

CAIRNGORMS NATIONAL PARK AUTHORITY

Title: CNPA Interim Policy No.2: Radio
Telecommunications;
Consultation Report on the Consultation Draft.

Prepared by: Norman Brockie/Pip Mackie

Purpose: Discussion

Recommendations:

It is recommended that the attached comments are considered for revising the Consultation Draft into the Finalised Draft, which will then be brought to the Planning Committee* for approval and adoption as CNPA Interim Planning Policy/ Supplementary Planning Guidance (*following agreement by a telecom working group).

The Scottish Executive want local (development) plans to be shorter and more concise; these plans will be supported by detailed Supplementary Planning Guidance, which will have a statutory basis following public consultation and approval/adoption. [Making Development Plans Deliver : Consultation Paper, s.47-49].

Executive Summary:

There is general acceptance that there is a need for radio-telecommunications coverage within the Park, as an economic and social benefit to communities, as well as essential emergency services. There is also acceptance that these needs must be carefully balanced by mitigation for the impacts that will be made on the Park's landscape, environment and cultural heritage.

Many consultees wish the policy to be stricter, calling for tighter scrutiny of site justifications, and more exploration of how networks can share facilities. Most consultations agree that siting, design and screening/landscaping measures must be very carefully considered for all proposals within (and around) the Park, with planning conditions (and possibly 'bonds') in place to ensure compliance. Several consultees query whether we should be zoning the Park in levels of 'sensitivity', and noting that the Sandford Principle should be applied when necessary.

The policy will be revised, and agreed by a working group which will comprise the main telecom operators and four local authorities (working within the Park), before coming to the CNPA Board for approval and adoption.

There follows a summary of the consultation responses on the Consultation Draft of the CNPA Interim Planning Policy No.2 : Radio Telecommunications.

CONSULTEE	DATE REC'D	FEEDBACK
<p>Alvie & Dalraddy Estates</p>	<p>20/09/04</p>	<ul style="list-style-type: none"> • Important where possible TC facilities should be sited and designed in sympathy with surrounding landscape. • In CNP believe should be a presumption in favour of underground TC services particularly where masts and overhead lines are likely to have an adverse visual impact. • 5.6 - suggest potential loss of habitat and disturbance to wildlife has been overstated. Impacts can be reduced in sensitive sites by restricting all but emergency access during breeding and shooting seasons. • The interests of different land occupiers inc. RSPB should as far as possible be treated equally. • In many circumstances it may be possible to install overhead lines with minimal impact on wildlife and landscape. The cost of under-grounding lines may be prohibitive. • 5.9 - Prefer to see presumption against overhead lines rather than a prohibition of overhead lines. • 5.11 - In many cases of unsurfaced redundant tracks letting nature reinstate the track naturally causes less damage than covering with topsoil or reseeding within a specific period. • RT - Support desire to minimise impact of man-made developments, concerned that "...a strong presumption against further incursions of man-made development within the Park..." does not take sufficient account of changing economics of land use in the area. Agree man-made development should be managed sensitively, the CNPA should not presume against any further incursions of man-made developments. • RT1 (a) - word "<i>minimal</i>" would be more appropriate than "<i>no</i>". • RT1 (c) - may be situations where less or the same impact will be created by another mast rather than sharing an existing mast. • RT1 (g) - "<i>All power lines will be routed underground</i>" is too restrictive and in some circumstances unrealistic. • RT1 (j) - is too prescriptive in regard particularly to the reinstatement of infrastructure inc. access tracks. Hard standings, power supplies, communication lines and access tracks may often be better left than reinstated.
<p>Angus Council</p>	<p>13/09/04</p>	<ul style="list-style-type: none"> • Key principles are generally supported, the wording of some of the policy should be reviewed. • (c) - Clarity of existing wording improved, suggest amendment to: "<i>Justification will be required where existing masts, sites and other structures cannot be shared. A new mast should be structurally capable of being shared by additional telecom systems, without adversely affecting the visual impact of its design (e.g. making the mast structure bulkier).</i>" • (d) - Statement requires only alternative sites to be considered but not used if more suitable suggest wording of "<i>There are no more satisfactory alternative sites available.</i>" • (e) - Consider rephrasing to "<i>To ensure compliance with ICNIRP public exposure guidelines.</i>" • (f) - Suggest deleting - not aware of any evidence in any PAN that infers there is interference to the existing telephone line infrastructure.

