

Policy/site ref Policy 33
Objector Ref Name The Crown Estate
419r

Agent Name Debbie Mackay
Smiths Gore
12 Bernard Street
Edinburgh
EH6 6PY
Company The Crown Estate

Summary of objection to Deposit Local Plan

The wording should be more supportive of tourism development and amended to include 'significantly' before 'adverse environmental or landscape impacts'.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. The wording used within this policy will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

Proposed 1st Modification

Reword para 1 to be more supportive for developments.

Amend introduction to section 6 to give greater support and understanding to the tourism sector and the part it plays in the economy of the Park.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The policy has been partly amended to give a more positive steer to tourism developments. No further modifications are therefore proposed.

Objection maintained

Policy/site ref Policy 33
Objector Ref Name Mr Michael Bruce
403m 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

Glen Tanar should be identified as a settlement to allow any significant tourist development to take place within or adjacent to the settlement.

CNPA analysis of objection to Deposit Local Plan

The approach to the identification of settlements outwith those identified in the deposit plan will be reviewed, and in line with the requirements of SPP1 a detailed rational behind the approach taken will be drawn up. Where it is considered that additional detail including land allocations would assist in the level of detail provided for smaller communities and help attain their aspirations, the specific identification of those settlements will be considered as appropriate through modification both Section 7 of the Plan, the policies regarding housing outwith strategic settlements, and the proposals maps. Any change to the approach taken may also impact on the SEA. Confirm the policy refers to all development whether within or outwith a settlement.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

From the enclosed you will see that we have maintained our objections to the following - Policy 33.

CNPA analysis of objections to 1st modifications

The original representation requested that Glen Tanar be established as a settlement to allow tourism development to occur within its boundary. The approach to settlements is maintained and it is considered that under policy 33 tourism development could go ahead in an appropriate fashion regardless of the existence of a settlement boundary or not. No modification is therefore proposed.

Objection maintained

Policy/site ref	Policy 33	Agent Name
Objector Ref	Name Susan Davies	
465u	Scottish Natural Heritage	
	Great Glen House	
	Leachkin Road	
	Inverness	Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Recommend that this policy notes the 'desirability of spreading the benefits of tourism across different areas of the Park' as a factor to be considered in determining planning applications. The Local Plan could contribute even more to the delivery of the Strategic Objective for sustainable tourism if sites suitable for tourist development were identified on maps of settlements in less-visited parts of the Park.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. The wording used within this policy will be clarified to ensure the appropriate level of

guidance is

available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

Proposed 1st Modification

In implementation of policy refer specifically to the objectives in the Park Plan.

Response to 1st modification objections

We repeat our recommendation that this policy seeks to support National Park Plan Sustainable Tourism Strategic Objective (h) by promoting the 'desirability of spreading the benefits of tourism across different areas of the Park'. We therefore recommend adding "spread the benefits across the Park" after "enhance the range and quality of tourism attractions and facilities".

CNPA analysis of objections to 1st modifications

The wording is considered to add clarity to the policy and will be included as a second modification to the plan.

Objection maintained

Policy/site ref	Policy 33
Objector Ref	Name Glenmore Properties Ltd
453o	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 wording of the policy is slightly at odds with Policy 1 which allows for developments that impact on the environment and landscape where the economic impacts

outweigh the environmental impacts. This policy should have a similar balanced approach.

CNPA analysis of objection to Deposit Local Plan

Throughout the plan further cross referencing will be made to ensure that policies are consistent within themselves and when compared to others. 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.

Confirm all policies should be read together - and that the amended policy 1 should be complied with as well as policy 33.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Suggest willingness to withdraw objection

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref

Policy 33

Agent Name Debbie Mackay

Objector Ref **Name** John Forbes-Leith Esq
418r Dunachton Estate

Smiths Gore
12 Bernard Street
Edinburgh
EH6 6PY

Company Dunachton Estate

Summary of objection to Deposit Local Plan

The wording should be more supportive of tourism development and amended to include 'significantly' before 'adverse environmental or landscape impacts'.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the

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

available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

Proposed 1st Modification

Reword para 1 to be more supportive for developments.

Amend introduction to section 6 to give greater support and understanding to the tourism sector and the part it plays in the economy of the Park.

