

Date:			
Issue:	General - Settlements		
Objector(s):	Badenoch and Strathspey Conservation Group	Objection ref(s):	400n
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 objection raised to the Deposit Local Plan as modified in respect of general approach to settlements 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 Section 5 of the Deposit Local Plan as modified sets out the overall approach to the provision of housing land with reference to a variety of pieces of work that are explained more fully in Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23). This paper along with Topic Paper 1 “Statutory National Park Context” (CD7.21) sets out the context for the Local Plan within a National Park and the approach to the allocation of land, including issues surrounding the collection of data. Section 7 of the mDLP explains the hierarchy of settlements in line with the strategic objective of the National Park Plan and the site selection within this context. The Settlement Maps and accompanying text identify the individual site allocations. The Topic Paper 4 “Site Selection” (CD7.24) offers further explanation.

3.0 Summary of objection(s)

- 3.1 1 objection raising 3 issues has been lodged on the general issue of approach to settlements and wishes to be considered by a hearing:
- In response to 1st modifications concern at failure to apply precautionary principle in light of significantly inadequate data sets held by CNPA, CNPA has virtually no idea of impact of housing proposals in the mDLP on habitats and species. **(400n)**
 - Objects to the scale of housing proposed and wants a clause that should Highland Council allocations with permission lapse then the settlement boundaries should be redrawn to avoid a presumption in favour of development. There is a conflict with the aims of the National Park. This applies to many settlements. **(400n)**
 - Object to inadequate information in the mDLP e.g. ancient woodland inventory sites should be on settlement maps to enable public and CNPA to make proper appraisals. Also current land use should be shown on maps, development underway should also be shown. Should be an unequivocal statement that areas classed as environment should be protected from any development. **(400n)**

4.0 Summary of Cairngorms National Park Authority Response

- 4.1 The figures regarding the need for and level of housing provision have been arrived at following work to establish population growth and housing land supply. Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23) explains this in full and the issue has been addressed in evidence on housing land supply. The identification and allocation of sites has involved a full assessment of all relevant factors and the DLP has been subject to SEA and where

relevant appropriate assessment. Topic Paper 4 “Site Selection” (CD7.24) explains the process. Sites where permission lapses will not be automatically excluded from settlements. The DLP will be subject to ongoing review and work on the new Local Development Plan will take account of any changes in the situation regarding allocations and will assess them in light of prevailing circumstances. The CNPA constantly updates maps and datasets based on information available and presents this in the most appropriate way. The intention is to keep maps as simple as possible; they are proposals maps and so clearly indicate allocations and not schemes underway. The policies and allocations in the mDLP are intended to ensure that developments take place in the appropriate location and that there is a full assessment of individual proposals against the plan via the planning application process. No further modifications are proposed.

5.0 CNPA Commendation to Reporter

5.1 It is commended to the Reporter that the objection to the general approach to settlements as listed above is rejected.

6.0 Strategic issues

6.1 Topic Paper 1 “Statutory National Park Context” (CD7.21) and Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23) explain the context within which the Deposit Local Plan has been prepared and the issues in relation to housing provision. The DLP is helping to deliver the housing elements of the adopted National Park Plan.

7.0 Other material considerations

7.1 Topic Paper 4 “Site Selection” (CD7.24)

8.0 Assessment / Scope of Evidence

8.1 **(400n)** Objection: Objects in response to 1st modifications concern at failure to apply precautionary principle in light of significantly inadequate data sets held by CNPA, CNPA has virtually no idea of impact of housing proposals in the mDLP on habitats and species.

8.2 **Response:** The figures regarding the need for and level of housing provision have been arrived at following work to establish population growth and housing land supply. Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23) explains this in full and the issue has been addressed in evidence on housing land supply. The identification and allocation of sites has involved a full assessment of all relevant factors and the DLP has been subject to SEA and where relevant appropriate assessment. Topic Paper 4 “Site Selection” (CD7.24) explains the process. The DLP will be subject to ongoing review and work on the new Local Development Plan will take account of any changes in the situation regarding allocations and will assess them in light of prevailing circumstances. The CNPA constantly updates maps and datasets based on information available and presents this in the most appropriate way. The policies and allocations in the mDLP are intended to ensure that developments take place in the appropriate location and that there is a full assessment of individual proposals against the plan via the planning application process. Further detailed assessment takes place within the context of an application for a specific proposal. No further modifications are proposed.

8.3 **(400n)** Objection: Objects to the scale of housing proposed and wants a clause that should Highland Council allocations with permission lapse then the settlement boundaries should be

redrawn to avoid a presumption in favour of development. There is a conflict with the aims of the National Park. This applies to many settlements.

8.4 Response: The figures regarding the need for and level of housing provision have been arrived at following work to establish population growth and housing land supply. Topic Paper 3 “Approach to Housing Land Supply and Affordable Housing” (CD7.23) explains this in full and the issue has been addressed in evidence on housing land supply. The identification and allocation of sites has involved a full assessment of all relevant factors and the DLP has been subject to SEA and where relevant appropriate assessment. Topic Paper 4 “Site Selection” (CD7.24) explains the process. Sites where permission lapses will not be automatically excluded from settlements. The DLP will be subject to ongoing review and work on the new Local Development Plan will take account of any changes in the situation regarding allocations and will assess them in light of prevailing circumstances. The policies and allocations in the mDLP are intended to ensure that developments take place in the appropriate location and that there is a full assessment of individual proposals against the plan via the planning application process. Fundamental to this is consideration against the aims of the Park, via Policy I in particular. No further modifications are proposed.

8.5 (400n)Objection: Object to inadequate information in the mDLP e.g. ancient woodland inventory sites should be on settlement maps to enable public and CNPA to make proper appraisals. Also current land use should be shown on maps, development underway should also be shown. Should be an unequivocal statement that areas classed as environment should be protected from any development.

8.6 Response: The CNPA constantly updates maps and datasets based on information available and presents this in the most appropriate way. The intention is to keep maps as simple as possible; they are proposals maps and so clearly indicate allocations and not schemes underway. The policies and allocations in the mDLP are intended to ensure that developments take place in the appropriate location and that there is a full assessment of individual proposals against the plan via the planning application process, this would take account of areas with an ENV allocation in the Plan. No further modifications are proposed.

9.0 Conclusions

9.1 It is commended to the Reporter that the objection to the general approach to settlements as listed above is rejected.

10.0 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”
- CD7.24 Topic Paper 4 “Site Selection”
- CD6.13 Cairngorms National Park Deposit Local Plan as at 2nd modifications
- CD7.1 Cairngorms National Park Plan 2007
- CD(7.3-7.5) CNPA Committee Reports

11.0 Cairngorms National Park Authority Witnesses for Hearing

- Don McKee – Head of Planning

