

Policy/site ref General

Agent Name

Objector Ref Name Lily Linge
467a Historic Scotland
Longmore House
Salisbury Place
Edinburgh, EH1 1SH

Company Historic Scotland

Summary of objection to Deposit Local Plan

Confirm that for our statutory historic environment interests we are content with the deposit plan as drafted and have no further comments, representations or objection to offer.

Note that a small number of land allocations lie in the wider vicinity of some historic environment features and have considered the issue of potential impact on their setting. Confirm no objection to the principle of any of these land allocations and are content that any adverse impacts on setting can be avoided through the detailed design process for developing these sites.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

No further action required.

Response to 1st modification objections

I refer to your letters of 22 May and 13 June notifying us of the proposed modifications to the above plan agreed by your board. Historic Scotland has reviewed these modifications which you have very helpfully inserted in red into the plan text. I can confirm that for our statutory historic environment interests we are content and do not wish to raise any objections.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General

Objector Ref Name Kay Briggs
095 Dalwhing Mill House
Glen Tanar
Aboyne
AB34 5ET

Agent Name

Company Mid Deeside Community Council

Summary of objection to Deposit Local Plan

Support for the policies of the deposit local plan.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

No further action required.

Response to 1st modification objections

I replied on behalf of the Mid Deeside Community Council, but did not make any objections.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General	Agent Name
Objector Ref 429a	Name Sarah Jane Laing SRPBA Stuart House Eskmills Musselburgh, EH21 7PB	Company SRPBA

Summary of objection to Deposit Local Plan

The wording used and how this plan links to the aims of the Park should be clarified throughout. Within the introduction there should be a clear statement of what

the aims and objectives of the Local Plan are, and the links that exist with the 4 local authorities. Any reference to national guidance should be cross referenced.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to clarify terminology and phrasing used. A review of the Introduction section is necessary to clarify the

context for the Local Plan and its relationship with other documents, including local, regional and national.

Proposed 1st Modification

Modify 1.3 to clarify wording on links between LP and 4 aims of the Park.

2.11 expand to clarify position with other LAs and national guidance.

2.14 expand vision and add clear aims and objectives for the Plan.

Response to 1st modification objections

We are happy to withdraw all but one of our formal objections as believe that majority of them have been addressed by the modifications, or by clarity of issues in

supporting text. The only one we would like to continue with is in relation to policy 1 where we still think that there should be support for projects which provide

social or economic benefits of local as well as national importance.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General	Agent Name
Objector Ref	Name	
400a	Dr A M Jones Badenoch and Strathspey Conservation Group Fiodhag Nethybridge PH25 3DJ	Company Badenoch and Strathspey Conservation Group

Summary of objection to Deposit Local Plan

Para 2.4 - The Park Plan provides only one overarching context for planning policy. Others include international commitments and international standards for Protected Areas.

Para 2.5 - there is a lack of direct reference to compliance with the NP Act.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. The context sections endeavours to set out all the context documents and obligations and should therefore be read in total.

Proposed 1st Modification

Amend context section to clarify the role of the various documents and obligations that influence the Plan.

Response to 1st modification objections

We are disappointed that in many respects the CNPA in the mDLP has gone no further than could be expected of any rural planning authority.

We object to the absence of any indication of the scale of recent development (e.g. at Aviemore and Kincaig). This omission is highly unsatisfactory as it impairs the

ability of the public to provide properly informed comments on the proposals.

We object that developments proposed in the mDLP do not appear to conform to the definition of sustainable development provided in 5.2.

We object to the scale of proposed housing and the degree to which the mDLP promotes unsustainable housing growth. This conflicts with all 4 aims of the Park

and does not support the Park Plan's vision for the Park.

We welcome the statement in the Park Plan that recognises that the CNPA's data sets are inadequate (final para of Park Plan quoted in mDLP). We are very

concerned at the level of data held by the CNPA on sites they are proposing for development.

In view of this we consider the precautionary principle should be robustly applied.

Object to all statements on how policies will be monitored in so far as all policies should be monitored in terms of the impact they are having on the natural and

cultural heritage (in addition to the aspects the mDLP already states will be monitored)

CNPA analysis of objections to 1st modifications

The general comments are noted. The specific issues are addressed through the objections relating to the various policies and proposals of the plan.

No further
modifications are therefore proposed.

Objection maintained

Policy/site ref **General**
Objector Ref **Name** Nick Halfhide
001 Great Glen House
Leachkin Road
Inverness
IV3 8NW

Agent Name

Company Deer Commission

Summary of objection to Deposit Local Plan

No comments to make

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

No further action required.

Response to 1st modification objections

No response required.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General**
Objector Ref **Name** Roy Turnbull
390a Torniscar
Nethy Bridge
Inverness-shire
PH25 3ED

Agent Name

Company

Summary of objection to Deposit Local Plan

The plan is a retreat from the high hopes that accompanied the establishment of the national park and seems to have focused on the needs of developers and landowners at the expense of the 1st aim of the Park.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to ensure a balance is struck between development opportunities and the protection of the special qualities of

the area as identified as a National Park.

Proposed 1st Modification

No further action required.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The local plan has the aims of the Park at its heart. Policy 1 is a direct link to these. No modification is therefore proposed.

Objection maintained

Policy/site ref	General	Agent Name
Objector Ref	Name	
439a	Jamie Williamson Alvie and Dalraddy Estate Alvie Estate Office Kincraig, Kingussie PH21 1NE	Company Alvie and Dalraddy Estate

Summary of objection to Deposit Local Plan

The plan as currently written will not meet the aims of the Park, the Park Plan or the aspirations of communities and businesses in the area. It gives undue weight to natural heritage at the expense of cultural heritage contrary to the 1st aim of the Park. The policies are prescriptive and restrictive and will stifle economic development with too much weight placed on the promotion of tourism at the expense of other rural economic activities. The policies will not reduce the gap between housing need and supply and will increase the gap between subsidised provision and open market housing. The Plan should concentrate on demand from local people who contribute to the economy. They will not encourage "good quality private rented sector accommodation available at affordable rents to meet local demand" and there should be more emphasis and encouragement on building additional houses to rent rather than buy.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to clarify terminology and phrasing used and will endeavour to ensure a balance is struck between development opportunities and the protection of the special qualities of the area as identified as a National Park. A review of the Introduction section is necessary to clarify the context for the Local Plan and its relationship with other documents, including local, regional and national. Clarification is needed on how the Local Plan relates to the aims of the National Park. The comments made regarding housing will be assessed through the representations made specifically on the Housing section of the Plan.

Proposed 1st Modification

Amend introduction to clarify wording on links between Local plan and 4 aims of the Park.
Expand section on links with other plans to clarify position with other LAs and national guidance.

Response to 1st modification objections

We object to many of the policies as stated in the Cairngorms National Park Deposit Local Plan First Modifications. The policies as proposed will not meet the aims

of the National Park as set out in the National Parks (Scotland) Act 2000, it will not meet the aspirations and needs of communities and businesses within the Park

and it will not achieve the vision to make housing more affordable and sustainable as stated in the Park Plan.

The Cairngorms National Park Deposit Local Plan gives undue weight to the natural heritage at the expense of the cultural heritage of the Park. It will not 'conserve

and enhance the natural and cultural heritage of the area' which is the first aim of the Park.

The development policies as stated are unreasonably prescriptive and restrictive to the extent that they will stifle further economic development within the Park.

They are a 'top down' approach, government planners dictating objectives, plans and regulations to control and govern the community. We would prefer to see a

'bottom up' approach where the Park Plan provided a less prescriptive strategic framework within which local communities and residents were encouraged to

CNPA analysis of objections to 1st modifications

The overarching comments are noted. The plan as modified has tried to set the proper tone to facilitate appropriate development within the National Park and as

such no further modifications are proposed in light of this comment.

Objection maintained

Policy/site ref	General	Agent Name
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Objector Ref	Name	
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434s	Robert Maund Scottish Council for National Parks The Barony 2 Glebe Road Kilbirnie, Ayrshire	
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		Company Scottish Council for National Parks
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Summary of objection to Deposit Local Plan

This plan is less positive and more unclear than the draft plan, and the tone of the policies does not give the same degree of confidence in the results that will be achieved.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to ensure a balance is struck between development opportunities and the protection of the special qualities of the area as identified as a National Park.

Proposed 1st Modification

No further action required.

Response to 1st modification objections

Objection maintained as in 434a.

CNPA analysis of objections to 1st modifications

The general comment is noted. The modifications have endeavoured to set the proper tone to shape development within the National Park. No further modifications are therefore proposed.

Objection maintained

Policy/site ref	General	Agent Name
Objector Ref	Name	
477a	Dr Alister Scott	
	University of Aberdeen	
	Department of Geography and Environment	
	Elphinstone Road	
	Aberdeen	Company

Summary of objection to Deposit Local Plan

The wording of para 1.5 places insufficient weight on the purpose of the local plan in conserving and enhancing the natural and cultural heritage - this should be clarified.

The plan also needs to consider the impact of development outwith the Park which could affect its special qualities, in particular wind farms and the impact of development on the landscape.

CNPA analysis of objection to Deposit Local Plan

The role of the local plan will be clarified in terms of its role in delivering the 4 aims of the Park. Within the introduction the wording will be clarified to ensure the

appropriate level of consideration is given to all forms of development which affect the Park and its special qualities. However clarify that the local plan could not be

used to impact on developments over which we have no control. In providing advice to neighbouring authorities on applications which affect the special qualities the

4 aims of the Park and the special qualities themselves are paramount.

Proposed 1st Modification

Modify introduction to clarify wording on links between LP and 4 aims of the Park in revised para 2.11-2.17

Clarify to explain the use of the Plan and all its policies in the decision making process in revised para 1.20.

Response to 1st modification objections

Hello and apologies for not replying sooner. I have resigned from my job in order to take up a new position in New Zealand and the issues with this have rather

been at the forefront of my mind. My principal concerns lay with the landscape section of the plan and i am glad to see that the revisions strengthen this considerably. Specific reference could be made and indeed should be made to the European landscape Convention as justification.

I therefore have no outstanding objections. I do still have some comments and at this stage wonder if they have to be formed in the form of an objection. Perhaps a short written response would be OK

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General	Agent Name
Objector Ref 025x	Name Mairi Maciver Communities Scotland Urquhart House Beechwood Park Inverness, IV2 3BW	Company Communities Scotland

Summary of objection to Deposit Local Plan

Check the alphabetical ordering of settlements in Section 7.
Para 4.48, first sentence - amend "Panning" to read "Planning"
Policy 24 para 3 - "to a target of 30 per cent" conflicts with para 5.54 "will start at 30 per cent".

CNPA analysis of objection to Deposit Local Plan

The ordering of settlements will be reviewed to ensure clarity and ease of use. The typo in para 4.48 and wording in policy 24 are noted and the appropriate amendments will be included.

Proposed 1st Modification

Amend typos in line with comment
Amend order of settlements in Cpt 7 to logical alphabetical order.

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref **General**
Objector Ref **Name** Susan Davies
465a Scottish Natural Heritage
 Great Glen House
 Leachkin Road
 Inverness

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Once appropriate assessment is completed, strongly recommend ensuring that the findings are incorporated in relevant sections of the Local Plan itself.

CNPA analysis of objection to Deposit Local Plan

Appropriate Assessment will be undertaken to inform the development of policies and proposals in line with the corresponding legislation. Work on this is ongoing in conjunction with SNH partner staff.

Proposed 1st Modification

Work on appropriate assessment continues with assistance from SNH staff.

Response to 1st modification objections

No further representation received regarding this issue.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General**
Objector Ref **Name** Roger Muhl
031 The Heather
 Allanglach Wood
 North Kessock, Inverness
 IV1 3XD

Agent Name

Company Mountain Bothies Association

Summary of objection to Deposit Local Plan

No issues raised.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

No further action required.

Response to 1st modification objections

I refer to your recent letter on the above subject, which asks for confirmation of acceptance or withdrawal of our earlier objections to the Plan. Our response on 11

September 2007 simply said "We have not identified any issues that give rise to concern about the work of our organisation and so we have no further comment to

make" This is hardly a representation or objection and this remains our position.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General**

Objector Ref **Name** Susan Davies

465d Scottish Natural Heritage

Great Glen House

Leachkin Road

Inverness

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

1.21 Support statement about need for development proposals to comply with all policies, but suggest making a more prominent statement to this effect.

Suggest referring to how plan should be used with regard to developments outside the Park that could affect the special qualities, and the types of development most

likely to impact on the Park.

Suggest describing the new requirement for pre-application consultation for major development under the Planning etc (Scotland) Act 2006.

2. Suggest including more detail about the national planning context set out by NPPG 14 and the National Planning Framework, and the changes to development

planning due to the Planning etc (Scotland) Act 2006.

2.9/2.12 For clarity, include a definition of 'Sustainable Development', so everyone reading the plan is clear what it means in the National Park.

Suggest using the

definition in the Park Plan. Suggest including the full vision from the Park Plan so as not to miss the contextual elements of it.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. The Local Plan relates to development within the Park. For comments on developments outwith the Park other documents would be

considered including the National Parks Act, the National Park Plan and also national planning guidance. For clarification, further detail will be included in para 1.21

on how to use the plan and all its policies and the important role of pre application discussions in the development management process.

The reference to sustainable development within the Context section is also noted and some further clarification will be added.

Proposed 1st Modification

1.21 highlight need for pre application discussions.

2.1 expand to clarify the national context.

Response to 1st modification objections

No further representation received regarding this issue.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General	Agent Name
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Objector Ref	Name	Anne MacNamara, Planning Directorate
422c		Scottish Government
		Victoria Quay
		Edinburgh
		EH6 6QQ

Company Scottish Government

Summary of objection to Deposit Local Plan

The wording within policies should be clear and should not be written in a way which confuses interpretation eg too many clauses.

CNPA analysis of objection to Deposit Local Plan

Further work is needed to clarify how policies will be implemented through the development management process and to ensure the wording is not open to unnecessary interpretation. It is proposed to produce a series of working practice notes for use by staff across the 4 local authorities and the CNPA to ensure a consistent approach is taken.

Proposed 1st Modification

Throughout make sure wording is clear, phrases not too long, and structure of policies logical and easy to follow.

Response to 1st modification objections

No additional comments included.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General	Agent Name
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Objector Ref	Name	Anne MacNamara, Planning Directorate
422b		Scottish Government
		Victoria Quay
		Edinburgh

EH6 6QQ

Company Scottish Government

Summary of objection to Deposit Local Plan

The plan period should be more clearly expressed.

CNPA analysis of objection to Deposit Local Plan

Para 1.6 will be amended to clarify the timescales referred to.

Proposed 1st Modification

In 1.16 clarify the plan period

2.1 clarify impact of new Planning Act and Regs

Response to 1st modification objections

No additional comments included.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General

Objector Ref Name Planning, Environment and Development
469c The Highland Council

Agent Name

Company The Highland Council

Summary of objection to Deposit Local Plan

The policies in sections 4 and 6 are clear and indicate how they will be implemented and monitored.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

No further action required.

Response to 1st modification objections

The Council's representation was supportive of the Deposit Draft.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General

Objector Ref Name Rona Main

Agent Name Steve Crawford
Halliday Fraser Munro

425a

Scottish Enterprise Grampian
27 Albyn Place
Aberdeen
AB10 1DB

8 Victoria Street
Aberdeen
AB10 1XB
Company Scottish Enterprise Grampian

Summary of objection to Deposit Local Plan

There is a heavy concentration of economic development towards the west of the Park to allow thriving communities and tourism to grow in the east of the Park.

There should be specific proposals for 'gateway' areas such as Dinnet and Glenshee and other Aberdeenshire settlements. There is also a lack of an explicit

development strategy. The vision is too narrow and does not reflect the aims of the Park. It should clearly intimate that growth is necessary in settlements and some

bespoke tourism investment opportunities outwith settlements to enable the Park to provide the level of quality and recognition that it strives for.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to clarify terminology and phrasing used. A review of the Introduction and Context sections are necessary to

clarify the context for the Local Plan and its relationship with other documents, including local, regional and national, and also to expand on the thinking behind the

policies as drafted.

Proposed 1st Modification

Modify introduction to clarify position with other LAs and national guidance.

Also modify and expand vision and add clear aims and objectives for the Plan.

Response to 1st modification objections

We are pleased to note that the Local Plan has been amended to reflect some of the Economic Development and Tourism objectives raised by Scottish Enterprise,

and that these modifications have had to be balanced with the conservation aims of the Park. However, we do not believe the modifications go far enough and in

some circumstances the policies are unclear.

Notwithstanding, this or the following comments, we believe the Local Plan, has been well written and that most of the policies are generally well framed. We also

appreciate the Park have to balance economic development objectives within a sustainable policy framework and with respect to the conservation and protectionist

objectives.

We believe The Local Plan First Modifications continues to have a heavy concentration of economic development towards the West of the Park and does not

consider the future of the Eastern settlements and areas in enough detail to enable their viable future as thriving communities or as global tourist destinations.

We acknowledge modifications have been carried out under Policy 26 to acknowledge Economic Development, however the Local Plan is still missing an explicit and

clear economic development strategy.

We acknowledge the Local Plan has been modified in various sections to account for conservation needs balanced with economic development

needs however, we

believe a conservationist approach rather than the controlled growth approach set out by the National Parks Act prevails in the Local Plan. We fully appreciate why

this is the emphasis, but the merits of controlled sustainable growth and development, particularly within the Tourism sector, should be strengthened.

We strongly support the modifications made under Section 6 (pages 55 & 56) regarding sustainable Tourism and the need to provide a high quality experience in an

increasingly global market. We would however wish to see stronger policy support in favour of improved visitor accommodation and opportunities for developing a

sustainable high quality small-mid scale resort to the East of the Cairngorms. On this note, we are pleased with the amended references under Policy 27 Business

Development section c) 'other business opportunities' to promote diversification within existing businesses or to create new small scale development which supports

the local economy.

Although there is general support under Policy 27 for Business diversification there appears to be no specific reference to support diversification within the Glenshee

or Lecht Ski Resorts.

There is still a very low allocation of new housing to settlements on the East of the Park, however the Local Plan is improved by reference to housing tenure mix and the development of key worker and affordable housing

There are no specific new employment land allocations to settlements on the East of the Park at Deeside or Strathdon.

The development plan policies still remain restrictive in parts, for encouraging business growth and improvement in business and accommodation premises, in an

area where development has the potential to be unviable. Again, the need for conservational balance is appreciated, however property owners and developers may

be discouraged by the protectionist approach and the additional policy requirements.

The Plan should be promoting infrastructure provision and improvements in a co-ordinated fashion, based on an agreed strategy that covers public transport, roads

infrastructure, utility infrastructure as well as softer infrastructure such as streetscape and public realm improvements. It is important that Local Authorities are pro-

active in ensuring that infrastructure is programmed via other agencies (especially Scottish Water) to meet the aims and vision, in this instance, for the National Park.

The modifications go some way to addressing these issues – especially Transport and Water, however the Transport provisions are vague and the Plan is silent on

softer infrastructure improvements such as streetscape and public realm improvements.

As per our previous representations, there are no new employment land use allocations in the Deeside or Strathdon settlements and we believe this may impede

rural economic development and growth.

We acknowledge and welcome that Dinnet as one of the gateway settlements to the Park has been referred to in the modifications with an emphasis on improving

tourism and recreational facilities in this settlement.

Our previous representations of 27 September 2008 still stand, however we acknowledge some of our concerns have been thoughtfully addressed.

For the avoidance of doubt, and at your request, we wish our original observations to be maintained and they are highlighted below for ease of reference.

CNPA analysis of objections to 1st modifications

The general comments are noted. The specific objections will be considered through the subsequent formal objections to the plan. No further modifications are proposed as a result of this part of the objection.

Objection maintained

Policy/site ref	General	Agent Name	
Objector Ref	Name	Amanda Howard	
414e		Development Services	
		The Moray Council	
		High Street	
		Elgin, IV30 1BX	Company

Summary of objection to Deposit Local Plan

CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

We wish to suggest the following changes, which you may treat as technical comments or as an objection to the relevant modification (if you require this to 'hang'

any changes on):

- Section 2.7 (p.8) - Need to correct reference to Moray Structure Plan 2007 (not 1999)

- Section 4.10 (p.18) – Query change in first sentence which has gone from:

'Policy 2 applies to development proposals on sites proposed through the Local Plan as well as development proposals on sites that are not zoned.'To

'Policy 2 applies to development proposals on sites proposed through the Local Plan as well as on development sites identified in the Local Plan.'

Was it intended that the revised statement refer to 'sites not identified', in order to preserve the original intent of the statement?

- Policy 6 (p.21): A word, possibly 'indicate', is missing from the first sentence of the final paragraph of the policy.

- Could you show Tree Preservation Orders on your settlement maps? The one on Tomnabat Lane by the library is not indicated.

- We are a bit late commenting on this, but the indication of 'the centre' (ie the purple line along the affected roads) is hard to interpret – i.e. which buildings are

within 'the centre'. How far from the purple line does it extend and to what scale is the line reliable for interpretation?

Policies

Policy 16 (p.33)

We wish to highlight that the policy text modification adding 'any detrimental impact to the environment' can be literally applied to all development in practice. We

suggest that some further modification to the text may be necessary to assist with policy implementation e.g. 'any net negative impact on the environment' or 'any detrimental impact to the environment that cannot be mitigated'.

Policy 18 (p.36): We wish to highlight the resource implications for Development Management of this modified policy, particularly with regard to assessing

compliance (and judging where compliance is required) with the modified criteria for the 'statement' and also with regard to the newly required checklist to

accompany all developments. Requiring this level of information for all proposals will further burden the planning assessment process. In addition, we believe that the

criteria listed for the 'statement' are too impractical and broad to meaningfully assess.

Policy 25 (p.48):

The new requirement to establish that a dwelling has been occupied in the last 10 years, requires supporting 'implementation' guidance – i.e. the nature of evidence

required and the length of habitation required. In addition we would like clarification regarding interpretation of the new requirement for a replacement house to

'reflect the siting and scale of the original'. For example, if scale is interpreted as 'size' there may be some difficulty in complying with this policy and modern Building

Control Regulations if the replacement house is confined within the footprint of the original building.

Policy 30 (p.52):

The expansion of the policy to include tests for 'making positive contribution to improvement of sustainable transport network is useful. However, the modified

policy, when taken literally, refers to all development proposals as needing to demonstrate compliance. We have interpreted this as applying to 'development

proposals, where appropriate' and, therefore not applying to minor householder applications, for example. It might be helpful to clarify this in the policy text,

however.

Settlement Policy: Tomintoul

- The New ENV designations are supported. However, on the basis that these other sites have been identified as ENV, we would query why the open space area in the town centre has not also been designated ENV.

CNPA analysis of objections to 1st modifications

The additional comments are noted and minor amendments made as appropriate.

Objection maintained

Policy/site ref **General**

Objector Ref **Name** George Alder

392e Laggan Community Association
 Community Office
 Laggan, Newtonmore
 PH20 1AH

Agent Name

Company Laggan Community Association

Summary of objection to Deposit Local Plan

Planning hearings should automatically consult the local community association.

CNPA analysis of objection to Deposit Local Plan

This comment relates to the workings of The Directorate for Planning and Environmental Appeals within the Scottish Government. No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modifications proposed.

Objection maintained

Policy/site ref **General - Consultation**

Objector Ref **Name** James and Evelyn Sunley

056e 12 Lochnagar Way
 Ballater
 AB35 5PB

Agent Name

Company

Summary of objection to Deposit Local Plan

The consultation carried out does not represent the whole community.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. The consultation process is designed to gain a full understanding of all views within the Park and uses a variety of techniques to gain a full picture of the views of the community. It does not rely on particular events and considers all representations received of equal importance. No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modification needed

Response to 1st modification objections

The modified Park Plan does not address any of the objections that we made, we therefore continue our objections and ask you to think again.

CNPA analysis of objections to 1st modifications

The CNPA has carried out exhaustive consultation throughout the process and received an excellent response. No further amendment is therefore proposed.

Objection maintained**Policy/site ref General - Consultation**

Objector Ref	Name	Jan Semple
475		1 Lettoch Road
		Nethybridge
		Inverness-shire
		PH25 3EJ

Agent Name**Company****Summary of objection to Deposit Local Plan**

Commends the consultation process. Expresses confusion over the role of Community Councils.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. The consultation process is designed to gain a full understanding of all views within the Park and does not place additional emphasis made

by any particular individual or group. All representations are considered of equal importance. No modification considered necessary as a result of this

representation. In regard to the role of Community Councils, members are elected to represent the views of their community and form an important role in the

complex network of bodies which feed into the Local Government process. No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modification needed .

Response to 1st modification objections

Objection withdrawn.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn**Policy/site ref General - Consultation****Agent Name**

Objector Ref 025e
Name Mairi Maciver
Communities Scotland
Urquhart House
Beechwood Park
Inverness, IV2 3BW

Company Communities Scotland

Summary of objection to Deposit Local Plan

Welcome information about the consultation process contained in the Plan, but there should be a statement how local development forums contributed to the Local Plan.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. The wording does not however identify particular forums and groups but remains a general comment.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref General - Consultation
Objector Ref 409a
Name William Stuart Paterson
3 Lynstock Park
Nethy Bridge
PH25 3EL

Agent Name

Company

Summary of objection to Deposit Local Plan

The views of the local community council are not necessarily representative.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. The consultation process is designed to gain a full understanding of all views within the Park and does not place additional emphasis made by any particular individual or group. All representations are considered of equal importance. No modification considered necessary as a result of this

Proposed 1st Modification

No modification needed

Response to 1st modification objections

Objection maintained. Some concerns appear to have been addressed.

