

Issue 1	GENERAL	
Development plan reference:	INTRODUCTORY SECTIONS ACTION PROGRAMME GLOSSARY OVERALL PLAN PREPARATION CONSULTATION PROCESS	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>028 Alvie Estate 179 An Camas Mòr LLP 080 Badenoch and Strathspey Conservation Group 218 Kincaig and Vicinity Community Council 044 North East Mountain Trust 104 Phil Swan 195 Ramblers Scotland 035 Reidhaven Estate 040 Scottish Natural Heritage 235 Scottish Water 063 SEPA 244 Sheena and Campbell Slimon 069 Sportscotland 061The Cairngorms Campaign 043 The Highland Council 090 Victor Jordan 196 Woodland Trust Scotland</p>		
Provision of the development plan to which the issue relates:	ACTION PROGRAMME GLOSSARY OVERALL PLAN PREPARATION CONSULTATION PROCESS	
Planning authority's summary of the representation(s):		
<p><u>INTRODUCTORY SECTIONS</u> An Camas Mòr LLP (179) - Requests Section 2 should make the importance placed on the plan-led system clearer and changes are needed to para 2.1 and 2.2 to set out the minimum requirements for an application and accompanying documentation. There is no statutory provision to support a requirement in excess of the legal standard.</p> <p>Reidhaven Estate (035) - Introduction para 1.1 - the plan period is unclear with confusion between the plan period and housing land supply period.</p> <p>Ramblers Scotland (195) - Para 1.3 - The text should accurately reflect the Scottish Government's stated central purpose which is "to make Scotland a more successful country, with opportunities for all to flourish through increasing sustainable economic growth." Shortening this statement gives undue emphasis to economic growth above environmental and social elements.</p>		

Scottish Water (235) - Ask that the importance of early engagement between SW, CNPA/ Local Authorities and developers is highlighted either as part of the supporting text, or under each settlement/site.

ACTION PROGRAMME

SEPA (063) - Action Programme - Support.

Note possible issues with the wastewater treatment works at Grantown on Spey, with sewer network capacity at Aviemore and Newtonmore and with the existing septic tank at Tomintoul. Scottish Water should provide further information on these.

Action Programme could identify any major energy generation and transmission requirements.

Suggest that the A9 dualling should be identified for clarification.

Sportscotland (069) - Action Programme

Object to there being no reference to Sportscotland in the section regarding 'Review of sport and recreation facilities and identify gaps and opportunities'.

Scottish Natural Heritage (040) – SNH happy for additional reference to partnership working with them at Boat of Garten, An Camas Mòr, Natural heritage policy, HRA and actions arising

GLOSSARY

Scottish Natural Heritage (040) – Add definitions of Habitat Regulations Appraisal, Appropriate Assessment, Wildness and Protected Species to the Plan. Update definition of Ramsar site to reflect current legislation.

SEPA (063) - Definition of Scottish Environment Protection Agency - should also refer to SEPA as Scotland's environmental regulator and that SEPA monitors and reports on the state of Scotland's Environment.

OVERALL PLAN PREPARATION

Badenoch and Strathspey Conservation Group (080) - Object to the tone of the LDP which implies it has been written for applicants. It should give everyone a sense of ownership.

North East Mountain Trust (044) - Text used is too informal and open to interpretation.

Sheena and Campbell Slimon (244) - Farming – seek enhanced environmental payments to support environmental projects

Planning - seek greater transparency and consistency of decisions and better focus of effort – eg focusing on objecting to the pylon line distracted from possible enhancements which could have been achieved

Transport – it is impossible to visit Laggan or Dalwhinnie without a car

Economy – seek assistance for communities to support the economy, and support for economic development other than tourism.

The Cairngorms Campaign (061) - Object to lack of numbering of policies and their layout.

The Highland Council (043) - Text should be checked to ensure the policies accurately and fully reflect what is set out in the guidance.

Kincraig and Vicinity Community Council (218) - It is hard to see how the objectives of the development plan are reflected throughout the document and supplementary guidance. There is no clear guidance or direction which results in contradictions and conflicts across the various Policies and Supplementary Guidance. These need to be resolved before the Plan can be implemented.

