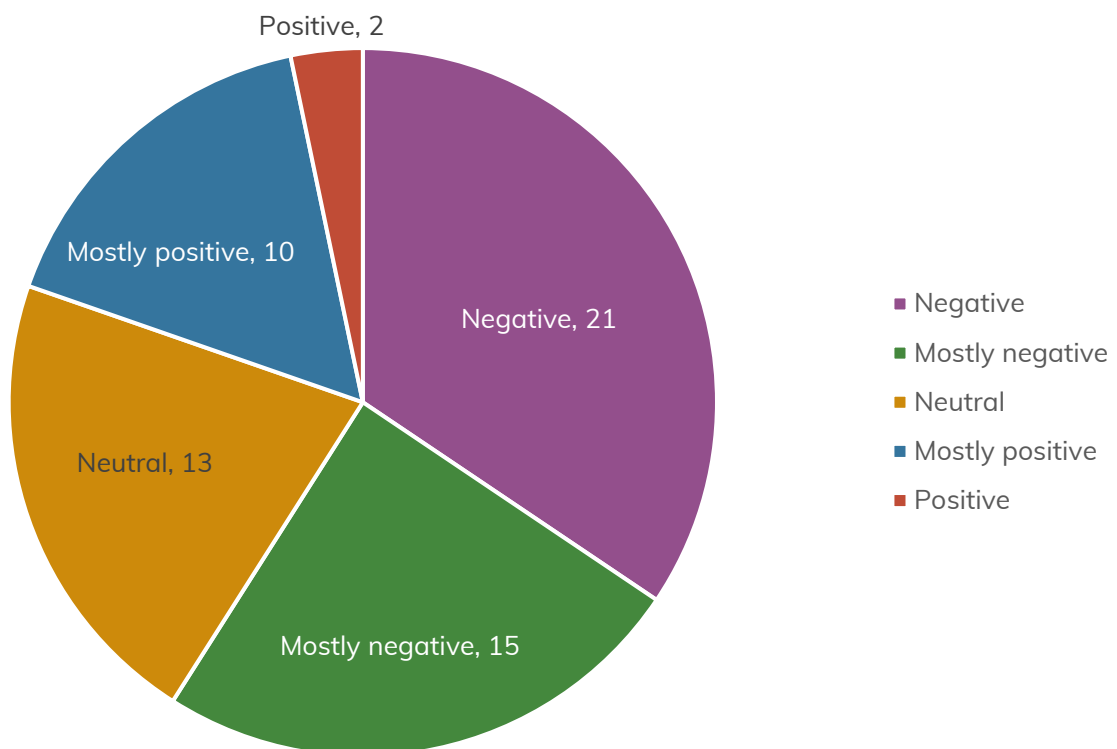


Figure 2 Sentiment of contributions to the map engagement exercise.



## Summary of Responses

The significant majority of comments received were from local residents to the National Park (see Figure ) and translates as just under 0.5 % of the total population<sup>2</sup>. Local residents in Badenoch and Strathspey formed the majority of contributors, whilst there was also good representation of local residents in Aboyne, Upper Deeside and Donside, which reflects the location of most settlements within these two Wards. More limited comments were received from those who have business or work in the National Park, are a member of a community group or are a visitor to the National Park. A separate written response was received from the Royal Society for the Protection of Birds, a summary of which is provided in this report with the detailed response in Appendix 2. As this response was not through the online platform, this data is not reflected in the quantitative analysis presented within this report.

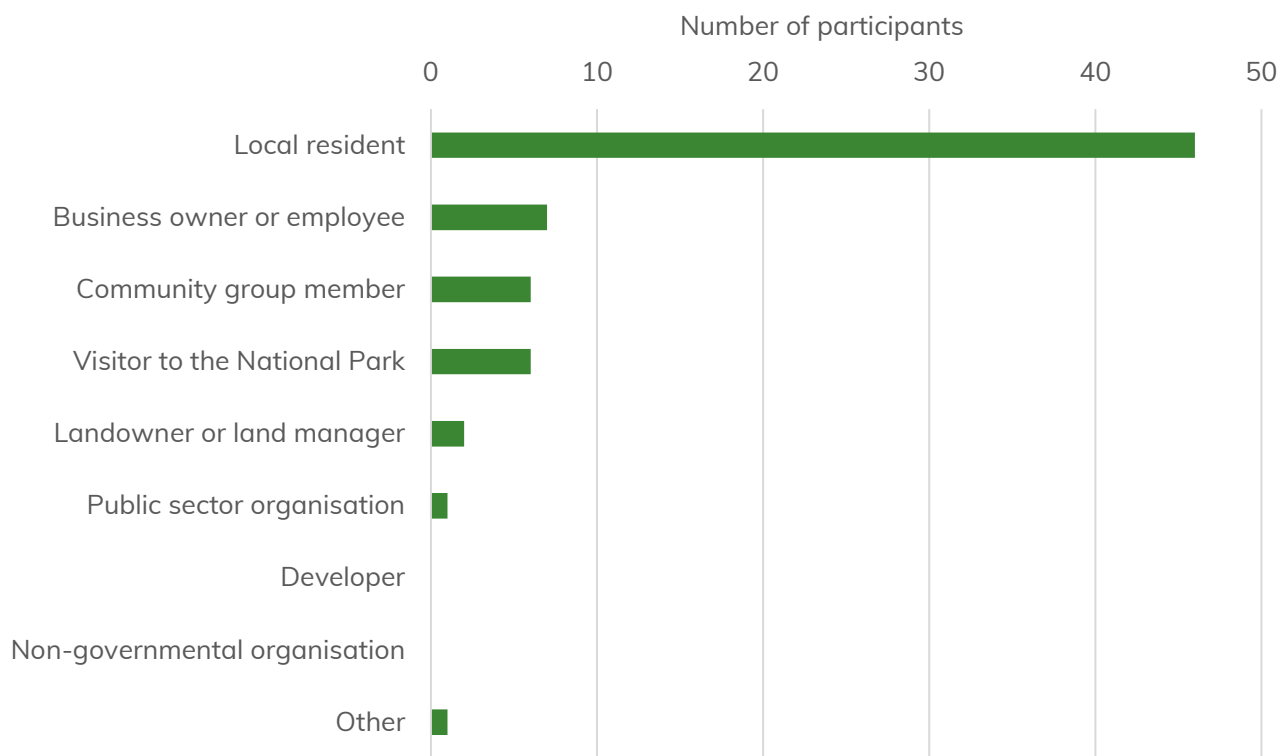


Figure 3 Respondent's connection to the Cairngorms National Park.

<sup>2</sup> 2021 estimated population of the Cairngorms National Park as 18,711 people (Scottish Government, 2023).



The infographic below (Figure ) clearly illustrates that most of the comments received are place-based and relate to the main settlements or a particular place (denoted by the 'yes') within the National Park, including Aviemore, Kingussie and Braemar. Subsidiary to that comments received include both place-based issues and a wide diversity of topic-based issues including homes, playing and open space.



Figure 4 Infographic illustrating the extent to which comments are place-based or general to the Cairngorms National Park.

Within the broader spectrum of place-based comments, issues involving a wide diversity of topics were raised as illustrated in the infographic below (Figure ).