CNPA analysis of objections to 1st modifications

The comment remains noted but no further modifications are proposed.

Objection maintained

Policy/site ref	General - Context	Agent Name
Objector Ref	Name Dr Alister Scott	
477b	University of Aberdeen	
	Department of Geography and Environment	
	Elphinstone Road	
	Aberdeen	Company

Summary of objection to Deposit Local Plan

The role of national guidance and the NPF2 should be clarified. Cross referencing to these documents should be included throughout.

CNPA analysis of objection to Deposit Local Plan

In section 2 add clarification of the role of the Plan in context with national guidance and NPF.

Proposed 1st Modification

Modify 2.1 - 2.3 to clarify national context.

Response to 1st modification objections

Hello and apologies for not replying sooner. I have resigned from my job in order to take up a new position in New Zealand and the issues with this have rather been at the forefront of my mind. My principal concerns lay with the landscape section of the plan and i am glad to see that the revisions strengthen this considerably. Specific reference could be made and indeed should be made to the European landscape Convention as justification.

I therefore have no outstanding objections. I do still have some comments and at this stage wonder if they have to be formed in the form of an objection. Perhaps a short written response would be OK

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General - Context	Agent Name Steve Crawford
Objector Ref	Name Rona Main	Halliday Fraser Munro
425x	Scottish Enterprise Grampian	8 Victoria Street

27 Albyn Place
Aberdeen
AB10 1DB

Aberdeen
AB10 1XB
Company Scottish Enterprise Grampian

Summary of objection to Deposit Local Plan
CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

Section 1.16 (p 5). The modifications are welcomed and we fully support a partnership approach and collaborative working with strategic partners on the delivery of

key projects. We would wish to see the following addition in bold: ' Partners of the Cairngorms National Park and statutory consultees will be key in the delivery of

the Local Plan both through advice during the planning process and through their strategic work involved in areas of work such as cultural and natural heritage,

tourism, infrastructure and economic development. '

We welcome the modification under Section 2.14 (p 9) outlining the Park's vision and 2.15 second bullet the role of the Park as a destination for Visitors. We wish

to see this vision expanded to embrace the Park as a major national and international visitor destination, and to encourage business development for the provision of

world class visitor accommodation and experiences, which are complimentary to the National Park environment.

CNPA analysis of objections to 1st modifications

Para 1.16 will be amended in line with the comment. 2.15 2nd bullet 'and internationally' will be added.

Proposed 2nd modifications

Objection maintained

Policy/site ref **General - Context**

Objector Ref **Name** Dr A Watson

020b Clachnaben
 Crathes, Banchory
 Kincardineshire
 AB31 5JE

Agent Name

Company

Summary of objection to Deposit Local Plan

Add "where this would not damage the sites" to page 10, ix.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. However the wording referred to is a quote from the National Park Plan which has now been adopted. The consultation undertaken here

relates to the wording within the local plan rather than cross references to other documents. No modification considered necessary as a result of this

representation.

Proposed 1st Modification

No modification necessary as result of objection.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The reference is a direct link to the Park Plan and is included for information only. No further modification is therefore proposed.

Objection withdrawn

Policy/site ref	General - Context	Agent Name
Objector Ref 037b	Name DW and IM Duncan Pineacre West Terrace Kingussie PH21 1HA	Company

Summary of objection to Deposit Local Plan

There should be mention of SNH and Historic Scotland in the policies where they are the lead regulatory agency.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Additional reference will be included within the background text in support of each application to clarify the roles of partner organisations.

Proposed 1st Modification

Amend 1.16 implementing the Plan to highlight the role of partner organisations.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The delivery of the Local Plan will be achieved by partnership working with many organisations. This is recognised in para 1.16. The Planning Authority will

however remain the key agency in ensuring that developments are approved in accordance with the policies. No further modifications are therefore proposed.

Objection maintained

Policy/site ref	General - Economic Development	Agent Name
Objector Ref 463zh	Name John Anderson Kincaig and Vicinity Community Council	

Goldenacre, Dunachton Road
Kincraig, Kingussie
PH21 1QE

Company Kincraig and Vicinity Community Council

Summary of objection to Deposit Local Plan

CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

para 5.79 Economic development in the local plan must be flexible enough to ensure that new enterprises can occur, bearing in mind the need for economic as well

as biological sustainability.

This includes having regard to the significant number currently employed in the construction/house maintenance sector, whose skills need to be maintained through

what may become a difficult period for new build activity in the short term.

CNPA analysis of objections to 1st modifications

The approach taken in this section is to encourage appropriate development and does not limit options to particular sites identified in the plan, although some are

highlighted. No modifications are therefore proposed.

Objection maintained

Policy/site ref General - Economic development

Agent Name

Objector Ref Name D R MacKellar

430a Cairngorms Chamber of Commerce
PO Box 15
Kingussie
PH21 1WF

Company Cairngorms Chamber of Commerce

Summary of objection to Deposit Local Plan

Some of the housing and economic development lack robust background information and justification and a general understanding of the issues.

This is especially

the case in regard to housing, tourism, business development and transport. As a result informed comments and decisions were not possible regarding policy

direction and the need for a particular policy emphasis. There must be an appropriate structure and approach that will foster and support investment in new,

growing and sustainable businesses. The plan should therefore give a more positive emphasis and approach to this objective.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities and the protection of the

special qualities of the area as identified as a National Park. A review of the Introduction and Context sections is necessary to clarify and refine the

vision for the

Plan and set out clearly the strategic background to the policies drafted.

Proposed 1st Modification

2.14 expand vision and add clear aims and objectives for the Plan which will underpin the whole plan. Throughout include a more positive tone.

Response to 1st modification objections

Objection withdrawn

CNPA analysis of objections to 1st modifications

No further action.

Objection withdrawn

Policy/site ref	General - Economic Development	Agent Name
Objector Ref	Name	
4001	Dr A M Jones Badenoch and Strathspey Conservation Group Fiodhag Nethybridge PH25 3DJ	Company

Summary of objection to Deposit Local Plan

CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

5.79 Object.

HC's 'enterprise strategy' should not be slavishly followed. We understand that neither Aberdeenshire nor Moray local authorities have an equivalent aspiration to

increase population. The population of Badenoch & Strathspey is not projected to decline and nor has it done so in the recent past.

Increasing the population in a NP is an inappropriate aspiration for the CNPA in conflict with the 1st aim.

Object to misleading lack of clarity as the strategies referred to are not specified.

Object to use of phrase 'improving the demographic structure'.

Object. The statement regarding being an exemplar of the country's best, is spin not substance and such an aspiration is inappropriate in the mDLP.

Object. The CNPA should not be 'in support of this' (being the Enterprise Strategy etc).

Object to lack of clarity in the statement that the Local Plan approach must be flexible.

CNPA analysis of objections to 1st modifications

It is not true to say that the economic development policies slavishly follow any Highland Council strategy, but we do work in partnership with all four local

authorities and take into account their various strategies and programmes. The para 5.79 is intended to set some context for the economic development policies

and developments which promote a more balanced demographic structure, with better economic opportunities are considered to be in line with the aims of the Park.

No modification is therefore proposed.

Objection maintained

Policy/site ref	General - Economic Development	Agent Name
Objector Ref	Name Fergus Ewing MSP	
041	Constituency Office	
	Highland Railhouse	
	Station Square, Inverness	
	IV1 1LE	Company

Summary of objection to Deposit Local Plan

Additional land should be allocated for employment use, particularly within Newtonmore.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities, allocation of land for services to support this including creating the appropriate level of opportunities for employment growth, and the protection of the special qualities of the area as identified as a National Park. The wording used within policies throughout will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use. As a result of this consultation process further work will be undertaken to link more closely the demand for housing to economic prosperity and the need to work within the aims of the Park. This will be linked to the work ongoing relating to sustainability.

Proposed 1st Modification

Allocate employment land in Newtonmore.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

Additional land has been included for employment uses. No further modifications are therefore proposed.

Objection maintained

Policy/site ref	General - Enjoying and Understanding	Agent Name
Objector Ref	Name Dr A M Jones	
400m	Badenoch and Strathspey Conservation Group	
	Fiodhag	
	Nethybridge	
	PH25 3DJ	Company

Summary of objection to Deposit Local Plan
CNPA analysis of objection to Deposit Local Plan
Proposed 1st Modification

Response to 1st modification objections

6.4 Object. Key to the success of sustainable tourism is maintaining the special qualities of the area. This should not be secondary to delivering a high quality experience. The order of the sentences could be switched.

CNPA analysis of objections to 1st modifications

The policies of the plan should be read together with the 4 aims of the Park and in no way does the wording suggest that the special qualities of the Park are secondary to the visitor experience. No modification is therefore proposed.

Objection maintained

Policy/site ref General - Enjoying and Understanding

Agent Name

Objector Ref Name John Anderson

463zl Kincaig and Vicinity Community Council
Goldenacre, Dunachton Road
Kincaig, Kingussie
PH21 1QE

Company Kincaig and Vicinity Community Council

Summary of objection to Deposit Local Plan
CNPA analysis of objection to Deposit Local Plan
Proposed 1st Modification

Response to 1st modification objections

Sustainable tourism - Sustainable tourism development has both to be sustainable in terms of not damaging the very product which supports it i.e. the land and water

resources, but also needs to be sustainable in terms of cash return. Many of the tourism developments in the Spey Valley are not financially sound, requiring significant support from the Government Agencies to maintain viability and leading to unfair competition for businesses in the private sector.

CNPA analysis of objections to 1st modifications

The comment is noted. No modification is proposed.

Objection maintained

Policy/site ref General - Glossary

Agent Name

Objector Ref Name Susan Davies

465z-l
Scottish Natural Heritage
Great Glen House
Leachkin Road
Inverness

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Seeks inclusion of European Protected Species and National Scenic Areas in the glossary.

CNPA analysis of objection to Deposit Local Plan

The proposed amendment will be added to the Glossary.

Proposed 1st Modification

Add European Protected Species and National Scenic Areas to the glossary.

Response to 1st modification objections

No further representation received regarding this issue.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing

Agent Name

Objector Ref Name Anne MacNamara, Planning Directorate
422p Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

Company Scottish Government

Summary of objection to Deposit Local Plan

There should be a clear distinction between the established land supply and the effective supply, together with evidence of how these sites contributed to meeting a 5 year land supply for the Park.

The housing land allocations are confusing and the lack of a clear base year for the Plan adds to this. Why do the housing tables only look to 2016. Does this relate to the GRO figures? The reference in Tables 3 & 4 to 5 years and 10 years would be better set out in actual years, e.g. 2006-2011 (5 years) or 2006-2016 (10 years).

The footnote to Table 3 should be amended to explain why this assumption is made.

Within the tables each site allocated within each settlement should be displayed along side the totals for that settlement and how that contributes to the overall

housing land requirement. This would also be useful in relation to economic development sites and could be included as an appendix.

There is a need for an overarching policy which allocates land, makes provision for review of the land supply and for replacement where sites may no longer be

effective, and also for the consideration of windfall or redevelopment sites within the main settlements. A definition of windfall sites should be

included in the
glossary.

Para 5.31 refers to Cairngorms Housing System Analysis, but it is not clear the extent to which the housing land requirement set out in the plan relates to the findings of the study.

CNPA analysis of objection to Deposit Local Plan

Two background papers undertaken by consultants relating to population figures and affordable housing requirements are available on line. A summary of the approach taken will be appended to the Local Plan. Also amendments will be made to the introduction to the housing section to clarify the need for housing in the Park.

The tables will be revised to clarify.

The supply of an effective supply will be considered through amendment in light of needs assessments

Proposed 1st Modification

Amend tables to ensure correct and clear.

Add new policy 22 on housing in settlement allocations.

Add windfall sites to glossary.

Response to 1st modification objections

It is noted that many of the comments made to the Deposit Local Plan have been addressed, though a small number of matters are outstanding.

The source(s) of the information set out in Tables 2,3, and 4 should be stated. The descriptor "open market housing allowance" in Table 2 is not as clear as the terminology used in the previous Plan. Further clarification is required that land allocations identified in Table 4 are part of the effective land supply and are capable of being brought forward for development within the Plan period.

In relation to drafting, paragraph 5.29 lists the key factors which have affected the availability of housing in recent years, but does not provide any evidence for this statement.

References are made to two different housing need figures (in para 5.31 and in para 5.43) drawn from separate studies. Referring to the most recent figure only

would help to avoid confusion. Housing need and demand assessment should also be referenced in paragraphs 5.45 and 5.68 and a reference to Homestake in

Appendix 2 should be replaced with shared-equity.

CNPA analysis of objections to 1st modifications

References will be added to tables 2, 3 and 4. The reference to open market housing will be further clarified. Para 5.29 additional reference will be

included to

support this information. Reference has been included regarding both studies to clarify that both exist. It is the view of CNPA that this remains an important point of clarity. The appropriate changes will also be added to 5.45, 5.68 and the appendix.

Proposed 2nd modifications

Objection maintained

Policy/site ref General - Housing

Agent Name

Objector Ref Name Anne MacNamara, Planning Directorate
422o Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

Company Scottish Government

Summary of objection to Deposit Local Plan

Additional clarity should be provided to the options to create additional crofts in introduced in the Crofting Reform etc. Act 2007.

CNPA analysis of objection to Deposit Local Plan

Ensure policies regarding housing and economic growth adequately make provision for croft development. However it is not the intention to include a separate policy relating only to croft development.

Proposed 1st Modification

Modify policies 24 and 27 to allow for croft development.

Response to 1st modification objections

No additional comments included.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing

Agent Name

Objector Ref Name Mairi Maciver
025c Communities Scotland
Urquhart House
Beechwood Park
Inverness, IV2 3BW

Company Communities Scotland

Summary of objection to Deposit Local Plan

Local Housing Strategies should be given more prominence, with reference to their role in the delivery of the Local Plan established at the start of the Housing section.

CNPA analysis of objection to Deposit Local Plan

The links with Local Housing Strategies will be clarified in the text explaining the links between the Local Plan and other Plans and Strategies (para 2.10-2.11). Any further explanation considered necessary within the Housing section of the Plan will be added as appropriate.

Proposed 1st Modification

5.24-5.26 expand clarity on the role of strategic guidance including role of local housing strategies.

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref	General - Housing	Agent Name
Objector Ref	Name	
011a	Colonel F.M.K. Tuck Allargue Corgarff, Strathdon Aberdeenshire AB36 8YP	Company

Summary of objection to Deposit Local Plan

Para 5.35 - Amend wording to include 'landowners'

CNPA analysis of objection to Deposit Local Plan

The comment is noted and the wording will be amended.

Proposed 1st Modification

Include 'landowners' to para 5.34.

Response to 1st modification objections

I refer to your letter obj 011 of 22 May on Modifications to Deposit Local Plan.

First may I say how very pleased and honoured I am to receive a personal and comprehensive reply to my comment on the plan. I can not remember ever having had one before, and it is gratifying to feel that one is being listened to !

Second I confirm that I am in agreement with the modifications suggested and do not wish to object further. On the whole I consider that you have dealt with my comments and that the amended plan is satisfactory.

Having said that, may I make one or two further comments?!

- a. On p 42 Table 14 it is strange that Aberdeenshire would not have at least a target figure for Donside as well as Ballater and Braemar.
- b. Although much improved I still find Policy 23 and 24 overly and unnecessarily restrictive. I can see places in Corgarff (which badly needs regeneration) where two or three new build houses could be built without in any way conflicting with the other aims of the Park. So to restrict to one new house where there are three would prevent this. Similarly I can envisage other worthy candidates for a new house under Policy 24 eg a retired gamekeeper on my estate when his tied dwelling is required, or for a family member with dependent needs to live on the estate. A wording could be inserted in the new subpara b " or similar worthy persons ".
- c. Some of my problems have been resolved in Policies 25 - 29. It would be helpful to refer to these at the end of new para 5.70
- d. Finally you have not taken on board my comment on other unsightly communication developments besides Telecoms in Policy 31. There are some awful electrical, road, and water constructions including the 32000 volt power lines alongside the Lecht road which have not been used for 7 years. I hope the Board will approve the Plan on 30 May and I wish you well with it.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General - Housing	Agent Name
Objector Ref 025j	Name Mairi Maciver Communities Scotland Urquhart House Beechwood Park Inverness, IV2 3BW	Company Communities Scotland

Summary of objection to Deposit Local Plan

Support the reference to provide a range of opportunities and mechanisms to enter the housing market, and the need to create an appropriate balance of house sizes. Further detail on what mechanisms and opportunities exist would be helpful, as in PAN 74. There should also be clear reference to the Homelessness etc (Scotland) Act 2003 and its impact on the homelessness duties of local authorities and registered social landlords, as well as on the Planning Authority area for any

potential land-use implications.

CNPA analysis of objection to Deposit Local Plan

Within the section dealing with Housing Issues in the National Park, further clarity will be included on the mechanisms available to address the issues faced. Cross

referencing to PAN 74 and the Homelessness etc (Scotland) Act 2003 will be undertaken to ensure the policies are supporting text are in alignment with the advice therein.

Proposed 1st Modification

5.24-5.26 expand clarity on the role of strategic guidance.

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref **General - Housing**

Objector Ref **Name** Mr D Carrott

021a Tigh na Fraoch

Nethy Bridge

PH25 3DA

Agent Name

Company

Summary of objection to Deposit Local Plan

The consultation process is not transparent and could be misleading.

a)The Deposit Plan was only forwarded to people who previously made comments which could preclude others getting involved.

b)On the proposals maps 'Community' use also includes Affordable Housing. This is confusing as there is a separate colour used for housing.

c)It is clear that affordable housing for the community does not necessarily mean the local people from that settlement.

d)It contradicts the value of the Plan to have windfall sites which could be used for housing. This implies that any suitable site outwith the designated areas could be used for housing without going through the consultation process.

CNPA analysis of objection to Deposit Local Plan

The comments are noted. The consultation on the Deposit Plan has exceeded the requirements of the guidelines prepared by the Scottish Parliament, and every

effort has been made to contact as many people within the community and other interested groups and individuals. The level of response is testament to the efforts

made. The comments regarding the terminology used on the proposals maps are noted, and clarification on the terms used will be included as a

proposed

modification. The comments regarding affordable housing are also noted and further clarification on this point will be added to paragraphs 5.47-5.60.

The comments regarding windfall sites are noted. National planning guidance allows for the consideration of such ad hoc sites for all forms of development, where applications are judged against the policies within the Plan regarding such considerations as impact on the landscape, design, sustainability, impact on natural heritage, etc. Consideration will be given however to the need for an additional policy to consider development proposals within settlements, and also further clarity on how development proposals outwith settlement boundaries are assessed.

Proposed 1st Modification

cpt 7 change wording in 7.10 to revised para 7.11 referring to 'sustainable communities'.

Response to 1st modification objections

Thank you for your letters of 22 May 2008. We have studied the content, and in view of the amendments, would not wish to continue our objection. We are very

appreciative of all the hard work which must have gone into considering the many comments and the fact that appropriate amendments have ensued. No doubt a

more robust document will result, which will aid the development of the Park in a sustainable manner to the benefit of most if not all.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing

Objector Ref Name Dr A M Jones

400g(e) Badenoch and Strathspey Conservation Group
Fiodhag
Nethybridge
PH25 3DJ

Agent Name

Company Badenoch and Strathspey Conservation Group

Summary of objection to Deposit Local Plan

Para 5.28 Sweeping statements regarding need should be fully substantiated.

Para 5.30 B&S has seen the highest growth rate of any rural district in Scotland over recent decades and the text is therefore misleading. What were the figures used by the CNPA to arrive at their statement?

Para 5.34 - Sweeping statements regarding need should be fully substantiated.

Para 5.35 The statement is misleading as there is no means of controlling who gets a house, either social or open market.

Who is referred to in provide housing to meet everyone's needs? Again this is misleading.

Para 5.37 There should be reference to any serious study to assess the carrying capacity of things like existing infrastructure, basic info that would inform the

delivery of the aims of the park plan.

Para 5.38 - improved is too subjective. An improved housing supply may be at the expense of other aspects of the Park such as landscape and recreational opportunities. Communities of the Park is unclear. Development is by no means a clear improvement for communities of the Park.

Tables 2, 3 and 4 and 5.39 - Object to figure as there is no rigorous explanation as to how this figure is derived, and no reasoned justification is provided for taking a higher rather than a mid way or lower estimate. Throughout the arguments are not coherently explained. Statements are included without any supporting justification and are misleading and information is included in part without full explanation of where the data is sourced.

The allocation for affordable houses is inconsistent in significant respects with the aims of the NP. The Plan should not be seeking to meet 'demand'. Also figures

calculated have not taken into account natural and cultural heritage requirements of the 1st aim of the Park.

CNPA analysis of objection to Deposit Local Plan

The comments regarding unsupported statements throughout the text are noted. In the modifications it is hoped to address such situations. The wording used

within policies throughout will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use.

The supply of housing land is based on studies undertaken to assess need and methods of provision in particular affordable housing. The policies regarding housing do however have to be read together with all the other policies of the plan, and the aims of the Park, and development will not therefore occur to the detriment of the natural resources of the Park or undermine its aims.

Modifications will also endeavour to ensure a more appropriate balance is struck between development opportunities and the protection of the special qualities of the

area as identified as a National Park. The wording used within policies throughout will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use.

Proposed 1st Modification

Amend text in support of housing to reflect comments made.

Response to 1st modification objections

Object. - There is an inference that runs through this chapter that affordable housing is geared towards local people. However allocation rules to a large extent

preclude this, so any such assumption is liable to be misleading.

5.23 Object (and note a lack of clarity in the revised wording where it is stated “modest incomes have will [sic] continue...”.)

The argument advanced appears over simple and thus misleading. Providing more affordable housing does not necessarily support a more sustainable community.

Already at least one community council in the NP has indicated that it is not in favour of further affordable housing in the immediate future in their community.

Any major housing proposal can be divisive within, rather than supportive to a community. The large scale housing proposed in the mDLP is typically a contentious

issue within a community. More houses mean less countryside and associated environmental, social and economic benefits in and around a community, and there is

a sizeable body of opinion in any community that validly does not regard that loss as supportive of a sustainable community.

The provision of affordable housing through the private sector and as a proportion of open market housing, as is proposed in the mDLP, is contentious. This

approach has already created conflict between communities and the National Park Authority.

The need for affordable housing will predictably rise as a result of the increased population associated with the housing allocations in the mDLP (as each new

generation of first time buyers enters the housing market). The mDLP is promoting unsustainable growth at the expense of the special qualities of the Park and

opportunities for future generations.

5.25 Object. - We wish to see a more critical and in depth appraisal of the forecasts made around a decade ago. We do not consider the mDLP should be

slavishly following these forecasts.

5.32 - Object. The meaning of ‘housing market area’ and its significance need to be defined.

5.33 Object. - The higher figure should not be used.

Object to the reason for this of coping with unforeseen circumstances. We consider proposing 200 more houses to be built to cope with unforeseen circumstances,

when the population is projected to remain stable or only rise slightly, and we are already approximately a quarter of the way through the relevant time period, is

unjustifiably excessive. This approach fails to give proper priority to enhancing and conserving the special environment of the NP in line with the 1st aim.

Object to the unqualified use of the word ‘dynamic’. Object to use of the word ‘likely’ in relation to estimates of household numbers. This implies an unwarranted

level of certainty.

Object to final sentence.

5.34 - Object. We do not consider that the mDLP has provided convincing evidence to demonstrate that the NP faces any more of a dilemma than some other areas. Object to final sentence stating that the CNPA etc 'need to work together to provide housing to meet everyone's needs'.

5.35. - Object to inference in 1st sentence that the land allocations made in the Local Plan for affordable housing are to meet the 'needs of the Park's communities'.
The allocation of affordable housing only slightly favours local people; therefore affordable housing cannot be significantly geared towards meeting the needs of the Park's communities.
Object to inference in the 1st sentence that the land allocation made in the mDLP for market housing meets economic and social needs of local communities. Large scale market housing developments have many negative impacts on the economic and social needs of local communities.
Object to the lack of reference to the fact that land for housing is a finite resource.

5.38 - Object to higher figure of 950 being used (adds 200 units). Object to further allowance being made to take account of vacant properties and provision not controlled by planning system (adds 475 units). Object to additional 15% to allow for uncertainty (adds 214 units). These add 889 units. We do not consider this approach to planning for future housing meets the 4 aims of the NP.

Tables 2,3,4 Object. - Object to the information that is provided in these tables. The derivation of all the information in these tables is not clear and readily understandable, nor appropriately provided. For example, the detailed derivation of the higher figure of 1845 compared to 1639 is not provided. Did the CNPA take into account the affordable unit allocations that have been made in extant permissions? Moreover, providing the explanation for adding 206 units (a figure not itself provided) as a footnote does not give this addition proper emphasis.
Object to omissions of information. These Tables should also provide information on areas of land required for the numbers of houses given and should provide the total area of land within the proposed settlement boundaries of each settlement and the proportion of this that is proposed for built development in the mDLP allocations.
The Tables should also provide a breakdown of the areas of land of different habitats (birch woodland etc) in the proposed allocations in each settlement and the total area of that habitat in the whole CNP area.
This information would enable the public and the CNPA to better assess the impact of the developments proposed on the land and habitat resources.
The Tables should also provide information on the number of present houses and present population in each settlement. This information would

enable the public
and the CNPA to better assess the environmental and social aspects of developments proposed.