Crannach Management Group	15/09/04	<ul style="list-style-type: none"> • Generally supports proposed policy, however, feel it could be tightened up in some sections. • (d) - wording could be more robust as “can demonstrate that there is no practical alternative”.
J L Davison, Boat of Garten	04/08/04	<ul style="list-style-type: none"> • Thrust of policy document is entirely correct and what is expected of CNPA in achieving 1st aim though perhaps could be more clearly spelled out in plain English. • Proliferation of masts damage attractiveness of area.
Forestry Commission	14/10/04	<ul style="list-style-type: none"> • To what extent is it policy to accept that there will be some holes in the cover? • Use of GRP seems to stem from proposals to hide equipment in boulders or streetlights on buildings. Haven’t seen any examples and can’t comment except that the success of this approach depends on the context. • Tree screening - planting trees unlikely to have much mitigation effect within a practical timescale and may draw attention to the structure if out of context. Existing tree screen more effective. • Masts disguised as trees should be the norm. • Communications are essential for effective rural businesses and reception is poor in certain parts of the CNPA and this is hindering business communication. • More suitable designed and located masts could be helpful in overcoming these issues; FCS may be able to make land available if this is required.
Glenlivet & Inveravon Community Association	13/09/04	<ul style="list-style-type: none"> • Support the interim planning policy.
Johnnie Grant, Rothiemurchus Estate	09/09/04	<ul style="list-style-type: none"> • Would be more complete if section explaining how policies link to 4 aims of CNP and how wider community have been involved in their preparation. • Intro of new policies that support resulting higher costs of managing land in the NP might allay fears of those who see this as first series of papers that will become a barrier to sustainable land use and management. • Strongly object to the idea that a designation that was introduced as a consultative mechanism e.g. SSSI is being proposed as a basis for a blanket restriction on activity. SSSI are there to ensure proposals that do not require planning permission are properly considered by SNH, they should not in themselves place a ban on activity. The Park by proposing to use SSSI boundaries as a geographic constraint in planning policy is introducing a new idea that is misplaced and unfair.
Highland Council	13/09/04	<ul style="list-style-type: none"> • 6 (b) - The need for positive provision subject to various environmental and other issues must be noted, and this is not reflected in the context. • Proposed policies must not be so negative as to lead to interruption in networks within the “community” areas of the NP. • 1.1 - Negative stance of this paragraph should be tempered by reference to the scope for careful siting and design to overcome problems. • 1.3 - Telecommunications proposals will come in a large range of forms from antennae on buildings to free standing masts - it is surely only the latter that might have significant landscape impacts. • 5.1 - Paragraph is weak - not possible to say as a generalisation that visual impacts of TC developments will be greater than physical impacts - depends on site selection. Should be reference to landscape character assessment work. A

		<p>requirement for a statement of alternative sites investigated and the reason for the selection of the site in question would be of assistance.</p> <ul style="list-style-type: none"> • 5.6 - Could be amended to “natural and cultural heritage issues” and reference made to the need to take account of any archaeological/historical features that may be disturbed through mast/track construction. • 7.2 - Council would wish to be consulted on any protocol agreement for proposals within the NP. • RT1: • (a) - Add “unreasonable” before “adverse”. • (d) - add “and a statement provided on the reasons for selection of the site”. • (e) - Rephrase to “the application must be accompanied by a declaration that the equipment and installation is designed to be in full compliance with the appropriate ICNIRP guidelines for public exposure to radiofrequency radiation.” • (h) - Add “where peat stripping will be involved, a construction method statement will be required to ensure peat stability through careful disposal of any surplus peat and drainage arrangements during construction and operation.”
Ali Loder, Glenkindie	08/09/04	<ul style="list-style-type: none"> • Agree any masts/equipment should be carefully sited an unobtrusive as possible should not forget rental income from masts can be significant esp. for rural businesses.
Marr Area Partnership	02/09/04	<ul style="list-style-type: none"> • 1.2 & 2.3 - would wish consideration be given to a more proactive stance on the value of economic benefit to the area. • Believe active investigation should be encouraged by the CNPA, the communities in the Park or ideally both into how non-invasive technology can be explored to achieve the availability of the latest technology to remote communities. • Would consider that support should be given in the area of the CNPA to pilot projects to address/research hoe the balance between development and environmental impact can best be served.
Mobile Operators Association (MOA)	15/09/04	<ul style="list-style-type: none"> • 1.1 - 1.5 - Overall tone of section is that TC development is viewed as being an unnecessary intrusion into designated landscapes with only passing regard for the economic and social benefits afforded by an advanced mobile TC infrastructure. Would have preferred more positive tone in the introduction with economic and social benefits to the Park being given equal importance to the protection of the environment. • Suggested rewording: <ul style="list-style-type: none"> 1.1 - <i>The CNP was set up on 1st Sept 2003 from when it has used its development control call-in procedure to determine some planning applications. These usually relate to development which may be considered contentious. TC development has the potential, depending upon its siting and design, to be the type of development likely to be called-in by the Park Authority. The growth in the demand for TC services and the advances in technology, such as 3G, are likely to have implications for the planning system and particularly for designated areas such as NP’s. Once adopted, this Supplementary Planning Guidance (SPG) would inform development control decisions within the NP alongside the relevant Local Plan policy.</i> 1.2 - <i>Mobile TC’s can make an important contribution to the economic and social fabric of an area. This is especially true of remote and/or rural areas. This is acknowledged in NPPG19. Mobile telephony, especially with 3G services</i>

