

Date:			
Issue:	General – Links to Park Plan		
Objector(s):	RS Garrow Ltd	Objection ref(s):	464a
	Scottish Council for National Parks		434a
	Badenoch and Strathspey Conservation Group		400b

Reporter	Mrs Jill Moody and Mr Hugh Begg
Procedure	Hearing

1.0 Overview

- 1.1 This statement sets out the Cairngorms National Park Authority response to the objections raised to the Deposit Local Plan as modified in respect of general content on links to the National Park Plan and supplements the response made to those objections by the Cairngorms National Park Authority in its report to Committee (CD7.3-7.5). No changes are proposed.

2.0 Provision of the Local Plan:

- 2.1 The relationship between the Deposit Local Plan, the National Park Plan and the 4 structure plans in Section 2 has been clarified in the 1st and 2nd modifications. Section 3 and Policy 1 clearly set out the contribution of the Local Plan to collective achievement of the 4 aims. There are appropriate references to the National Park Plan within the DLP that are there to provide context. Policy 13 deals specifically with issues in relation to water.

3.0 Summary of objection(s)

- 3.1 4 objections raising some 4 issues have been lodged on the general issue of links to the National Park Plan:
- The local plan must underpin the Park aims, particularly 2nd and 3rd aims. Role of local plan in relation to 4 structure plans and National Park Plan requires clarifying. **(425b)**
 - Modern technologies available to more effectively manage sourcing water supplies and dealing with waste water. Suggests change to 2012 outcome vii on p10 of mDLP. **(464a)**
 - The DLP takes on board aspirations of the National Park Plan approved by Ministers in March 2007. Concerned that the tone of the plan is more development orientated than the Consultative Draft and could lead to lack of clarity that as to the intentions. Wording does not reflect principle aim of the National Park which is to conserve and enhance the natural and cultural heritage. Failure by the authority to meet its obligations to environmental sustainability. **(434a)**
 - Object to emphasis on partnership working in para 2.6 of DLP and long term as 25 years in 2.7. Suggest insertions to clarify. In response to 1st mDLP recommend inserting Park before Plan in 2.10 to clarify which plan is being referred to. **(400b)**

4.0 Summary of Cairngorms National Park Authority Response

- 4.1 The relationship between the Deposit Local Plan, the National Park Plan and the 4 structure plans in Section 2 has been clarified in the 1st and 2nd modifications. Section 3 and Policy 1 clearly set out the contribution of the Local Plan to collective achievement of the 4 aims. There are appropriate references from the National Park Plan within the DLP that are there to provide context. They cannot be changed as they are not part of the Deposit Local Plan. Topic Paper 1 “Statutory National Park Context” (CD7.21) sets out the specific context for a local plan in a

National Park and Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23) expands on this in respect of housing land supply and the relationship with structure plans. Policy 13 deals specifically with issues in relation to water and any relevant points will be addressed under evidence on that policy. It is considered that the relationship with the National Park Plan has been clearly expressed and no further modifications are required.

5.0 CNPA Commendation to Reporter

5.1 It is commended to the Reporter that the objections to the general content on links to the National Park Plan as listed above are rejected.

6.0 Strategic issues

6.1 The strategic context for the Local Plan is explained in Topic Paper 1 “Statutory National Park Context” (CD7.21)

7.0 Assessment / Scope of Evidence

7.1 **(425b)** Objection: Objects as the local plan must underpin the Park aims, particularly 2nd and 3rd aims. Role of local plan in relation to 4 structure plans and National Park Plan requires clarifying.

7.2 **Response:** The relationship between the Deposit Local Plan, the National Park Plan and the 4 structure plans in Section 2 has been clarified in the 1st and 2nd modifications. Section 3 and Policy 1 clearly set out the contribution of the Local Plan to collective achievement of the 4 aims. There are appropriate references from the National Park Plan within the DLP that are there to provide context. Topic Paper 1 “Statutory National Park Context” (CD7.21) sets out the specific context for a local plan in a National Park and Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23) expands on this in respect of housing land supply and the relationship with structure plans. It is considered that the relationship with the National Park Plan and structure plans has been clearly expressed and no further modifications are required.

7.3 **(464a)** Objection: Objects, modern technologies available to more effectively manage sourcing water supplies and dealing with waste water. Suggests change to 2012 outcome vii on p10 of mDLP.

7.4 **Response:** There are appropriate references, such as the 2012 outcomes, from the National Park Plan within the DLP that are there to provide context. They cannot be changed as they are not part of the Deposit Local Plan. Policy 13 deals specifically with issues in relation to water and any relevant points will be addressed under evidence on that policy. No further modifications are considered necessary.

7.5 **(434a)** Objection: Objects, the DLP takes on board aspirations of the National Park Plan approved by Ministers in March 2007. Concerned that the tone of the plan is more development orientated than the Consultative Draft and could lead to lack of clarity that as to the intentions. Wording does not reflect principle aim of the National Park which is to conserve and enhance the natural and cultural heritage. Failure by the authority to meet its obligations to environmental sustainability.

7.6 **Response:** The relationship between the Deposit Local Plan, the National Park Plan and the 4 structure plans in Section 2 has been clarified in the 1st and 2nd modifications. Section 3 and Policy

I clearly set out the contribution of the Local Plan to collective achievement of the 4 aims and the particular role of the 1st aim. There are appropriate references from the National Park Plan within the DLP that are there to provide context. Topic Paper 1 “Statutory National Park Context” (CD7.21) sets out the specific context for a local plan in a National Park and Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23) expands on this in respect of housing land supply and the relationship with the National Park Plan structure plans. The Consultative Draft was not endorsed by the CNPA Board and it was at a point in the process when information, particularly on housing and population projections was still being obtained. The current Plan reflects the various research now available as well as the adopted National Park Plan and reflects the balance of measures considered necessary to contribute to delivery of the aims. It has been subject to SEA which has been well received by the statutory parties. No further modifications are required.

7.8 **(400b) Objection:** Object to emphasis on partnership working in para 2.6 of DLP and long term as 25 years in 2.7. Suggest insertions to clarify. In response to 1st mDLP recommend inserting Park before Plan in 2.10 to clarify which plan is being referred to.

7.9 **Response:** There are appropriate references from the National Park Plan within the DLP that are there to provide context. They cannot be changed as they are not part of the Deposit Local Plan. The mDLP has clarified which plans are being referred to in various sections. No further modifications are considered necessary.

8.0 Conclusions

8.1 It is commended to the Reporter that the objections to the general content on links to the National Park Plan as listed above are rejected.

9.0 List of documents (including Core Documents)

- CD1.3 The National Parks (Scotland) Act 2000
- CD1.18 Cairngorms National Park Designation Order 2003
- CD7.21 Topic Paper 1 “Statutory National Park Context”
- CD7.23 Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing”
- CD6.13 Cairngorms National Park Deposit Local Plan as at 2nd modifications
- CD7.1 Cairngorms National Park Plan 2007
- CD6.9 Consultative Draft Local Plan 2005
- CD7.3-7.5 CNPA Committee Reports

10.0 Cairngorms National Park Authority Witnesses for Hearing

- Don McKee – Head of Planning