Table 2. Object to number of units proposed as explained above.

Table 3. Object to addition of 206 units. - Object to lack of clarity concerning this addition as explained above.

5.39 - Object to assumption made. Object to lack of clarity.

5.41 Object. - The approach taken does not necessarily support sustainable communities nor their economies.

CNPA analysis of objections to 1st modifications

The issue of local waiting lists is key to the success of the housing policies in the local plan and CNPA continue to work with the local housing authorities to try and

influence this. Local people or people with a local connection can however get additional points on waiting lists and we aim to build on this. The issue raised

regarding para 5.2 is not accepted as all developments will take place with the 4 aims of the National Park and the reasons for its original designation in mind.

Regarding land allocations, the CNPA conducted a study to assess the need for housing within the Park and has allocated land accordingly. However it is not

considered to have allocated excessive amounts of land which are more than the established need would suggest. The allocations do therefore comply with the requirements of SPP17.

Regarding para 5.23 the paragraph is intended to highlight the reasons for the growth in demand for affordable housing, as throughout the consultation for the local

plan, this was seen as a key issue and important to help retain local people within their communities. The development proposed will be carried out in accordance

with the 4 aims of the Park and it is considered an important part of the local plan by the CNPA Board. No modifications are therefore proposed in light of this objection.

The position regarding land allocation as set out in tables 2-4 has not changed. The background information has been made available, and this remains the basis for

the approach. The paragraphs 5.22-5.40 aim to explain what is a complex issue and important part of the local plan and is intended to clarify the CNPA board

thinking behind the approach taken. This thinking has not changed, and therefore no modifications are proposed to this section.

A definition of 'housing market area' will be added to the glossary.

Objection maintained

Policy/site ref **General - Housing**
Objector Ref **Name** Susan Davies
465o Scottish Natural Heritage
Great Glen House
Leachkin Road
Inverness

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Suggest placing this detailed justification in an annex.

CNPA analysis of objection to Deposit Local Plan

The level of detail included in the deposit plan reflects the importance placed on this issue. However, in the revised plan explanatory detail at this level may not be necessary and consideration will be given to the suggestion made.

Proposed 1st Modification

Move definition of affordable housing to appendix.

Response to 1st modification objections

No further representation received regarding this issue.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General - Housing**
Objector Ref **Name** Mr Michael Bruce
403h Glen Tanar Estate

Agent Name John Wright
Strutt and Parker
28 Melville Street
Edinburgh
EH3 7HA

Company Glen Tanar Estate

Summary of objection to Deposit Local Plan

Support the housing policies contained within the deposit plan.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modifications proposed

Response to 1st modification objections

No further action required.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General - Housing	Agent Name
Objector Ref	Name	
390u	Roy Turnbull Torniscar Nethy Bridge Inverness-shire PH25 3ED	
		Company

Summary of objection to Deposit Local Plan

The housing allocation for the Park is too high. The figures and the background documents do not refer to the natural and cultural heritage aspects of the Parks

aims. The aims of the park must be considered collectively which cannot happen if the 1st aim is ignored. Has the 1st aim of the Park been taken into account by

the background studies? Also the SEA summary states that "relatively few changes to the Local Plan have [been] made due to the SEA alone". This could only be

justified where there is no conflict between the 1st aim of the Park and the proposals for development. This is not the case.

Even before the Park was established there were many cases where developments have been in conflict with the 1st aim of the park – a range of examples are listed regarding both natural and cultural heritage.

The allocations are not sustainable, indicating a sharp increase in build rates. Between 1976-2995 2931 houses were built in Badenoch and Strathspey, an average

of just under 100 houses a year. The current plan proposes 888 houses in the next 5 years and 678 for 5-10 years, an average of 177 and 135 houses a year. In

the long term a further 1426 are proposed, which would mean that by 2025 an average of 158 houses would be built, and a 60% increase in the rate of house

building for the next 20 years. This is not sustainable for the natural and cultural heritage of the area and if this is projected over time the lowland areas would

become significantly impacted by urban sprawl. The plan should instead be making provision for a small amount of houses for local people within the confines of the

1st aim of the Park.

Further, the most unacceptable feature of the housing allocation is the provision for second homes in table 2. Why is supply increased just because demand is

increasing? This does not address local need or the local concerns regarding holiday and second homes. The previous policies in the consultative draft were a more

fair way of managing the situation and meeting local need.

CNPA analysis of objection to Deposit Local Plan

Two background papers undertaken by consultants relating to population figures and affordable housing requirements are available on line. A summary of the

approach taken will be appended to the Local Plan. Also amendments will be made to the introduction to the housing section to clarify the need for housing in the Park.

Proposed 1st Modification

Modifications to introduction to housing section to clarify need and approach to affordable housing. Also include appendix to add further detail. Add consultants reports to the web page for general viewing.

Response to 1st modification objections

Objection maintained

CNPA analysis of objections to 1st modifications

The allocation of land for housing is in response to work undertaken to establish the need for housing within the Park. Underlying all developments are the aims of

the Park and this is linked through Policy 1. The CNPA position regarding the allocation of land for housing in Aviemore has not changed. No modification is therefore proposed.

Objection maintained

Policy/site ref General - Housing

Objector Ref Name Dr A Watson

020j Clachnaben

 Crathes, Banchory

 Kincardineshire

 AB31 5JE

Agent Name

Company

Summary of objection to Deposit Local Plan

Incorrect use of language in box regarding the Extract from the National Park Plan.

In 5.34 use 'council houses' not 'council owned property'. Suggest that the sale of council houses should end.

In 5.39 note that the increase in housing will be accompanied by a lack of sustainable growth, energy use, pollution and destruction of habitats.

In 5.49 support this idea.

CNPA analysis of objection to Deposit Local Plan

Amend the text to support the housing policeis to clarify the wording.

Proposed 1st Modification

modify para 5.29 to clarify the issue of need.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The references to the Park Plan are included for information. The background text to provide context for the housing policies has also been redrafted for clarity. No

further objections therefore proposed.

Objection maintained

Policy/site ref **General - Housing**

Objector Ref **Name** John Anderson

463zf Kincaig and Vicinity Community Council
 Goldenacre,Dunachton Road
 Kincaig, Kingussie
 PH21 1QE

Agent Name

Company Kincaig and Vicinity Community Council

Summary of objection to Deposit Local Plan

CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

The local plan housing policies are generally acceptable provided they are adhered to. Where groups of housing are acceptable this should mean exactly that and

planners should not seek to diminish the argument where there are only three or four properties in a group.

There are currently extensive issues affecting first time buyers and self builders who face unnecessarily authoritarian and inquisitorial attitudes towards such

development. This planning mind set needs to change.

Objective a) encourage resident occupied housing rather than second homes, particularly on greenfield sites.

Housing policy must be sufficiently flexible to take account of changing demographic circumstances such as age, family size, etc.

5.33 smaller households mean smaller houses – two bedrooms for singles, sufficient for what is and likely to be a continuing need, larger 3-4 bedroom or more

houses are not the first priority.

CNPA analysis of objections to 1st modifications

The comments regarding implementation of the policies for housing are noted. No further modifications are proposed.

Objection maintained

Policy/site ref **General - Housing**

Objector Ref **Name** Dr Alister Scott

Agent Name

477h

University of Aberdeen
Department of Geography and Environment
Elphinstone Road
Aberdeen

Company

Summary of objection to Deposit Local Plan

The detail included in support of housing policies exceeds the other topics and should be included as an appendix. Also all other policies should include data to provide a similar level of evidence.

CNPA analysis of objection to Deposit Local Plan

The level of detail included in the supporting text will be reviewed and the appropriate changes made to better the balance. However the issue of provision of affordable housing remains a key issue with the National Park.

Proposed 1st Modification

Move definition of affordable housing to appendix.

Response to 1st modification objections

Hello and apologies for not replying sooner. I have resigned from my job in order to take up a new position in New Zealand and the issues with this have rather been at the forefront of my mind. My principal concerns lay with the landscape section of the plan and I am glad to see that the revisions strengthen this considerably. Specific reference could be made and indeed should be made to the European Landscape Convention as justification.

I therefore have no outstanding objections. I do still have some comments and at this stage wonder if they have to be formed in the form of an objection. Perhaps a short written response would be OK

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing (affordable)

Objector Ref Name Mairi Maciver
0250 Communities Scotland
Urquhart House
Beechwood Park
Inverness, IV2 3BW

Agent Name

Company Communities Scotland

Summary of objection to Deposit Local Plan

In Para 5.59 has consideration been given to the possible effects on affordability for those building their own home who do not require grant aid, but have limited

means.

CNPA analysis of objection to Deposit Local Plan

The approach taken will support any method of truly affordable housing provision. The revisions to the policies will not therefore preclude against any particular mechanisms.

Proposed 1st Modification

Modify policy 21 to reflect 3Dragons report and include list of options for affordable provision in appendix.

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref **General - Housing (affordable)**

Agent Name

Objector Ref

Name Robert Maund
Scottish Council for National Parks
The Barony
2 Glebe Road
Kilbirnie, Ayrshire

Company Scottish Council for National Parks

Summary of objection to Deposit Local Plan

The background section should include clearer justification for the figures and percentages proposed, and detailed in table 2. It would have been beneficial to have

the information on housing market areas, inward and outward migration and where people live and work.

Policy 24 seems to be a bit wishful thinking rather than a real effort to tackle the problem. Lessons might be learned from discussions with national park authorities

in England and Wales. The Final Report on Cairngorms Housing System Analysis of February 2006, indicates that all the current completions projected through the

planning system might require to be for affordable housing. We doubt whether the policies in the Plan can hope to meet such an aim.

CNPA analysis of objection to Deposit Local Plan

Review the approach in line with the findings of the 3Dragons report. The model used in this report will then underpin the delivery of the local plan. Further work

will also continue with the local authorities on the role of waiting lists and the provision for local people.

Proposed 1st Modification

Policy 21 modified to reflect work of 3Dragons report and findings.

Response to 1st modification objections

Objection maintained as in 434a.

CNPA analysis of objections to 1st modifications

The approach to affordable housing has been amended to reflect the ongoing modelling work being carried out to ensure that developments are economic and the affordable contribution realistic. No further modifications are therefore proposed.

Objection maintained

Policy/site ref **General - Housing (affordable)**

Objector Ref **Name** Iain Michie

411 1 Curr Road
 Dulnain Bridge
 PH26 3NY

Agent Name

Company

Summary of objection to Deposit Local Plan

The approach to housing allocations supports larger housing developments, without due regard to local small firms who employ local people.

CNPA analysis of objection to Deposit Local Plan

The policies as drafted do provide for small scale development on sites which are not specifically allocated within the Plan. The wording of policies for new development outwith allocated sites will be revisited to clarify the range of opportunities available and provide the appropriate level of guidance is available for developers. Also in text for larger sites make reference to securing opportunities for small scale builders.

Proposed 1st Modification

Confirm the changes to policies 25, 26 and 28 to create some more opportunities for housing outwith allocations, and confirm that the plan does not limit housing purely to allocated sites.

Response to 1st modification objections

Objection withdrawn.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General - Housing (affordable)**

Objector Ref **Name** AW Laing Ltd

410 110 High Street

Agent Name

Summary of objection to Deposit Local Plan

The policies relating to housing will have a major negative impact on future business opportunities and sustainability of local building firms. 29 building firms have

subscribed to the representation.

The consultation period coincided with a holiday period in the building industry which made responding difficult, and also with a busy period when there is a

shortage of building standards staff.

- the plan is unclear in terms of understanding what developments might be allowed. The only exception is housing allocations on land owned by volume house

builders. The approach seems to therefore promote large scale development.

- other than the land allocated in settlement boundaries no other land is identified for development which is unhelpful.

- the housing outwith settlements policy is non-specific and very restrictive which is unhelpful to local builders

- the proposals maps are not clear in how the policies are applied, which makes the plan difficult to understand.

- while recognising that the policies apply across the Park and potential developers must look at their proposal in light of the policies, this approach is complicated

and unusable.

- the wording of the policies is ambiguous and words which carry value judgements and are open to interpretation, which leaves it unclear to developers what will be

appropriate and on what approach individual planners will take.

- the sites allocated most are already in the control of volume builders. There should also be a supply of small building sites to sustain local builders who employ

local employees and contribute to the local economy.

CNPA analysis of objection to Deposit Local Plan

The policies as drafted do provide for small scale development on sites which are not specifically allocated within the Plan. The wording of policies for new

development outwith allocated sites will be revisited to clarify the range of opportunities available and provide the appropriate level of guidance is available for

developers. Also in text for larger sites make reference to securing opportunities for small scale builders.

Proposed 1st Modification

Confirm the changes to policies 25, 26 and 28 to create some more opportunities for housing outwith allocations, and confirm that the plan does not limit housing

purely to allocated sites.

Response to 1st modification objections

We unite representing three of the larger local building firms operating from Grantown on Spey. As a group we support directly and indirectly over 100 local

tradesmen and apprentices. Recent large housing, planning applications and current housing development are being monopolised by large construction firms, this

trend coupled with the National Parks policies on housing in the countryside is representing a serious threat to our separate firms sustainability. The current draft local plan further erodes our potential landbank eg the residential areas identified in the 1997 local plan in Nethy Bridge at former nursery Dell Road (8 houses) and Duack Bridge (6 houses) are no longer zoned for residential development (see attached pages). Small sites such as these have historically provided a solid backbone on which to run our businesses. We unite to ask on the feasibility of reinstating areas such as these for residential development and suggest a meeting to discuss this issue further.

CNPA analysis of objections to 1st modifications

The sites referred to were not included in the deposit plan, and no objection was raised to their removal at that point. The objection therefore raises a new issue which is not appropriate at this time. It is therefore not proposed to add any second modification or amendment to these allocations.

Objection maintained

Policy/site ref	General - Housing (affordable)	Agent Name
Objector Ref	Name Ingram Builders Ltd	
412	Quarrybridge	
	Dallas	
	Moray	
	IV36 2RW	Company Ingram Builders Ltd

Summary of objection to Deposit Local Plan

The approach to housing allocations supports larger housing developments, without due regard to local small firms who employ local people.

CNPA analysis of objection to Deposit Local Plan

The policies as drafted do provide for small scale development on sites which are not specifically allocated within the Plan. The wording of policies for new development outwith allocated sites will be revisited to clarify the range of opportunities available and provide the appropriate level of guidance is available for developers. Also in text for larger sites make reference to securing opportunities for small scale builders.

Proposed 1st Modification

Confirm the changes to policies 25, 26 and 28 to create some more opportunities for housing outwith allocations, and confirm that the plan does not limit housing purely to allocated sites.

Response to 1st modification objections

Objection withdrawn.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing (affordable)

Agent Name

Objector Ref Name Peter Crane
346a 4 Lynstock Park
Nethy Bridge
Inverness-shire
PH25 3EL

Company

Summary of objection to Deposit Local Plan

Support the policy regarding affordable housing provision, the proposals for housing in the countryside and the contribution new development makes to the Park.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation

Proposed 1st Modification

Amend policy 21 in light of 3Dragons findings.

Response to 1st modification objections

I am satisfied that the revised Draft Local Plan covers all the issues raised in my original consultation response and I withdraw any 'objections'.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing (affordable)

Agent Name

Objector Ref Name William Stuart Paterson
409j 3 Lynstock Park
Nethy Bridge
PH25 3EL

Company

Summary of objection to Deposit Local Plan

Affordable houses in the area should be for local people who do not have to travel long distances to work.

CNPA analysis of objection to Deposit Local Plan

Review the approach in line with the findings of the 3Dragons report. The model used in this report will then underpin the delivery of the local plan.
Further work

will also continue with the local authorities on the role of waiting lists and the provision for local people.

Proposed 1st Modification

Policy 21 modified to reflect work of 3Dragons report and findings.

Response to 1st modification objections

Objection maintained. Some concerns appear to have been addressed.

CNPA analysis of objections to 1st modifications

The definition of affordable housing has been included in the appendix. The issue of local houses for local people remains important and CNPA staff continue to

work with the housing authorities to influence the allocations policies. No further modifications are therefore proposed.

Objection maintained

Policy/site ref **General - Housing (affordable)**

Objector Ref **Name** David Horsfall

391e Homes for Scotland

5 New Mart Place

Edinburgh

EH14 1RW

Agent Name

Company Homes for Scotland

Summary of objection to Deposit Local Plan

The affordable housing problem is a pre-existing issue that should not be the basis for a local plan policy that seeks unreasonable levels of affordable housing. The

affordable housing policy must include a percentage figure that is appropriate to the area and is fully justified by an up to date housing needs assessment.

The policy should therefore consider the alternative means that the planning system can use to contribute to the delivery of Affordable Housing in line with PAN 74

para 21 which supports:

Making surplus local authority land available for affordable housing at less than full market value;

Working with 3rd parties to assemble sites for affordable housing, including other public agencies (such as the forestry commission)

Opting to increase council tax on second homes by 50% to 90%, raising revenue which can be used to increase the supply of affordable housing within the housing

market area;

Using compulsory purchase powers.

CNPA analysis of objection to Deposit Local Plan

Amend policy to reflect findings of 3Dragons work on affordable housing provision. Two background papers undertaken by consultants relating to population

figures and affordable housing requirements are available on line. A summary of the approach taken will be appended to the Local Plan. Also amendments will be

made to the introduction to the housing section to clarify the need for housing in the Park.

Proposed 1st Modification

Amend policy 21 in light of 3Dragons findings.

Modifications to introduction to housing section to clarify need and approach to affordable housing. Also include appendix to add further detail.

Add consultants reports to the web page for general viewing.

Response to 1st modification objections

Part 4 - Homes for Scotland suggest that the affordable housing problem is a pre-existing issue. The affordable housing policy must include a percentage figure that is

appropriate to the area and this should be no more than the benchmark figure of 25% set out within PAN 74 paragraph 34.

CNPA analysis of objections to 1st modifications

The intent of the policy to secure 25% affordable units where one third subsidy or less exists is to ensure provision on the ground which does not adversely impact

on the developer and economics of the scheme. The CNPA are also promoting the use of a residual land value toolkit to ensure that the most accurate economic

situation can be reflected in the implementation of this policy. The benchmark set by the Scottish Government does not refer to land values or availability of subsidy.

It is therefore considered that the policy has endeavoured to reflect the market situation and no modifications are therefore proposed.

Objection maintained

Policy/site ref	General - Housing (affordable)	Agent Name
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Objector Ref	Name	
091k	Jane Angus	
	Ballater & Crathie Community Council	
	Darroch Den	
	Hawthorn Place, Ballater	
	AB35 5QH	

Company	Ballater & Crathie Community Council
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Summary of objection to Deposit Local Plan

There should be greater clarity on how the housing requirement for each area has been calculated. The requirement for affordable housing mixed throughout

developments will have an adverse impact on the value of open market houses. There should also be a better understanding of the size requirements within

individual communities. What ever development occurs it should be in keeping with the character of the settlement, and should ensure that low cost and affordable

houses are truly for local people and essential workers.

CNPA analysis of objection to Deposit Local Plan

Amend policy to reflect findings of 3Dragons work on affordable housing provision. Two background papers undertaken by consultants relating to population figures

and affordable housing requirements are available on line. A summary of the approach taken will be appended to the Local Plan. Also amendments will be made to

the introduction to the housing section to clarify the need for housing in the Park. The approach to 'pepper potting' affordable houses is one which has been tried

and tested across the country for many years. However, the approach taken will be assessed on a case by case basis and a prescriptive approach will not be

Proposed 1st Modification

Amend policy 21 in light of 3Dragons findings.

Modifications to introduction to housing section to clarify need and approach to affordable housing. Also include appendix to add further detail.

Add consultants reports to the web page for general viewing.

Response to 1st modification objections

The Ballater and Crathie Community Council wish to continue our objections to the proposed Local Plan.

CNPA analysis of objections to 1st modifications

The work to calculate the housing need have been placed on the CNPA web site. The allocations reflect this work undertaken to establish local need, and we

continue to work closely with the local housing authorities to ensure the most up to date information. The requirements for affordable housing have also been

altered. No further amendment is therefore proposed.

Objection maintained

Policy/site ref	General - Housing (affordable)	Agent Name
Objector Ref	Name Housing and Property Services	
471b	The Highland Council	

Company The Highland Council

Summary of objection to Deposit Local Plan

Seek the removal of the statements made in 2nd and 3rd sentences in para 5.35. States there is no evidence for either statement, and also that they do not justify the

use of the affordable housing policy and therefore may lead to developers challenging the policy.

CNPA analysis of objection to Deposit Local Plan

Clarification of the wording highlighted will be included.

Proposed 1st Modification

Amend para 5.34 to clarify the housing dilemma faced in the Park by those seeking to secure a house.

Response to 1st modification objections

No further representation made from THC.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing (affordable)

Objector Ref Name George Alder

392c Laggan Community Association
Community Office
Laggan, Newtonmore
PH20 1AH

Agent Name

Company Laggan Community Association

Summary of objection to Deposit Local Plan

Clarity needed on how to protect affordable housing for the future, and how to make its provision a priority.

CNPA analysis of objection to Deposit Local Plan

Clarify the use of legal agreements in the text to the policy.

Proposed 1st Modification

5.47 modifications to include clarity on the use of legal agreements.

Objection maintained

Policy/site ref General - Housing (affordable)

Objector Ref Name Inverburn Ltd

408b

Agent Name Bill Hepburn

Tulloch Homes Ltd
Stoneyfield house
Inverness
IV2 7PA

Company

Summary of objection to Deposit Local Plan

There needs to be a degree of flexibility in land use allocations within existing community areas and adjacent hinterland in order to meet the affordable housing

aspirations for the area. Emphasis should be placed on highly sustainable, environmentally friendly developments complimenting the community and meeting local

need. Such flexibility should be afforded only to schemes which provide circa 75% social housing.

CNPA analysis of objection to Deposit Local Plan

Review the approach in line with the findings of the 3Dragons report. The model used in this report will then underpin the delivery of the local plan.

Further work

will also continue with the local authorities on the role of waiting lists and the provision for local people.

Proposed 1st Modification

Policy 21 modified to reflect work of 3Dragons report and findings.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The intent of the policy to secure 40% affordable units where subsidy exists is to ensure provision on the ground which does not adversely impact on the developer

and economics of the scheme. The CNPA are also promoting the use of a residual land value toolkit to ensure that the most accurate economic situation can be reflected in the implementation of this policy. The benchmark set by the Scottish Government does not refer to land values or availability of subsidy. It is therefore considered that the policy has endeavoured to reflect the market situation and no modifications are therefore proposed.

Objection maintained

Policy/site ref	General - Housing (affordable)	Agent Name
Objector Ref	Name Planning, Environment and Development	
469g	The Highland Council	

Company The Highland Council

Summary of objection to Deposit Local Plan

The levels of affordable housing and the balance of house sizes proposed is a bold response to the problem but there is insufficient evidence to support the argument that this approach will deliver an appropriate number of houses. The approach risks creating a two tier regime of affordable and other forms of housing, and may place developers within the Park at a disadvantage. Closer reference should be made to the provisions of PAN 74 to provide variable contributions where exceptional circumstances exist. The balance of houses types sought would be provided by the market if the demand existed. If this does not exist, it may result in a slowing of all houses delivered. It is considered that if this policy continues, it should contain reference to the need to integrate affordable houses within the overall scheme. The reference to monitoring these policies is also of concern as it may indicate flexibility to the advantage of developers.

In terms of the wording of the supporting text, there is need for additional clarity and definition throughout the housing section, to ensure that all those involved in housing delivery are clear on what is expected as a result of the policies. Particular mention is made to para 5.35, 5.49, 5.52, 5.53, 5.56. The wording of the objectives on delivery should also be clarified to reflect the fact that the CNPA will work with housing providers to ensure an allocations policy that is responsive to

CNPA analysis of objection to Deposit Local Plan

Two background papers undertaken by consultants relating to population figures and affordable housing requirements are available on line. A summary of the approach taken will be appended to the Local Plan. Also amendments will be made to the introduction to the housing section to clarify the need for housing in the

Park.

Proposed 1st Modification

Policy 21 modified to reflect work of 3Dragons report and findings.
Modifications to iparas 5.35-5.40 to clarify requirement and supply issues.
Add consultants reports to the web page for general viewing.

Response to 1st modification objections

We note that CNPA has made some significant modifications to the policy and its supporting text, informed by key studies. We welcome the broad direction of change. This can provide a basis for going forward in terms of implementation, with further refinement of policy and associated guidance if necessary through discussion plus future monitoring and review. need. On the basis of the Local Plan First Modifications the Council is content with this part of the Plan as a way of going forward and does not maintain its earlier representation.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing (affordable)

Objector Ref Name Mairi Maciver
025m Communities Scotland
 Urquhart House
 Beechwood Park
 Inverness, IV2 3BW

Agent Name

Company Communities Scotland

Summary of objection to Deposit Local Plan

In Para 5.49 suggest using PAN 74 definition of affordable housing ("housing of a reasonable quality that is affordable to people on modest incomes")

CNPA analysis of objection to Deposit Local Plan

Move definition to appendix and cross referencing of the definition in PAN 74.

