

## Marr Area Committee Report 23 November 2021

Reference No: APP/2021/0917

**Full Planning Permission for Erection of Boundary Fence and Gates (Retrospective), Change of Use and Conversion, Alterations and Formation of External Stairs of Mill to Class 9 (Dwellinghouse) at Former Strathdon Fish Farm, Mill of Newe, Strathdon, Aberdeenshire, AB36 8TG**

**Applicant:** Mr D Knight, C/o Agent  
**Agent:** Gerry Robb Architectural Design Services, Bridgend, Bridgeview Road, Aboyne, Aberdeenshire, AB34 5HB

Grid Ref: E:337149 N:812301  
Ward No. and Name: W15 - Aboyne, Upper Deeside and Donside  
Application Type: Full Planning Permission  
Representations: None  
Consultations: 7  
Relevant Proposals Map: Cairngorms Local Development Plan 2021  
Designations: Rural Housing Market Area  
Complies with:  
Development Plans: No  
Main Recommendation: Refuse



**NOT TO SCALE**

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## 1. Reason for Report

- 1.1 The Committee is able to consider and take a decision on this item in terms of Section B.8.1 of Part 2A List of Committee Powers and Section C.3.1i of Part 2C Planning Delegations of the Scheme of Governance as the application is recommended for refusal but at least two Local Ward Members in the Ward in which the development is proposed, have requested that the application be referred to the Area Committee.

**Councillor Peter Argyle:** *In all the circumstances I feel it would be appropriate for MAC to consider this application in the context of the CNP LDP, particularly in relation to flood issues.*

**Councillor Geva Blackett:** *As there are other houses in the location, I would like the committee to consider the flooding implications.*

**Councillor Paul Gibb:** *I'd like Committee to discuss the application, in particular Policy 10 Part 2.*

- 1.2 The Head of Finance and Monitoring Officer within Business Services have been consulted in the preparation of this report and had no comments to make and are satisfied that the report complies with the Scheme of Governance and relevant legislation.

## 2. Background and Proposal

- 2.1 This application seeks full planning permission for the erection of a boundary fence and gates retrospectively, while also seeking planning permission for the proposed change of use and conversion, alterations and formation of external stairs of a former mill to a Class 9 (Dwellinghouse) at the former Strathdon Fish Farm, Mill of Newe, Strathdon.
- 2.2 The application site is located in the countryside approximately 1km west of the Strathdon settlement boundary. The application site extends 0.1ha and features a C listed former mill building. The listing for the building notes that it was built in the 18th century and was previously category B listed however this was changed to a category C listing in 2006. The building features a kiln vent and is L shaped featuring a two storey section, as well as a three storey section. The building is finished in natural slate, cast iron rainwater goods and timber astragal windows. The building was most recently used as a fish hatchery for the Don District Salmon Fishery Board, however this use ceased some time ago and the building has fallen into a state of disrepair. To the east of the site is the Burn of Deochry, and to the north and north west of the site are several neighbouring dwellings, including the C listed 'Mill of Newe.' The site is accessed via a private access track which runs along the western boundary of the site and serves neighbouring dwellings to the north. The site is bound by 1.2m post and wire fencing along the east, south and west boundaries with a farm gate providing access for parking along the western boundary of the site. The boundary features have been erected in the absence of planning permission.

2.3 It is proposed to change the use of the building from a mill to a class 9 dwellinghouse. The application proposes some minor alterations to the exterior of the building including repairs to the granite and harling on exterior walls. New timber stairs would be erected on the north west elevation to provide access to an existing first floor stable door which would also be replaced with a new timber door on a like for like basis. Three flues would project from the roof to serve wood burning stoves within the proposed dwelling and repairs would also be undertaken to the kiln vent as well as the roof. Permission is also sought retrospectively for the erection of the post and wire fencing and an access gate at the site, which are already in place. The dwelling would be served by the public water supply and a private drainage arrangement with soakaways already in place at the site which would serve the proposed dwelling. An application for listed building consent was submitted to address the proposed alterations to the building which has been approved by the Planning Service. It is worth noting the listed building consent only considered matters pertaining to the physical works to the listed building, the use as a dwelling or technical matters such as flood risk are not applicable to that listed building consent, hence it being supported as the interventions to restore the listed building are acceptable on their own merit.