Fewer issues were raised regarding the themes of climate change, flooding, design and placemaking and equity, diversity and inclusion. This clearly indicates that the resilience





of local communities through the provision of housing and in particular affordable housing, to retain populations within the National Park is of principal concern.

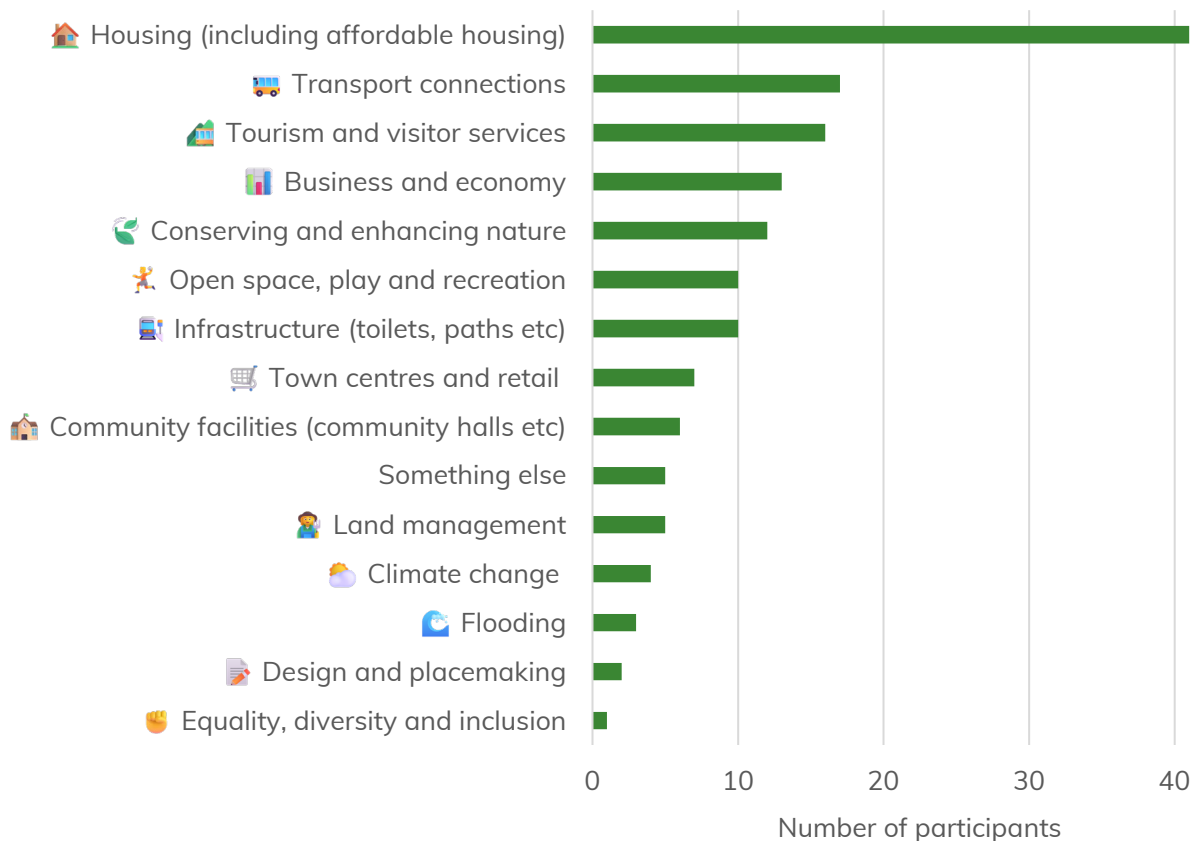


Figure 6 What issues in the National Park did people comment about?

Taking a number of these main issues and considering them in more detail (summarised from Appendix1 Table 1) a number of recurring overarching themes can be drawn out:

- **Housing** – There are some generic comments regarding the allocation of housing sites in the current Local Development Plan. However the majority of comments focus on the perceived lack of housing and in particular affordable housing across a number of settlements in the National Park (including both the larger service centres such as Aviemore, Kingussie and Ballater, and smaller towns and villages such as Dalwhinnie, Insh, Kincaig and Blair Atholl). Related to this is the concern about the perceived continued support by the Park Authority for market driven ‘luxury’ housing and short-term holiday lets as opposed to affordable housing. In turn many then raise concerns about the consequences of limited affordable housing, forcing local people to move elsewhere, and indeed beyond the National Park, and thus stagnating the growth of communities and reducing their resilience.



- **Transport** – The key message is the lack of good regular transportation links across the National Park beyond the main A road corridors and the Inverness to Perth railway line. Local residents and some visitors to the National Park raised concerns about the significant lack of public transport to the more remote areas such as the Angus Glens. For places such as Dalwhinnie, even being located proximal to the A9 corridor and railway, there is frustration about the infrequency of services in turn affecting opportunities for inward investment in the local economy and limiting tourism and population growth.
- **Tourism** – Concerns are raised both regarding the perceived continued high provision of housing for short-term lets and AirBnB to meet tourism demands, and the significant demands placed on the existing (often historical) infrastructure of many of the settlements. There is a high inward flux of tourists at peak seasons. Whilst welcomed by many as important to the economy of the National Park, the sheer numbers of visitors create tensions with local communities, regarding access to, and use of existing services including parking and road use. This tension between local communities and visitors extends beyond just the provision of affordable housing, with the perception from several of the local residents that provision for tourism maintenance and growth (and indeed protection of the environment) is of greater priority to the National Park Authority than provision for local communities.

In response to engagement questions asking what people wanted the Local Development Plan to do and why, the majority of comments were singular in focus demanding more affordable housing and less market driven housing. Respondents were less convinced that the Local Development Plan could provide this, citing that there has been a lack of past action by the National Park Authority to remedy this, or indeed that it is perceived not to be a priority for the Park Authority.

There was very limited neutral or positive detailed feedback as part of the Commonplace engagement, with only one contributor commenting that the National Park Authority appear very stakeholder friendly, and that these stakeholder consultations are found to be useful.



## Summary of response from the Royal Society for the Protection of Birds

The full consultation response from the Royal Society for the Protection of Birds is in Appendix 2.

In summary the comments focus on four main themes:

- Nature Networks – that the National Park Authority can work with the underpinning Local Authorities to create a system of habitats to support species. Development should be used as a mechanism to facilitate nature recovery by enhancing habitats, creating habitat connections and stepping-stones for species.
- Nature Recover and 30 x 30 – support for the National Park Partnership Plan's ambitious targets for ecosystem restoration of 50% land managed and would like to see nature recovery and enhancement over and above the Scottish Government commitment of 30% by 2030.
- Biodiversity Enhancement – the Cairngorms Local Development Plan has the potential to play a critical role in connecting biodiversity enhancement with the wider planning system, for both nature networks and communities. Suggestions for further guidance from the Park Authority on area-specific biodiversity enhancement are requested to support delivery.
- Capercaillie – from the 2022 survey, the significantly low Capercaillie populations are of particular concern. The National Park plays host to 85% of this population and as such policies and land allocations should reflect this situation as a priority and ensure ongoing protection for the species.