Proposed 1st Modification

Include appendix on definition of what is affordable housing

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref General - Housing (affordable)

Agent Name

Objector Ref Name Donald Lockhart
385a Albyn Housing Association
98-100 High Street
Invergordon
IV18 0DL

Company Albyn Housing Association

Summary of objection to Deposit Local Plan

In general terms, Albyn Housing Association would seek further clarification on how the Common Housing Register will operate; how RSL's deal with home ownership applications; the exigencies of the 2001 Housing Act as they bear upon RSL's particularly and how the affordable element is to remain deliverable given these ambitious policy statements. Albyn support the views of Highland Council regarding strategic context, however previous comments made regarding household and population numbers and projections remain true. The tone of the document remains negative and does not adequately explain the development process and the weight given to all aspects of it.

CNPA analysis of objection to Deposit Local Plan

For clarity move the explanation of use of the common housing register to appendix and confirm that the CNPA will work with the approaches taken by the housing authorities. Two background papers undertaken by consultants relating to population figures and affordable housing requirements are available on line. A summary of the approach taken will be appended to the Local Plan. Also amendments will be made to the introduction to the housing section to clarify the need for housing in the Park. Throughout also ensure a more positive tone is achieved.

Proposed 1st Modification

Include reference to Common Housing Register in appendix.
Place consultants reports on line for general viewing.

Objection maintained

Policy/site ref General - Housing (affordable)

Agent Name

Objector Ref Name RG and CE Armstrong
042 59 North Bar Within
Beverley
East Riding of Yorkshire
HU17 8DG

Company

Summary of objection to Deposit Local Plan

Affordable homes should not be mixed through open market housing as this can adversely impact on the value of the latter. Also there should be a greater allocation

of land within rural settlements to allow for development to meet local demand for housing.

CNPA analysis of objection to Deposit Local Plan

The approach to 'pepper potting' affordable houses is one which has been tried and tested across the country for many years. However, the approach taken will be

assessed on a case by case basis and a prescriptive approach will not be imposed.

Proposed 1st Modification

Amend policy 21 in light of 3Dragons findings.

Response to 1st modification objections

I thank you for your recent letter and I confirm that the issues that I mentioned to you in an earlier letter have been answered in a satisfactory manner.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General - Housing (affordable)	Agent Name
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Objector Ref	Name D R MacKellar	
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430j	Cairngorms Chamber of Commerce	
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	PO Box 15	
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	Kingussie	
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	PH21 1WF	
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	Company Cairngorms Chamber of Commerce	
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Summary of objection to Deposit Local Plan

There is little analysis of what has worked successfully in the past. Best practice of local solutions should be built upon and be encouraged. The policies will destroy

any notional housing latter and will encourage stigmatism through its approach to 'affordable' housing provision. Open market housing will become artificially

inflated to support the provision of affordable houses at the level proposed. Larger sites with resources sufficient to meet the affordable requirement may go ahead,

but smaller locally based schemes may not as they will not have the resources to carry out a 'no public subsidy' development.

In terms of the variety of affordable provision, clarification is needed on:

Are the developers to be Landlords? Would local developers want to?

Allocation of tenants?

Management of property?

Management of tenants?

Pay for the above?

Who is responsible?

do housing associations have the financial resources to support properties handed over to them?

Purchase properties

Manage properties on landlords behalf

CNPA analysis of objection to Deposit Local Plan

Amend policy to reflect findings of 3Dragons work on affordable housing provision. Two background papers undertaken by consultants relating to population

figures and affordable housing requirements are available on line. A summary of the approach taken will be appended to the Local Plan. The detailed information

required will be made available as supplementary to the local plan once the overall approach has been agreed. The appendix will however clarify what is an

Proposed 1st Modification

Amend policy 21 in light of 3Dragons findings.

Modifications to introduction to housing section to clarify need and approach to affordable housing. Also include appendix to add further detail.

Add consultants reports to the web page for general viewing.

affordable house.

Response to 1st modification objections

Objection withdrawn

CNPA analysis of objections to 1st modifications

No further action.

Objection withdrawn

Policy/site ref **General - Housing (affordable)**

Objector Ref **Name** Stuart Robertson

474a Planning Gain Co-Ordinator

Aberdeenshire Council

The Square

Banchory

Agent Name

Company Aberdeenshire Council

Summary of objection to Deposit Local Plan

Seeks a consistent approach across all Council areas within the Park is desirous for the industry and for infrastructure provision.

Suggest doubling land allocation, but keeping same number of units required in order to help hold down land values.

Suggest allowing public sector employers and tourism related employers to build or convert buildings on their sites for rented accommodation. These units could

then be managed by RSLs.

CNPA analysis of objection to Deposit Local Plan

Two background papers undertaken by consultants relating to population figures and affordable housing requirements are available on line. A summary of the

approach taken will be appended to the Local Plan. Also amendments will be made to the introduction to the housing section to clarify the need for

housing in the
Park.

Proposed 1st Modification

Amend policy 21 in light of 3Dragons findings.

Modifications to introduction to housing section to clarify need and approach to affordable housing. Also include appendix to add further detail.

Add consultants reports to the web page for general viewing.

Response to 1st modification objections

Objection withdrawn.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing (affordable)

Objector Ref Name Mairi Maciver

025n

Communities Scotland

Urquhart House

Beechwood Park

Inverness, IV2 3BW

Agent Name

Company Communities Scotland

Summary of objection to Deposit Local Plan

In Para 5.57 'applicants' should be defined to clarify to whom it refers.

CNPA analysis of objection to Deposit Local Plan

Confirm that the use of the term 'applicant' is a commonly used on in the planning process - for those applying for permission.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the

consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref General - Housing (affordable)

Objector Ref Name Donald Lockhart

Agent Name

385c

Albyn Housing Association
98-100 High Street
Invergordon
IV18 0DL

Company Albyn Housing Association

Summary of objection to Deposit Local Plan

While supporting the boldness of the 50% quota Albyn are concerned that this may deter developers from bringing forward development proposals. A case by case

consideration depending on the level of housing stress in the area might be preferable. Some sites may merit a greater quota than the 50% stated.

CNPA analysis of objection to Deposit Local Plan

Amend policy to reflect findings of 3Dragons work on affordable housing provision. Two background papers undertaken by consultants relating to population

figures and affordable housing requirements are available on line. A summary of the approach taken will be appended to the Local Plan. Also amendments will be

made to the introduction to the housing section to clarify the need for housing in the Park.

Proposed 1st Modification

Amend policy 21 in light of 3Dragons findings.

Modifications to introduction to housing section to clarify need and approach to affordable housing. Also include appendix to add further detail.

Add consultants reports to the web page for general viewing.

Objection maintained

Policy/site ref General - Housing (communities)

Agent Name

Objector Ref

Name

Robert Maund

434i

Scottish Council for National Parks

The Barony

2 Glebe Road

Kilbirnie, Ayrshire

Company Scottish Council for National Parks

Summary of objection to Deposit Local Plan

It is important that the plan should try and address the problems of affordable housing and second homes. Priority must be given to the needs of existing

communities rather than new build open market housing which is likely to be too expensive for most local people and cater for second homes and commuters.

CNPA analysis of objection to Deposit Local Plan

Continue to work with the Scottish Government on the issue of second homes. Confirm in introduction to chapter 7 the commitment to sustainable communities.

Proposed 1st Modification

Introduction to cpt 7 confirm importance of sustainable communities.

Response to 1st modification objections

Objection maintained as in 434a.

CNPA analysis of objections to 1st modifications

The importance of affordable houses is reinforced in amended policy 21. A number of other amendments have also been included within the housing policies. No further modifications are therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply

Objector Ref Name James Gibbs

421a HIE Inverness and East Highland
 The Green House
 Beechwood Business Park North
 Inverness, IV2 3BL

Agent Name

Company HIE Inverness and East Highland

Summary of objection to Deposit Local Plan

Support the housing provision but feel additional capacity should be provided in Moray.

CNPA analysis of objection to Deposit Local Plan

The supply of housing land is based on studies undertaken to assess need and methods of provision in particular affordable housing.

Proposed 1st Modification

No modifications proposed.

Objection maintained

Policy/site ref General - Housing land supply

Objector Ref Name North East Mountain Trust

443f Burnhead Farmhouse
 Raemoir
 Banchory
 AB31 4EB

Agent Name

Company North East Mountain Trust

Summary of objection to Deposit Local Plan

The approach to housing is incompatible with the 1st, 2nd and 4th aims of the Park. Particularly concerning is the focus on holiday homes in table 2. Affordable

housing should be the key focus to housing provision to ensure sustainable communities. The scale of land allocated will also affect the natural resources of the Park,

examples of which can be seen across the Park. Also this level of development is unacceptable in terms of its contribution towards climate change.

CNPA analysis of objection to Deposit Local Plan

The supply of housing land is based on studies undertaken to assess need and methods of provision in particular affordable housing. The policies

regarding housing

do however have to be read together with all the other policies of the plan, and the aims of the Park, and development will not therefore occur to the detriment of the natural resources of the Park or undermine its aims.

Proposed 1st Modification

No modifications proposed.

Objection maintained

Policy/site ref	General - Housing land supply	Agent Name
Objector Ref	Name	
437k	Mrs Jane Angus Darroch Den Hawthorn Place Ballater AB35 5QH	Company

Summary of objection to Deposit Local Plan

Consideration should be given to the effects of rapid growth on social, economic, educational and medical matters. It cannot be appropriate to develop large numbers of houses for people to commute to the city or to provide housing for the retired. The finds of the Rural Needs Survey should be included. Greater

consideration should be given to home working, specialist employment opportunities in the new technological era, tourism providing employment opportunities, and possible tax changes

CNPA analysis of objection to Deposit Local Plan

The policies of the plan endeavour to provide a balanced approach to land allocation and services to support this, including creating the correct level of

opportunities for employment. Further work is needed to ensure that land allocations are matched with the appropriate level social support (WORK WITH LOCAL AUTHORITIES ON THIS). A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared

to clarify the rationale behind the housing policies. Within this reference will be made to the relationship between the provision of new housing within the Park and

the National Park Plan and aims of the Park. Further explanation will also be required to justify the allowance made in table 2 for second homes and vacant

properties, and detail how the approach taken will benefit local people. On completion of this paper, information will be circulated to all those who made

representation on this issue, and detailed consultation undertaken to assess the level of continued objection, which may result in a modification to the calculations

Proposed 1st Modification

Include employment land in settlements to compliment housing. Clarify commitment to sustainable communities in introduction to chapter 7.

Response to 1st modification objections

response received - need to confirm actual position regarding formality of objection

CNPA analysis of objections to 1st modifications

response received - need to confirm actual position regarding formality of objection

Policy/site ref	General - Housing land supply	Agent Name	Jill Paterson
Objector Ref	Name		Halliday Fraser Munro
456c	Reidhaven Estate		8 Victoria Street
	Seafield Estate Office		Aberdeen
	Cullen		AB10 1XB
	Buckie		Company Reidhaven Estate
	Banffshire		

Summary of objection to Deposit Local Plan

The underlying assumptions on which the housing strategy is based are not clear. The total household projection to 2016 seems based on a low growth scenario

and does not take account of the 132 affordable houses. The allocation of units in table 4 in intermediate settlements shows little growth for the medium to long

term. It is important that such settlements are supported to provide choice and support for existing services. New developments within the Park should be directed

in a more balanced way to existing settlements rather than focusing on An Camas Mor. Also, is the number of units for the new settlement achievable in the

projected timescales due to the need for infrastructure investment?

CNPA analysis of objection to Deposit Local Plan

Place consultants work on line. Confirm therefore that sufficient land has been included within the Plan, and continue to work closely with the An Camas Mor team

to ensure delivery of housing within the appropriate time scales.

Proposed 1st Modification

No modifications proposed. .

Response to 1st modification objections

Maintain objection.

CNPA analysis of objections to 1st modifications

The CNPA position regarding housing land supply has not changed. No further modifications are therefore proposed.

Objection maintained

Policy/site ref	General - Housing land supply	Agent Name
Objector Ref	Name	
	Donald Lockhart	

385b
Albyn Housing Association
98-100 High Street
Invergordon
IV18 0DL

Company Albyn Housing Association

Summary of objection to Deposit Local Plan

Concern remains that relatively little new land has been added to the existing land allocation. There is an over-reliance on the future development of An Camus

Mor despite the significant infrastructure challenge that it poses. The issue of indicative densities marked on proposals maps is unhelpful as these are often

unsupported by detailed feasibility studies which when carried out later often prove density levels the project is unviable, which can then generate unhelpful interest

among parties opposed to development and one which is difficult to argue against. The plan should instead make it clear that numbers were truly indicative and

considerations of density levels will be subject to other tests, such as maximising the use of diminishing serviceable sites together with rigorous analysis of the

sustainability issues.

CNPA analysis of objection to Deposit Local Plan

Table 2 is based on work undertaken by consultants and available on line to consider the issue of need and housing land. The plan allocates sufficient land for

housing development, and there is no need therefore to include additional land such as that suggested. The CNPA staff will continue to work with the developers at

An Camas Mor to ensure that it is delivered to support the local plan.

Proposed 1st Modification

No modifications proposed.

Objection maintained

Policy/site ref **General - Housing land supply**

Objector Ref **Name** DW and IM Duncan

037a
Pineacre
West Terrace
Kingussie
PH21 1HA

Agent Name

Company

Summary of objection to Deposit Local Plan

The focus of the Local Plan on housing development is at odds with the first aim of the National Park.

CNPA analysis of objection to Deposit Local Plan

The aims of the Park are paramount in all decision making the Policy 1 must be complied with to allow any development to go forward.

Proposed 1st Modification

No modifications proposed.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The housing allocations are a response to housing needs within the National Park for all sectors of the community. Amendments have been made to ensure a

balance is struck between housing and other forms of development. The aims of the Park remain paramount in all decision making. No further amendment is therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply

Agent Name

Objector Ref Name Jane Angus

091j Ballater & Crathie Community Council
Darroch Den
Hawthorn Place, Ballater
AB35 5QH

Company Ballater & Crathie Community Council

Summary of objection to Deposit Local Plan

The housing requirements identified in NEST better reflect the actual need for the Mar area and in turn Ballater.

CNPA analysis of objection to Deposit Local Plan

Table 2 is based on work undertaken by consultants and available on line to consider the issue of need and housing land. The plan therefore allocates sufficient and adequate land for housing development.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

The Ballater and Crathie Community Council wish to continue our objections to the proposed Local Plan.

CNPA analysis of objections to 1st modifications

The allocations also reflect work undertaken to establish local need, and we continue to work closely with the local housing authorities to ensure the most up to date

information. No further amendment is therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply

Agent Name

Objector Ref Name DW and IM Duncan

037h

Pineacre
West Terrace
Kingussie
PH21 1HA

Company

Summary of objection to Deposit Local Plan

The addition of 500 houses as second homes in the table is concerning. The CNPA should take a more robust approach to resisting such homes. The total

allocation of 1640 houses in the next 10 years seems unsustainable, in terms of water provision, energy use, pollution, traffic and congestion. Such level of

development would have an adverse impact on important habitats in the area, and the impact on landscape is already evident in certain settlements in Strathspey.

CNPA analysis of objection to Deposit Local Plan

Amend table 2 to reflect the parts of the housing market not controlled by the planning system. The total figures are however based on work undertaken to establish

need within the Park and this study is available on line. Issues such as infrastructure are considered through the planning process and the local plan feeds into the

investment programmes for supplies. The policies regarding housing do however have to be read together with all the other policies of the plan, and the aims of the

Park, and development will not therefore occur to the detriment of the natural resources of the Park or undermine its aims.

Proposed 1st Modification

Amend table 2 to reflect parts of the market not controlled through the planning process.

Place consultants work on line.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The CNPA position regarding housing land supply and allocation of sites has not changed. No further modifications are therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply

Objector Ref Name Jamie Williamson

439q Alvie and Dalraddy Estate

Alvie Estate Office

Kincraig, Kingussie

PH21 1NE

Agent Name

Company Alvie and Dalraddy Estate

Summary of objection to Deposit Local Plan

The underlying problem is not of limited land supply but of taxes and regulatory constraints. Detailed comment is provided on historical issues which have created

the current situation regarding price and availability, cost of borrowing and state of the economy, government attitude to home ownership, ownership issues, changes

in population number and structure, growth in the second homes market, impact of the growth of Inverness, and the creation of the Park.

The plan should therefore mitigate the demand by encouraging a more balanced rural economy and restrict housing provision to local people or those with jobs

within the Park.

Increasing supply will not necessarily resolve the problem, causing an increase in demand. This would be matched with an increased demand on labour and materials

which would lead to an increase in costs and potential decrease in standards. Innovative methods of provision should be considered such as modular homes. The

focus on 'tied' affordable housing will also serve to exacerbate the two tier housing market which is emerging and restrict movement within the housing ladder. The

level of affordable provision suggested in the Plan will ultimately result in no development happening within the Park.

The plan should therefore concentrate on ensuring that:

1. New houses are well built, energy efficient and do not compromise the natural and cultural heritage of the Park.
2. Greater effort is made to rebuild, renovate and refurbish existing buildings particularly where they are built of local materials and reflect vernacular construction.

3. A greater proportion of houses are built to rent rather than sell.

4. There is a presumption in favour of building houses to be occupied by existing residents and their dependents, those that are employed within the Park and those

CNPA analysis of objection to Deposit Local Plan

The supply of land is guided by work undertaken by consultants to establish the need and the methods of providing affordable houses, available on line. Policies are

also included to allow refurbishment. The issue of sustainable development is considered in policy 18.

Proposed 1st Modification

Amend policy 18 to reinforce commitment to sustainable development

Amend policy 21 to reflect findings of 3Dragons work.

that are likely to invest in and contribute to the economy of the area.

Response to 1st modification objections

No reference to this policy in response to modifications. Therefore assume objection is resolved.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing land supply
Objector Ref Name Muir Homes Ltd
038l

Agent Name Malcolm Smith
TMS Planning and Development Services
Balclune, 32 Clune Road
Gowkhall, Fife
KY12 9NZ

Company

Summary of objection to Deposit Local Plan
CNPA analysis of objection to Deposit Local Plan
Proposed 1st Modification

Response to 1st modification objections

I am aware that the text below is largely commentary rather than forming an objection in light of the terms of the original local plan text. The general tenor for

support for new development to support communities appears, again, not to provide sufficient support for allocated sites. Table 4 "Phased land supply by local

authority area" is wrongly labelled as it refers to the "indicative capacity of additional sites identified" where some of these are in fact existing sites identified within

the adopted local plan (including site H1 in Grantown-on-Spey) and therefore should be reflected as such. Policy 21 relates to affordable housing. Its terms are

preferable to the original affordable housing policy within the Deposit local plan but here lies another problem with the failure of the local plan to provide "support"

for allocated sites. Without the private development the 121 affordable houses required annually will not be provided.

CNPA analysis of objections to 1st modifications

The comments are noted. However they are recognised as commentary rather than objection. No further action is therefore recommended.

Objection maintained

Policy/site ref General - Housing land supply
Objector Ref Name Alistair McLeod
389
McLeod Building Ltd.,
78 High Street,
GRANTOWN ON SPEY
PH26 3EL

Agent Name

Company McLeod Building Ltd.

Summary of objection to Deposit Local Plan

The proposals regarding house development would have an adverse impact on local small scale builders. The proposal sites should create opportunities for small scale developments to meet local needs.

CNPA analysis of objection to Deposit Local Plan

The policies as drafted do provide for small scale development on sites which are not specifically allocated within the Plan. The wording of policies

for new development outwith allocated sites will be revisited to clarify the range of opportunities available and provide the appropriate level of guidance is available for developers. Also in text for larger sites make reference to securing opportunities for small scale builders.

Proposed 1st Modification

Modify policies 22, 23 and 24 to increase options for small scale builders. Also include in text to large sites importance of development briefs in securing opportunities for joint working arrangements between large and small scale builders.

Response to 1st modification objections

We unite representing three of the larger local building firms operating from Grantown on Spey. As a group we support directly and indirectly over 100 local

tradesmen and apprentices. Recent large housing, planning applications and current housing development are being monopolised by large construction firms, this

trend coupled with the National Parks policies on housing in the countryside is representing a serious threat to our separate firms sustainability.

The current draft local plan further erodes our potential landbank eg the residential areas identified in the 1997 local plan in Nethy Bridge at former nursery Dell

Road (8 houses) and Duack Bridge (6 houses) are no longer zoned for residential development (see attached pages). Small sites such as these have historically

provided a solid backbone on which to run our businesses. We unite to ask on the feasibility of reinstating areas such as these for residential development and

suggest a meeting to discuss this issue further.

CNPA analysis of objections to 1st modifications

The sites referred to were not included in the deposit plan, and no objection was raised to their removal at that point. The objection therefore raises a new issue

which is not appropriate at this time. It is therefore not proposed to add any second modification or amendment to these allocations.

Objection maintained

Policy/site ref General - Housing land supply

Objector Ref Name Mairi Maciver

025w Communities Scotland

Urquhart House

Beechwood Park

Inverness, IV2 3BW

Agent Name

Company Communities Scotland

Summary of objection to Deposit Local Plan

In Section 7 timescales for the completion of the number of houses in each settlement should be included, making clear the link to Table 4.

CNPA analysis of objection to Deposit Local Plan

The links between the proposals section and Table 4 are noted, and some cross referencing will be made to help clarify the position.

Proposed 1st Modification

Amend tables to ensure correct and clear.
 Cross reference to settlement proposals

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn**Policy/site ref General - Housing land supply****Agent Name**

Objector Ref Name Alison Hogg
 473p Aberdeenshire Council, Planning and Development
 Woodhill House
 Westburn Road
 Aberdeen, AB16 5GB

Company Aberdeenshire Council

Summary of objection to Deposit Local Plan

While housing development based on a 5 year land supply as described in the plan is welcomed, ongoing analysis of population change, coupled with increasing demand for economic development opportunities, will require to be considered, as the life of the plan progresses. While conservation of the special qualities of the Park is key, the increasing awareness and attractiveness of the Park will result in greater demand for housing, plus business development to service communities over time. The Cairngorms National Park is well placed to demonstrate that social and economic sustainable development can go hand in hand with conservation and enhancement of the natural and cultural heritage combined with sustainable use of the natural resources

CNPA analysis of objection to Deposit Local Plan

Continue to work with Local Authorities to ensure most accurate and up to date information is available.

Proposed 1st Modification

No modifications proposed.

Response to 1st modification objections

We write with reference to your letter dated 18th Sept 2008, concerning the above subject. As stated in our previous letter dated 5th October 2007, Aberdeenshire Council does not object to the deposit local plan. Our previous letter did include a number of comments that we recommend being taken forward in the deposit local plan. These comments/recommendations should not be treated as objections to the plan.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General - Housing land supply**

Objector Ref **Name** Rona Main
425a(d) Scottish Enterprise Grampian
27 Albyn Place
Aberdeen
AB10 1DB

Agent Name Steve Crawford

Halliday Fraser Munro
8 Victoria Street
Aberdeen
AB10 1XB

Company Scottish Enterprise Grampian

Summary of objection to Deposit Local Plan

Concentrating housing in the west side of the Park is not appropriate to developing employment opportunities across the Park. The spread of sites should be more equal spread. Housing for key workers is essential for economic development and the future viability of settlements. The affordable housing policies are very restrictive and may discourage development. A more equitable approach is required which could include allocating sites specifically for such housing.

CNPA analysis of objection to Deposit Local Plan

Table 2 is based on work undertaken by consultants and available on line to consider the issue of need and housing land. The plan allocates sufficient land for housing development, and there is no need therefore to include additional land such as that suggested. The allocations also reflect the centres of population and demand. The approach to affordable housing is based on the work of the 3Dragons and the benchmark of the Scottish Government.

Proposed 1st Modification

Amend policy 21 to reflect work of 3Dragons.

Response to 1st modification objections

The new housing allocation under Section 5 Table 4 has not been modified and there is a high concentration of housing allocation on the western side of the Park.

We believe this is not an appropriate policy response to the issues affecting the Scottish Enterprise Aberdeen City & Shire Area (formally SE Grampian area). We therefore wish to see a more equal spread across the Park settlements and more viable housing sites allocated in settlements on the eastern side of the Park.

CNPA analysis of objections to 1st modifications

The approach to housing land allocation reflects the centres of population and areas of pressure within the Park. It would not be appropriate to equal out the allocations between Highland and Aberdeenshire as the Highland section of the Park contains much more population and settlements. The approach taken therefore reflects the geography and settlement pattern.