2.4 In support of the application the following information has been submitted:

- **Bat Survey** prepared by Tay Ecology. Following the submission of a preliminary survey completed in January 2021 a full survey was requested and this report provides the findings of this supplementary survey which was undertaken in August 2021. One bat roost containing one non-breeding common pipistrelle bat was identified during the activity surveys at the site. The applicant also provided a licence from NatureScot granted in August 2021 which permits the disturbance of bats for the proposed development subject to conditions set out within the licence. Received 02/09/21.
- **Drainage Report** prepared by S.A. McGregor. This report notes that the building benefits from an existing septic tank and foul water soakaway which would provide sufficient capacity for the proposed development. There is also an existing surface water soakaway which can continue to serve the site in its intended use as a dwellinghouse. Confirmation of registration with SEPA is also provided. Received 21/04/21.
- **Engineer Report** prepared by Ramsay & Chalmers. This report provides a description of the building as well as findings from an external and internal inspection of the building. Recommendations are subsequently provided on what works should be undertaken on the building, in terms of structural integrity, in the context of a proposed conversion to a dwellinghouse. Received 21/04/21.
- **Flood Risk Assessment (FRA)** prepared by JBA Consulting. This outlines some background to the proposal as well as findings from fluvial flood modelling. The report concluded that the flood risk to the proposed dwelling is primarily from the Burn of Deochry. The report presented

proposed mitigation to address the flood risk at the site. These include raising the finished floor level of the proposed dwelling and flood resistance measures. Received 21/04/21.

- **Geoenvironmental Study** prepared by Earth Environmental & Geotechnical Ltd. This report outlines findings from a Phase I Environmental Desk Study for the proposed change of use within the application site. The report provided recommendations based on the findings of the study. Received 21/04/21.

2.5 In terms of relevant planning history, a similar proposal for converting a building to residential use, albeit not a listed building, was recommended for refusal to the Marr Area Committee on the basis of unacceptable flood risk posing a risk to life if the conversion to a single dwelling were to take place. That application was APP/2019/2108 at Prony Steading, Glengairn, Ballater. At its meeting of 18<sup>th</sup> February 2020, the Marr Area Committee were minded to grant consent, contrary to the recommendation of the Planning Service and against the concerns and objections of SEPA and the Council's Flood Risk and Coast Protection Team. This intention to grant required referral to Scottish Ministers, who then refused the application.

The Reporter's report to Ministers on the application stated;

*The principle of the development is supported. The proposed conversion would comply with Policy 1, Part 8 (Conversions), Policy 3, Part 3 (Converting existing buildings), Policy 4 (Natural Heritage) and Policy 10, Part 1 (Water Resources) of the development plan.*

*The proposed conversion does not accord with the requirements of Policy 10, Part 2 (Flooding), as it has not been demonstrated that the dwelling house would be free from significant risk of flooding.*

*Overall the proposed development is contrary to the development plan, as the benefits of the conversion are not sufficient to outweigh the risk that the dwelling house could flood in the future, with adverse consequences for human health and safety and for property.*

*The relevant policies of the proposed local development plan are not materially different from those of the extant plan, and there is no reason to alter the above conclusions.*

*Granting planning permission would be contrary to the precautionary approach set out in Scottish Planning Policy, and to the advice that areas at medium to high risk of flooding are generally not suitable for isolated dwellings in sparsely developed locations. The operational agricultural need identified by the applicant does not apply given that alternative locations may be available.*

### 3. Representations

3.1 No valid letters of representation have been received.

### 4. Consultations

4.1 **Business Services (Developer Obligations)** confirmed that contributions have been agreed towards affordable housing within the Aboyne catchment.

4.2 **Infrastructure Services (Contaminated Land)** confirmed that the Geoenvironmental report submitted by the applicant was satisfactory and requested that a condition be placed on any grant of planning permission requiring a site investigation prior to the commencement of any development.

4.3 **Infrastructure Services (Flood Risk and Coastal Protection)** objected to the proposed change of use on the basis of flood risk. The Service noted that the site is identified as being at medium to high likelihood of flooding and any residential use would be contrary to local and national policy. The Service considered that despite the mitigation proposed within the FRA, the site is unsuitable for a change of use to a residential dwelling which is a highly vulnerable use, posing a risk to life for any occupant. The proposed mitigation would not remove the medium to high likelihood of flooding risk at the site and as such the Service objects to the application.