		<p><i>coming on-stream, can provide rural businesses with the means to compete with those located in more populated areas. It is important that the Park does not lose out on the benefits afforded by this technology. However it is important that any advantages provided are balanced against any visual or environmental impacts.</i></p> <p>1.3 - <i>While the CNPA must have regard to national planning policy, existing development plan policies and specialist advice (eg. From SNH) for guidance towards the formulation of its own policies, central to all Park policy will be its four aims.(list of 4 aims)</i></p> <p>1.4 - <i>The general purpose of the CNPA is to ensure that the aims are collectively achieved in relation to the Park in a co-ordinated way; where there is a conflict between the first aim and any of the other aims, the CNPA must give greater weight to the first aim.</i></p> <ul style="list-style-type: none"> • 2.1 - 2.3 - Set out planning guidance issued by Scottish Executive and feel they are an accurate representation of the advice set out within them. However suggest reordering to appear according to importance. • 2.5 - Sets out different TC systems and does so in a clear and informative manner - support contents. • For consistency advise there should be a paragraph 4.2 which points to Appendix 2 for the summary of relevant policies. Would then be consistent with format of Section 3. Suggest the policy does not include reference to Policy U5 which relates to microwave equipment and council owned property - whilst it does appear in the Adopted Plan we consider that it runs contrary to and extends the advice in NPPG19, also consider that this policy should have remained an internal Council Estate policy rather than being included in a Structure Plan which should deal with strategic land use planning issues. • 5.3 - suggest siting and design options should reflect the options set out in NPPG19 & PAN62. This would see the removal of the fifth bullet point on network sharing. Network Sharing and 'Roaming' are as yet unproven solutions for network coverage by operators. Change definitive language under mast sharing to "...<i>may lead to quicker and cheaper installation.</i>" • 5.11 - makes reference to the Telecommunications Act 1984. This was amended by the Communications Act 2003. To take account of this change, suggest "Code System Operators" be changed to "<i>Electronic Communications Code Operators</i>" and that "...<i>as amended by the Communications Act 2003</i>" be added after " the Telecoms Act 1984". • Feel an application should be judged on its merits and how it actually affects the appearance of either a Listed Building or Conservation Area rather than have an policy which rules out certain locations on buildings. Suggest no site-specific guidance on siting be included in this paragraph. • 6 - Prepositions on which the CNPA seek to base their policy reflect the importance of NP designation and would agree with these. • 7.1 - Support contents. • 7.2 - Happy to work with CNPA in a strategic working group to ensure siting and design of TC developments minimises environmental impacts on the Park whilst ensuring inhabitants and visitors can benefit from mobile telephony services. • RT1 - Concern over some wording in the policy which is rather too definite in its approach. Impacts and issues such as power should be dealt with on a case by case basis with impact
--	--	--