Policy 21 has been amended to secure 40% affordable units where subsidy exists is to ensure provision on the ground which does not adversely impact on the developer and economics of the scheme. The CNPA are also promoting the use of a residual land value toolkit to ensure that the most accurate economic situation can be reflected in the implementation of this policy. It is therefore considered that the policy has endeavoured to reflect the market situation and no modifications are therefore proposed. No further modifications are therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply
Objector Ref Name Goldcrest (Highland) Ltd
445a

Agent Name Claire Smith
Ryden LLP
25 Albyn Place
Aberdeen
AB10 1YL
Company Goldcrest (Highland) Ltd

Summary of objection to Deposit Local Plan

Currently within Nethy Bridge no additional land has been allocated for housing development, other than that already with planning consent. To ensure an effective 5 year supply, land should therefore be allocated to meet the need. Para 5.37 acknowledges that there is no exact measure of how many houses will be required for the future, nor is there an accurate method of predicting how many houses will be built during the lifetime of the Local Plan. The CNPA has therefore simply estimating the likely need and demand for additional houses. The Park Plan highlights the lack of access to good quality housing by many communities and identifies the need for affordable housing provision as a priority for implementation. Population estimates also indicate a significant population and growth over the next few years. Without sufficient zoning of land for housing, supply would be further stifled, driving up demand further, for example Nethy Bridge which has no sites are identified for future housing. To increase the supply of new housing in the Park area and the efficient flexibility is built in to allow for uncertainty to accommodate the highest growth scenario the figures in Table 2 should be increased substantially and additional sites should be identified for residential development in Nethy Bridge.

Table 2 should therefore be amended to allow for additional flexibility, and table 3 amended to make provision for additional units at Nethy Bridge. Table 4 should

CNPA analysis of objection to Deposit Local Plan

Table 2 is based on work undertaken by consultants and available on line to consider the issue of need and housing land. The plan allocates sufficient land for housing development, and there is no need therefore to include additional land such as that suggested.

Proposed 1st Modification

No modifications proposed.

Response to 1st modification objections

I refer to your letter dated 13 June 2008 advising of the publication of the further modifications to the Cairngorms National Park Local Plan which were agreed by the Park board.

In total three representations were previously made on behalf of my client, Goldcrest (Highland) Ltd. These were referenced as 445a in relation to housing land

requirement and supply; 445b in relation to Nethy Bridge; and, 445c in relation to Grantown on Spey.

As no modifications have been made in relation to these matters, I would be grateful if these representations were maintained. I trust this is acceptable; however,

should you have any queries, please do not hesitate to contact me.

be amended accordingly.

CNPA analysis of objections to 1st modifications

The position regarding housing land supply and allocations has not changed since the plan was modified. No further modifications are therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply

Objector Ref Name Dominic Fairlie
452a Scotia Homes Ltd
23 Bridge Street
Ellon
AB41 9AA

Agent Name

Company Scotia Homes Ltd

Summary of objection to Deposit Local Plan

The Plan seems to wish to avoid the word 'zoning' throughout except in para 5.37. The term 'zone' has resulted in exactly the blandness across Scotland, which the

plan is trying to avoid. The wording should therefore be modified to delete the term and rephrased to imply that housing should be provided as part of a mix of

development and uses. Replace the word with 'provide'.

CNPA analysis of objection to Deposit Local Plan

The policies of the plan endeavour to provide a balanced approach to land allocation and services to support this, including creating the correct level of

opportunities for employment. As a result of this consultation process further work will be undertaken to link more closely the demand for housing to

economic

prosperity and the need to work within the aims of the Park. This will be linked to the work ongoing relating to sustainability and also to the work undertaken in

Ballater by the Princes Foundation relating to sustainable communities. (WORK WITH NATURAL HERITAGE SECTION AND ECONOMIC AND SOCIAL DEVELOPMENT SECTION)

Proposed 1st Modification

5.35 amend to reflect comment

5.38 clarify figures in table 2.

Response to 1st modification objections

No additional comments relating to this objection in the response to modifications.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General - Housing land supply**

Objector Ref **Name** Dr A Watson

020a Clachnaben

Crathes, Banchory

Kincardineshire

AB31 5JE

Agent Name

Company

Summary of objection to Deposit Local Plan

CNPA need to ensure the plan covers all issues more equally. At the moment, there is an over emphasis on new housing, and living and working in the Park, and

not enough focus on conserving and enhancing the national park

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities and the protection of the

special qualities of the area as identified as a National Park. The wording used within policies throughout will be clarified to ensure the appropriate level of guidance

is available for developers, and the Plan is easy to understand and use. A review of the Introduction and Context sections is necessary to clarify and refine the vision

for the Plan and set out clearly the strategic background to the policies drafted. Similarly further clarification is needed in the introduction section to each Chapter

to state clearly the justification for the approach taken and the aspirations sought as a result of implementation of the policies.

Proposed 1st Modification

Amend introduction to clarify position and role of aims of the Park. Amend Local Plan vision to link more closely to the National Park Plan.

Move definitions regarding housing into appendix.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The housing allocations are a response to housing needs within the National Park for all sectors of the community. Amendments have been made to ensure a

balance is struck between housing and other forms of development. No further amendment is therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply
Objector Ref Name The Proprietors of Mar Centre
394i

Agent Name Steve Crawford
Halliday Fraser Munro
8 Victoria Street
Aberdeen
AB10 1XB
Company The Proprietors of Mar Centre

Summary of objection to Deposit Local Plan

CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

These tables have been altered with Aberdeenshire part of the Park and Braemar in particular losing housing sites over the period to 2016. Braemar can and should

accommodate more housing than is proposed in order to support its future role in the Park

Changes Required to Resolve the Objection

Increase the housing allocation in Braemar in line with the sites identified in this report.

CNPA analysis of objections to 1st modifications

The tables have only been altered to reflect extant permissions and to correct errors in the previous version. The figures are not accurate and no further

modifications are therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply
Objector Ref Name John Forbes-Leith Esq
418t Dunachton Estate

Agent Name Debbie Mackay
Smiths Gore
12 Bernard Street
Edinburgh
EH6 6PY

Company Dunachton Estate

Summary of objection to Deposit Local Plan

The sites H1 and H2 in Kincaig should not be allocated for housing, but provision should instead be allocated on land NW of the main road. H1 allocation is too

dense and would be out of character with the settlement. The site is low lying, the centre of the site being wet, indicating problems for drainage. The allocation

could therefore be at variance with SPP7. Site H2 has poor visibility splays creating access problems. The site is removed from the village core and other facilities.

Table 4 indicates no medium or long term growth allocation within Kincaig whereas it is argued that there are suitable sites to allow for such growth. The

alternative sites will consolidate the village core creating a more nucleated settlement. The sites have no access or drainage issues and will open opportunities for the

future provision of community facilities on the west side of the road. The sites are a logical infill development between the A9 and the B9152. The inclusion of a

buffer zone will enhance the amenity of the village as a whole by blocking views and noise from the A9. These should be in line with the sites previously identified in

CNPA analysis of objection to Deposit Local Plan

The plan allocates sufficient land for housing development, and there is no need therefore to include additional land such as that suggested.

Proposed 1st Modification

no modifications proposed.

Response to 1st modification objections

No further representation received regarding this issue.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing land supply

Objector Ref Name Anne MacNamara, Planning Directorate

423k Scottish Government

Victoria Quay

Edinburgh

EH6 6QQ

Agent Name

Company Scottish Government

Summary of objection to Deposit Local Plan

The figures in Table 4 are inconsistent with the proposed numbers in the settlements section. This should be corrected.

CNPA analysis of objection to Deposit Local Plan

The calculations will be cross checked and any inconsistencies corrected.

Proposed 1st Modification

correct the inconsistencies.

Response to 1st modification objections

Transport Scotland acknowledges that some numbers within Table 4 have been amended, however, there is the caveat that these numbers are indicative only. The

target total for Aviemore from 2006 to 2016 remains at 300. Other than consented development, however, the proposals for Aviemore only provide a site area and

is not possible to relate these to the numbers in Table 4.

CNPA analysis of objections to 1st modifications

The comment is noted. The issues regarding access however are clarified in the proposals section relating to Aviemore as there are no additional sites proposed

other than those with an existing consent. No further modifications are therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply

Agent Name

Objector Ref Name Mairi Maciver

0251 Communities Scotland
Urquhart House
Beechwood Park
Inverness, IV2 3BW

Company Communities Scotland

Summary of objection to Deposit Local Plan

Table 3 should be clearer with columns labelled 0-5 years and 5-10 years, if this is what is meant.

CNPA analysis of objection to Deposit Local Plan

The titles used in the table will be reviewed to ensure clarity and easy understanding.

Proposed 1st Modification

Amend table 3 to clarify years referred to.

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the

consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref General - Housing land supply
Objector Ref Name James and Evelyn Sunley
056i 12 Lochnagar Way
Ballater
AB35 5PB

Agent Name

Company

Summary of objection to Deposit Local Plan

The housing allocations should recognise the important part of the economy played by retiring people, which could be used to assist affordable housing provision.

CNPA analysis of objection to Deposit Local Plan

Two background papers undertaken by consultants relating to population figures and affordable housing requirements are available on line. A summary of the approach taken will be appended to the Local Plan. Also amendments will be made to the introduction to the housing section to clarify the need for housing in the Park.

Proposed 1st Modification

Modifications to introduction to housing section to clarify need and approach to affordable housing. Also include appendix to add further detail. Add consultants reports to the web page for general viewing.

Response to 1st modification objections

The modified Park Plan does not address any of the objections that we made, we therefore continue our objections and ask you to think again.

CNPA analysis of objections to 1st modifications

The housing allocations are a response to housing needs within the National Park for all sectors of the community. The wording does not therefore highlight particular sectors or age ranges. The allocations do not in any way intend to stifle development or opportunities, rather the opposite is true, and the policies aim to ensure that a greater cross section of the population are able to get an appropriate house. No further amendment is therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply
Objector Ref Name Dinnet and Kinord Estate
438b Estate Office
Dinnet
Aboyne
AB34 5LL

Agent Name Claire Smith
Ryden
25 Albyn Place
Aberdeen
AB10 1YL
Company Dinnet and Kinord Estate

Summary of objection to Deposit Local Plan

The tables for housing land requirement in table 2 and 3 should be amended to include for the proposed allocation of 60 houses at Dinnet. Table 4 should also be

amended to make allowance for this allocation.

The local plan must provide enough effective land for market and affordable housing to meet the economic and social needs of local communities encouraging proactive growth. The land supply currently allocated fails to meet this objective. Para 5.37 acknowledges that there is not exact measure of how many houses will be required in the future, nor any accurate method of predicting how many houses will be built during the lifetime of the Local Plan. As the figure is therefore an estimate it is essential to build in a degree of flexibility to allow for uncertainty and in order to accommodate the highest growth scenario. Table 2 should therefore be increased to accommodate the level of housing considered necessary at Dinnet. That scale of housing is necessary to realise diversification opportunities in terms of new business and tourism related developments, which will contribute to the overall economic benefit of the National Park Area.

CNPA analysis of objection to Deposit Local Plan

Table 2 is based on work undertaken by consultants and available on line to consider the issue of need and housing land. The plan therefore allocates sufficient and adequate land for housing development.

Proposed 1st Modification

No modifications proposed. .

Response to 1st modification objections

In relation to representation 438b it is noted that there is no increase in the housing land calculation in Table 2. Similarly, no increase in housing land supply is provided in Table 3 in the Aberdeenshire Local Authority Area. Finally, no provision is made in Table 4 for housing in Dinnet. Therefore we would maintain our original objection in that regard.

CNPA analysis of objections to 1st modifications

The position regarding the allocation of land for housing remains and the need to change table 2 and 3 is not therefore accepted. No modifications are therefore proposed.

Objection maintained

Policy/site ref	General - Housing land supply	Agent Name
Objector Ref	Name Clare Jenkins	
057	6 Railway Cottages Newtonmore PH20 1AR	

Company

Summary of objection to Deposit Local Plan

The local plan should not be making any provision for the development of second homes which add little to the economy and exacerbate house price rises. The policies should promote sustainable communities and protect the special qualities of the Park.

CNPA analysis of objection to Deposit Local Plan

Amend table 2 to reflect issue of sectors of the market not controlled by the planning system.

Proposed 1st Modification

Clarify table 2.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The reference to second homes has been removed from table 2. CNPA continue to work with the government in regards the issue of second homes. The policies regarding affordable housing have been amended to ensure they are robust but realistic and we continue to work on economic modelling to ensure that affordable houses are achieved through this plan. No further modifications are therefore proposed.

Objection maintained

Policy/site ref	General - Housing land supply
Objector Ref	Name Housing and Property Services
471d	The Highland Council

Agent Name

Company The Highland Council

Summary of objection to Deposit Local Plan

Questions whether or not the land supply calculations are realistic given experience and past trends of land availability / economically deliverable land availability?

CNPA analysis of objection to Deposit Local Plan

The figures are based on studies undertaken by consultants which are available on line for information. The view is maintained that sufficient land is included to meet this need, and no additional land is therefore required.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

No further representation made from THC.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing land supply
Objector Ref Name Glenmore Properties Ltd
453b Viewfield Farm
Craigellachie
Aberlour
AB38 9QT

Agent Name Steve Crawford
Halliday Fraser Munro
8 Victoria Street
Aberdeen
AB10 1XB
Company Glenmore Properties Ltd

Summary of objection to Deposit Local Plan

The calculations provided in table 2 seem to be based on a very low growth scenario, a low flexibility percentage and does not seem to take into account the economic factors that would help the National Park achieve its aims and vision. Nor does it take into account the 132 units of affordable housing expected every year. The allocations should therefore be increased and the assumptions/background information made available to allow for a fuller debate.

CNPA analysis of objection to Deposit Local Plan

The figures are based on studies undertaken by consultants which are available on line for information. The view is maintained that sufficient land is included to meet this need, and no additional land is therefore required.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

No additional comments received regarding this issue.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing land supply
Objector Ref Name Housing and Property Services
471e The Highland Council

Agent Name

Company The Highland Council

Summary of objection to Deposit Local Plan

Comment made that as long as affordable housing investment does not drop significantly, there is likely to be subsidy available to support the 50% affordable housing target.

CNPA analysis of objection to Deposit Local Plan

Amend policy 21 to reflect work of the 3Dragons to ensure appropriate level is set.

Proposed 1st Modification

Confirm the reduction of % in policy 21 to 40%

Response to 1st modification objections

No further representation made from THC.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General - housing land supply
Objector Ref	Name Phillip John Swan
462b	30 Monaltrie Avenue
	Ballater
	AB35 5RX

Agent Name

Company

Summary of objection to Deposit Local Plan

The proposed number of new homes for Ballater is too high. Suggest 30-40 affordable housing units would be sufficient to serve legitimate needs. This could be achieved though infill and upgrading / conversion of existing properties. Overestimates of Ballater’s housing requirement could lead to lower than planned uptake hence properties being left empty and targets for vandalism, and secondly, there would not be enough employment for all the new homes, leading to increased number of long term unemployed.

Seek change of target from 250 to around 50 homes.

CNPA analysis of objection to Deposit Local Plan

The figures for housing supply are based on work undertaken to establish the need within the Park as a whole, and in the various parts thereof. The Local Plan is

obliged to make adequate provision for a 5 year period and table 4 is therefore only amended to correct previous mistakes in the figures.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

I wish to maintain my objections to the CNPA Deposit Plan.

CNPA analysis of objections to 1st modifications

The CNPA position regarding housing land allocation H1 in Ballater has not changed. No further modifications are therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply

Agent Name

Objector Ref Name Mrs Audrey MacKenzie

416i Aviemore and vicinity Community Council
Tamsduchus
10 Dalfaber Road
Aviemore,PH22 1PU

Company Aviemore and vicinity Community Council

Summary of objection to Deposit Local Plan

How were the figures calculated. The sources should be included so that they can be checked.

CNPA analysis of objection to Deposit Local Plan

The figures are based on work commissioned and this is available on line for information.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Representation to modifications does not raise this as an outstanding issue. Assume issue has been resolved.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - housing land supply

Agent Name John Wirght

Objector Ref Name The Clouds Partnership

398c Kinakyle
Aviemore

Strutt and Parker
28 Melville Street
Edinburgh
EH3 7HA

Company

Summary of objection to Deposit Local Plan

Table 4 is not in accordance with the Park Plan which encourages the proactive growth of the main settlements including Aviemore, and for the provision of land for

housing growth to meet the social and economic needs of other settlements and communities. The 0-5 year target for Aviemore is 250 and the

indicative target for

5-10 year is 50. The long term numbers are 0. The Local Plan does not therefore comply with SPP1 which requires an ongoing 5 year land supply for Aviemore during the lifetime of the Plan.

CNPA analysis of objection to Deposit Local Plan

The details of Table 4 and the background to housing land requirement calculations and land supply requirements are based on work undertaken by consultants to support the local plan. The view is maintained that sufficient land is included to meet this need, and no additional land is therefore required.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Please find enclosed completed objection forms for the above consultation. From the enclosed you will see that we have maintained our objections to the following:

Policy 1 - development in the Cairngorms National Park

Table 4 - phased land supply

S7 Settlement proposals - Aviemore

S7 Settlement proposals - An Camas Mor

CNPA analysis of objections to 1st modifications

The position regarding the allocation of land for housing as set out in Table 4 has not changed, and as such no modifications are proposed.

Objection maintained

Policy/site ref General - Housing land supply

Objector Ref	Name
452h	Dominic Fairlie Scotia Homes Ltd 23 Bridge Street Ellon AB41 9AA

Agent Name

Company Scotia Homes Ltd

Summary of objection to Deposit Local Plan

The plan should be less prescriptive in terms of the housing capacity for development in Ballater, to take into account the work done by the Princes Foundation,

which tries to balance good design, a mix of tenures, affordable housing and use of local materials. The proposed allocation in table 4 of 90 units in 0-5 years is

probably too small for the development to be viable. It is not possible to be precise (yet) as to the amount of development that may be required, but it would appear

that the desire for a well designed place and the high percentage of affordable housing will make a successful development difficult to deliver with essentially only 45

open market, relatively small, houses in the first 5 years of the plan. The table and the approach needs to be amended to become more flexible.

CNPA analysis of objection to Deposit Local Plan

The figures in table 4 are indicative. Options to vary from these will therefore be considered where appropriate.

Proposed 1st Modification

Table 4 add clarification that figures are indicative.

Response to 1st modification objections

No additional comments relating to this objection in the response to modifications.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing land supply

Agent Name

Objector Ref Name Simon Blackett

442c The Estate Office
4 The Keiloch
Braemar
A835 51W

Company Invercauld Estate

Summary of objection to Deposit Local Plan

Does the allocation in Table 3 for either the 5 or 10 year period provide adequate development to fund the necessary infrastructure and affordable housing.

CNPA analysis of objection to Deposit Local Plan

Clarify the timescales in table 3. confirm continued work with infrastructure providers to build sufficient capacity to meet demand.

Proposed 1st Modification

Modify table 3 to clarify timescales.

Response to 1st modification objections

OK I agree to withdraw any objections

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing land supply

Agent Name

Objector Ref Name Housing and Property Services

471c The Highland Council

Company The Highland Council

Summary of objection to Deposit Local Plan

Agree that future projections include projections for in-migration (as well as backlog) we can see no reason why workers from the EU Accession Countries are

specifically mentioned and are concerned that this may contribute to a negative view and anxiety by individuals and communities re. particular ethnic minority

CNPA analysis of objection to Deposit Local Plan

Confirm amendment will be made in line with comment.

Proposed 1st Modification

Replace with reference to in-migration.

Response to 1st modification objections

No further representation made from THC.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing land supply

Objector Ref Name Mairi Maciver

025k Communities Scotland
Urquhart House
Beechwood Park
Inverness, IV2 3BW

Agent Name

Company Communities Scotland

Summary of objection to Deposit Local Plan

The sourcing of the figures used in Table 2,3 and 4 and para 5.39 should be added. The wording in Table 2 should be amended to ".. to reflect both the backlog of

existing demand for housing from recent years, changes in household structure and inward migration." Regarding the need identified in Table 2, given Heriot-Watt's

suggestion that the net need for additional affordable housing is 132 units per year over the Plan period, it appears that insufficient land supply has been allocated to

meet this need. Land allocations in the Plan should be sufficient to meet all need.

CNPA analysis of objection to Deposit Local Plan

Include the work of the consultants on line for general viewing.

Amend table 2 to reflect comment.

Proposed 1st Modification

Reword table 2 part 1 to 'inward migration'.

Cross check allocations in table 4 against requirement in Table 2.

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref	General - Housing land supply	Agent Name
Objector Ref	Name Alison Hogg	
473q	Aberdeenshire Council, Planning and Development Woodhill House Westburn Road Aberdeen, AB16 5GB	Company Aberdeenshire Council

Summary of objection to Deposit Local Plan

There seems to be a discrepancy between the housing figures quoted for Ballater and Braemar in the housing land requirement and supply information.

CNPA analysis of objection to Deposit Local Plan

The tables will be revisited to ensure they are accurate, clear and easy to understand.

Proposed 1st Modification

Amend tables to ensure correct and clear.

Response to 1st modification objections

We write with reference to your letter dated 18th Sept 2008, concerning the above subject. As stated in our previous letter dated 5th October 2007, Aberdeenshire Council does not object to the deposit local plan. Our previous letter did include a number of comments that we recommend being taken forward in

the deposit local plan. These comments/recommendations should not be treated as objections to the plan.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General - housing land supply	Agent Name
Objector Ref	Name M T Collings	
395d	Birchfield Nethybridge PH25 3DD	

Company

Summary of objection to Deposit Local Plan

The provision for holiday/second homes in table 2 is inconsistent with provisions of low cost housing for local residents and should be removed from the table. Also

the provision for housing in strathspey is not met by an appropriate level of employment opportunities to encourage balanced communities.

The requirement for single house builders to make a contribution to affordable housing should also be removed as it removes the low cost of such a building option.

CNPA analysis of objection to Deposit Local Plan

Amend table 2 to reflect issue of sectors of the market not controlled by the planning system. The importance of affordable housing is maintained by the Authority

and the contribution made by all is therefore retained.

Proposed 1st Modification

modify table 2 to reflect issue of open market houses not controlled by the planning system.

Response to 1st modification objections

Thank you for your letter of 22nd May and enclosure. I am grateful for the consideration given to my earlier comments and agree with what you say. 5.38 the 2nd sentence needs to be in proper English. It is not entirely clear that Policy 21 is to be amended so as to avoid penalising self build low cost housing with

planning cash payments thereby discouraging the very development that needs to be encouraged. (para 4) perhaps it could become discretionary to CNPA by

amending 'will' in the 1st line to 'may'.

CNPA analysis of objections to 1st modifications

The policy is intended to apply to all developments, with provision of either affordable houses or a contribution to a fund which would eventually build homes

elsewhere. The financial mechanisms for this are being further developed at present. No modification is therefore proposed.

Objection maintained

Policy/site ref **General - Housing land supply**
Objector Ref **Name** Housing and Property Services
471a The Highland Council

Agent Name

Company The Highland Council

Summary of objection to Deposit Local Plan

Welcome the proposals in principle and think that they may make a significant contribution to meeting housing needs. Stress the need for realistic allocations of

economically deliverable land due to the possible impact of restrictive policies and also the consequent impact on house prices and housing need.

CNPA analysis of objection to Deposit Local Plan

Amend approach to reflect 3Dragons work.

Proposed 1st Modification

Amend policy 21 to reflect 3Dragons work.

Response to 1st modification objections

No further representation made from THC.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General - Housing land supply	Agent Name
Objector Ref	Name	
437o	Mrs Jane Angus	
	Darroch Den	
	Hawthorn Place	
	Ballater	
	AB35 5QH	Company

Summary of objection to Deposit Local Plan

The provision of mixed and affordable housing should be to meet the local demand and the levels proposed should not cause disruption to the character of

settlements and communities. Play and other open space must be included in the design of all development to meet everyone's needs. All proposals should be

discussed with planners before they submit applications. The design guide should emphasize the importance of insulation and energy use. The allocations should also

extend beyond 5 years to allow for a more planned approach.

CNPA analysis of objection to Deposit Local Plan

The National Park authority is committed to the creation and support of sustainable communities. Confirm in cpt 7 this issue.

Proposed 1st Modification

Introduction to cpt 7 confirm importance of sustainable communities.

Response to 1st modification objections

response received - need to confirm actual position regarding formality of objection

CNPA analysis of objections to 1st modifications

response received - need to confirm actual position regarding formality of objection

Policy/site ref	General - Housing land supply	Agent Name
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Objector Ref 037g
Name DW and IM Duncan
Pineacre
West Terrace
Kingussie
PH21 1HA

Company

Summary of objection to Deposit Local Plan

In para 5.27 it is ironic that the designation of the National Park has increased demand for housing which has added to the cost of housing.

CNPA analysis of objection to Deposit Local Plan

The policies in the plan and the allocations for housing development are intended to redress the balance in house prices and the need for affordable housing across the Park. Whilst the asking prices for open market houses cannot be controlled by the CNPA the policies are designed to impact particularly on affordable homes, and provide choice for those in need of such accommodation. No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

CNPA continue to collect and analyse information in relation to house prices and use this information in the production of policies for the future. No further modifications are therefore proposed.

Objection maintained

Policy/site ref General - Housing land supply

Agent Name

Objector Ref 025f
Name Mairi Maciver
Communities Scotland
Urquhart House
Beechwood Park
Inverness, IV2 3BW

Company Communities Scotland

Summary of objection to Deposit Local Plan

Welcome general approach to housing land provision and comments regarding access to affordable housing. Need to include a definition of "Local Need", as its current use is confusing and potentially excluding.