4.4 **Infrastructure Services (Roads Development)** commented that there is sufficient space available within the driveway to provide the required three car parking spaces and had no further comment to make.

4.5 **Cairngorms National Park** confirmed that the application does not raise any planning issues of general significance to park aims and as such no call-in is necessary.

4.6 **Scottish Water** confirmed that the site could be served by the Lumsden water treatment works however noted that no public water infrastructure was within the vicinity of the site and advised that the applicant explore private options.

4.7 **SEPA** raised concern regarding the modelling used to inform the FRA submitted and noted that the site is acknowledged as being at medium to high risk of flooding. They noted that many of the proposed mitigation steps would not be acceptable and objected to the proposed development. The applicant submitted two further reports containing supplementary information in response to the matters raised by SEPA, however they maintain an objection noting that the proposed development would result in people and property being placed at risk of flooding which is contrary to Scottish Planning Policy.

## 5. Relevant Planning Policies

### 5.1 Scottish Planning Policy

The aim of the Scottish Planning Policies is to ensure that development and changes in land use occur in suitable locations and are sustainable. The planning system must also provide protection from inappropriate development. Its primary objectives are:

- to set the land use framework for promoting sustainable economic development;
- to encourage and support regeneration; and
- to maintain and enhance the quality of the natural heritage and built environment.

Development and conservation are not mutually exclusive objectives; the aim is to resolve conflicts between the objectives set out above and to manage change. Planning policies and decisions should not prevent or inhibit development unless there are sound reasons for doing so. The planning system guides the future development and use of land in cities, towns and rural areas in the long term public interest. The goal is a prosperous and socially just Scotland with a strong economy, homes, jobs and a good living environment for everyone.

SPP policy principles for managing flood risk and drainage are that the planning system should promote a precautionary approach to flooding from all sources, taking account of the effects of climate change; flood avoidance by safeguarding flood storage and conveying capacity, and locating development away from functional flood plains and medium to high risk areas; flood reduction by assessing flood risk and, where appropriate, undertaking natural and structural flood management measures; and avoidance of increased surface water flooding. The planning system should prevent development which would have a significant probability of being affected by flooding or would increase the probability of flooding elsewhere.

### 5.2 Cairngorms Local Development Plan 2021

Policy 1 New Housing Development  
Part 8 Conversions

Policy 3 Design and Placemaking  
Part 6 Alterations to existing building stock

Policy 4 Natural Heritage  
Part 4 Protected species

Policy 9 Cultural Heritage  
Part 1 Listed buildings

Policy 10 Resources

Part 2 Flooding  
Part 3 Connection to sewerage  
Part 8 Contaminated land

Policy 11 Developer obligations

## **6. Discussion**

- 6.1 This application seeks full planning permission, retrospectively, for the erection of a boundary fence and gates, while also seeking planning permission for the proposed change of use and conversion, alterations and formation of external stairs of a mill to form a Class 9 use (Dwellinghouse) at the former Strathdon Fish Farm, Mill of Newe, Strathdon. The key considerations in the determination of this application are the principle of development as well as the impact of the proposed alterations to the building and site. Consideration must also be given to flooding at the site as well as cultural heritage considerations in respect of the listed building. The policies contained within the Cairngorms Local Development Plan 2021 are the main consideration in this case.
- 6.2 Policy 1 Part 8 supports the conversion of existing traditional buildings to housing where it is demonstrated that the building is capable of the proposed conversion works. In this instance the applicant has provided a report from an engineer which confirms that while works have to be undertaken to repair the existing building, it is capable of conversion. Any proposal must also maintain the style and character of the original building in terms of form, scale, materials and detailing, where they contribute positively to the context and setting of the area. The repairs outlined as necessary within the engineer's report can be undertaken while retaining the original character of the dwelling. The proposed change of use and conversion of the former mill building to a dwellinghouse would have minimal impact to the original style and character of the building. The most intrusive aspect of the development is the new timber access stairs to the former stable door on the north west elevation. This elevation is unseen from the south where the site is most visible, and therefore is considered by the Planning Service to be acceptable.
- 6.3 In conclusion, the proposed change of use and alterations to the former mill building to convert the building to a dwellinghouse are considered to comply with Policy 1 Part 8, and therefore is acceptable in principle.
- 6.4 Policy 3 Part 6 notes that alterations to existing building stock will be considered favourably where they respect the design, massing, proportions and general visual appearance of the building and area. In this instance, the proposed alterations are largely required to repair the building rather than alter it. The proposed alterations are minimal and would wholly respect the visual appearance of the building and would have no adverse impact on the surrounding area. The plans note that the existing cast iron rainwater goods would be repaired as well as repairs to the existing roof. The retention of these materials on a traditional building is welcomed as they retain its historic character. The biggest alterations to the building would be the installation of