## Links

- Cairngorms Local Development Plan Commonplace site  
<https://cairngormsldp.commonplace.is/>
- Interactive map (closed for comments)  
<https://cairngormsldp.commonplace.is/en-GB/map/local-development-plan-map>
- Development Plan Scheme 2023  
<https://cairngorms.co.uk/wp-content/uploads/2023/06/230629DevelopmentPlanScheme2023.pdf>

## Appendix 1: Map responses

This appendix contains the detailed comments from the map engagement on Commonplace.

The information is presented according to the connection of the respondent to the National Park. Table 1 contains responses from those identifying as local residents who did not indicate any other connections to the National Park. Following that the comments are then structured by community organisations (Table 2), business owners, employees, land owners and managers (Table 3), visitors to the National Park (Table 4) and public sector organisations (Table 5). Within these categories where the contributor has indicated a further category, this is also noted.

Comments presented below are as submitted on the Commonplace forum. The third column in the tables identifies which topics the participants commented on through the engagement process. This information is summarised using the icons below, drawn from the online questionnaire:







































- |  |  |   |
|--|--|---|
|  Housing (including affordable housing) |  Infrastructure (toilets, paths etc)        |  Climate change                    |
|  Transport connections                  |  Open space, play and recreation            |  Flooding                          |
|  Tourism and visitor services           |  Town centres and retail                    |  Design and placemaking            |
|  Business and economy                   |  Community facilities (community halls etc) |  Equality, diversity and inclusion |
|  Conserving and enhancing nature        |  Land management                            |   |


Table 1 Responses from those identifying as local residents by location.

Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local Development Plan to do about the issues you raise?	Why do you say that? Do you have any other comments?
<b>Aboyne Upper Deeside and Donside</b>					
1	Local Resident		Specific Place. Victoria Hall playing field (for sport recreational use (football, basketball).  Area should be developed to allow use all year and on evenings.	Look at options available to install astro turf and flood lights.	Not sure.
2	Local Resident	 	Braemar.  Huge shortage of affordable housing, priority should be given to local people who want to live and work in the area	-	More provision for grocery shopping in the area
3	Local Resident	      	It is my strongly held view that the Development of the Eastfield site (H1) be removed from the LDP, bearing in mind that despite the zoning of this site for housing, as part of the CNPA Deposit Local Plan as far back as 2008, absolutely no progress has been made because the zoning is fundamentally flawed.	Bearing in mind the above, it should be obvious to the Authority that they should correct their earlier ill-judged decision and remove H1 from the 2024LDP and focus on those brownfield sites, a number of which	In light of the introduction of Local Place Plans, I am hopeful that the CNPA has had a change of heart and instead of the previous 'top down' pronouncements of the past, that



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			<p>Throughout this extended period of time the development of H1 has been actively pursued by the Authority as the sole option of for affordable housing, despite continuous objections from the local community and indeed major problems having been identified against housing being built on this site.</p> <p>Included with the many objections lodged with the CNPA, from the outset and throughout this time, being that the site is vulnerable to flooding and that the Development Plan failed to identify the road and pedestrian routes to the site, as highlighted in the evidence presented to the Reporters 2009 examination.</p> <p>It should be noted that the report by the Prince's Foundation Trust in 2006 again, highlighted these major problems, which still remain as a major obstacle.</p> <p>Even the never ending proposals, by Scotia Homes, for the development of H1 has highlighted the unsuitability of the site. The suggestion that the houses be elevated by 2m, to mitigate the effects of any flooding and difficulty in deciding upon any access route to the site, again demonstrates the fundamental flaw of zoning this area as suitable for development.</p>	have previously been identified, for affordable homes, as was the case with the Old School as far back as 2009.	common sense and listening to the Community may be the way ahead.
4	Local Resident	 	<p>Braemar.</p> <p>Public transport is awful, we don't need more big houses we need accommodation for working families</p>	No more sites to be added for building big houses. Use the ones we have and make them for affordable units	Well you tend to not care we are a village not a town... we don't want houses encroaching along the A93 to the castle but you tried to slip that site in last time...
5	Local Resident	    	<p>Glen Muick Road.</p> <p>Repair and upgrade passing places</p>	Repair and upgrade passing places	Past experience
6	Local Resident		Scotia Homes Development. Currently an empty field. Should remain green belt. Building should only be on brownfield sites.	Ban development on green belt	-
7	Local Resident	     	Ballater especially the land north east of Monaltrie Park.	The site Ballater H1 should be removed from the local plan and the area north east of Monaltrie Park should be made	The past attitude of the National Park Authority or their staff. For example in answer to the point in the section 4








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			<p>The choice of land north east of Monaltrie Park for a site H1 for 250 dwellings was based on two assumptions which had been proved wrong namely first that affordable dwellings can only be financed by allowing housing subject to a condition that a percentage be affordable housing and secondly that land for housing cannot be found in the village. While H1 has awaited development for over ten years, 36 affordable homes to rent have been provided within the village. Seeking land or existing buildings within the village is the only sustainable way to provide affordable housing. Moreover National Planning Framework 4 on page 37 states that to adapt to climate change Local Development Plans should steer development away from vulnerable areas and the Flood Study which the current Local Development Plan requires to be followed shows that land subject to a risk greater than 0.5% annual probability (what used to be called the functional flood plain) will not only adjoin the land allocated for development but will run up a strip of land going through the centre of that land.</p> <p>The fact that development of this site would conflict with the first statutory aim was asserted in objections to all three local plans containing the proposal but none of the Reporters pronounced on the issue not even when, in relation to what became the current local development plan, this objection was included in the section 4 summary included in the Reporter's report as was the CNPA's response to this assertion.</p>	environmentally protected. If that is done local people and owners of land within the village would have an incentive to cooperate in action need to provide affordable housing including a local trust for young people having or wishing work at Ballater.	<p>summary the CNPA's comment included the fact that Ballater is a strategic settlement. A policy in a development plan cannot alter the criterion laid down by statute.</p> <p>This method of being consulted is not very conducive to submitting evidence. I have not been informed how I can pause and save my draft.</p>
8	Local Resident		There is a massive lack of housing available in Braemar. Everything that goes on sale is bought up for holiday houses and no one is able to buy or afford who live in Braemar area. We are being forced to leave our village.	Build some affordable housing for locals that fit with the character of Braemar. And not allow any to be bought buy others out with the ab35 postcode.	Cause nothing ever changes for the people of the village. Everything is done for tourists.




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9	Local Resident		Carrbridge.  All the problems in the area are mostly created by the national park designation. why not disband the money sucking national park and we will have a more natural growth of the area keeping in line with the proper development of appropriate supporting infrastructure	Disband the national park.  We don't want or need to be designated as a national park	Grant Moir and those in charge of the national park have no empathy with those who live and work in the area  yes. the national park is an unwanted and ineffective level of bureaucracy which is draining resources which could be put to better use for the benefit of Scotland
10	Local Resident		Allow for dense housing to be built within the centre of Aviemore	-	-
11	Local Resident		Lack of housing in Kingussie for local workers.  As a person moving from an area to here to work as a teacher it was almost impossible to get a house. Still haven't got one to purchase. This restricts the access to expertise for our young.	Allow locals to purchase houses. Provide additional funding or interest free top ups so we can compete with outside buyers.	Sadly, money motivates sellers.
12	Local Resident		Aviemore is a bustling tourist town crying out for local workers that can afford to live in the area.  Aviemore and other surrounding villages need affordable housing not more second homes. Green belt land needs to be preserved and new developments concentrated in areas with good connections to amenities that reduces the need for a car.	Ensure new developments include a large proportion of affordable housing. Make sure affordable housing cannot be resold as second homes or at market rate. Affordable housing needs to stay that way, there are several examples where it's being resold as holiday lets or rented out for premium rates or even as a holiday let.  Keep the guidance about building in rural and agricultural land to limit development to what is needed and focus new housing on towns and villages in the national park. Improve public transport and cycle networks to reduce the need for a car. Limit holiday lets in the are and preference local owners over large companies for holiday let licences.	Have seen positive results from some of the previous local action plan points. More needs to be done for affordable housing, considering the needs of local people. Local people need amenities and transport for schools and jobs.






