There is a need for a more realistic balance between the needs for economic development and the protection of the natural heritage. Neither should be to the detriment of the other. Because of the greater emphasis being placed on the first two aims, the third and fourth aims have little chance of being addressed in a manner that allows us to implement its own strategies and policies in the interests of the community.

Woodland Trust Scotland (196) - Support the Plan as being concise and well presented plan.

Consider any woodland included in SNH's Ancient Woodland Inventory (or AWI), which is present on historical maps or which exhibits a significant numbers of ancient woodland indicators can be considered as ancient, is therefore high value for conservation and worthy of further study and is likely to pose a constraint on development. Consideration of woods and trees is pertinent to housing, health, employment, attracting business and inward investment, transport, renewable energy and infrastructure.

Concerned about the general focus on economic and social development, which does not adequately reflect the duty placed on public bodies to further the conservation of biodiversity, does not comply with section 9(6) of the National Parks (Scotland) Act 2000, nor reflect the sentiment of Cairngorms Nature Action Plan. Feel that the protection of the natural environment has been placed at the heart of the policies other than that for natural heritage.

The importance of the natural environment to the sustainable development of the Cairngorms National Park's economy cannot be under-estimated, should be a key overarching principle, and form the basis on which a development plan is built.

Concerned to note that within the plan sustainable development is only mentioned within the community section.

Support the general emphasis on reducing the impacts of climate change, but seek a clear statement regarding the contribution made by trees and woods to this critical issue.

Support the phrase "the special qualities of the Park are enhanced by new development where possible and protected from new development that would significantly harm or erode them", but suggest the word significant here will mean that a key challenge of "enhancing the landscapes and habitats and species of the Park while also delivering social and economic benefits for business, communities and visitors" will become even more of a challenge.

Victor Jordan (090) - Object to approach taken with regards housing. Suggests sites only or mainly for affordable housing should be provided. Suggests a lower target for population is required and alternative housing strategies should have been more fully explored. Concerns discussions and debates around housing are complex and confusing and the complications of the various figures and tables adds further to this problem.

The spatial strategy set out does not comply with the requirements of the legislation as it relies on settlement statements.

Neither did the Main issues report comply with the requirements of the legislation since it did not set out reasonable alternatives and relied on existing consents. This was used as an excuse to overlook many sites which did not have permission, notably Ballater H1, Grantown on Spey H1, land at Newtonmore, Blair Atholl, Boat of Garten, Braemar, Cromdale, Dinnet, Dalwhinnie, Dulnain Bridge, Killiecrankie, Kinraig and Tomintoul. Nor did it include proposals as required by section 17(2) of the act.

One option might have been to concentrate such sites or new sites for affordable housing only which would have addressed the continuing need for such housing. It is an excuse to suggest that existing consents will provide for the needs of affordable development.

The approach followed ignored the majority of responses to the MIR which supported a focus on land for affordable development and relied on an ongoing notion that the authority must provide for open market housing.

Alternatively different requirements could have been followed for the different parts of the Park, since the need and demand in Aberdeenshire and Badenoch and Strathspey are not comparable. Equally different, lower growth scenarios regarding migration could have been adopted.

An Camas Mòr LLP (179) - Support streamlining of policies down to 10 from 36 in previous Local Plan and the way the Plan integrates with other relevant legislation, statutory plans and strategies. Welcome emphasis on sustainable and high quality design and increased renewable energy generation. Support conservation and enhancement of natural and built heritage, emphasis on low carbon economy, producing resources and reducing environmental impacts of consumption. Support Section 13 on community infrastructure which should help deliver community aspiration for sustainable development. Support Section 12 on developer contribution which seeks to address impacts of development. Concerns current review of NPF and SPP may create inconsistencies with the documents and so this document should be reviewed and re-consulted on after NPF3 and SPP discussions have concluded.

CONSULTATION PROCESS

Alvie Estate (028) - Frustrated by seemingly endless consultations and lack of evidence that views expressed have been taken on board. Concerned proposed Plan will result in economic inertia as it is too prescriptive and restricts activities and use of land.

Phil Swan (104) - The consultation process has been inadequate and has excluded members of the community. Concerned the equalities impact assessment accompanying the plan is not adequate. (various documents and emails are appended to the representations to amplify the points made. These show ongoing correspondence with the CNPA on various issues, notably the Ballater Community vision, and the consultation process)

Modifications sought by those submitting representations:

INTRODUCTORY SECTIONS

An Camas Mòr LLP (179) - Amend the last sentence in paragraph 2.1 as follows:
“All relevant policies will be considered (delete “must” and “and complied with”) before a judgement is made as to the acceptability, or otherwise, of the development proposal”.