CNPA analysis of objection to Deposit Local Plan

Further clarification on terms used within the Plan, such as that of 'local need' will be added within the modifications.

Proposed 1st Modification

Include appendix to clarify issue on housing need.

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref	General - Housing land supply	Agent Name
Objector Ref	Name John Davison	
344	Locheil	
	Drumuille	
	Boat of Garten	
	PH24 3BX	Company

Summary of objection to Deposit Local Plan

Housing in Aviemore is not in accordance with the aims or intentions of the Park. Who are all the houses for? The proposals are completely unsustainable. And where will it end - looking at the other unspoilt villages in the Strath.

CNPA analysis of objection to Deposit Local Plan

The supply of housing land is based on studies undertaken to assess need and methods of provision in particular affordable housing. The policies regarding housing do however have to be read together with all the other policies of the plan, and the aims of the Park, and development will not therefore occur to the detriment of the natural resources of the Park or undermine its aims.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

The modifications don't alter any of my objections in the least.

So you poor girl floundering in a quagmire of regulation, changes of regulation, hopelessly lost. I have strong feelings of sympathy for you trying to deal with the morass.

Lets start with the guiding motto: where one gets to depends on where you start from'.

You start from an advanced position already and previously handling all sorts of situations, objections, arrangements, pressure groups, regulations, modifications, etc etc.

I start from Sam Galbraith's resolution at the beginning that CNP should be 'an icon of peace and beauty' ie that this Park should be built on the model of John Muir

and national parks in the States and Canada. (see the odd Simon King TV prog that epitomises the ideal.)

But now 'tis clear that the 2 national parks are nothing of the sort. 'Titular' parks perhaps, but pretend parks not real ones. So not to be taken seriously. (the icon

bit didn't last long as MOD insisted on aerial war games practised) Because:

A – the govt setting them up fudged the issue in not giving the Boards crystal clear directional aims that they should achieve. Instead of which – pass the buck – 4

very woolly worded aims that any Philadelphia lawyer could argue indefinitely about as to practical conclusions. The Board meets fortnightly to resolve planning

applications but there is no clear word in the 4 aims of how to deal with housing. So plan, local plan, modification to local plan ...

And hence you're landed wallowing in the morass like a hippopotamus.

B – the Board – what a ramshackle set up this is! Clear that govt has no high regard for it as allowed poaching of the chairman, the one person with a clear sense of

leadership as to where the Board should go. All of them were self promoted in arriving on the Board, so self seeking, nice little earners, floundering like yourself

under a regime of no clear leadership of where they are going and what the Park should be. So fudge, balancing acts, sops to lobbies, local plans, modifications to

local plans, in 5 yrs more local plans, industrial housing estates going up, Falkirk rulings.

So how can we take CNPA seriously?

Why don't you have a champagne, have a good weep, resign the job, write a really good book on the 'Follies of National Parks in Scotland' and join J K Rowland in

making a lot of money?

CNPA analysis of objections to 1st modifications

The CNPA position regarding allocations in Aviemore has not changed. It is therefore not proposed to add any second modification or amendment to these

allocations.

Objection maintained

Policy/site ref General - Housing land supply

Objector Ref **Name** Mrs Audrey MacKenzie
416h Aviemore and vicinity Community Council
 Tamsduchus
 10 Dalfaber Road
 Aviemore,PH22 1PU

Agent Name

Company Aviemore and vicinity Community Council

Summary of objection to Deposit Local Plan

How is demand calculated and how are current stock houses factored into this. Within B&S there is plenty of land allocated for development and demand is rising

but the population changes indicate that more small houses should be provided. In the case of affordable houses who is going to build them.

CNPA analysis of objection to Deposit Local Plan

The supply of housing land is based on studies undertaken to assess need and methods of provision in particular affordable housing. The policies regarding housing do however have to be read together with all the other policies of the plan, and the aims of the Park, and development will not therefore occur to the detriment of the natural resources of the Park or undermine its aims. The provision of affordable houses will be undertaken in part by everyone wanting to build houses within the Park - by way of a financial contribution or on site provision. The houses will be built by developers or other housing providers such as RSLs.

Proposed 1st Modification

- 5.27 include clarity on the impact 2nd homes have on the open market supply.
- 5.30 confirm the lack of land is in effective supply.
- 5.32 include clarity that the supply of smaller households will be an aspiration of the plan.
- 5.35 remove unsubstantiated comments regarding funding.

Response to 1st modification objections

Representation to modifications does not raise this as an outstanding issue. Assume issue has been resolved.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	General - Housing land supply	Agent Name
Objector Ref	Name James and Evelyn Sunley	
056m	12 Lochnagar Way	
	Ballater	
	AB35 5PB	

Company

Summary of objection to Deposit Local Plan

The number of affordable housing units needed in different parts of the Park are not comparable and the plan needs to identify how many LOCAL people need accommodation and employment.

CNPA analysis of objection to Deposit Local Plan

The supply of housing land is based on studies undertaken to assess need and methods of provision in particular affordable housing. CNPA also work closely with the housing authorities to ensure the most up to date information is available on local need. Also we continue to try and influence the use of housing waiting lists.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

The modified Park Plan does not address any of the objections that we made, we therefore continue our objections and ask you to think again.

CNPA analysis of objections to 1st modifications

The allocations reflect work undertaken to establish local need, and we continue to work closely with the local housing authorities to ensure the most up to date

information. The requirements for affordable housing have also been altered. No further amendment is therefore proposed.

Objection maintained

Policy/site ref **General - Housing land supply**

Objector Ref **Name** D Scobbie

458 22 Seafeld Court
 Grantown on Spey
 PH263LE

Agent Name

Company

Summary of objection to Deposit Local Plan

There should be a presumption in favour of retaining local people in the area who appreciate the cultural heritage of the Park. The proposed level of housing will do

nothing to support this and will destroy many of the Park's assets. What is driving the demand for the level of housing, there is little justification in the Plan. Where

figures are specifically mentioned for the provision of affordable houses in settlements the indication is a level of 25% (eg carrbridge), which implies a level of 75%

open market houses. Where are all these people going to come from, even allowing for a number of people within the area wishing to upgrade or move house.

There seems to be some justification for the need for affordable homes but none on the remainder of the houses to be provided as open market development.

The provision should not be for retirement/second/holiday/investment homes or homes for people commuting to Inverness, which add little to the economy. The

level of construction proposed will result in the need for out of out-of-area contractors, again putting nothing back into the local economy. Increases in population

will also attract chain and non local shops, again destroying the cultural heritage of the area. It will have an adverse impact on climate change despite other aims

mentioned in the Plan.

There is also an issue with infrastructure provision to support the level of construction, including water, waste, hospitals, schools etc. The intended levels of upgrade

do not seem to match with the projected level of demand.

Suggested modification –

- the housing allocation should be reconsidered, with construction of affordable houses for local people given priority, provided at a level over 50% until demand has been fulfilled. Houses should be built by local builders. The actual demand for such affordable housing should be assessed accurately to ensure provision is made in the correct areas. Where developments exceed 50 houses, developments should be staged over at least 5 years and should coincide with all essential infrastructure projects. Speculative building should be banned, and development should only be allowed where there is a demonstrable need. The cumulative impacts of the levels of development should also be assessed.

CNPA analysis of objection to Deposit Local Plan

The figures for housing supply are based on studies commissioned by the Park Authority to support the local plan. The policies in the plan and the allocations for housing development are intended to redress the balance in house prices and the need for affordable housing across the Park. Whilst the asking prices for open market houses cannot be controlled by the CNPA the policies are designed to impact particularly on affordable homes, and provide choice for those in need of such

accommodation. No modification considered necessary as a result of this representation.

Proposed 1st Modification

Amend policy 21 to reflect findings of 3Dragons.

Response to 1st modification objections

Thank you for the copy of the modified LP, much appreciated. Unfortunately, for domestic reasons, I have been unable to devote enough time to digest fully the implications of the amendments and I am unlikely to do so before the 30th. I appreciate that you too may be short of time so, if it helps, I would like to give my conditional approval to the proposed changes. It is certainly an improvement on the original. I would also like to take advantage of your offer and receive a full copy of the document.

One statement does puzzle me somewhat. The wording in the Grantown on Spey settlement proposal GS/H1 appears to imply that the application will be approved.

GS/ED1, however states that the caravan and camping site will be protected from adverse development. These statements are mutually incompatible. Which is

CNPA analysis of objections to 1st modifications

The wording does not imply that any application has been or will be approved. It merely highlights that there is an outstanding application on the site yet to be

determined and any housing which is developed will contribute to the housing needs of the area. No further action required.

Objection withdrawn

Policy/site ref	General - Housing land supply	Agent Name
Objector Ref	Name Planning, Environment and Development	
469e	The Highland Council	

Company The Highland Council

Summary of objection to Deposit Local Plan

The current allocations and phasing seems to rely on Scottish Water to rectify present water supply constraints which limit building to 500 homes, as well as serious

waste-water deficiencies at Grantown-on-Spey, Kingussie and Newtonmore, as part of its priorities to 2010. Subject to this, however the land allocation is reasonable

in numerical terms, allowing growth in all communities and an element of choice in most. However it is the release of land for development and its attractiveness to

the market which will bear most significantly on local prospects. Concern has been expressed over the reliance on An Camas Mor and reassurances

that this land

will become available would be welcomed. Careful monitoring of the take-up of land for development consistent with the Council's Housing Land Audit will be needed.

In addition it would be useful to identify economic development land in strategic positions. Particular reference is made to Aviemore, An Camas Mor and

Kingussie/Newtonmore axes. A business land bank is important in responding positively to investment interest as it arises. The choice of land for other uses in these

locations in particular, gives ample scope for suitable initiatives whether bespoke land allocations or provisions to integrate economic development with other

CNPA analysis of objection to Deposit Local Plan

The comments in regard to Scottish Water are noted. The land allocations do rely on the effectiveness of An Camas Mor and further information regarding the

timescales for its commencement will be sought from the landowner. In regard to the comments on economic development land, further work is being undertaken to

take such land allocations forward, in particular with the Chamber of Commerce and Business sector.

Proposed 1st Modification

Identify employment land within proposals maps.

Response to 1st modification objections

We note that CNPA has responded by moving in the right direction with a closer link between housing and economic development provisions to provide a more

complete, sustainable strategy for development and that is welcomed. In particular we note that CNPA has now sought to identify a more comprehensive portfolio of

sites for economic development. The Plan could still make more explicit reference to the particular strategic infrastructure challenges, including the Scottish Water

matters previously referred to by the Council, and it is suggested that a general reference could also be included in the footnote to Table 4.

Subject to the inclusion of such references and on the basis of the Local Plan First Modifications the Council will be content and will not maintain its earlier

activities. For development management purposes, such provisions enable restraint of damaging piecemeal pressures. representation.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Housing land supply

Agent Name

Objector Ref 448f
Name The Cairngorms Campaign
PO Box 10037
Alford
AB33 BWZ

Company The Cairngorms Campaign

Summary of objection to Deposit Local Plan

The approach is incompatible with the 1st, 2nd and 4th aims of the park. The approach seems to focus heavily on the provision of housing for holiday homes (table

2) which add little to the economy or the sense of community, whereas it should be focused on providing housing for local people. Also the scale of development

proposed will have an adverse impact on the natural resources of the Park, eg semi natural woodlands and water resources. Finally the carbon footprint of such an approach is totally inappropriate.

CNPA analysis of objection to Deposit Local Plan

The supply of housing land is based on studies undertaken to assess need and methods of provision in particular affordable housing. The policies regarding housing

do however have to be read together with all the other policies of the plan, and the aims of the Park, and development will not therefore occur to the detriment of

the natural resources of the Park or undermine its aims.

Proposed 1st Modification

Amend table 2 to clarify position of sectors of the market not controlled by the planning system.

Response to 1st modification objections

Living and Working in the Park – Housing

The shortage of affordable housing for residents of the Park is easily the most important social issue facing the Park authority and we strongly support efforts by the

authority to solve this problem which, while it is widespread in rural Scotland, is almost certainly worse within the Park area due to the natural attractions of the

Park. However, we maintain our objection to the scale of holiday home construction envisaged within the Local Plan, particularly within Badenoch and Strathspey.

The statement by Badenoch and Strathspey Conservation Group on the previous draft of the plan seems to us to bring out the issue clearly:-

“Second Homes

The most unacceptable feature of the proposals on housing is the proposed increase in provision for second homes (Table 2, page 43), which betrays the driving

influence behind the housing allocation figures. Because “demand” is expected to be higher, therefore supply must be increased. This is “predict and provide”, the

same market forces housing provision that has caused such problems for the natural and cultural heritage, and failed to address local needs, during recent decades.

This proposal flies in the face of repeated expressions of concern by local people about the over-supply of second/holiday homes in the Park, briefly

and inadequately

reported in the Consultation Report July 2007, para. 3.21, thus: "The ongoing issue of holiday and second homes was also raised as adding to the problem."

In addition to the detrimental effects upon the natural and cultural heritage of the Park, this proposal will also add to its unnecessary carbon (and other resource)

footprint. House building is a carbon and resource intensive activity and one must question why the CNPA should be encouraging the building of houses for people

who already have a dwelling elsewhere, whilst claiming that it is attempting to minimise its own carbon footprint."

This is a particularly important objection since the plan states it aims to achieve socially and economically sustainable communities, and there is ample research into

tourism development abroad that excessive development of holiday homes damages communities both socially and economically, especially in tourist areas.

Accepting large scale holiday home construction is simply not compatible with the aims of the Park.

CNPA analysis of objections to 1st modifications

The issue of second and holiday homes continues to cause a problem within the housing market and the impact these have on the availability of affordable homes.

However the Planning Authority cannot control this sector of open market development and no modification is therefore proposed.

Objection maintained

Policy/site ref	General - Housing land supply	Agent Name	Malloy Smith Associates
Objector Ref	Name		92 Main Road
387	John M Smith		Langbank
	92 Main Road		Renfrewshire
	Langbank		
	Renfrewshire		

Company

Summary of objection to Deposit Local Plan

Two additional sites should be included as housing allocation within Aviemore to ensure an effective land supply and integrate new housing with existing

communities. The sites are accessible and whilst in the floodplain, development which would mitigate flood risk in accordance with SPP7. Details are provided on

how this would be achieved.

CNPA analysis of objection to Deposit Local Plan

Table 2 is based on work undertaken by consultants and available on line to consider the issue of need and housing land. The plan allocates sufficient land for

housing development, and there is no need therefore to include additional land such as that suggested.

Proposed 1st Modification

No modifications proposed.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The position regarding the allocation of housing land within Aviemore and in general terms has not changed. As such no modifications are proposed.

Objection maintained

Policy/site ref **General - housing land supply**

Objector Ref **Name** Phillip John Swan

462a 30 Monaltrie Avenue

Ballater

AB35 5RX

Agent Name

Company

Summary of objection to Deposit Local Plan

The basis of the total housing requirement for the park seems excessive, being more than 70% above the best available realistic estimate. Plan should revert to the

household projection figure of 950 units as a realistic total requirement.

CNPA analysis of objection to Deposit Local Plan

The housing supply figures are based on work commissioned by the CNPA and this is on line for information. The view is therefore maintained that the plan

includes the correct amount of land for the need.

Proposed 1st Modification

No modifcaiton proposed.

Response to 1st modification objections

I wish to maintain my objections to the CNPA Deposit Plan.

CNPA analysis of objections to 1st modifications

The CNPA position regarding housing land supply and allocation of sites has not changed. No further modifications are therefore proposed.

Objection maintained

Policy/site ref **General - Housing land supply**

Objector Ref **Name** Planning, Environment and Development

469d The Highland Council

Agent Name

Summary of objection to Deposit Local Plan

The regeneration of communities should be founded on a balanced approach to growth in population and economy. There would be merit in a fuller explanation of

the key forecasts and the implications for the economy. There should be a clear understanding about such key forecasts and their implications, since population

change and economic prosperity will depend on the level of in-migration sustained and in large part, the employment and housing opportunities which support it. A

certain level of growth is needed to sustain the core workforce at the present level and would depend on access for residents of the Park to additional jobs, whether

or not these are located within or outwith the Park.

The local plan (and park plan) has been amended to reflect the importance of proximity of Inverness, the Inner Moray Firth and the A96 growth corridor as a driver

for economic regeneration. The Park should build on established commuter transport services, share in prosperity and derive from it a contribution to long term

sustainability. This economic dimension should be positively promoted in support of land allocations and house-building aspirations. It is essential also that the

opportunity to promote a position of economic advantage for local communities, is fully embraced.

With regard to Table 2, in terms of building in a degree of flexibility into projections for growth and demand for housing, the Council would normally apply a 25%

"flexibility" component, raising the land capacity requirement to the equivalent of 1,780 units. Since there has been a measure of uncertainty about the deliverability

of housing land in the past, an adjustment to the Plan is recommended in this respect. The reference to "EU Accession Countries" is not appropriate in this context.

CNPA analysis of objection to Deposit Local Plan

A detailed paper outlining the background to the housing land requirement calculations and land supply requirements will be prepared to clarify the rationale behind

the housing policies. Links will be made within this to the need for a more strategic approach to employment and sustainable communities. Within this reference

will be made to the relationship between the provision of new housing within the Park and the National Park Plan and aims of the Park. Further explanation will also

be required to justify the allowance made in table 2 for second homes and vacant properties, and detail how the approach taken will benefit local people. On

completion of this paper, information will be circulated to all those who made representation on this issue, and detailed consultation undertaken to assess the level of

continued objection, which may result in a modification to the calculations and allocations made. In regard to the comments on economic development land,

further work is being undertaken to take such land allocations forward, in particular with the Chamber of Commerce and Business sector.

Proposed 1st Modification

Amend % to 25 and 40 to reflect national benchmark and findings of 3Dragons.
Remove reference in table 2 to EU countries.

Response to 1st modification objections

We note that CNPA has responded by undertaking significant work on key forecasts setting out the basis on which the Plan is founded and has made a number of modifications in line with our suggestions.

On the basis of the Local Plan First Modifications the Council is content and does not maintain its earlier representation.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Implementation

Agent Name

Objector Ref Name Mrs Audrey MacKenzie
416a Aviemore and vicinity Community Council
 Tamsduchus
 10 Dalfaber Road
 Aviemore,PH22 1PU

Company Aviemore and vicinity Community Council

Summary of objection to Deposit Local Plan

The wording should be clear and indicate that developers must always speak with planning officials before submitting an application.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to clarify terminology and phrasing used. Further clarity will also be included in the Introduction on how to use the Plan and the importance of pre application discussions.

Proposed 1st Modification

Amend revised para 1.21 to highlight need for preapplication discussions.

Response to 1st modification objections

Representation to modifications does not raise this as an outstanding issue. Assume issue has been resolved.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Introduction

Agent Name

Objector Ref **Name** Nicola Abrams
399s SEPA
 Greyhope House
 Greyhope Road
 Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan
CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

SEPA objects to the wording of paragraph 1.22.

Reason for objection: SEPA considers that the Local Plan should highlight Drainage Impact Assessments (DIA) as supporting information which may be required in support of development.

Suggested Modification: SEPA requests that reference is made in the list of supporting information to Drainage Impact Assessment (DIA)

CNPA analysis of objections to 1st modifications

The reference to DIA will be included in 4.80 policy 13. No further modification is proposed in addition to this.

Objection maintained

Policy/site ref **General - Introduction**

Agent Name

Objector Ref **Name** James Hall
371a Craigdhu
 Braeside Place
 Newtonmore
 PH20 1DW

Company

Summary of objection to Deposit Local Plan

The consultation process is flawed and does not take into account the views of Newtonmore and Vicinity Community Council.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Representation has been received separately from the Community Council referred to and the representations made by them will be analysed full in connection with their submission. No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modification needed

Response to 1st modification objections

Since there is no reference to community councils at all in the Local Plan, how will you implement the Sustainable Communities Strategic Objectives outlined in the

National Plan, which includes the statement that "Communities should be supported in developing effective community councils,..." (5.2.2 para d), as well as the

objective to promote community involvement (para e)?

CNPA analysis of objections to 1st modifications

The local plan has been drawn up through extensive community engagement and consultation and the introduction, although not referring to particular parties or

organisations does refer to partners, consultees, a wide range of organisations and groups, etc. all of which are key to the success of the Plan. The Park Plan also the

strategic context for the local plan. The planning process will continue to seek the views of community councils and continue to seek their engagement. However

the view has been taken not to highlight any particular group or body. No modification is therefore proposed.

Objection maintained

Policy/site ref General - Introduction

Objector Ref Name John Anderson

463zb Kinraig and Vicinity Community Council

Goldenacre, Dunachton Road

Kinraig, Kingussie

PH21 1QE

Agent Name

Company Kinraig and Vicinity Community Council

Summary of objection to Deposit Local Plan

CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

1.2 We support the four aims of the Park so long as they are not used to the disadvantage of reasonable development, accepting that the Natural Sites, Protected

Species and Biodiversity are all matters of great interest and value to all who live in or visit the Park.

However we note that the 1st aim 'to conserve and enhance the natural and cultural heritage of the area' takes precedence over the other three, where there is

conflict. We are concerned that this results in the document over emphasising the 'natural' at the expense of the 'cultural' with the result that the things that matter

to people living and working in the area are liable to take second place to the conservation 'big drums' to the detriment of the Park's economic welfare.

The language used continues to be strange to lay people 'bland and wishy washy' with insufficient 'plain English' resulting in the guidance offered being insufficiently

sharp to ensure consistency of application, particularly where cases are being 'judged on their merits' (outwith settlement boundaries for example).

Farming – there is very little said about farming but the local plan must have greater regard to the needs of future generations. This should imply a 'presumption

against' development on the very limited arable land resource within the Park.

We are very much opposed to the use of 'Section 75' regulations for small businesses with impact on 'change of use' wishes as and when

circumstances change.

We note that 'conditions' are also often applied to planning approvals. Please clarify the difference between the two and ensure that both may be taken back for re-

consideration where appropriate such as when a 'change of use' is requested. If there is little difference in practical outcome, then we suggest that 'conditions' should

be adequate and that 'section 75' designations be abandoned.

CNPA analysis of objections to 1st modifications

The general comments are noted. The plan does endeavour to give clear guidance in regard to planning issues, and it is often difficult to ensure wording is clear and

also easy to read. In regard to section 75 agreements, it is normal for planning authorities to use legal agreements and conditions to secure development approvals.

Conditions are linked to planning permissions whereas section 75 agreements are legal documents which although associated with planning permissions, are a

separate legal document. Where possible conditions are used as they are a faster method of ensuring permissions can be issues.

No further modifications are proposed in light of the comments.

Objection maintained

Policy/site ref **General - Introduction**

Objector Ref **Name** Muir Homes Ltd
038b

Agent Name Malcolm Smith

TMS Planning and Development Services
Balclune, 32 Clune Road
Gowkhall, Fife
KY12 9NZ

Company

Summary of objection to Deposit Local Plan

CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

Paragraph 1.6 - This paragraph states that 'The Local Plan provides a development framework for the whole of the Park, bringing together areas where development

proposals were previously considered under four separate local authority plans. It creates a clear and consistent approach to guide development proposals and

opportunities within the National Park, while allowing an appropriate level of flexibility to ensure that the Plan can be reactive and accommodate good ideas which

further the aims of the Park. Its duration for up to five years from adoption identifies strategic sites and land for some development to provide certainty about the use

of land in the medium to longer term beyond the next five years'.

The underlying ethos of this statement appears fine on the surface. It is only when you consider it is association with a number of Policies that the inherent contradictions can be seen. The policy framework, and in particular Policies 1, 4, 6, 7, 14 and the various other local plan paragraphs identified within this statement provides no certainty about land use development within the Park. Again, the status of allocated sites is questioned as is the clear and consistent approach to guide development proposals which is clearly absent in respect of allocated sites wherein the principle of development in the first instance appears to remain "up for grabs".

Paragraph 1.20 - This paragraph states that "The planning authorities will use conditions and legal agreements, produced at the expense of the applicant, to ensure that consented developments comply with the Plan's policies. In carrying out its planning function the National Park Authority will act in line with its Codes of Conduct, and ensure that all developments are carried out in line with its obligations created through various legislation such as the Nature Conservation (Scotland) Act 2004 which places a duty to further the conservation of biodiversity in carrying out its function".

This statement is too vague and the implications of compliance are unclear. The implication here is that all development must further the conservation of biodiversity. Built development will inevitably require the use of Greenfield land resources and therefore to some extent will impact adversely on biodiversity. Development within the Park has many functions including the requirement to promote economic and social development. The plan requires to recognise these impacts and to plan for them.

How to Use the Local Plan - Everyone applying for planning permission must look at all of the policies in the Plan. Policies are not cross referenced. You must therefore make sure your proposal complies with all of the policies that are relevant. The settlement maps identify sites proposed for particular types of development. In considering options for these sites, proposals must comply with all relevant policies, as well as working to achieve the four aims of the Park.

The local plan needs to provide certainty in order that investments decisions can be made with a degree of confidence in order to ensure that beneficial development within the Park can be delivered. This is the only means by which the National Park Outcomes related to supporting sustainable communities and making housing more affordable and sustainable can be delivered. There is a need to recognise the balance between development and the environment and to ensure that the balance is such as not to fail the Parks' communities by failing to deliver the type and level of development required. As presently written there

appear little

acceptance of the status of allocated sites over and above any other area. There is no dispute that development should be carried out in such a manner in order to

minimise its environmental impacts while delivering beneficial development for the community. The approach adopted fails to accept this and indeed where is the

certainty related to land use allocations (reasonably caveated as indicated)?