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13	Local Resident		<p>Aviemore needs affordable rental and homes to buy as matter of urgency</p> <p>Aviemore is very close to being a town for the rich only. Irony will be every restaurant, hotel, shop and bar will have no staff to run them as they've nowhere to call home. I have to work in a job I dislike just to stay in my tied house but looks like that cannot continue and will leave the town I was born and raised in to get a stable home.</p>	Stop allowing building of houses as second homes and ones outwith the reach of people who work here. Concentrate on housing for communities first before sense of community dies	<p>Lack of action so far</p> <p>I've rantd enough</p>
14	Local Resident	 	<p>Aviemore not enough infrastructure , loads of different types of houses and only luxury houses or</p> <p>No affordable getting built. Not enough people to work in the jobs that are available.</p> <p>CNP planning have done a terrible job with the layout of new builds and nothing is in keeping. There has been lots of developments but nothing that suits the local working community.</p>	Stop second homes, stop more holiday lets, promote local community and businesses so we have housing and people here to work. Then we can offer our visitors a much better experience.	Because of the state of Aviemore. Cnp do not have enough interaction with the local Community to be making decisions. A terrible job has been done so far and that's because they don't care. Other national parks are run way better.
15	Local Resident	—	<p>Nethy Bridge.</p> <p>Concerned re: lack of affordable housing, particularly as there as so many second/holiday homes that are driving up prices and decreasing supply of housing stock. Younger generation more likely to leave area for work and housing opportunities, leading to an ageing local population.</p> <p>Local transport unreliable and infrequent. Would like to travel in more environmentally friendly way but lack of transport and variety of routes prevent this.</p>	Address the issues in a meaningful way, in particular housing as it has far reaching consequences for the village if it can not be remedied.	Not able to comment as unaware of failures/successes of previous LDP to gauge likelihood of this issue being addressed.
16	Local Resident	 	Desperate shortage of homed in Aviemore. Restaurants are struggling as they can't get staff as there is nowhere for them to live. 60% of resididential housing is owned by holiday makers. We the locals need affordable housing please.	Build affordable housing to be sold only to people living locally.	It feels like housing is not enough of a priority.











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17	Local Resident	—	Grantown is such a beautiful place, vibrant community and lots of wonderful community initiatives and businesses. The High Street has a number of empty shop fronts and one or two that look like they've been abandoned. It would be great to invest in the High Street so that small businesses are supported to open up on the High Street and use some of the spaces that have been empty for years. As it is it lets down the other wonderful businesses on the High Street and doesn't make us locals feel good and doesn't look good to visitors.	I am not sure what the scope / remit is on the LDP but my comments above highlight the issue. Maybe grants to help start-ups get in the High Street or help with painting some of the existing shop fronts so it all looks nicer.	-
18	Local Resident		<p>Half the houses in Insh village are holiday homes, included in that number are those used as holiday lets. Prices for modest-sized properties are now beyond the reach of the vast majority of people holding down regular jobs who live and work in the area. Those houses that are occupied year round are owned by wealthy, or relatively wealthy, people at, near or beyond retirement age.</p> <p>The lifeblood of any community are its young families but they can't afford the increasingly out of reach house prices. If this trend continues the village will morph rapidly into a place where the lights of more than half the houses only come on at weekends/Xmas/New Year/Easter and a few weeks in the summer. The remainder will be occupied by OAPs. Something substantive needs to be done to arrest the social decline of this once thriving crofting community. Enacting planning laws to halt the sale of our limited housing stock as short term lets and second homes, would be a start. Allowing free market forces to take control never was and never will be the answer to this problem in our community. Quite the opposite!</p> <p>It's all very well caring for the beautiful landscape within the national park but at the moment it seems the CNPA is merely curating it for the benefit of the holiday trade, wealthy second home owners and retirees. Something needs to be done.</p>	Develop and enact planning laws with real bite to stem the tide of holiday homes (and short term lets) in our community	The tourism lobby is too strong. (Who, incidentally, complain about STL registration et al but seem to forget that if there is nowhere for its workforce to live then there is no tourism industry.)




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19	Local Resident	      	<p>The town (Kingussie) needs more housing. There are so many people on waiting list for bigger houses, but authorities need to remember that schools etc also need to be looked at.no point having more housing and no infrastructure to support it..</p> <p>Yes houses are being built, but how long will it take and how many will actually be for social housing?</p> <p>It would also be helpful if current council housing was given to current residents first, as opposed to those from outwith who have absolutely no ties to the area, nor jobs.</p>	-	-
20	Local Resident	  	<p>A small village (Dalwhinnie) that feels neglected in parts because of lack of infrastructure</p> <p>Its taken over years so far for planning approval for camping park! More houses on land station road please.</p>	Grant permission to develop the village/ infrastructure! Cycle lane/additional housing and camper site would go a long way to rebuilding this community!	Dalwhinnie never seems a priority!
21	Local Resident		<p>North Aviemore, near the dump.</p> <p>The land beside the dump is being considered for building houses. Living beside the rubbish dump would be smelly and I feel like it's a terrible idea to consider putting houses there.</p>	Build houses elsewhere.	I think more action needs to be taken to address the needs of the young local families. We have such little faith in our housing needs being catered for, which is purely based on past actions and experience. Come on, you can do better!
22	Local Resident	   	<p>Boat of Garten.</p> <p>It's a lovely place but needs more affordable housing as at the minute it has lots of holiday homes and rich retired owners. Hard if you two kids going local school and average house Â£230k+ will never be able to buy. Unless rich family.</p> <p>Need more houses the working class can afford .</p>	Locate some more building for locals to be able to afford and buy. I don't want to live in Aviemore particularly. Too touristy! Carrbridge and Boat are both great villages to raise kids with things for them too do.	I'm not the first to say there's issues and won't be the last
23	Local Resident	 	<p>Boat of Garten.</p> <p>Needs more housing</p>		Lack of development in past