Reason: To comply with the approach advocated in the House of Lords decision.

Amend the last sentence in paragraph 2.2 as follows:

“This contains detailed guidance on how to meet the standards set by the policy, and what information may helpfully be submitted (delete “you will be required to submit”) as part of your application”.

Reason: The minimum requirements for an application and accompanying documentation are set out in the Town & Country Planning (Development Management Procedure) (Scotland) Regulations 2008. There is no statutory provision to support a requirement to exceed this legal requirement.

Reidhaven Estate (035) - Clarify wording to explain the plan period.

Ramblers Scotland (195) - Amend para 1.3 to properly quote the Government's central purpose “to make Scotland a more successful country, with opportunities for all to flourish through increasing sustainable economic growth.”

Scottish Water (235) – Include text to clarify the importance of early engagement between SW, CNPA/ Local Authorities and developers

ACTION PROGRAMME

SEPA (063) - Seek additional information from Scottish Water on possible wastewater treatment works at Grantown on Spey, sewer network capacity issues at Aviemore and Newtonmore and possible issues with existing septic tank at Tomintoul.

Identify any major energy generation and transmission requirements.

Include A9 dualling

Sportscotland (069) - Include reference of sportscotland under 'Review of sport and recreation facilities and identify gaps and opportunities'.

Scottish Natural Heritage (040) – Include additional reference to partnership working with SNH at Boat of Garten, An Camas Mòr, Natural heritage policy, HRA and actions arising.

GLOSSARY

Scottish Natural Heritage (040) - Add the following definitions to the glossary:

Habitat Regulations Appraisal: An Appraisal carried out by a planning authority to determine whether a development proposal would be likely to have significant effects on any Natura 200 site, either alone or in combination with other plans or projects. If likely significant effects are identified, the HRA moves on to an Appropriate Assessment

Appropriate Assessment: An assessment carried out by a planning authority as part of Habitat Regulations Appraisal to determine whether it can be concluded

that there will be no adverse effects on the integrity of a Natura site from the a development proposal. If the planning authority is unable to reach this conclusion, the development proposal can only be approved in the most limited circumstances.

Wildness: The quality experienced within area of wild land character, dependant on physical attributes of perceived naturalness, ruggedness of terrain, remoteness and visible absence of modern artefacts.

Protected species: Wild species of animal, plant or fungi that are protected by law and for which an offense may be committed unless a license is obtained. Legal protection is provided by the conservation (Natural Habitats, &c.) Regulations 1994 as amended, Wildlife and Countryside Act 1981 as amended and Protection of Badgers Act 1992 as amended.

Update Ramsar site definition to say: Ramsar Convention Site- A designation of globally important wetland areas that are classified to meet the UK's commitments under the Ramsar Convention. Scottish Government Policy states that all Ramsar sites are also Natura 2000 sites and/or Sites of Special Scientific Interest and are protected under the relevant statutory regimes.

SEPA (063) - Definition of Scottish Environment Protection Agency - include reference to SEPA as Scotland's environmental regulator and that SEPA monitors and reports on the state of Scotland's Environment.

OVERALL PLAN PREPARATION

Badenoch and Strathspey Conservation Group (080) - Redraft text to provide a sense of collective ownership.

North East Mountain Trust (044) - Remove/reduce text which is open to interpretation and informal.

Sheena and Campbell Slimon (244) – seeks overarching modifications to seek enhanced farm payments for environmental projects, greater transparency in decision making, improved public transport, support for rural communities across a broad spectrum of activities.

The Cairngorms Campaign (061) - Request that shorter discrete and numbered policies are developed which are easier to refer to.

The Highland Council (043) – Review text to check for accuracy and consistency

Kincraig and Vicinity Community Council (218) – Review text to check for clarity and consistency. Include more realistic balance between the needs for economic development and the protection of the natural heritage. Include better balance between the emphasis being placed on all four aims.