three flues projecting from the roof to serve wood burning stoves within the building. The flues would be twin skin metalbestos flues and would project 0.8m from the ridge line of the roof. While these would be visible, they would not detract from the overall traditional character of the building and as such can be accepted. The proposed new stairs to the first floor are considered acceptable on the basis that they would be timber and located on the north west elevation and as such would be largely unseen from outwith the site. The boundary treatments and gate which have been erected at the site are in keeping with the rural setting of the site and as such are considered to be acceptable.

- 6.5 Policy 3 Part 6 further notes that alterations will be considered favourably where they maintain an appropriate level of private garden ground, including space for off-street parking. In this instance no garden ground would be lost and a sufficient level would serve the proposed dwelling. The Council's Roads Development Service was consulted and confirmed that while no parking is specifically shown on the site plans, that there is sufficient space within the site to accommodate three vehicles and had no further comment to make on the proposals. Therefore, the proposal is considered to comply with Policy 3 Part 6.
- 6.6 Policy 4 Part 4 notes that development that would have a significant adverse impact on any European Protected Species will not be permitted unless:
- a) the developer can demonstrate that there are public health, public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment; and
  - b) there is no satisfactory alternative solution; and
  - c) the development will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.
- 6.7 The application was initially supported by a preliminary roost assessment which identified droppings from Brown Long-eared bats at three locations within the building. The Council's Natural Heritage Service was consulted and requested the submission of a full survey. Following the submission of this along with a licence granted for the site from NatureScot, the Natural Heritage Service confirmed it was satisfied with the proposal. Therefore, the application is considered to comply with Policy 4 Part 4.
- 6.8 The building within the application site is a C listed building and as such Policy 9 Part 1 must be considered. This policy notes that development affecting a listed building should preserve the special qualities of the building or structure. As previously noted, the majority of the alterations to the building involve repair work to existing finishes such as the rainwater goods and roof. These would retain the character of the building and not adversely impact it. The applicant also proposes to replace the access door on the first floor, however this would be on a like for like basis and therefore would have no adverse impact upon the listed building. The proposed flues would extend

from the roof of the building, however the building has an industrial history and is considered acceptable on this basis. The boundary and entrance features, which already exist, do not pose any significant concerns in relation to the setting of the building. The policy further notes that any development should enhance the character of the listed building. In this regard the Planning Service welcomes the reuse of this building, and the application largely proposes to retain and repair existing traditional materials within the site. The repairs to the building would enhance the character of the listed building and as such the proposal would comply with Policy 9 Part 1.

- 6.9 Policy 10 Part 2 must be considered as the site is shown to be at risk of flooding. This policy states that all development should:
- a) be free from Medium to High risk of flooding from all sources taking into account predicted impacts of climate change; and
  - b) not increase the risk of flooding elsewhere; and
  - c) not add to the area of land that requires flood prevention measures; and
  - d) not affect the ability of the functional floodplain to store or move flood waters.
- 6.10 In support of the application a FRA was provided which confirmed that almost all of the building footprint is at a medium to high risk of flooding. The FRA proposed mitigation through the restoration of a section of the Burn of Deochry by removing historical engineering works, but acknowledged that with this mitigation the dwelling would still flood. Further mitigation is proposed through the raising of floor levels, flood resistance construction and a water level sensor alarm. The Council's Flood Risk and Coastal Protection Service (FRCP) considered the findings and proposed mitigation within the FRA and still objected to the proposed development, noting that the building is at risk of flooding, and the proposed mitigation measures to the adjacent burn would still result in the building flooding. Furthermore, the Service noted that mitigation such as flood resistant measures or warning alarms are not suitable mitigation measures to enable change of use to residential development.
- 6.11 SEPA was also consulted and objected to the proposed development. They also provided comment on the FRA noting concern regarding the flows utilised to inform the FRA, as well as highlighting that the FRA provides no comment on whether the proposed channel alterations would be appropriate and would result in a stable channel able to convey the higher flows in the future. It also raised concern regarding the modelling for the FRA highlighting that it did not extend far enough upstream and that there may be out of bank flows upstream of the model which may impact the site.
- 6.12 The applicant provided supplementary information in response to the comments from SEPA and the FRCP Service which sought to justify the modelling for the initial FRA, and address the matters raised by SEPA. Information was provided regarding property flood resilience and further mitigation measures which could alleviate the flood risk to the proposed dwelling. The FRCP Service considered the matters raised within the supplementary information and concluded that it appeared acceptable