		<p>minimisation being the goal rather than blanket criteria which do not take account of the operational and technical characteristics of mobile telephony.</p> <ul style="list-style-type: none"> • RT1 c - Is contradictory to the aims of the policy overall. Speculatively over-designing a mast (ie. making it bulkier) on the chance that another operator may request to share the mast runs contrary to criterion a). Should an operator wish to share, the mast will be redeveloped to accommodate the additional apparatus, with a minimal support structure. Suggest this section of the criterion be removed. • RT1 j - Regulatory legislation exists under Communications Act 2003 to ensure operators remove redundant apparatus or face sanction from OFCOM. The planning system should not replicate controls that exist under separate legislation. Requirement of a bond for some permissions also goes beyond the controls necessary to ensure reinstatement of land - would slow application process and impose a financial penalty on the operator. Suggest removal of this criterion. • Suggested Policy RT1 - RT proposals will be permitted where the following criteria are met, in line with the siting and design criteria in section 5 of this paper: <ol style="list-style-type: none"> a) <i>The proposal must minimise any impact on the landscape and heritage of the Park, from any of its works, or through cumulative impact; the siting and design must minimise the visual and environmental impacts (eg. Flora, fauna or habitats, with particular attention to designated sites).</i> b) <i>There is an established operational need to justify the location proposed.</i> c) <i>Existing mast should be shared where this represents the best environmental option. Evidence will be expected to show that the sharing of existing masts and structures have been investigated.</i> d) <i>Alternative sites have been investigated.</i> e) <i>To ensure that ICNIRP public exposure guidelines are complied with.</i> f) <i>Existing telecom services will not be interfered with.</i> g) <i>All related power lines should be routed underground.</i> h) <i>Any associated buildings/infrastructure, inc. access tracks and fencing, should be designed and sited to minimise visual and environmental impacts.</i> i) <i>No advertising signage or logos, or non safety lighting, may be included with the development.</i> • Checklist of additional information sometimes required seems to encompass all relevant issues and support this section of the policy.
<p>North East Mountain Trust</p>	<p>13/09/04</p>	<ul style="list-style-type: none"> • Pleased to see the document specifically refers to the need to get the support of Local Authorities, to protect the Park from unsightly developments outwith the Park which adversely affect its setting or important views from within the Park. • Support view that people living in Park need good telecommunication networks. Issue of appropriate development for the vulnerable/valuable areas and appropriate development for the low level community areas is likely to come up for a number of different aspects. Would appear to be a case for some sort of zoning to help guide treatment of planning applications. Agreeing principles for zoning now would be useful step forward. • Pleased to see 'strong presumption against further development' in prepositions noted on page 6 and would like to see this

		<p>wording repeated in the actual policy as set out on page 7 where the weaker phrase 'will be permitted' is used.</p> <ul style="list-style-type: none"> • Policy on page 7 states 'the proposal has no adverse impact on the landscape or cultural heritage of the Park'. Difficult to see how any TC installation cannot have an impact. Guidance needs to be given on what level of adverse impact would be unacceptable, given the fact that this is likely to vary. • Page 5 - document refers to the need to return any redundant sites to an 'appropriate natural state'. Guidance needs to be given on how this will be decided.
<p>Scottish Council for National Parks</p>	<p>08/09/04</p>	<ul style="list-style-type: none"> • Hope that appropriate weight given to Sandford Principle and that it will be applied when necessary. • Support need for development of good siting and design guidance for mobile phone installations. Would be advisable for CNPA to require applicants to use Landscape Architects, preferably with experience in Forest Design, to assist with projects. • CNPA should develop an indicative strategy for the location of mobile phone masts based on environmental sensitivity and the capacity of landscape to absorb change - Identify areas of high sensitivity - in these areas there will be a strong presumption against any mobile mast installation. Only exceptions; Human safety - - subject to EIA Other Areas - All proposals subject to EIA. • 1.2 - line 2 substitute "accept" for neutral phrase such as "take account", "have regard" or "acknowledge". • 1.3 - To ensure consistency of policy execution there would be merit in making call-in obligatory. • 5 - Siting & Design Issues - Monopoles are less intrusive than lattice towers and should be used wherever possible. CNPA should ensure arrangements are made for a sufficiently large ground area surrounding installations to be acquired to be planted to reflect landforms if tree screening is to be effective. (useful Ref: The Design of Forest Landscapes⁷ Chapter 6 OWR Lucas OUP 1991.) Although consider some aspects need to be expanded and strengthened, welcome the comprehensive approach adopted. However, their rigorous use and enforcement will be essential. • 5.3 - CNPA should develop technical criteria for assessing the feasibility of sharing masts and apply these rigorously. • 5.5 - The development of strategic guidance for the location of installations should help to minimise cumulative impacts. • 5.7 - There is concern among many communities about the possible adverse health effects from the higher intensity emissions from 3G telecom equipment - and as such there could be resistance from communities to the siting of these installations within or close to built areas, resulting in pressure to locate these masts in the wider countryside. • 5.8 - Geometric fence alignments should be avoided. Alignments should reflect landforms. • 5.10 - see comments for SCNP response to CNPA consultation draft on Vehicle Hill Tracks. • 5.11 - Welcome the comments. • Policy 6 (b) - line 3 - Recommend criterion for exemption "except those necessary to..." is strengthened along following lines "except those <i>clearly</i> necessary to..." or "except for those <i>essential</i> to ...". • Policy 6 (c) - line 1 - replace "should" with "will". • 7.2 - Believe providing a Forum to give an overview of the