Woodland Trust Scotland (196) – Include clarity that all woodland included in SNH's Ancient Woodland Inventory (or AWI), which is present on historical maps or which exhibits a significant numbers of ancient woodland indicators can be considered as ancient. Consider woods and trees across housing, sustainable development, health, employment and employment, attracting business and inward investment, transport, renewable energy and infrastructure.

Review plan to ensure proper reflection of duty placed on public bodies to further conservation of biodiversity. Ensure proper compliance with section 9(6) of the National Parks (Scotland) Act 2000, and properly reflects the sentiment of Cairngorms Nature Action Plan.

Rebalance the plan to include clearer reference to sustainable development.

Include clear statement regarding the contribution made by trees and woods to climate change.

Provide clear measures or indicators of how the special qualities can be enhanced by new development to avoid future problems in implementing this overarching aim.

Victor Jordan (090) - Requests re-issuing of the Plan for consultation with a clear explanation of housing requirement for Aberdeenshire and its justification.

Restart the process giving reasonable alternatives.

An Camas Mòr LLP (179) - The Cairngorms National Park Proposed LDP should, following the consultation deadline for NPF3 and Draft SPP of 23rd July 2013, be further reviewed and if necessary modified, to ensure consistency with these national statements of Government Policy. Any significant pre-examination modifications should then be re-published, with further opportunity provided for additional public representation.

CONSULTATION PROCESS

Alvie Estate (028) - General Process - A different approach is needed.

Phil Swan (104) - Requests a full equalities impact assessment is carried out. CNPA should be more active in helping people to engage with the LDP process.

Request re-launch of consultation process and taking the document back to Main Issues Report stage.

Summary of responses (including reasons) by planning authority:

INTRODUCTORY SECTIONS

An Camas Mòr LLP (179) – Regarding para 2.1 the objector seeks for a change to the text to align it more clearly with case law concerning the required approach to the determination of a planning application when considered against the terms of a development plan and other relevant material considerations. The CNPA accepts the proposed alteration to para 2.1 to read: “All relevant policies will be considered before a judgment is made as to the acceptability, or otherwise, of the development proposal”.

Regarding the text at para 2.2, the CNPA accepts the alterations sought, so as to comply with the requirement for a planning application and accompanying documentation as set out in the Town and Country Planning (Development Management Procedures) (Scotland) Regulations 2008 (SDXxx para xxx). However given the sometimes high potential for significant environmental surveys and assessments, due to the special nature, existence and intrinsic importance of protected wildlife species and landscapes, flora and fauna in the National Park, then the CNPA suggest the text may be clearer if provided through an additional paragraph - para 2.3 to read : “The planning authority may require additional surveys, or additions and alterations to submitted surveys, to ensure that the

required level of detail and timeliness of survey information is before them to enable a decision to be taken on the merits, or otherwise, of the proposed development. Applicants are therefore strongly advised to seek the pre-application of the planning authority before submitting a planning application to ensure that any requirement for additional or time/season specific survey work is considered prior to the submission of a planning application. This will help facilitate a more speedy decision, and reduce possible costs and overall risk to the applicant.”

Reidhaven Estate (035) – Regarding para 1.1 and a definition of the plan period, regulations require an up to date LDP every five years, although land should be identified for development for a longer period. The CNPA can understand the confusion expressed and accept that additional explanation may clarify this point. The CNPA would therefore support an amendment to the final sentence, which might better read “It sets out the policies for the period of 5 years from adoption and proposals for development and use of land for the next 5-10 years”

Ramblers Scotland (195) – Regarding para 1.3, the CNPA did not intend the noted shortening of the text to change its meaning and does not therefore object to the inclusion of the full quote to read “to make Scotland a more successful country, with opportunities for all to flourish through increasing sustainable economic growth.”

Scottish Water (235) – Regarding the need for partnership working and early engagement, the CNPA agrees this is a key component to achieving successful development. The CNPA do not therefore object to an amendment to add additional text to the end of para 1.5 to clarify this, and would not object to wording to read “Early dialogue between applicants/developers, the planning authority, the local community, other relevant statutory and relevant local authority stakeholders, and infrastructure providers (e.g. SHN, SEPA, roads and drainage authorities, Scottish Water, Education and Health services) is key to the success of development proposals. We strongly recommend that you contact these key parties at the earliest opportunity to discuss your proposal prior to the submission of a planning application”.