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24	Local Resident	 	Aviemore and surrounding area.  No more house building. It's sheer madness that most new incomers do not work in the local area. And the term 'affordable housing' is a gimmick.	Stop building more housing.	Because you will ignore local residents. You will ignore nature. You just want to encourage more and more Airbnb, holiday homes, rentals
25	Local Resident	—	Unused land suitable for housing in Nethy Brudge. Oen of many places around Nethy Bridge that could have housing association/shared ownership houing. Someone needs to systematically look around all the villages and identify areas that are suitable. Nethy bridge has many opportunities.	Be proactive about housing association/shared ownership housing sites. There is an unhealthy negative view taken by the Park Authority that overrides local wishes.	Lots of talk but no pragmatic action. The 70% target is nonsense, there should be a clearly identified number required. This is just headline soundbite marketing!
26	Local Resident		St Vincents hospital is a perfect opportunity for much needed affordable housing in Kingussie. Housing that is avaiable only to thse with a local connection for example attended school in the town or working long term in the town. Housing that is family orinetated not poky two bedroom flats. Flats are great if they are large,have outside space and underneath parking and storage.	I would like to see areas zoned for this type of property to retain families ,retutning families,teachers and helath workwers in our community.	The CNPA was set up to support communitis and nature and it woudl be good if the amount of money spent on houseing capercaillies and beavers was spent on housing communities  We can see the evidence in Aviemore for example. Building as though it was going out of fashion But are there any more pupils in the local school than twenty years ago - there aren't. That tell a story. Nine classes 20 yearsr ago and nine classes now. Were it not for Ukrainiaans being here temporarily there would be even fewer classes.
27	Local Resident		Everywhere between Grantown-on-Spey and Netwonmore  Spread the social housing throughout the entire Badenoch and Strathspey area. This will give housing to many more people, spread the economic benefits and create jobs.	-	-
28	Local Resident	   	Broader area and whole of the National Park, but the issues are most prevalent in and around Aviemore.	Question why the rate of building has been allowed by the private developers and somehow change course before an even bigger hole is created. Is there	Money talks.




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			<p>The housing situation in and around Aviemore is an absolute shambles. Driven by money and greed by a select few individuals who control the development companies and appear to have almost free reign over the location, scale and target market of their developments. If you join the dots the same person(s) link all the companies currently building in the Aviemore area. That is not a coincidence. They have, and are still currently building, large numbers of 'luxury' homes for which there is a rapidly declining demand. If these planned developments continue over the coming years there will be a huge oversupply of homes in the upper price bracket that locals can't afford and will appeal far less as second homes if they cannot be rented for supplementary income.</p> <p>Furthermore, as highlighted in other responses, this is a National Park. If another X hundred luxury homes are built then how many more affordable homes need to follow, and where do they go? There is a reason the area is a National Park, and for that reason the green spaces need to be heavily protected.</p>	larger homes are more profitable for the developers then there needs to be a form of subsidy to encourage them to build more smaller homes to balance output and thus mean further areas are not turned over to housing.	
29	Local Resident		There is a lot of low grade plantation woodland around Nethy Bridge that could be used for housing. Almost all of Scotland was ancient woodland. But once removed and replaced with commercial woodland it has no special significance over and above other crops.	<p>Get real about freeing up housing land so more housing association/affordable housing can be built.</p> <p>The cost of building is now so high, £2500/m2, especially for a passive house standard as per latest and upcoming Scottish building regulations, that even smaller houses will be unaffordable to most people. More housing association housing will be required no matter what else happens. The existing stock will never become affordable. Nethy Bridge houses are no more expensive than comparable houses in Inverness.</p>	<p>Lack of local wishes being respected by the National Park authority.</p> <p>Public celebrity pressure should not be an influencing factor in planning decisions. Listen to local people from the local area, particularly locally born and raised community councillors who are locally elected by local people. Do you get the message? no more academics overriding local wishes.</p>



Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local Development Plan to do about the issues you raise?	Why do you say that?  Do you have any other comments?
30	Local Resident		In Grantown-on-Spey there needs to be affordable housing available for locals, or there will be a drop in people actually residing in the area and it being a holiday town. This goes for all of Badenoch and Strathspey!	Create affordable housing that is aimed at locals. Have some sort of format with criteria that people have to fulfil to be able to have a property (eg lived in the area for a certain amount of time)	This has been an issue for locals for years within the national park and nothing has been done, so any doubt shouldn't come as a surprise!
31	Local Resident	   	Dalwhinnie. The forgotten village.  They are all in need of an upgrade but sadly in almost every case they are missing or have never even been there to be missing in the first place.	Whatever you can to put Dalwhinnie back on the map!	Been that way for a long time now hence why I feel Dalwhinnie and it's small surrounding area has been forgotten and sadly neglected.
32	Local Resident		Nethy Bridge. Open unused field area in the heart of the village.  This area is ideal for expanding affordable housing within the existing village. The area is large enough to accommodate new housing and would have very little impact on exiting residents or wildlife. There are no trees to be disturbed as most land is a hay field. It is ideally located in the centre of the village and within walking (off road) distance of the primary school. Connecting to existing roads and infrastructure would be very simple.  The current use of the land does not provide benefit to the residents as there is limited current access for walking.	Zone the area for housing	Some feel that the open spaces are part of the village but at present it just breaks up the village rather than provide benefit to the village. End of settlement land seems to be targeted rather than existing land within the central village.
33	Local Resident	-	North Dalfaber, Aviemore. Between Robertsons development and the Kat track.  This area should be developed for housing	-	-
34	Local Resident		Aviemore primarily, but also the surrounding areas  This town draws a TON of tourists yet business are starved for workers because there is no affordable housing. It is over run with over-priced holiday accommodation. Now with the new laws only the wealthy will be able to comply and locals who rely on holiday lets to survive will be even more hard up. Who will be left to speak	Truly affordable housing (not Â£500k houses). I also think that only people that live in the area most of the year should be allowed to have holiday lets and the number should be limited. Otherwise you end up with most of the housing and land being owned by people that are only interested in	I don't know enough about the local development plan, but generally it's the wealthy that end up benefitting from most schemes and the middle and lower classes are offered just enough scraps to keep them from upsetting the status quo.





Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local Development Plan to do about the issues you raise?	Why do you say that?  Do you have any other comments?
			for the community interests when most of the area is owned by foreigners or people that don't live here most of the year?	money and not in the community or land.	Land ownership and community management should be by and for the people that live on that land/in that community, not for capitalist interests.
35	Local Resident		National Park and Aviemore.  Trying to get back to the original idea of a National Park for the benefit of nature/ local residents and visitors. Development seems to be very piecemeal at the moment.	Housing for local workers and residents is the main issue. And has been for as long as I can remember in Aviemore. Without decent affordable housing for locals we can not hope to have a thriving, happy local community, which in turn leads to happy visitors.	As I said before, the housing issue has been a problem for ever. Yet we are still seeing developments of luxury houses being built in various parts of the Park.
36	Local Resident		Urgent requirement for housing in Newtonmore!	-	-
37	Local Resident		Kingussie/Newtonmore and rural area around Newtonmore.  We need housing that is matched in pricing to local wages. We have a lot of people on low income that can't afford housing. Prices are pushed high by incomers and those who work here just can't get houses	Housing only to be let/sold to people in local jobs, who will use them as primary residences.	Because house prices and rents are still considerably high compared to incomes locally
<b>Tomintoul and Glenlivet</b>					
38	Local Resident		Tomintoul is a beautiful, albeit remote location. With improved infrastructure eg public transport, climate friendly gravel bike tracks to Braemar/Grantown/Aviemore, affordable housing it could be a great place to raise families and work  The public transport links (including buses and cycle ways) could be vastly improved to encourage people to live, visit and exercise in the area.	Is there any scope to link up all bike trail/ski centres in the Cairngorms (Glenlivet, Lecht, Glenshee, Cairngorms, Laggan etc) with gravel paths such that community and visitor use can be maximised using climate friendly transport (bike/ski touring)?  Affordable housing and areas will be far more appealing if villages appear less isolated.  Is there also scope for harm reduction facilities in our National Park such that	To be fair, the CPNA appear very stakeholder friendly and hold widespread consultations. Sure, there are limited budgets and priorities but it is useful to solicit ideas for solutions rather than have people complain they have no input. Big fan of these consultations.







Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local Development Plan to do about the issues you raise?	Why do you say that?  Do you have any other comments?
				those who are facing adversity through drug use etc have safe spaces?  Can the Crown Estate offer up vacant tenancies for local businesses to provide accommodation with jobs?	
No location provided					
39	Local Resident		<p>What is a National Park? Is its aim to protect the environment or to be a play ground for visitors and dogs or to be a place where people can experience nature in the wild or to provide luxury housing for the rich? Is there room for all of these?</p> <p>Where I recognise that there are still plenty of areas where you can escape into the wild, and we do, I think what has happened at Loch Morlich and up the mountain is a disgrace. If agencies cannot work together to provide a solution in a timeous manner to the car parking, visitor numbers , facilities and fire risk etc. it is a poor show.</p> <p>The development up the mountain also is questionable. Mountain biking and electric bikes are really out of place on the plateau, which should be more protected.</p>	<p>A drastic measure for Glenmore would be to issue permits to limit the numbers. Encourage people not to use cars by providing a park and ride system. Really sort out the road side parking, improve the current car parks, not necessarily build new ones. Provide more toilet facilities is a must to protect the environment. Making sure all dogs are on a lead.</p>	<p>This has been a problem for a long while and no solution has been forthcoming.</p>






Table 2 Responses from those identifying as community groups or organisations, by location.

Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local Development Plan to do about the issues you raise?	Why do you say that?  Do you have any other comments?
<b>Aboyne Upper Deeside and Donside</b>					
40	Community Group Member Local Resident		<p>Braemar village- residents perspective.</p> <p>Parking- long term issue that no one seems to resolve. No yellow lines so that in the height of tourist season we get ridiculous parking, both sides of narrow roads, on the bridge in the centre of the village, in front of the Fife with vehicles protruding halfway across the road, campervans filling the car park overnight taking up one and a half spaces each so that there's little space for anyone else. It's clogging up the village, detracting from the lovely setting, it's dangerous for cyclists and pedestrians, it's creating an anti-tourist vibe. Parking restrictions please, overflow parking areas, no overnight parking in the central car park.</p>	Yellow lines, overflow parking area, campervan dedicated parking outwith the central area.	It's been a problem for years and everyone backs away from addressing it. Meanwhile the situation just gets worse. Tourism great for the local economy but needs to be managed – the 'idyllic' village is getting trashed.
<b>Badenoch and Strathspey</b>					
41	Community Group Member Local Resident		There is a housing crisis in the Aviemore area. Any sort of affordable housing for people working/ living in the area is sorely needed. The effect of the crisis can be seen from young people having to leave the area, to businesses struggling to find any staff due to housing issues, and the overwhelming bias it seems towards funding for all thing holiday accommodation. The area also needs infrastructure desperately, I cannot even count the amount of times I've encountered human waste, irresponsible dirty campers, and terrible driving conduct in the park.	Prioritise affordable homes/ housing schemes for locals/ people who work in the area. Use money to create infrastructure to help the area cope with the sheer number of visitors. We need toilets, bins, enforced camping rules/ designated campgrounds etc.	Since NP status, I've seen the national park endorse and provide funding for ventures solely based around tourists (ie, nonaffordable homes). It seems the people who live here, and the environment has been given deferential treatment in favour of quick money from developers. It gets worse every year and I remain pessimistic, and I'm currently choosing to move away from the area due to these issues.
42	Community Group Member		<p>Kingussie. The capital of Badenoch.</p> <p>KVCC discussed the issue of housing recently. no significant house building has taken place here in 30 years. All development has focussed on Aviemore. It is time for new thinking on housing. All newly built housing should be points allocated for sale/ rent. Eg born</p>	Opportunities for local first time builders with support for land buying. Clauses attached that resale must reflect the original land price and not for 10/15 years.	Plans have come and gone over the lifetime of the Park and housing issues have only increased. The CNPA is in a position of influence but not effect. 2030 is too late for those in secondary school now.



Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local Development Plan to do about the issues you raise?	Why do you say that?  Do you have any other comments?
			in the area, educated in the area, permanent job with employer reference. Low cost housing awarded on same basis.		We get inundated with surveys as a CC for example this survey , Highland Council similar survey and then Community Partnership Plan . How do they all mesh.?
43	Community Group Member Local Resident		<p>Dalwhinnie. Small rural village at the edge of the national park and bottom of the Highland council area. Point where there infrastructure to the west begins from the A9 and many vehicles both tourist, local and business travel passes through.</p> <p>Limited staff want to work here due to shocking transport infrastructure. Despite being on the main rail line and A9 to Inverness very few trains service Dalwhinnie and we are lucky to have a school bus service as no buses stop here. The Sleeper won't allow local use and the bus stop on the A9 is rarely used due to lack of safe path into the village. Long distance buses certainly won't go through the village to make a stop... and they are often reluctant to stop on the A9 with people having to buy tickets from the next stop up or down the road. (Aviemore/Pitlochry). We had to fight tooth and nail to get a bus service for college students to be able to attend Inverness college this last year. Why can't we have a local community bus service to connect us to Newtonmore/Kingussie where larger services run from daily? This small community bus could service Dalwhinnie, Laggan and other small communities on a loop?</p> <p>The lack of infrastructure will affect businesses and locals alike, tourism, (Hostel, B&amp;B's, Air B&amp;B's, possible camper parks etc), staffing, residents forced to have a car to drive if they are eligible, (not too old, don't suffer with a condition stopping driving, can afford to and aunt a young student without a licence yet!), and students who can't get to/from college easily - eventually after a year of trying</p>	<p>1. Look into a small community bus to service the area south and west of Kingussie/Newtonmore including Dalwhinnie with a regular service to help with staff/student/resident and tourist links and travel.</p> <p>2.Help the development and allow the village to grow by investing in projects such as a path/cycletrack from the A9 into the village, maybe a path/cycletrack to Laggan and wolf tracks.</p> <p>3. Positive outlook and outcome to the development of a camper/motorhome park in the village... Dalwhinnie used to have one on the opposite side of the road, this would be a perfect opportunity to put in tourism infrastructure to help with the growing tread and in turn increase employment and the village residents being supported with better infrastructure. With tourism we have to create infrastructure which supports the local residents needs for</p>	<p>Because we are so on the edge of everything - the investment in Aviemore, Boat, and other honeypot towns &amp; villages is so good, but we appear to be an afterthought - we should be the gateway to the park... you should be shouting it, signing it etc, many visitors or even residents from larger towns don't realise we are in the park!</p> <p>We are such a small community we have few resources, volunteers and help... we need help from outside organisations and CNP should be jumping right in... but we often feel HC and CNP don't and budgets just get cut, so we suffer, north - south divide of the park?!</p>



Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local Development Plan to do about the issues you raise?	Why do you say that?  Do you have any other comments?
			<p>to attend, it is made so difficult with transport it is another negative reason to attend!</p> <p>All this in turn affects our local economy and businesses are unable to operate... so a village slowly dies within a fabulous part of the national park famous for outdoor sports such as hillwalking, long distance trails, biking and ski touring/mountaineering. There is so much to offer here if only the infrastructure was there to support it and planning allowed developments such as tourist facilities like the Camper/motorhome park with full services/infrastructure for all mobile tourism passers by as well as those staying on site. This has been in planning stage (albeit not always due to CNPA planning), for almost 3 years! We could help spread the tourism love, lift our village as being more integrated into the park we would attract more investment/grants for local improvements/services such as transport, as well as general employment with a way to travel to/from work if staff were not staying in the village.</p>	<p>transport/employment and housing in the long term.</p> <p>This too will help tourist dispose of waste and keep our area tidy so removing some fly tipping issues we find during litter picks.</p> <p>4. Grant/funding for a playwark in dalwhinnie at the Hostel - there is one there already it just needs maintenance and maybe small additions.</p>	
44	Community Group Member Local Resident Business owner or employee	  	<p>Small village (Dalwhinnie) which needs growth. A shortage of accommodation means lack of staff for local business. There is a train station but limited stops. No buses in the village at all.</p> <p>Many buses travel up and down the A9 but do not stop here. Encourage bus companies to add request bus stops , lighting in bus stops and timetables ( currently no lights or timetable in the existing stop )</p> <p>Rail services- it's not currently possible to collect pre bought tickets at Dalwhinnie or to use the app to activate tickets. It's not possible to take advantage of deals available with rail cards ( unless you drive a 40 mile round trip to get them at Kingussie which sort of defeats the purpose of taking the train)</p> <p>You cannot book your bicycle on the train here ( need to travel to Kingussie or Aviemore to get a bicycle ticket )</p>	<p>1. Provide a subsidised community bus which connects Dalwhinnie to Newtonmore and Kingussie ( even better aviemore) - this could be used by residents and tourists</p> <p>2. Ask current bus providers to stop and request bus stops on the A9 both at Dalwhinnie road end and at Balsporran carpark</p> <p>3. Ask rail network to put a machine into Dalwhinnie station so we can collect tickets there</p>	Some money will need to be spent. Communication with residents, tourists and transport providers will be needed.
			Blair Atholl, Killiecrankie and Glenshee		




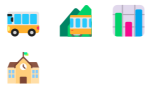



Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local Development Plan to do about the issues you raise?	Why do you say that?  Do you have any other comments?
45	Community Group Member Local Resident Visitor to the National Park		<p>Train stations/ transport hubs - Blair Atholl, Dalwhinnie, Kingussie, Aviemore, Carrbridge.</p> <p>With more staycations &amp; low carbon visits could there be huts/ cabins nearby railheads to facilitate visitors by train &amp; possibly displaced second home owners. A local bus to link them would be perfect</p> <p>Huts/ cabins has been part of national policy. Could there be land allocations in the park on say DVL in walking distance of town centres i.e. the old mart in Kingussie, sites near rail stations</p>	Allocate some sites for holiday usage as this would support local holidays, reduce pressure on AirBnB, & huts/ cabins are more appealing to campervan types than trailers/ park homes	<p>So few huts/ cabins have been allocated and built in Scotland but it seems a more just way to allow those who are not super rich to have holidays too</p> <p>A local bus that linked stations &amp; holiday destinations would help, even if just seasonal</p>

Table 3 Responses from those identifying as a business owner, employee or landowner or manager.

Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local authority to do about the issues you raise?	Why do you say that?  Do you have any other comments?
<b>Badenoch and Strathspey</b>					
46	Business owner or employee Landowner or land manager		Comments are submitted on behalf of Newtonmore Golf Club. The club seeks to ensure the longevity of this significant community resource. In order to do so the club will come forward with proposals for some small scale residential development the purpose of which is to secure the clubs long term financial future.	Allocate housing sites.	We would hope the National Park Authority are supportive in maintaining this important community facility.
47	Business Owner or Employee Local Resident		<p>Aviemore/Glenmore bus links.</p> <p>The provision of an improved bus service between Aviemore &amp; Cairngorm is a positive step.</p> <p>I think it's use is significantly limited by lack of free parking (not time limited) in Aviemore.</p> <p>You can't park and ride, if you can't park.</p> <p>Finding space for a dedicated (and incentivised) park and ride scheme in town would be a big step to reducing Glenmore parking demand.</p>	<p>Investigate improved parking options in Aviemore.</p> <ul style="list-style-type: none"> <li>- Find new options</li> <li>- Remove time limit on existing options</li> </ul>	Joined up planning seems unlikely
48	Business owner or employee Local Resident		<p>Specific Land – owned by the estate and accessible it should have just affordable housing on it.</p> <p>The estate has odd bits of land that need to be used for housing</p>	-	-
49	Business owner or employee Local Resident		We are absolutely desperate for local affordable housing in the Kincaig area. Our young are being forced to leave in there droves. The zero affordable housing in the village.	Build affordable housing for our local community	<p>I've lived here all of my life. For so many years we have screamed to so many authorities Highland council , NP, Government â€¦ no acts .</p> <p>If it's not addressed soon. The area is going to be left with retirement villages, ghost villages and no one of working age . Businesses are on there</p>





Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local Plan to do about the issues you raise?	Why do you say that?  Do you have any other comments?
					knees already due to the lack of working aged people.
50	Business owner or employee Local Resident		I think all of the highlighted headings are connected. But fundamentally we need to be clear what we want for Aviemore and the surrounding area. At the moment the direction of travel is towards increased motorised consumerism and catering to that 'demand'. Little regard has/is given to redefining what matters - with climate change all our old assumptions about what sustains this area will no longer be valid.	Not sure a LDP can address much as it will always be in response to the wider strategic intent. But short term housing, travel (not car based) should be addressed.	I'm not seeing anything recently that supports any part of the issues I've flagged. Increased up market housing development; massive influx of vehicle based tourism; lack of basic facilities for visitors (toilets) its hard to be optimistic as we seem incapable of dealing with basic issues never mind significant ones. And the plans are hardly accessible in terms of presentation and access... this website and 'interactive' map highlights that. very exclusionary.
51	Business owner or employee Local Resident		Grantown-on-Spey. Open field behind doctors surgery. Adjacent to caravan park. Potential development area with opportunity to include existing green space.  Need for new modern energy efficient housing in a variety of sizes across the park generally and within the town. Nothing available to rent. Elderly family member been trying to relocate to area to live closer for 3+ years.	Assist with land allocation and the development of mid market and social housing for all ages of people.	Neutral.  CNPA need to help curb the conversion of existing residential housing to short term let's to help meet local demand and maintain sense of community. New housing developments mostly too expensive for local labour market and out pricing salaries.





Table 4 Responses from those identifying as visitors to the National Park.


Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local an to do about the issues you raise?	Why do you say that?  Do you have any other comments?
52	Visitor to the National Park	-	It would be great to have a Scottish Water top-up tap at or near the Glendoll Lodge/Car park for hikers or some signage surrounding how safe the water is to drink from the waterfall at Corrie Fee.	Consider and promote the (sensitive) implementation of Scottish Water top-up taps for popular hiking spots around the National Park.	The Town and Country Planning (Scotland) Act supports the implementation of these top-up taps, possibly making this an easier strategic move to put in place.
53	Visitor to the National Park Local resident (Aboyne, Upper Deeside, Donside)	-	Braemar bus services.  Stagecoach have just split the 201 Braemar to Ballater into two parts, the buses are rarely on time and there is regularly an hour layover in Ballater making a 2 hour journey 3 hours	Consider the public transport network in the park, in Braemar last week the town was choked with cars, campervans and tour buses. I was one of only 2 people on the public bus. This doesn't serve residents or the environment and discriminates against those who cannot drive	I doubt the bus company will change their mind given how little the service is used because using a vehicle is so much easier
54	Visitor to the National Park Local resident (Kirriemuir and Dean)	-	Angus Glens. Clova Village, Prosen Village and Tarfside. Why are there no buses up the Angus Glens? It seems mad that you have to drive or take a taxi up from Brechin or Kirriemuir with the associated environmental cost. Unfortunately people like the freedom of having their cars but at present there is no option	Other national parks have bus networks, the Lake District for instance. I would love to see a network of buses that let walkers and mountain bikers have the freedoms only car drivers currently have	I don't know how people can be encouraged not to drive, and i understand it's unlikely to be financially appealing for bus companies
55	Visitor to the National Park	-	Left no comment		
56	Visitor to the National Park		In order for the National Park to remain a park rather than to become a housing estate, only previously developed land is to be used for new housing developments.  I am aware that there is a huge housing shortage but using green field is not the solution certainly not within a national park...	Use previously developed land instead of sacrificing nature again.	Because in 99% of the cases the easiest way for new housing development is starting on an empty plot. Sacrificing the environment once more.

Table 5 Responses from public sector organisations.


Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local Plan to do about the issues you raise?	Why do you say that? Do you have any other comments?
<b>Aboyne Upper Deeside and Donside</b>					
57	Public Sector Organisation		Settlements like Ballater should have regular town centre health checks carried out like the ones in Aberdeenshire. This would help identify strategic issues and support the community with evidence and data for improvement projects.	consider undertaking town centre health checks in the main settlements.	The TCHC process in other authority areas has provided a rich and deep source of information about places. Settlements in CNPA area are at a disadvantage by not having this resource.

Table 6 Responses from those who left no detailed comments.

Reference number	What is your connection to the National Park?	What topic does your comment relate to?	What do you want to tell us about these particular topics?	What do you want the Local Plan to do about the issues you raise?	Why do you say that? Do you have any other comments?
58	Badenoch and Strathspey	-	-	-	-
59	-	-	-	-	-
60	-	-	Nethy Bridge	-	-
61	-	-	Staff of local businesses have nowhere to live	Identify things.	LDP is amazing



## Appendix 2: Response from the Royal Society for the Protection of Birds (RSPB)

Sent by email only  
29 September 2023

Dear Dan

### **The Next Cairngorm Local Development Plan**

RSPB Scotland welcomes the opportunity to contribute to the gathering of issues and ideas that will form the evidence base for the next Cairngorms Local Development Plan. Please find our comments set out in the attached annex.

We would be happy to discuss any of these issues further, please don't hesitate to contact me,

Yours Sincerely  
Peter Gilbert  
Senior Conservation Officer (South Highland)



## **Annex 1- RSPB Scotland Comments - Cairngorms LDP Information Gathering**

### **Nature Networks**

RSPB Scotland would like to see The Cairngorms National Park supporting Scotland's Nature Network, making places for nature bigger, better and more joined up.

The Fourth National Planning Framework (NPF4) aims to 'secure positive effects for biodiversity, create and strengthen nature networks and invest in nature-based solutions to benefit natural capital and contribute to net zero'.

Under the LDP section of NPF4 it states that LDPs, 'should also promote nature recovery and nature restoration across the development plan area, including by: facilitating the creation of nature networks and strengthening connections between them to support improved ecological connectivity; restoring degraded habitats or creating new habitats; and incorporating measures to increase biodiversity, including populations of priority species.'

Development can create barriers to nature, making it harder for species to be resilient. However, development can also help nature recovery by enhancing habitats, creating habitat connections and stepping-stones for species.

The Scottish Government Biodiversity Framework consultation is currently ongoing and covers policy frameworks for delivering 30x30 and Nature Networks. The finalised delivery plans and policy frameworks are expected in early 2024. We hope that Cairngorms LDP can work closely with The Highland Council to fully support Nature Networks and strive to create an amazing system of habitats to support species in the area, especially priority species for the Cairngorms, which in turn, will feed into a national Scottish Nature Network.

### **Nature Recovery and 30x30**

Nearly 50% of the Cairngorm National Park is designated as protected for nature and the CNPA Partnership Plan has ecosystem restoration targets of 50% of land managed for ecosystem restoration by 2045. Therefore, we would like to see a Cairngorms LDP support ambitious plans for nature recovery and enhancement, over and above the Scottish Government Commitment to protect at least 30% of land and sea by 2030.



As part of this, protected sites (Special Protection Areas, Special Areas of Conservation, Ramsar sites and Special Sites of Scientific Interest) and any other nature sites should be clearly mapped in the LDP (and RSS) and taken into consideration throughout the stages of the plan.

## **Biodiversity Enhancement**

Biodiversity Enhancement has the potential to unlock support for habitats and species that will contribute to nature recovery, and sustainable and liveable places. It represents a huge opportunity to expand those who are directly involved and can benefit from nature and allows us to think more strategically about nature restoration at larger scales. To achieve these important outcomes, individual Biodiversity Enhancement proposals need to be grounded within, and make reference, to local and regional spatial strategies and plans including the Cairngorms Nature Action Plan.

Cairngorms LDP has the potential to play a critical role in connecting Biodiversity Enhancement implementation with the wider planning system, and its consideration of both nature networks and the communities affected by development. We would like to see a clear vision on how biodiversity enhancement can be achieved in Cairngorm National Park through the planning system.

Although NatureScot guidance, 'Developing with Nature', has been published it would be great if CNPA had clear guidance and aspirations for enhancement, to be more ambitious in delivery of enhancement from local developments. We would especially like to see more area specific guidance which takes a strategic approach to this in the area. Opportunity mapping, linking in with nature networks in the area would be very useful in identifying the best places for enhancement, creating bigger, better and more joined up habitats. Members of the public and communities should be encouraged and supported to shape the opportunity mapping to ensure that this delivers for people and nature.

## **Capercaillie**

The latest national Capercaillie survey results released in September 2022 estimated there were only 542 remaining individuals, putting the population at real risk of extinction in the UK. With over 85% of the remaining population found within the Cairngorms National Park, it is therefore critical that policies are included within the Cairngorms LDP to reflect this situation and to ensure that potential impacts from development on remaining populations are avoided. In addition, land allocations and nature networks need to support wider aims to help protect this population.