		<p>harmonisation of policy etc. and guiding various Authorities towards a coordinated approach is an excellent proposal.</p> <ul style="list-style-type: none"> • Policy RT 1: • Policy (a) - Appears to be a non-sequitur between first part of policy “no adverse impact” and second part “must minimise...impacts”. Suggest either omitting second part or changing to “<i>where planning consent is granted, the applicant must ensure that implementation of the works is to the highest standards and thereby minimises the visual and environmental impacts....</i>” • Policy (b) - Recommend strengthening as follows: “There is a <i>clearly</i> established operational need...” <p>Policy (c) - Strongly recommend policy be strengthened as follows: “<i>Existing masts, sites and other structures must be shared; where this is deemed to be not feasible by the applicant, a clear justification will be required.</i>”</p>
Scottish Executive - Planning	17/08/04	<ul style="list-style-type: none"> • 1.3 - seems to imply all telecommunication applications will be called-in by the CNPA. • RT1(g) - is in effect establishing a blanket policy to underground all power lines - PAN62 states that this may not always be the best solution. Change wording to “<i>consideration should be given to routing power lines underground, for all or part of their length in sensitive locations.</i>” • RT1(j) - NPP does not encourage the use of bonds to secure the reinstatement of base stations. Reinstatement can be controlled through conditions.
SEPA	09/08/04	<ul style="list-style-type: none"> • 5.9 - suggests amendment to ensure fuel is stored in a suitable manner. Additional sentence “<i>The design and installation of any storage tank should be made in accordance with the Scottish Environment Protection Agency (SEPA) guidelines for Above Ground Oil Storage Tanks - PPG2 available on its website www.sepa.org.uk.</i>” • 5.11 - supports comment that redundant equipment should be removed from the site. But could be strengthened by including “...completely removed from the site <i>and disposed of at a suitably licensed facility</i> and the site itself...” • RT1g - reword to state that “<i>related power lines should be routed underground where this is environmentally the best practicable option.</i>”
SNH	14/09/04	<ul style="list-style-type: none"> • Recognises benefits to society arising from TC and supports establishment of base stations provided development is suitably located, sited and designed to avoid harm to natural heritage interests and their enjoyment. • Not clear whether paper to be read as <i>the</i> policy or discussion paper. Statement to clarify would be useful. • SNH understanding that mast, equipment cabin, access tracks, power lines and fencing etc. are all regarded as components of a base station. Would assist if definition included. • 1.1 - helpful if merits/failings of existing policies of local authorities were stated along with ways in which new policy would provide improvements. • 5.0 - some siting and design criteria found here but they precede RT1 and are amongst other information. Therefore not easy to understand how document to be read and used by various audiences. • 5.3 - list of options closely resembles that in paras 41 - 47 of NPPG19. SNH understanding that NPPG intends each of these options be given equal consideration with a view to finding the one which gives best environmental outcome for any given set of