ACTION PROGRAMME

Scottish Natural Heritage (040); SEPA (063); Sportscotland (069) – There are a number of additions to the Action Programme which could make it clearer how partnership working between the key agencies would help deliver the plan. The CNPA welcomes the comments made and would support a change to include

- Work with SEPA and Scottish Water to clarify additional wastewater treatment requirements and upgrades to infrastructure within identified settlements to allow development to come forward in a timely way
- Work with Scottish Government and key partners to bring forward the dualling of the A9 in accordance with the Governments’ agreed timetable
- Work with developers and key partners to bring forward transmission line upgrades within the Park in accordance with permissions granted
- Work with SNH to bring forward information to allow the development of housing, specifically in relation to issues highlighted through the HRA.
- Review sports and recreation facilities and identify gaps and opportunities

in collaboration with Sportscotland.

The CNPA also supports the suggestion to include reference within the Action Programme to bringing forward energy generation projects. The CNPA do not however consider that the Park is an appropriate place for major wind farm development, given the likelihood of and potential significant and harmful landscape, visual and wildlife impacts without any likelihood of appropriate mitigation, and in line with NPPP policy 1.3 (SDXxx page 42)

GLOSSARY

Scottish Natural Heritage (040); SEPA (063) – The CNPA accepts that the addition of definitions for a number of additional terms would provide the reader with greater clarity, and would therefore support an amendment to the glossary to read:

Appropriate Assessment: An assessment carried out by a planning authority as part of Habitat Regulations Appraisal to determine whether it can be concluded that there will be no adverse effects on the integrity of a Natura site from the a development proposal. If the planning authority is unable to reach this conclusion, the development proposal can only be approved in the most limited circumstances.

Habitat Regulations Appraisal: An Appraisal carried out by a planning authority to determine whether a development proposal would be likely to have significant effects on any Natura 2000 site or designated area, either alone or in combination with other plans or projects. If likely significant effects are identified, the HRA moves on to an Appropriate Assessment.

Wildness: The quality experienced within area of wild land character, dependant on physical attributes of perceived naturalness, ruggedness of terrain, remoteness and visible absence of modern artifacts.

Protected species: Wild species of animal, plant or fungi that are protected by law and for which an offense may be committed unless a license is obtained. Legal protection is provided by the Conservation (Natural Habitats, &c.) Regulations 1994 as amended, Wildlife and Countryside Act 1981 as amended and Protection of Badgers Act 1992 as amended.

Update Ramsar site definition to say: Ramsar Convention Site- A designation of globally important wetland areas that are classified to meet the UK's commitments under the Ramsar Convention. Scottish Government Policy states that all Ramsar sites are also Natura 2000 sites and/or Sites of Special Scientific Interest and are protected under the relevant statutory regimes.

In addition it agrees with the objector (063) that the proposed definition for SEPA would be better if amended and therefore supports a further change to the glossary to read

SEPA – The public body with a remit for environmental protection, acting as Scotland's environmental regulator who monitor and report on the state of Scotland's Environment.

OVERALL PLAN PREPARATION

Badenoch and Strathspey Conservation Group (080); North East Mountain Trust (044); The Highland Council (043); Kincaig and Vicinity Community Council (218) – Regarding the tone of language used and accuracy of text, CNPA has tried to strike a balance between clarity, brevity, and direction. It has endeavoured to write a plan which is understandable and not confusing. Where criteria or caveats apply to policies, these are set out clearly. It is hoped that, following the extensive

and detailed public consultation that the Local Development Plan has gone through (and continues to go through), all parties with an interest in the Cairngorms National Park – whether they be national, regional, international or local – feel that they have had an opportunity to have their say, to try and influence the plan, and therefore take joint ownership of the final plan, recognising that it would be impossible to meet all the concerns and aspirations of all parties all of the time. Regarding accuracy and consistency, the CNPA has undertaken checks to ensure consistency and clarity, but is supportive of the need to do this again, prior to final adoption of the Plan and in supplementary guidance. The CNPA do not therefore accept that any overarching amendment is required as suggested by the objectors at this stage.