mitigation against flooding is not possible at the site due to the building's location and sustained its objection to the proposed development. SEPA also maintained its objection noting that the use of informal flood prevention works is not suitable to enable development in flood risk areas. The mitigation would not remove the building from the functional floodplain and the ground floor of the building would still be expected to flood. The applicant proposed to raise the floor levels of the building to mitigate the risk of flooding, however SEPA noted that this would not remove the residential development from the functional floodplain. SEPA concludes by noting that it remains of the position that this building is not suitable for residential development highlighting that this would be contrary to Scottish Planning Policy (SPP) which notes that the planning system should prevent development which would have a significant probability of being affected by flooding.

- 6.13 Further information was again provided by the applicant in response to the further comments by SEPA and the FRCP Service. Having considered this information, SEPA again maintained its objection to the proposed development highlighting that it would put people and property at risk of flooding, contrary to SPP. It sustained its previous position noting that the FRA provided by the applicant indicates that the building is at risk of flooding and that the applicant has not demonstrated that appropriate measures can be implemented to remove the risk of flooding to the property. It again raised that the use of flood warning systems and property level protection, as proposed by the applicant, are not suitable mitigation measures to enable development in flood risk areas. The Council's FRCP Service noted that of the mitigation measures by the applicant, only the raising of floor levels and channel restoration works to the Burn of Deochry would be considered acceptable, however those measures would not remove the flood risk at the site, and as such the Service continued to object to the proposal.
- 6.14 Having considered the matters within the FRA and the comments from SEPA and the FRCP Service, the Planning Service conclude that the proposed development fails to comply with Policy 10 Part 2. A lot of engagement and opportunity for additional information has taken place, but the simple fact is that the site, even with suggested mitigation presented by the applicant's consultant, is at risk of flooding and residential development would pose a risk to life. The application site is within an area acknowledged within the supporting FRA as being at medium to high risk of flooding. While a number of mitigation measures are proposed many of these are considered unsuitable. Of the measures deemed acceptable, these would not be sufficient to remove the high risk of flooding at the site. The application proposes a use which would be highly vulnerable to flooding and as the site is at medium to high risk of flooding, it fails to comply with Policy 10 Part 2, and is contrary to SPP.
- 6.15 Whilst this current application is considered under the recently adopted CNPA LDP, there is a comparable historical application from 2020 (referenced in 2.5 above) that sets out the significance of the consideration in relation to flood risk, and that it is not a matter to take lightly. Introducing a new residential use into an area at risk of flooding poses a risk to life for the occupants. In

this instance there is no mitigation to make the site safe, and there is no material consideration that would outweigh a risk to life to offer any support for the application. The Prony Steading application is a very relevant consideration, the key issues in that proposal are the same as those here, and the general policy topics and content in the recently adopted CNPA LDP do not differ significantly from the policies in place in 2020 (as noted by the Reporter). As the Reporter set out to Ministers for Prony Steading, the same conclusion can be reached for this application - *planning permission would be contrary to the precautionary approach set out in Scottish Planning Policy, and to the advice that areas at medium to high risk of flooding are generally not suitable for isolated dwellings in sparsely developed locations.*