CNPA analysis of objections to 1st modifications

para 1.6 - The representation considers that the plan does not give sufficient guidance to developers and as such the policies are contradictory with this paragraph.

However this view is not considered correct, and the modifications as agreed by the Board are considered to give the appropriate level of guidance. No second

modification or amendment is therefore proposed.

Para 1.20 - this paragraph is intended to highlight the fact that planning authorities can, through their planning function, use conditions and legal agreements. The

cases when these may be used is further expanded in the relevant policies throughout the plan. Also the reference to the Nature Conservation (Scotland) Act 2004

is given as an example, and not the only example of other legislation and obligations which exist. No second modifications or amendments are therefore proposed.

How to use the Plan - The paragraph explains that cross referencing has not been included and applicants must therefore look at all relevant policies. This is the

case in all local plans, and is part of the planning process, where developers must look not only at proposals, allocations and policies, but also government policy and

guidance, and other guidance from agencies, european regulations etc. The paragraph is included to assist in this process and ensure that applicants are clear that

Objection maintained

Policy/site ref **General - layout**

Objector Ref **Name** Amanda Howard

414d Development Services

The Moray Council

High Street

Elgin, IV30 1BX

Agent Name

Company The Moray Council

Summary of objection to Deposit Local Plan

The layout should use clearer sub-headings and topics began on new pages.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to clarify terminology and phrasing used, and ensure the layout is clear and easy to follow.

Proposed 1st Modification

Modifications throughout to retain consistent layout.

Response to 1st modification objections

We wish to withdraw our 'general' objection to the layout of the as this has been improved and made more user-friendly.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General - layout**

Objector Ref **Name** Jane Angus

091c Ballater & Crathie Community Council
 Darroch Den
 Hawthorn Place, Ballater
 AB35 5QH

Agent Name

Company Ballater & Crathie Community Council

Summary of objection to Deposit Local Plan

The approach to create policies which apply across the park does not allow for flexibility within individual communities.

CNPA analysis of objection to Deposit Local Plan

The approach taken attempts to create a clear planning framework for the Park area as a whole. The wording of individual policies should provide sufficient

flexibility to account for the needs of individual communities, but further clarity will be included as a proposed modification within the Introduction Section to further

explain how to use the Plan and its policies and proposals.

Proposed 1st Modification

Amend 1.5 purpose of Plan to explain the role of the Plan across the Park.

Response to 1st modification objections

The Ballater and Crathie Community Council wish to continue our objections to the proposed Local Plan.

CNPA analysis of objections to 1st modifications

The National Park is required to produce a local plan for the whole of the National Park. In particular regard to Ballater it has identified the central shopping area,

additional employment land, and open space which contributes to the settlement. No further amendment is therefore proposed.

Objection maintained

Policy/site ref **General - layout**

Objector Ref **Name** Anne MacNamara, Planning Directorate

Agent Name

422a

Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

Company Scottish Government

Summary of objection to Deposit Local Plan

Care should be taken in the presentation of the document to ensure it is easy to read. A consistent approach should be taken when referring to government advice and guidance.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to clarify terminology and phrasing used. A review of the Introduction and Context sections are necessary to clarify the context for the Local Plan and its relationship with other documents, including local, regional and national, and also to expand on the thinking behind the policies as drafted.

Proposed 1st Modification

Throughout the document include consistent approach to referencing other documents, including govt advice and guidance - name and no. of document

Response to 1st modification objections

As outlined in previous comments, it would be useful to set out more clearly on a Plan-wide basis which settlements have sites allocated in the Plan. As a minimum, the National Grid lines and numbers should be added to the individual settlement maps, as required by the 1983 Structure and Local Plan Regulations

CNPA analysis of objections to 1st modifications

The grid references will be added to the proposals maps for clarity.

Objection maintained

Policy/site ref General - layout

Agent Name

Objector Ref Name Mrs Sally Spencer
017g Pitagowan House
Newtonmore
Inverness-shire
PH20 1BS

Company

Summary of objection to Deposit Local Plan

The 4 aims of the Park should be highlighted clearly so that it is clear that they are taken into consideration in the determination of any planning application.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to clarify terminology and phrasing used. A review of the Introduction and Context sections is

necessary to

clarify the context for the Local Plan and its relationship with other documents, the Park Plan, and also to expand on the thinking behind the policies as drafted.

Proposed 1st Modification

Amend introduction to clarify link to 4 aims in para 1.2 and reinforce links through revised policy 1.

Response to 1st modification objections

response received - need to confirm actual position regarding formality of objection

CNPA analysis of objections to 1st modifications

response received - need to confirm actual position regarding formality of objection

Policy/site ref	General - layout	Agent Name
Objector Ref 025a	Name Mairi Maciver Communities Scotland Urquhart House Beechwood Park Inverness, IV2 3BW	Company Communities Scotland

Summary of objection to Deposit Local Plan

Welcome the shorter version of the plan. Need to include a statement on the CNPA's policy on complaints handling.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to clarify such procedures or refer to CNPA wider policies which affect the Authority as a whole, rather than the Planning Section.

Proposed 1st Modification

Include reference after 1.20 regarding use of plan in regard to other CNPA policies including approach to take if there are complaints.

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref	General - Links to other plans	Agent Name
Objector Ref	Name Anne MacNamara, Planning Directorate	

422f

Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

Company Scottish Government

Summary of objection to Deposit Local Plan

para 2.4,2.5 - the link to structure plans should be clarified.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to clarify terminology and phrasing used. A review of the Introduction and Context sections is necessary to

clarify the context for the Local Plan and its relationship with other documents including Structure Plans

Proposed 1st Modification

2.7 include ref to the 4 LAs and their dates for clarity, and their role in light of the new planning act.

Response to 1st modification objections

Paragraph 2.7, second sentence, is incorrect. Structure Plans will not be entirely "phased out", but will be replaced by Strategic Development Plans for the four City

Regions. Local Development Plans will need to provide both vision and detailed policy outwith these areas.

CNPA analysis of objections to 1st modifications

Para 2.7 will be redrafted to clarify the position regarding Strategic Development Plans and Local Development Plans.

Proposed 2nd modifications

Objection maintained

Policy/site ref **General - Links to other plans**

Objector Ref **Name** Dr A M Jones

400c Badenoch and Strathspey Conservation Group

Fiodhag

Nethybridge

PH25 3DJ

Agent Name

Company Badenoch and Strathspey Conservation Group

Summary of objection to Deposit Local Plan

Para 2.10 - The delivery of the Park Plan objectives also relies on securing better information on the natural heritage resource. (Refer to 'Towards a Strategy for

Scotland's Biodiversity: BiodiversityMatters!')

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Reference to other plans and strategies will be expanded to clarify the position.

Proposed 1st Modification

2.11 include need to support and encourage research and information.

Response to 1st modification objections

No additional representation included regarding this issue.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Links to other plans

Objector Ref Name Ian Francis

424a RSPB Scotland
East Regional Office
10 Albyn Terrace
Aberdeen, AB10 1YP

Agent Name

Company RSPB Scotland

Summary of objection to Deposit Local Plan

Para 1.2 - The introduction should mention from the outset the requirements of the National Parks Act section 9(6) relating to the 1st aim of the Park.

Para 1.11 – It is also necessary to consider the need for an appropriate assessment

Also the text should include reference to the duty on CNPA to further the conservation of biodiversity under the Nature Conservation (Scotland) Act 2004.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to clarify the relationship of the Local Plan and the aims of the Park, as currently mentioned in Policy 1, and the

Biodiversity duty as mentioned in Policy 6. Appropriate Assessment will be undertaken to inform the development of policies and proposals in line with the

corresponding legislation and before any modifications are finalised and published for consultation.

Proposed 1st Modification

1.3 include clear link with Policy 1 to reinforce role of the 1st Aim.

1.20 clarify duty placed on CNPA under nature conservation act to further the conservation of biodiversity

Work on Appropriate assessment continues with the help of SNH staff.

Response to 1st modification objections

Chapter 1 Introduction

Para 1.2 and 1.3 the four aims of the National Park. We still recommend that it should be mentioned here that section 9 (6) of the National Parks (Scotland) Act

requires that where it appears to the National Park Authority that there is conflict between the aims, then greater weight should be given to the first aim

(conservation of natural and cultural heritage). This was stated clearly at an early stage of the draft plan. Although the issue is covered elsewhere in the Plan (para

3.3 and 3.4) this caveat known as the Sandford Principle was inserted by the Scottish Parliament for a purpose and we believe that it should always be presented

along with the Park aims. We recommend that it should be reinserted here.

CNPA analysis of objections to 1st modifications

The wording of the policy has been drafted to reflect the aims of the Park and the special qualities of the Park, and the responsibilities of the Park Authority. The proposed change would not be in accordance with this and no further modification is therefore proposed.

Objection maintained

Policy/site ref General - Links to other plans
Objector Ref Name Scottish and Southern Energy Plc
447j

Agent Name Jones Lang Lasalle
7 Exchange Crescent
Conference Square
Edinburgh
EH3 8LL

Company Scottish and Southern Energy Plc

Summary of objection to Deposit Local Plan

The concluding submission refers to the need to comply with SPP1, and the requirement of the plan to include specific locational guidance for development, and also define the special qualities including spatial guidance to support this.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications within the Context section will endeavour to clarify the relationship of the Local Plan and its relationship with other documents including national planning guidance. Further cross reference to the requirements of the SPP series will be made to ensure the Plan complies with the latest Scottish Government thinking.

Proposed 1st Modification

Include better link in introduction to the special qualities stated in the National Park Plan.
Include additional detail on sites and settlements for clarity. Throughout include reference to national guidance where appropriate.

Response to 1st modification objections

The special qualities of the National Park have still not been clearly defined and there is still a lack of specific locational guidance for electricity infrastructure development. It is therefore considered that the modifications do not comply with elements of SPP1.

CNPA analysis of objections to 1st modifications

The comment is noted, however there is considered to be adequate guidance and direction to comply with SPP1 and whilst a number of second modifications are proposed, none are directly proposed as a result of this representation.

Objection maintained

Policy/site ref **General - Links to other plans**
Objector Ref **Name** D R MacKellar
430b Cairngorms Chamber of Commerce
PO Box 15
Kingussie
PH21 1WF

Agent Name

Company Cairngorms Chamber of Commerce

Summary of objection to Deposit Local Plan

Para 2.10 - The Plan should refer to the other plans, policies and local solutions that are already in existence thus demonstrating continuity of approach and also the way it relates to future plans and strategies. There is concern that the approach taken in certain circumstance, for example, use of waiting lists, may actually contradict National strategies and policies. If this is the case the plan may be the subject of the law of unintended consequence.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities and the protection of the special qualities of the area as identified as a National Park. A review of the Introduction and Context sections is necessary to clarify and refine the vision for the Plan and set out clearly the strategic background to the policies drafted. Similarly further clarification is needed in the introduction section to each Chapter to state clearly the justification for the approach taken and the aspirations sought as a result of implementation of the polices.

Proposed 1st Modification

2.11-2.13 add role LP plays in delivering objectives of other documents eg from LAs for the delivery of things like housing.

Response to 1st modification objections

Objection withdrawn

CNPA analysis of objections to 1st modifications

No further action.

Objection withdrawn

Policy/site ref **General - Links to other plans**
Objector Ref **Name** Rona Main
425a(f) Scottish Enterprise Grampian
27 Albyn Place
Aberdeen
AB10 1DB

Agent Name Steve Crawford
Halliday Fraser Munro
8 Victoria Street
Aberdeen
AB10 1XB

Company Scottish Enterprise Grampian

Summary of objection to Deposit Local Plan

A number of comments have been made in regard to the representation made on the Draft Plan. The comments which remain relevant are carried through in the

specific representations made on individual policies and proposals.

CNPA analysis of objection to Deposit Local Plan

The comments are noted but relate to the draft plan. Specific comments on current policies are considered under those representations. No modification

considered necessary as a result of this representation.

Proposed 1st Modification

Modifications made in line with particular policies as listed.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The comments regarding the consultation draft plan are noted. The position regarding these has not changed and no further modifications are therefore proposed.

Objection maintained

Policy/site ref	General - Links to other plans	Agent Name
Objector Ref	Name	
443a	North East Mountain Trust	
	Burnhead Farmhouse	
	Raemoir	
	Banchory	
	AB31 4EB	

Company North East Mountain Trust

Summary of objection to Deposit Local Plan

The wording of some policies needs to be strengthened if they are to be effective. Within the broader context of the Plan there is a need to take more cognisance of

other international conventions etc, including the European Landscape Convention and the UK Biodiversity Action Plan (1994).

Other broader issues that need taken into account include Climate Change and the carbon footprint of developments.

It is also essential that careful note is taken of the insights derived from research into tourism development in other areas, such as the Alps and actual experience of

such development, currently lacking.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities and the protection of the

special qualities of the area as identified as a National Park. A review of the Introduction and Context sections is necessary to clarify and refine the vision for the

Plan and set out clearly the strategic background to the policies drafted. Similarly further clarification is needed in the introduction section to each Chapter to state

clearly the justification for the approach taken and the aspirations sought as a result of implementation of the polices. Reference to current successes should also be

included where relevant.

Proposed 1st Modification

Modifications in policies 18 and 19 to clarify issue of climate change and carbon footprints.

2.1 - 2.3 expand national context to clarify national importance of park designation and lessons to be learned from other NPs in UK and abroad

2.11-2.13 add reference to international conventions and UK Biodiversity Action Plan.

Objection maintained

Policy/site ref General - Links to other plans

Objector Ref Name D R MacKellar
430c Cairngorms Chamber of Commerce
 PO Box 15
 Kingussie
 PH21 1WF

Agent Name

Company Cairngorms Chamber of Commerce

Summary of objection to Deposit Local Plan

Para 2.6-2.11 - The plan must not only develop a co-ordinated set of policies to draw together the current fragmented situation, but also work within the wider

emerging context of the National Park. This wider dynamic must be clearly understood and presented as the strategic context for the Plan. This is lacking. The plan

does not look at what is currently working and build on that, or explain why it has been discounted. E.g. what part will the part play in achieving growth targets for

Highland area set out in the Highland Community Plan or in Visit Scotland's targets of growing the Tourism contribution. Comment must be made on how

important the value of the National Park is to the local, regional and national Economy, in particular the local economy which is dependent on this.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities and the protection of the

special qualities of the area as identified as a National Park. A review of the Introduction and Context sections is necessary to clarify and refine the vision for the

Plan and set out clearly the strategic background to the policies drafted. Similarly further clarification is needed in the introduction section to each Chapter to state

clearly the justification for the approach taken and the aspirations sought as a result of implementation of the polices. Reference to current successes should also be

included where relevant.

Proposed 1st Modification

2.14 revise vision and guiding principles.

Response to 1st modification objections

Objection withdrawn

CNPA analysis of objections to 1st modifications

No further action.

Objection withdrawn

Policy/site ref General - Links to Park Plan

Objector Ref Name Dr A M Jones

400b Badenoch and Strathspey Conservation Group
Fiodhag
Nethybridge
PH25 3DJ

Agent Name

Company Badenoch and Strathspey Conservation Group

Summary of objection to Deposit Local Plan

Para 2.6 - Over emphasis on 'partnership' working, and lack of regard to working in accordance with good governance. The wording should be revised to be more readily intelligible.

Para 2.7 - Concerned at the approach to management that views 'long term' as 25 years. 'Long term' should be omitted from 1st sentence. Concerned that all outcomes should be viewed as 'intended' outcomes. 'Intended' should be added before 'outcomes' in 1st bullet point.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. However the National Park Authority is fully committed to partnership working as the best way of taking forward the delivery of both the National Park Plan and the Local Plan.

Proposed 1st Modification

2.8 add reference to working in line with standards of good governance as well as partnership working.

2.10 include 'aspirational'.

Response to 1st modification objections

2.10 2nd bullet point. We recommend inserting 'Park' before 'Plan' to clarify which Plan is being referred to.

CNPA analysis of objections to 1st modifications

2.10 - the word Park will be added. This will be included in the 2nd modifications to the local plan.

Objection maintained

Policy/site ref General - Links to Park Plan

Objector Ref Name Robert Maund

434a Scottish Council for National Parks
The Barony
2 Glebe Road

Agent Name

Summary of objection to Deposit Local Plan

The wording of the policies appears more development orientated and could lead to a lack of clarity. The wording in places is open to interpretation and this could

lead to inconsistency. In places the wording is pro-development and does not reflect the 1st aim of the Park (to conserve the natural and cultural heritage)

notwithstanding the need to strike a balance over the four statutory aims.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities and the protection of the

special qualities of the area as identified as a National Park. The wording used within policies throughout will be clarified to ensure the appropriate level of guidance

is available for developers, and the Plan is easy to understand and use.

Proposed 1st Modification

General approach will be taken on board throughout. No specific modifications proposed as a result.

Response to 1st modification objections

We had hoped that there could have been a meeting with the Park to discuss the representations we made in our letter of 26 September 2007 on the Deposit Local

Plan and indeed, from correspondence, we believed that was the intended way forward. We recognize from the analysis of responses which you published, that you

have had a major task on your hands arising from the scale of responses but had still hoped that some of the issues we raised might have been resolved through

direct contact and discussion. In the event, it is clear that the modified version of the Deposit Local Plan does not adequately address any of the issues we raised.

We previously offered advice and help in the matter of addressing housing need by calling on the experience of national parks in England and Wales in this matter.

No reference is made in the modified Deposit Local Plan to the tools which are legally available to address this issue. At this stage of the process we regard the Park

Authority's approach to housing as flawed and inadequate in the context of the National Parks (Scotland) Act 2000 and we wish to sustain our objection on grounds

of failure by the Authority to meet its obligations to environmental sustainability.

As always, we are willing to meet to discuss the issues we raised to see if an effective resolution can be found

CNPA analysis of objections to 1st modifications

Many policies of the Plan have been largely redrafted to secure the aims of the Park at the heart of all decision making, not least Policy 1 which creates a clear link to

the role of the aims of the Park and the special qualities found within the Park. No further modifications are therefore proposed.

Objection maintained

Objector Ref 416b
Name Mrs Audrey MacKenzie
Aviemore and vicinity Community Council
Tamsduchus
10 Dalfaber Road
Aviemore,PH22 1PU

Company Aviemore and vicinity Community Council

Summary of objection to Deposit Local Plan

The costs incurred in affordable housing provision are passed on to other housing provision. Also how is the affordable unit retained for future occupants.

CNPA analysis of objection to Deposit Local Plan

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area.

Proposed 1st Modification

Amendments added to housing introduction to clarify position regarding costs.

Response to 1st modification objections

Representation to modifications does not raise this as an outstanding issue. Assume issue has been resolved.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Links to Park Plan

Agent Name

Objector Ref 430h
Name D R MacKellar
Cairngorms Chamber of Commerce
PO Box 15
Kingussie
PH21 1WF

Company Cairngorms Chamber of Commerce

Summary of objection to Deposit Local Plan

In the use of general polices, the important role of tourism to the economy and livelihood of the various communities, the protection and maintenance of the Parks

landscape and wildlife is of course vital. While recognizing the priorities given to the different aims of the Park, this should not be taken as a presumption, as seems

apparent through the planning process since the existence of the Park Authority. The aims must be achieved in a collective, coordinated and integrated way, to allow

development to be sustainable in the long term.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities and the protection of the

special qualities of the area as identified as a National Park. The wording used within general policies will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use. A review of the Introduction and Context sections is necessary to clarify and refine the vision for the Plan and set out clearly the strategic background to the policies drafted. Similarly further clarification is needed in the introduction section to each Chapter to state clearly the justification for the approach taken and the aspirations sought as a result of implementation of the policies.

Proposed 1st Modification

Policy 1 modifications to clarify role of the 1st aim of the Park.

Response to 1st modification objections

Objection withdrawn

CNPA analysis of objections to 1st modifications

No further action.

Objection withdrawn

Policy/site ref General - Links to Park Plan

Agent Name

Objector Ref Name George Alder
392d Laggan Community Association
Community Office
Laggan, Newtonmore
PH20 1AH

Company Laggan Community Association

Summary of objection to Deposit Local Plan

The local plan should re-state the planning references from the Park Plan for ease of understanding.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications within the Context section will endeavour to clarify the relationship of the Local Plan and its relationship with other documents

including the Park Plan

Proposed 1st Modification

2.9 clarify role of National Park Plan

Objection maintained

Policy/site ref General - Links to Park Plan

Agent Name

Objector Ref Name Alison Hogg
473a Aberdeenshire Council, Planning and Development

Woodhill House
Westburn Road
Aberdeen, AB16 5GB

Company Aberdeenshire Council

Summary of objection to Deposit Local Plan

Welcome support for Park Plan approach to innovative design.

Welcome action programme to improve outdoor access opportunities, however concern about lack of funding for removing barriers to access.

Welcome action programme for affordable housing. Encourages CNPA to work with a range of partners to help ensure a realistic level of affordable housing can

become a reality. Concern that lack of affordable housing is a perceived barrier to social and economic development in some of the Park's communities, especially

for the younger generation.

CNPA analysis of objection to Deposit Local Plan

Comments regarding design, and access are noted. Further clarity will be considered in regard to the implementation of Policy 34.

Confirm by letter the ongoing work to secure partnership buy in for the local plan and its approaches.

Proposed 1st Modification

No modifications proposed.

Response to 1st modification objections

We write with reference to your letter dated 18th Sept 2008, concerning the above subject. As stated in our previous letter dated 5th October 2007, Aberdeenshire Council does not object to the deposit local plan. Our previous letter did include a number of comments that we recommend being taken forward in

the deposit local plan. These comments/recommendations should not be treated as objections to the plan.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Links to Park Plan

Objector Ref Name Bob Garrow

464a RS Garrow Ltd
4 Mosspark Avenue
Milngavie
Glasgow, G62 8NL

Agent Name

Company RS Garrow Ltd

Summary of objection to Deposit Local Plan

Replace the original wording of the outcome with the following:

vii. The habitat and water quality of rivers and wetlands will be enhanced through commencement of positive management initiatives guided by catchment

management planning and promotion of local ultra-filtration units for drinking water preparation and membrane bio reactor package plants for waste water treatment.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. However the wording referred to is a quote from the National Park Plan which has now been adopted. The consultation undertaken here

relates to the wording within the local plan rather than cross references to other documents. No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

I wish to maintain my comment as the modifications move in the opposite direction from my comment which suggested we encourage the adoption of newer but

proven technology techniques to provide water services. As these newer technologies are more capable they are effectively independent of site conditions and as

they use only modest amounts of energy to process drinking water and waste water their environmental signature is much reduced compared to the methods

preferred in the CNPA Deposit Local Plan. They are also more compact, do not use consumable chemicals, are quicker to install and cheaper to buy and operate.

I recognise that much central public guidance excludes these newer technology techniques.

CNPA analysis of objections to 1st modifications

The policy does not preclude the use of modern technology as referred to in the objection. No modification is therefore proposed.

Objection maintained

Policy/site ref	General - Links to Park Plan	Agent Name Steve Crawford
Objector Ref	Name Rona Main	Halliday Fraser Munro
425b	Scottish Enterprise Grampian	8 Victoria Street
	27 Albyn Place	Aberdeen
	Aberdeen	AB10 1XB
	AB10 1DB	Company Scottish Enterprise Grampian

Summary of objection to Deposit Local Plan

It is important that the local plan underpins the aims of the Park.

In the implementation of the plan, the wording of policies must be such as to avoid confusion or misinterpretation. The role of the local plan in regard to existing

structure plans and the Park Plan is unclear.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications within the Context section will endeavour to clarify the relationship of the Local Plan and its relationship with other documents

including the aims of the Park, the Park Plan and structure plans, and also to expand on the thinking behind the policies as drafted. Throughout

proposed

modifications will endeavour to clarify while providing an appropriate level of guidance for developers and interested parties.

Proposed 1st Modification

2.6 expand to clarify position with LA structure plans and Park Plan.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

Additional clarity and information has been added to the introduction sections of the plan to highlight the role of the aims of the Park. No further modifications are therefore proposed.

Objection maintained

Policy/site ref General - Links to Park Plan

Agent Name

Objector Ref Name Kirsty Cameron, Archaeology
470a The Highland Council

Company The Highland Council

Summary of objection to Deposit Local Plan

Welcome outcome ix on page 10, but would prefer Action Programme point 2d to state 'Identify and Safeguard the features and landscapes of archaeological, historical and cultural heritage interest through planning and development control including design guidance and identification of buildings at risk'.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. However the wording referred to is a quote from the National Park Plan which has now been adopted. The consultation undertaken here relates to the wording within the local plan rather than cross references to other documents. No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modifications proposed.