		<p>circumstances. SNH supports this approach, and therefore concerned by lack of clarity in 5.3 on this matter. Encourage CNPA to reconsider advice in this para and offer a clear steer about how options should be used. Network Sharing/Roaming: concerned this is mentioned only as a <i>possibility</i> in remote areas and that it seems to be advocated as way of avoiding costly infrastructure networks in sparsely populated areas. No definition of remote areas. CNPA should be indicating firm intention to bring Operators together with clear view of encouraging network sharing/roaming in sensitive parts of the Park.</p> <ul style="list-style-type: none"> • 5.4 - Agree comments that landscape, and primarily visual, impacts are usually most significant ones raised by TC development but para seems to underplay issue. Production of siting and design guidance would be of value over and above the new policy statement. Welcome reference to extra care being appropriate in designated areas but consider the text should make it clear what these designations are and how the distinction between these and other parts of the Park will be made in practice. • 5.5 - Issue of cumulative impacts raised but no discussion of what the issues are or how they may be addressed. Helpful if CNPA express an intention to quantify number of base stations and establish how many more TC operators may wish to create, allowing CNPA to develop clear understanding of Parks capacity, areas under most pressure and steps necessary to manage demand. Network sharing/roaming should be identified as means of limiting cumulative impacts. Suggest first sentence wording modified after word 'existing' to include "<i>and other proposed telecommunication proposals</i>". • 5.6 - Reference to "loss of habitat" should be expanded to "<i>loss of or damage to habitat...</i>". Rather than make specific reference to endangered bird species would be more useful to refer to requirements and obligations of the Habitats Regulations and emphasise that within designated Natura sites permitted development rights are effectively suspended until it is established there will be no significant adverse impact on any Natura interests. • 5.10 - Could be improved by an explicit reference to impacts on habitats as well as landscapes. • 6 - states a wide range of policy options would be permissible, the box of propositions seems to imply that the same level of restriction will apply throughout the Park, although this is contrary to 5.4, in which it is suggested that extra care is required in designated areas. This is critical area of policy and would welcome greater clarity. • 6 (b) - clarify how CNPA will judge which proposals are necessary to serve needs of the community. • 7.1 - might be improved if it included a statement to reflect CNPA's understanding of the need for TC developments, recognition of industry's needs and need, on occasions, to protect areas of particular sensitivity will outweigh benefits of permitting TC development. • 7.2 - indicates Strategic Working Group will be established. Helpful if policy could be more specific about how the group will work to limit the number of base stations in the NP. • RT1 - might read better if it were to precede siting and design criteria and other considerations in section 5. • RT1 (a) - Benefit from revision include word '<i>significant</i>' before 'adverse' and remove discrepancy between '<u>no adverse landscape impacts</u>' and '<u>minimise visual and landscape impacts</u>'.
--	--	---

		<ul style="list-style-type: none"> • RT1 (b) - More explicit way to state this issue might read something like “<i>Operators must be able to justify that the selection of the site in question is the least environmentally damaging option amongst those sites and options which are technically feasible.</i>” • RT1 (d) - see RT1 (b). • RT1 (g) - Not convinced necessary to make this a separate criteria from RT1 (a). SNH view, power lines normally regarded as part of ‘the proposal’. Would be appropriate to indicate that CNPA would normally expect to see power lines under grounded providing this does not cause significant and irreparable damage to habitats. • RT1 (h) - as above • RT1 (i) - These matters (if they are land use planning subjects) should perhaps be part of RT1 (a). • RT1 (j) - perhaps more appropriate subject for a condition and could be mentioned in supporting text. • Support expression of intent to seek independent technical advice on occasions but suggest would be helpful to briefly set out reasons for this statement. • 8.1 - Helpful if text could indicate minimum amount of information to be submitted with an application.
<p>Strutt & Parker</p>	<p>02/08/04</p>	<ul style="list-style-type: none"> • Agree need for supplementary guidance for CNP. • Concerned draft does not reflect requirement for telecommunication operators to site share. • 5.3 - “...explore the possibility of site sharing...” now superseded under Communications Act 2003 operators are obliged to share where practicable. Important to point this out. • 5.11 - concern that telecommunications companies have become insolvent and redundant equipment has not been removed. May be necessary for CNPA to consider an obligation in any planning consent to require a reinstatement bond. The reinstatement bond should be provided by the operator not the landowner. • RT1(J) - applications usually made by the operator and the landowner not provided with a copy of planning consent and conditions. CNPA should provide a copy of any planning application to the landowner.
<p>Adam Watson, Crathes</p>	<p>03/09/04</p>	<ul style="list-style-type: none"> • Surprising that draft makes no attempt to zone the Cairngorms in terms of sensitivity. • Para 7 line 1 - states “will be permitted” rather than stronger statement in 6b of “a strong presumption against”, should be better consistency. • Para 7 (a) - “The proposal has no adverse impact on the landscape or natural heritage” is unrealistic. • Para 7 line 3 - “must minimise the visual and environmental impact” assumes that there must be such impacts and conflicts with the first quotation in Para 7 (a). • 8.1 - third bullet point - terms “hydrology” and “ecology” are misused. Also, hydrological conditions include drainage. Better to state “<i>Changes in hydrological conditions including drainage, with resultant consequences for soils, vegetation and animals</i>”.