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 **Policy 33**

Agent Name

Objector Ref **Name** James and Evelyn Sunley
056a 12 Lochnagar Way
Ballater

Company

Summary of objection to Deposit Local Plan

The local plan should include more detailed policies to support industrial and tourist development to create sustainable full time employment. There is over

emphasis on housing and no detail on encouraging business incentives or creating employment for people who might live in the houses proposed. Also there is little mention of the facilities and infrastructure needed to support such levels of development.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the

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

available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and

international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

Proposed 1st Modification

Amend proposals for Ballater to reflect work being done by Princes Foundation.

Add employment proposals to proposals maps.

Amend introduction to section 6 to give greater support and understanding to the tourism sector and the part it plays in the economy of the Park.

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

Additional land has been included for employment and tourism uses, and the text amended to reflect the importance of securing employment uses within the

National Park. No amendment is therefore proposed.

Objection maintained

Policy/site ref Policy 33
Objector Ref Name Forest Holidays LLP
397

Agent Name Steve Hearn
Tweedale
265 Tettenhall Road
Wolverhampton
WV6 0DE
Company Forest Holidays LLP

Summary of objection to Deposit Local Plan

There should be greater emphasis and recognition on supporting good quality and varied tourist accommodation. The Plan should recognise the

important role of

such accommodation on the tourism industry as a whole. The Plan should also provide support to allow existing tourist accommodation providers to expand and diversify where appropriate. The policy should be amended or an additional policy added to give clear support for the provision of tourist accommodation and to recognise its importance within the tourism industry and the economy as a whole. Support should be given to allow existing operators to expand and diversify the range of accommodation provided, to suit changes in market trends, in instances where such can be accommodated within detriment to the aims and objectives of the National Park.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. The wording used within this policy will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance are included. Confirm policy refers to all forms of development, not just new facilities.

Proposed 1st Modification

Reword para 1 to be more supportive for developments.

Amend introduction to section 6 to give greater support and understanding to the tourism sector and the part it plays in the economy of the Park.

Objection maintained

Policy/site ref Policy 33

Objector Ref Name Sarah Jane Laing

429j

SRPBA

Stuart House

Eskmills

Musselburgh, EH21 7PB

Agent Name

Company SRPBA

Summary of objection to Deposit Local Plan

In the 1st paragraph add 'significant' before 'adverse environmental or landscape impacts'. The policy as written may stifle development.

In the last sentence of para 1, what does 'standard' mean.

The policy should also be more closely linked to economic and business development to allow a more flexible approach. The 3rd para should therefore be removed.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the

protection of the

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

available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and

international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

are included. Confirm 3rd para is intended to support the existing tourism sector.

Proposed 1st Modification

reword supporting text to reflect the importance placed on tourism development and ensure policy is supportive in wording.

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 **Policy 33**

Agent Name

Objector Ref **Name** Mrs Jane Angus

437r Darroch Den
Hawthorn Place
Ballater
AB35 5QH

Company

Summary of objection to Deposit Local Plan

The growth in tourism will need to be carefully managed to ensure it does not result in disturbance for wildlife.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the

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

available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and

international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

Proposed 1st Modification

No modification proposed.

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	Policy 33	Agent Name Steve Crawford
Objector Ref	Name Rona Main	Halliday Fraser Munro
425a(b)	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

The plan does not include any real allocations for tourism use, nor any specific proposals for tourism development. It should so more to support tourism related

development and controlled economic growth in the eastern part of the Park. The Plan should allow for potential developments which are currently being investigated in detail, as well as long standing tourism and cultural facilities which are trying to diversify.

SE Grampian is currently investigating the potential for a new small-scale luxury resort in the Aberdeenshire part of the Park, or just outwith the boundary , to meet

the extant demand for tourism accommodation. The Local Plan should allow for this to be pursued in more detail without falling foul of Local Plan policies

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the

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

available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and

international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

are included. Confirm support for ongoing work of Scottish Enterprise in promoting development in the area, but confirm that sites have not been specifically shown

on local plan maps as the plan does not wish to hamper site selection and wishes to remain open to changes in proposals as they are developed. The policies

therefore endeavour to provide sufficient support for developments and give guidance on site selection. In doing so the wording would support things like

diversification as mentioned, particularly where they endeavour to extend the tourism season.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

We strongly support the modifications under Section 6 to support Sustainable Tourism however we would wish to see explicit policy statements on the improvement and creation of high quality/world class visitor accommodation.