Sheena and Campbell Slimon (244) – The issues raised by the objector are wider reaching and do not in all cases, relate to issues covered by the development planning system, including environmental payments and provision of public transport. The CNPA do however continue its work to influence government agencies, local authorities and others to improve services to local communities. . Regarding the transparency of planning decisions, the CNPA strives to ensure transparency, with background reports and supporting papers available for anyone to view. Members of the public are invited to attend meetings to hear the debate around planning matters, including planning committee when considering applications for new development and changes of use in the Park. Regarding support for local economies, the Plan provides a framework for decision making and aims to promote and support good development in the right place and at the right time, which helps grow local economies. Outside this, the CNPA continues to work closely with enterprise agencies, business partnerships and others to encourage inward investment across the Park.

The Cairngorms Campaign (061) – regarding the numbering of the policies, the CNPA considers that the policies are to be clearly numbered under each chapter. For example Chapter 6 is clearly marked Natural Heritage. This sets out numbered paragraphs with background information and contains the policy. The CNPA do accept however, in its response on individual policies, that some policies and associated wording require amendment to improve clarity.

Woodland Trust Scotland (196) - the comments regarding ancient and historic woodland is noted. However the CNPA would prefer to retain the definition of Ancient Woodland provided by SNH and included within the glossary as this is the accepted term for the woodland identified by SNH and others and recorded accordingly.

The CNPA do not consider there to be a general focus on development. The Plan is legally required to provide direction for applicants seeking development and so, by its very nature, must provide policies for this. However the plan includes in equal measure, policies to protect the Park, its landscapes, natural heritage, biodiversity and cultural heritage.

The CNPA do not consider embedding information within the Community section to be inferior in any way. This section forms part of the Plan and is of equal weight to the rest of the Plan. The CNPA would also highlight that sustainability is not only referenced within the Community section of the plan, but also as a

separate and specific policy, Policy 5, which deals with this very issue.

The plan must be read in total, and text at page 8, 2nd column within the coloured box clarifies this. In doing so the four aims of the Park remain firmly at the heart of all decision making.

Regarding the contribution of wood and trees to climate change, the CNPA accepts that this is correct, but do not consider there to be a need for a list of things which contribute to resolving issues of climate change. The topic is cross cutting, and is also embedded across the NPPP. The CNPA do not therefore support the suggestion of including this specifically.

Victor Jordan (090) – The objector suggests that the process followed in drafting the Plan and its supporting evidence base was not properly carried out. The CNPA has set out in its Participation Statement what it set out to do, and what was done. The process throughout has been assessed as being compliant with the Development Plan Regulations. The objector suggests that alternatives were not properly considered. The requirements of legislation require that realistic alternatives be considered, not every possible alternative. The CNPA considers that to ignore existing permissions is not realistic as development could occur on these sites at any time within the lifespan of the permission. The CNPA has also used sites contained within the adopted Local Plan as a starting point for allocation provision. Alternatives were also considered through its evidence base and Main Issues Report.

The Spatial Strategy explains where we want all forms of development to be focused during the next 20 years. The CNPA do not consider the use of existing and planned settlements as a basis for this to be flawed as it provides a sustainable route map for new development building on existing services.

The approach did not ignore comments received, but balanced these with the obligations placed on the CNPA to provide land to meet the housing and business land requirements to meet need and demand. Affordable housing forms only one part of this. Nor did the approach apply a one size fits all approach to the Park, as is set out in the evidence paper (SDXXX) where the different needs and demands of the 5 local authority areas were fully considered.

An Camas Mòr LLP (179) – The CNPA do not agree that the plan making process should be delayed to take account of draft documents published for consultation by the Scottish Government. The CNPA do however acknowledge that Reporters will wish to ensure that the Plan does not conflict with latest Government agreed thinking. However, it would be unreasonable to delay the plan making process so as to await updates on consultation documents.

CONSULTATION PROCESS

Alvie Estate (028) – The process followed in the preparation of the Plan is that prescribed by legislation. Whilst the CNPA understands the feelings of frustration expressed, it is confident that the proper process has been followed and so does not consider a different approach should have been followed.

Phil Swan (104) – The CNPA do not agree that in the process of plan preparation, the requirements to carry out an equalities impact assessment were not properly carried out. Assessments have been carried out at each stage and have been

publicly available. The CNPA specialist involved in the preparation of such assessments has been involved from the outset and the CNPA is confident that all has been done that is necessary in this regard. The CNPA would therefore not support the suggestion that the process is relaunched and the equalities impact assessment redone.

Reporter's conclusions:

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Reporter's recommendations:

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