Response to 1st modification objections

No further representation made from THC.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Living and working
Objector Ref Name The Proprietors of Mar Centre
394f

Agent Name Steve Crawford
Halliday Fraser Munro
8 Victoria Street
Aberdeen
AB10 1XB
Company The Proprietors of Mar Centre

Summary of objection to Deposit Local Plan
CNPA analysis of objection to Deposit Local Plan
Proposed 1st Modification
Response to 1st modification objections

This section is key to our Client's philosophy. As landowners in a populated area they have a responsibility to the community to ensure that Braemar has a positive future, that land-use policies and decisions are forward-looking rather than simply preserving the status quo and that development, in whatever form, helps to ensure a bright future for Braemar. Policy 17 is therefore fully supported and, indeed, its sentiments are those that should support further development in Braemar. Braemar's services are suffering and need a higher critical mass of resident population to maintain higher quality shops, community facilities and services. As suggested by the CNPA in their response to the original objections, concentrating on elements that are controllable is the best means forward.

CNPA analysis of objections to 1st modifications
The comments are noted. No further modifications are therefore proposed.
Objection maintained

Policy/site ref General - Maps
Objector Ref Name Susan Davies
465z-b
Scottish Natural Heritage
Great Glen House
Leachkin Road
Inverness

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan
Seek changes to the shading for NSA's to make their area clearer; identification of Rights of Way and Long Distance Routes; and identification of ancient and semi-natural woodland.
CNPA analysis of objection to Deposit Local Plan

The presentation of the maps will be reviewed and modified to ensure correctness of information and ease of understanding. Retain ancient and semi natural woodland on MapD.

Proposed 1st Modification

Review the shading for NSAs.
Remove core paths to avoid confusion.

Response to 1st modification objections

No further representation received regarding this issue.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Maps

Objector Ref Name Dr A M Jones

400i(a) Badenoch and Strathspey Conservation Group
Fiodhag
Nethybridge
PH25 3DJ

Agent Name

Company Badenoch and Strathspey Conservation Group

Summary of objection to Deposit Local Plan

Some of the maps may be inaccurate in regard to the core paths. The settlement maps should be more clear providing up to date development information, and complete information on the conservation status of land proposed for development.

CNPA analysis of objection to Deposit Local Plan

The presentation of the maps will be reviewed and modified to ensure correctness of information and ease of understanding.

Proposed 1st Modification

Include up to date conservation designations and up to date bases. Remove core paths to avoid confusion as these are available elsewhere from CNPA.

Response to 1st modification objections

No additional representation included regarding this issue.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Maps

Agent Name

Objector Ref 099
Name Dr David Gasking
Seann Bhruthach
Carr-Bridge
PH23 3AA

Company

Summary of objection to Deposit Local Plan

More detail should be included in the proposals maps to clarify the development potential within individual settlements.

CNPA analysis of objection to Deposit Local Plan

The approach taken in the deposit plan was to create proposal maps which were as simple as possible. In a review of the comments received it is now acknowledged

that this has not provided the level of guidance and clarity required, and does not therefore fall into line with the requirements of SPP1. Future modifications will

therefore be made to the proposals maps to add detail and additional information to meet the needs of all those using the plan and its maps.

Proposed 1st Modification

Amend proposals maps to return to additional detail on natural heritage, open space, employment etc.

Clarify wording to highlight the presumption in favour of current uses.

Response to 1st modification objections

Objection withdrawn.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Maps
Objector Ref 422d
Name Anne MacNamara, Planning Directorate
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

Agent Name

Company Scottish Government

Summary of objection to Deposit Local Plan

An overall proposals map showing the location of settlements and neighbouring authorities would be helpful. Those settlements with proposals should be clearly

identified in either a map, or at least with grid references (in line with the requirements of the 1983 Structure and Local Plan Regulations).

CNPA analysis of objection to Deposit Local Plan

The comment is noted and an overarching proposals map will be included as a modification showing the boundaries of the four local authorities and the location of

key settlements.

Proposed 1st Modification

Include overarching proposals map showing all settlements and 4 LA boundaries.

Response to 1st modification objections

No additional comments included.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General - Maps**

Agent Name

Objector Ref **Name** Mairi Maciver

025b Communities Scotland
 Urquhart House
 Beechwood Park
 Inverness, IV2 3BW

Company Communities Scotland

Summary of objection to Deposit Local Plan

Reinstate smaller settlements as identified in the proposals maps to give a more comprehensive picture of settlement proposals overall within the Park. Also include a

map indicating the 4 local authorities with responsibility within the Park.

CNPA analysis of objection to Deposit Local Plan

The comment is noted and an overarching proposals map will be included as a modification showing the boundaries of the four local authorities and settlements

identified in the proposals section of the Plan.

Proposed 1st Modification

Add smaller settlements to give more accurate picture of proposals across the Park.

Response to 1st modification objections

Your message to housing colleagues in relation to the proposed modification has been passed to me as I co-ordinated the Scottish Government response to the

consultation. Our comments were sent to Karen Major yesterday and are attached below.

CNPA analysis of objections to 1st modifications

Considered under objection 422. No further action required.

Objection withdrawn

Policy/site ref **General - Maps**

Agent Name

Objector Ref **Name** Dr A Watson

020o Clachnaben

Crathes, Banchory
Kincardineshire
AB31 5JE

Company

Summary of objection to Deposit Local Plan

Map D 'ancient woodland' actually covers all woodland. The blue of 'Ancient woodland' should be on the guide.

CNPA analysis of objection to Deposit Local Plan

The presentation of the maps will be reviewed and modified to ensure correctness of information and ease of understanding.

Proposed 1st Modification

Ensure most up to date maps are used in future modifications and versions.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The information regarding ancient woodland is provided by SNH and the maps are constructed using this and other datasets not in the control of CNPA. The map

also shows semi natural woodland inventory shown in blue. The most accurate information is always used. No further modifications proposed.

Objection maintained

Policy/site ref General - Maps

Objector Ref Name Kirsty Cameron, Archaeology
470g The Highland Council

Agent Name

Company The Highland Council

Summary of objection to Deposit Local Plan

Suggest revising para 7.14 last sentence to read 'Accurate data regarding these and other non-designated cultural heritage sites can be obtained directly from the

CNPA, the relevant Local Authority, Historic Scotland and RCAHMS.'

CNPA analysis of objection to Deposit Local Plan

The proposed wording is noted and some form of amendment will be added to clarify the sources of information available to support the Local Plan.

Proposed 1st Modification

7.15 modify to refer to other cultural heritage sites

Response to 1st modification objections

No further representation made from THC.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General - Maps**
Objector Ref **Name** Colonel F.M.K. Tuck
011j Allargue
 Corgarff, Strathdon
 Aberdeenshire
 AB36 8YP

Agent Name

Company

Summary of objection to Deposit Local Plan

Map D may not be accurate. There never was ancient woodland along the River Don between Delnadamp and Allargue, nor yet on the Hill of Allargue.

CNPA analysis of objection to Deposit Local Plan

The presentation of the maps will be reviewed and modified to ensure correctness of information and ease of understanding.

Proposed 1st Modification

Use most up to date map bases.

Response to 1st modification objections

I refer to your letter obj 011 of 22 May on Modifications to Deposit Local Plan.

First may I say how very pleased and honoured I am to receive a personal and comprehensive reply to my comment on the plan. I can not remember ever having

had one before, and it is gratifying to feel that one is being listened to !

Second I confirm that I am in agreement with the modifications suggested and do not wish to object further. On the whole I consider that you have dealt with my comments and that the amended plan is satisfactory.

Having said that , may I make one or two further comments ? !

a. On p 42 Table 14 it is strange that Aberdeenshire would not have at least a target figure for Donside as well as Ballater and Braemar.

b. Although much improved I still find Policy 23 and 24 overly and unnecessarily restrictive. I can see places in Corgarff (which badly needs regeneration) where

two or three new build houses could be built without in any way conflicting with the other aims of the Park. So to restrict to one new house where there are three

would prevent this. Similarly I can envisage other worthy candidates for a new house under Policy 24 eg a retired gamekeeper on my estate when his tied dwelling is

required, or for a family member with dependent needs to live on the estate. A wording could be inserted in the new subpara b " or similar worthy persons ".

c. Some of my problems have been resolved in Policies 25 - 29. It would be helpful to refer to these at the end of new para 5.70

d. Finally you have not taken on board my comment on other unsightly communication developments besides Telecoms in Policy 31. There are some awful

electrical, road, and water constructions including the 32000 volt power lines alongside the Lecht road which have not been used for 7 years.

I hope the Board will approve the Plan on 30 May and I wish you well with it.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General - Monitoring**

Objector Ref **Name** Anne MacNamara, Planning Directorate
422e Scottish Government
 Victoria Quay
 Edinburgh
 EH6 6QQ

Agent Name

Company Scottish Government

Summary of objection to Deposit Local Plan

The approach to monitoring may need more robust consideration and how the results will be used explained.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. A review of the methods of monitoring the success of the Plan will be undertaken to ensure it is deliverable, meaningful and robust.

Proposed 1st Modification

Throughout ensure that paras on implementation and monitoring are deliverable, measurable and meaningful

Response to 1st modification objections

Monitoring of the Plan is not clearly set out beyond reliance on reviewing planning permissions and it is not clear if the information gathered through this process will be published or simply inform the need for a Plan review.

CNPA analysis of objections to 1st modifications

An additional para will be added to the introduction to clarify the position regarding monitoring and publication of findings. This will be included by way of 2nd modifications.

Objection maintained

Policy/site ref **General - Natural Heritage**

Objector Ref **Name** The Cairngorms Campaign
448a PO Box 10037
 Alford
 AB33 BWZ

Agent Name

Company The Cairngorms Campaign

Summary of objection to Deposit Local Plan

The plan should also take cognisance of other international conventions including the European Landscape Convention and the UK Biodiversity Action Plan (1994).

It should also take full account of climate change and the carbon footprint of developments. The plan should also take better notice of others actual experience, such as tourism development in the Alps.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. Modifications within the Context section will endeavour to clarify the relationship of the Local Plan and its relationship with other documents

including international standards, conventions and commitments, and the National Park Act, and reference will added to other best practices as appropriate

Proposed 1st Modification

Modify policies 18 and 19 to clarify situation regarding climate change and carbon emissions.

2.1-2.3 add reference to national importance of park designation and lessons to be learned from other NPs in UK and abroad, and add reference to international conventions and UK Biodiversity Action Plan.

Response to 1st modification objections

No further representation has been added in regard to this objection

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - SEA

Agent Name

Objector Ref **Name** Jane Angus
091d Ballater & Crathie Community Council
Darroch Den
Hawthorn Place, Ballater
AB35 5QH

Company Ballater & Crathie Community Council

Summary of objection to Deposit Local Plan

The SEA must be more carefully examined as its findings will have a major impact on the area as a whole.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, but CNPA must refer to the responses from the 4 statutory consultees on SEA who have all commented on the clarity and soundness of

the Environmental Report. The findings of the ER will impact directly on the local plan, its policies and proposals and this will be done in line with the legislative

requirements and in liaison with the consultees.

Proposed 1st Modification

Comments will be reviewed prior to adoption to take into account the views expressed. No modifications needed at this stage.

Response to 1st modification objections

The Ballater and Crathie Community Council wish to continue our objections to the proposed Local Plan.

CNPA analysis of objections to 1st modifications

The SEA has been amended and is available on line. No further amendment is therefore proposed.

Objection maintained

Policy/site ref **General - SEA**

Objector Ref **Name** James and Evelyn Sunley
056f 12 Lochnagar Way
 Ballater
 AB35 5PB

Agent Name

Company

Summary of objection to Deposit Local Plan

The SEA assessment needs greater examination as its findings are so important to future development.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, but CNPA must refer to the responses from the 4 statutory consultees on SEA who have all commented on the clarity and soundness of

the Environmental Report. The findings of the ER will impact directly on the local plan, its policies and proposals and this will be done in line with the legislative

requirements and in liaison with the consultees.

Proposed 1st Modification

Comments will be reviewed prior to adoption to take into account the views expressed. No modifications needed at this stage.

Response to 1st modification objections

The modified Park Plan does not address any of the objections that we made, we therefore continue our objections and ask you to think again.

CNPA analysis of objections to 1st modifications

The SEA has been amended and is available on line. No further amendment is therefore proposed.

Objection maintained

Policy/site ref **General - SEA**

Objector Ref **Name** James and Evelyn Sunley
056c 12 Lochnagar Way

Agent Name

Ballater
AB35 5PB

Company

Summary of objection to Deposit Local Plan

The SEA should further explain how it reaches its conclusions.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, but CNPA must refer to the responses from the 4 statutory consultees on SEA who have all commented on the clarity and soundness of

the Environmental Report. The findings of the ER will impact directly on the local plan, its policies and proposals and this will be done in line with the legislative

requirements and in liaison with the consultees.

Proposed 1st Modification

A number of changes have been made to the SEA environmental report, which address the concerns raised.

Response to 1st modification objections

The modified Park Plan does not address any of the objections that we made, we therefore continue our objections and ask you to think again.

CNPA analysis of objections to 1st modifications

The SEA has been amended and is available on line. No further amendment is therefore proposed.

Objection maintained

Policy/site ref General - SEA

Agent Name

Objector Ref Name Nicola Abrams

399SEA(a)

SEPA

Greyhope House

Greyhope Road

Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

The overall document is of a very high standard, is thorough and well presented.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

No further action required.

Response to 1st modification objections

No further comments regarding the SEA received in the submission on the modifications.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref General - Settlements

Agent Name

Objector Ref Name Susan Davies

465z-q
Scottish Natural Heritage
Great Glen House
Leachkin Road
Inverness

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

Para 7.4 We note the new text to allow for mixed uses within the proposal types, but while this may be relevant for economic development, housing and community, we think that it should not apply to protected open space. Also the term "protected open space" has been changed later in 7.12 to "Environment", and also on the settlement maps, so it should for consistency be changed in this paragraph too.

CNPA analysis of objections to 1st modifications

Para 7.4 will be amended to list housing, economic development and community, then the explanation regarding mixed uses. Finally 'environment' will be listed as the 4th proposal type. This is a minor layout issue which would not require a formal modification. The change will therefore be made.

Objection maintained

Policy/site ref General - Settlements

Agent Name

Objector Ref Name Dr A M Jones

400n
Badenoch and Strathspey Conservation Group
Fiodhag
Nethybridge
PH25 3DJ

Company

Summary of objection to Deposit Local Plan

CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

We are very concerned at the CNPA's failure to apply the precautionary principle in light of significantly inadequate data sets held by the CNPA. The CNPA has virtually no idea of the impact of the housing proposals in the mDLP on habitats and species.

Object to the scale of housing proposed. The CNPA has not addressed issues of sustainability. Increasing the population within the Park, through large scale housing

developments, will increase the demand for affordable housing in the future as every new generation of first time buyers enters the housing market.

We object that there is not a clause included in the mDLP to the effect that there should be no carry over whatsoever of housing allocations which are being

determined under HC's LP due to the application having been started, should these applications lapse or be refused planning permission; and that the settlement

boundary will be redrawn to avoid there being a presumption in favour of built development on these sites. One reason for this is conflicts with the aims of the NP.

This applies to many settlements.

We object to the inadequate information provided in the mDLP. For example information such as Ancient Woodland Inventory sites should be included on the

settlement maps to enable the public and the CNPA to make proper appraisals. Similarly, current land use should be clear on the maps, e.g. where an extension to

an industrial site is proposed, the present extent of the industrial site and the extent of the proposed allocation should both be clearly shown. At present it is only

through local knowledge that anyone can know the difference. Built development that is under construction should be clearly depicted as such, with the number of

units being built indicated in the area. At present sites under construction are not indicated in any way at all, and it is only through local knowledge that anyone can

know they are sites for built development. These are important aspects of enabling the public and the CNPA to assess the proposals in the mDLP.

Areas classed as Environment should be protected from any built housing, industrial or employment development and this should be unequivocally stated in the

mDLP. It should be clear to developers that Environment areas are not available for built development.

CNPA analysis of objections to 1st modifications

The figures regarding the need for housing within the Park has come as a result of work undertaken to establish population growths and housing land supply.

Where an application is lodged with the planning authority, it will be determined in the normal way using the adopted local plan. The sites have not only been

included within the draft local plan because of any outstanding application and to remove them if a refusal ensues would only be considered appropriate where the

need was no longer existing and the local plan was under review again.

The issue of maps is noted and the approach taken has endeavoured to keep the maps as simple and clear as possible. The maps are intended as proposals maps

and therefore they indicate proposals and do not include schemes underway etc. We do however seek regular updates from OS to ensure we have the most up to

date bases for the proposals maps. No further modifications are therefore proposed.

Objection maintained

Policy/site ref General - Settlements

Objector Ref Name John Anderson

463zm Kincaig and Vicinity Community Council
Goldenacre, Dunachton Road
Kincaig, Kingussie
PH21 1QE

Agent Name

Company Kincaig and Vicinity Community Council

Summary of objection to Deposit Local Plan

CNPA analysis of objection to Deposit Local Plan

Proposed 1st Modification

Response to 1st modification objections

7.2 Rephrase 2nd half to 'within rural settlements, limited growth will be permitted only where it helps consolidate the settlement. Otherwise new facilities will be

discouraged. Outwith these recognised settlements, development proposals will not be considered'. As it stands the wording opens the floodgates to building in

sensitive rural areas, at least some of which would be likely to be for 2nd homes.

(this suggestion would make it difficult for retiring and other locals to be built outwith settlement boundaries, so need to find appropriate wording to enable some

build without opening the floodgates. See also policy 'affordable housing outwith settlements'.

7.6 Clarify what is meant by the expression of 'windfall sites'

CNPA analysis of objections to 1st modifications

The wording of 7.2 relates to the rural settlements identified in the plan. It also acknowledges that there are limited opportunities and all

development proposals

would then be assessed against the policies of the plan. No modification is therefore considered appropriate.

Objection maintained

Policy/site ref	General - Vision	Agent Name
Objector Ref	Name Dr Alister Scott	
477c	University of Aberdeen	
	Department of Geography and Environment	
	Elphinstone Road	
	Aberdeen	Company

Summary of objection to Deposit Local Plan

The vision statements for the Park Plan and Local Plan refer to sustainable development but there is no clarity on the term. The plan as written is too focused on

economic and social sustainability and there should be a better balance on the opportunities and costs of such an approach. The Vision is too limited and should

include the environment explicitly.

CNPA analysis of objection to Deposit Local Plan

A review of the Vision will be undertaken to ensure that it gives an appropriate level of imaginative and coherent guidance for the future of the Park, and promotes a

level of partnership working which is accepted by all.

Proposed 1st Modification

para 2.14-2.15 Amend vision to expand the issues it considers, and wording to be visionary explaining the aspirations of the plan for the area.

Response to 1st modification objections

Hello and apologies for not replying sooner. I have resigned from my job in order to take up a new position in New Zealand and the issues with this have rather

been at the forefront of my mind. My principal concerns lay with the landscape section of the plan and I am glad to see that the revisions strengthen this

considerably. Specific reference could be made and indeed should be made to the European Landscape Convention as justification.

I therefore have no outstanding objections. I do still have some comments and at this stage wonder if they have to be formed in the form of an objection. Perhaps a

short written response would be OK

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General - Vision**

Objector Ref **Name** Dr A M Jones

400d
Badenoch and Strathspey Conservation Group
Fiodhag
Nethybridge
PH25 3DJ

Agent Name

Company Badenoch and Strathspey Conservation Group

Summary of objection to Deposit Local Plan

Para 2.13 - give examples of other delivery tools

CNPA analysis of objection to Deposit Local Plan

The comment relates to the delivery of the National Park Plan, of which the Local Plan plays an important part. However the delivery of the Park Plan is not a

matter for debate at this stage as it has already been adopted. Direct reference should be made to the National Park Plan. No modification considered necessary as a result of this representation.

Proposed 1st Modification

para 2.14-2.15 Amend vision to expand the issues it considers, and wording to be visionary explaining the aspirations of the plan for the area.

Response to 1st modification objections

No additional representation included regarding this issue.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General - Vision**

Objector Ref **Name** D R MacKellar

430e
Cairngorms Chamber of Commerce
PO Box 15
Kingussie
PH21 1WF

Agent Name

Company Cairngorms Chamber of Commerce

Summary of objection to Deposit Local Plan

Para 2.12 - The Vision should give a more coherent and imaginative vision for the future direction of the Park which could be a focus for long term sustainability of

the Park and create a shared sense of partnership between public and private partners. The vision should refer to the unique identity of the area, the character and

interdependence of its various parts, and its role in the wider Highland economy. As written it is little more than a restatement of the aims of the Park and it does not

recognize that the area must continue as a place where a substantial population has to have the facilities and infrastructure to sustain the

communities and economies.

CNPA analysis of objection to Deposit Local Plan

A review of the Vision will be undertaken to ensure that it gives an appropriate level of imaginative and coherent guidance for the future of the Park, and promotes a level of partnership working which is accepted by all.

Proposed 1st Modification

para 2.14-2.15 Amend vision to expand the issues it considers, and wording to be visionary explaining the aspirations of the plan for the area.

Response to 1st modification objections

Objection withdrawn

CNPA analysis of objections to 1st modifications

No further action.

Objection withdrawn

Policy/site ref General - Vision

Agent Name

Objector Ref Name Jamie Williamson
439b Alvie and Dalraddy Estate
Alvie Estate Office
Kincraig, Kingussie
PH21 1NE

Company Alvie and Dalraddy Estate

Summary of objection to Deposit Local Plan

Whilst acknowledging the aims of the Park, the area does not have a distinctive character or coherent identity relative to adjoining areas. The policies are therefore to restrictive and will stifle economic development.

Within the Vision, there is an imbalance between protection and enhancement and particularly in regard to housing, the outcomes highlighted from the Park Plan will not be achieved through the local plan policies suggested.

CNPA analysis of objection to Deposit Local Plan

A review of the Vision will be undertaken to ensure that it gives an appropriate level of imaginative and coherent guidance for the future of the Park, and promotes a level of partnership working which is accepted by all.

Proposed 1st Modification

para 2.14-2.15 Amend vision to expand the issues it considers, and wording to be visionary explaining the aspirations of the plan for the area.

Response to 1st modification objections

We agree with the 4 stated aims for National Parks in Scotland but disagree that the area as designated has a distinctive character or coherent identity relative to areas adjoining the area designated. We do not believe designating the area as a National Park will meet the special needs of the area.

We consider the development policies as unreasonably restrictive and are concerned that insisting on all proposals complying with 'all the policies that are relevant'

(How to Use the Local Plan) will serve to stifle further economic development within the Park. There will be situations where a proposed development will satisfy and

promote one policy at the expense of another. It should be sufficient that all relevant policies are considered in balance.

CNPA analysis of objections to 1st modifications

The area is designated as a National Park and this is not the subject of debate through the local plan. No modifications are therefore proposed.

Objection maintained

Policy/site ref **General - Vision**

Agent Name

Objector Ref **Name** Planning, Environment and Development
469a The Highland Council

Company The Highland Council

Summary of objection to Deposit Local Plan

The vision is more of a mission statement than a true vision for the long term aspirations of the Park. It should instead include reference to the role of the Park

linking the Highlands with the south, the role of its settlements linking with key settlements outside its boundaries, and the role it has to play in the local, regional and

national economy. Reference should be made to physical characteristics, land uses, demographics and infrastructure in line with the Planning etc (Scotland) Act

2006. Additionally reference should be made to the role of the Park in sustaining communities, and supporting the economy.

CNPA analysis of objection to Deposit Local Plan

A review of the Vision will be undertaken to ensure that it gives an appropriate level of imaginative and coherent guidance for the future of the Park, and promotes a

level of partnership working which is accepted by all.

Proposed 1st Modification

para 2.14-2.15 Amend vision to expand the issues it considers, and wording to be visionary explaining the aspirations of the plan for the area.

Response to 1st modification objections

We note that CNPA has chosen not to use the Council's suggested wording for the vision. However, we note that CNPA has updated the Local Plan to reflect the

latest vision statement for the Park and its guiding principles and acknowledge that the National Park Plan provides an overarching context for development planning

and management within the National Park and is a material consideration in planning authority decisions. The National Planning Framework also provides strategic

context.

On the basis of the Local Plan First Modifications the Council is content and does not maintain its earlier representation

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **General - Vision**

Agent Name

Objector Ref **Name**

Robert Maund

434b

Scottish Council for National Parks

The Barony

2 Glebe Road

Kilbirnie, Ayrshire

Company Scottish Council for National Parks

Summary of objection to Deposit Local Plan

The vision linking to the Park Plan vision of 'the Cairngorms National Park as an exemplar of sustainable development where people and place thrive together will be

difficult to sustain when measured against the historical record, and the CNPA will need to vigorously promote the exemplar approach.

In the 'Outcomes for Conserving and Enhancing Biodiversity and Landscapes for 2012' the use of confident language is not borne out in the housing allocations later

in the Plan.

With iv regarding species and habitats, again some of the site allocations comprise habitat and species which are part of the Biodiversity Action Plan.

CNPA analysis of objection to Deposit Local Plan

A review of the Vision will be undertaken to ensure that it gives an appropriate level of imaginative and coherent guidance for the future of the Park, and promotes a

level of partnership working which is accepted by all.

Proposed 1st Modification

para 2.14-2.15 Amend vision to expand the issues it considers, and wording to be visionary explaining the aspirations of the plan for the area.

Response to 1st modification objections

Objection maintained as in 434a.

CNPA analysis of objections to 1st modifications

The vision has been completely redrafted in 2.15. No further modifications are therefore proposed.

Objection maintained