- 6.16 Policy 10 Part 3 notes that all development should be connected to the public sewer system unless it is in a small settlement where there is no system. In these instances a private system may be permitted where it does not pose or add to a risk of detrimental effect, including cumulative to the natural and built environment, surrounding uses or the amenity of the area. Scottish Water was consulted regarding the proposed connection to the public water supply and noted that according to its records there is no public waste water infrastructure within the vicinity of the site. It is therefore deemed reasonable in this instance to accept a private drainage arrangement to serve the proposed dwelling. The existing building is currently served by a foul and surface water soakaway arrangement. This is supported by drainage certification confirming the existing drainage is suitable to serve the proposed dwelling. As such the Planning Service is satisfied that the development can be served by the existing drainage arrangement and the proposal complied with Policy 10 Part 3.
- 6.17 Policy 10 Part 8 notes that development affecting contaminated land will be considered favourably where assessments are undertaken and in the event of a significant risk being identified that investigations and assessments are submitted to the Planning Service. This application is supported by a Geoenvironmental Study which provided the findings of a Phase I Environmental Desk Study. The Council's Contaminated Land Service was consulted and confirmed that the reports contents, conclusions and recommendations are satisfactory. The Service requested that a condition be attached to any grant of planning permission requiring a site investigation. In light of the comments from the Contaminated Land Service, the Planning Service is satisfied that the proposed development complies with Policy 10 Part 8.
- 6.18 The Council's Developer Obligations Service initially sent a Developer Obligations Assessment Report to the applicant. Following this the Service confirmed that contributions had been agreed towards affordable housing provision within the Aboyne Academy catchment area. Therefore, the proposal complies with Policy 11 of the LDP 2021.
- 6.19 In conclusion, the proposed development has some merits in terms of proposing to re-use a listed building, however the submission as a whole has a significant technical failing – the site is located within an area identified as

being at risk of flooding and the proposal is considered to be a vulnerable use within an area at medium to high risk of flooding. The applicant's agent/consultant has suggested some mitigation to attempt to somewhat alleviate the flood risk at the site, however the proposed residential dwelling would still be at a medium to high risk of flooding and as such would put people at risk. While the Planning Service welcomes the reuse of a listed building in general, in this instance the development cannot be supported on the basis that it would put people at risk from flooding. The Prony Steading example offers a very similar comparison, where the Reporter advised Members that conversion of a building to residential use, in an area at medium to high flood risk, is not acceptable. The same applies in this instance, the proposal is significantly flawed due to flood risk, and subsequent risk to life for occupants were it to be used for residential purposes. The development is therefore contrary to SPP and Policy 10 Part 2 of the Cairngorms Local Development Plan 2021 and is recommended for refusal.

## **7. Area Implications**

- 7.1 In the specific circumstances of this application there is no direct connection with the currently specified objectives and identified actions of the Local Community Plan.

## **8. Implications and Risk**

- 8.1 An integrated impact assessment is not required because the granting or refusing of the application will not have a differential impact on the protected characteristics of the applicant or any third parties.
- 8.2 There are no staffing and financial implications.
- 8.3 There are no risks identified in respect of this matter in terms of the Corporate and Directorate Risk Registers as the Committee is considering the application as the planning authority in a quasi-judicial role and must determine the application on its own merits in accordance with the Development Plan unless material considerations justify a departure.
- 8.4 No separate consideration of the current proposal's degree of sustainability is required as the concept is implicit to and wholly integral with the planning.

## **9. Departures, Notifications and Referrals**

### **9.1 Local Development Plan Departures**

Policy 10 Resources, Part 2 Flooding

- 9.2 The application is a Departure from the Local Development Plan and has been advertised as such.
- 9.3 The application falls within one of the categories contained in the Schedule of the Town and Country Planning (Notification of Applications) (Scotland)

Direction 2009 and therefore requires to be notified to the Scottish Ministers prior to determination in the event of approval.

- 9.4 The application would not have to be referred to Infrastructure Services Committee in the event of the Area Committee wishing to grant permission for the application.

## **10. Recommendation**

### **10.1 REFUSE Full Planning Permission for the following reasons:-**

01. The Planning Authority considers that the application is for a development that is not in accordance with the Cairngorms Local Development Plan 2021. The site is located within an area identified as being at medium to high risk of flooding, and the proposed change of use to a residential dwelling would put people occupying the proposed dwelling at risk as a result of any flooding. As such, the development is contrary to Scottish Planning Policy and Policy 10 Resources, Part 2 Flooding of the Cairngorms Local Development Plan 2021.

**Alan Wood**  
**Director of Environment and Infrastructure Services**  
**Author of Report: Iain McMillan**  
**Report Date: 05/11/21**