CNPA analysis of objections to 1st modifications

The creation of a world class National Park is key to the vision of the National Park and is stated both in the National Park plan and Local Plan. It runs through everything that both the Park Plan and Local Plan aim to achieve and stating it in any one part of the plan is therefore not considered necessary. No modification proposed.

Objection maintained

Policy/site ref Policy 33

Agent Name

Objector Ref Name Jamie Williamson
439y Alvie and Dalraddy Estate
Alvie Estate Office
Kincraig, Kingussie
PH21 1NE

Company Alvie and Dalraddy Estate

Summary of objection to Deposit Local Plan

There should be a greater range of economic activities supported in the National Park in addition to tourism.

Amended wording –

In para 1 replace ‘with’ with ‘or have’

In para 1 add ‘unreasonable’ before ‘adverse’

In para 2 change ‘and’ to ‘or’

In para 3 add ‘endeavour’ after ‘should’

In para 3 delete final sentence

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the

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

available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and

international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity

and guidance

Proposed 1st Modification

Confirm the rest of the policy is to support tourism and the wording should not undermine the underlying aim of the policy.

Response to 1st modification objections

Paragraph 6:13 should be deleted.

The economy within the Cairngorms National Park is already dominated by tourism and government. According to Andrew Harper (Head of Economic and Social

Development for the Cairngorms National Park) 85% of the Park's employment is dependent on tourism . Although we don't know the full extent as to the

dominance of tourism and government to the local economy it is likely to exceed 90% of the Park's gross domestic output. Economies so dominated by a single

industry can suffer serious recession or even catastrophic collapse in the event of a downturn in the dominant industry. Examples are the many towns in the UK that

were almost solely dependent on the coal industry and parts of Glasgow that were dominated by shipbuilding. If there is a significant down turn in tourism the Park

could face a serious recession. The National Park economy would benefit from having a more diversified economy. Diversification away from tourism should be

encouraged.

are included.

CNPA analysis of objections to 1st modifications

The paragraph is intended to offer some protection to what is a recognised key employment provider within the National Park. No modifications are therefore

proposed.

Objection maintained

Policy/site ref Policy 33

Agent Name

Objector Ref Name D R MacKellar

430i Cairngorms Chamber of Commerce

PO Box 15

Kingussie

PH21 1WF

Company Cairngorms Chamber of Commerce

Summary of objection to Deposit Local Plan

Tourism is recognised as a key driver to the economy of the Park and is vital to all communities, and positive polices for siting and design of tourism infrastructure

should be at the forefront of the Plan. While the Plan is generally supportive of the industry, it does not contain sufficient analysis of different types of tourism, or

their varying needs. There is a serious lack of understanding of the tourism economy and the plan should have clear statements of policy to support

this part of the

economy, with substantiated justification as background.

Where is the evidence to support "Any proposal which will reduce the tourist facilities will be resisted" (policy 33.)?

The aim of the plan to increase the stock of tourism businesses and facilities, by attempting to stop changes of use away from the tourism sector will cause a

restriction on entrepreneurial activity when individuals are contemplating selling up tourism businesses. To tell local business people who have grown businesses

often after changing the original use to tourism, that the use cannot be reversed is a disincentive to any entrepreneurial spirit and does not take any account of

events such as retirement, wishing to stop work or the need to release profits. This approach is contrary to the 1st sentence of policy 33 and

clarification is needed

to support in para 7.9 "The Local Plan will seek to protect the business use of existing businesses which provide key services to communities within the Park"

Evidence suggests that occupancy levels stand at around 40% which could be seen as an over provision. Considerable information gathering and analysis is needed

to support such statements and allow the policies to be constructed to provide a stronger guide to both trends and spatial planning, and there is a feeling that at

present the plan is wrong in its assumption that there is a vibrant tourism economy. There needs to be an understanding of:

- The fragility of the tourism economy.
- The seasonality
- The distance from its market
- The lack of 'passing trade' from large conurbations/centres of population.
- 'Force Majeure' issues such as Foot and Mouth
- The very high turnover in ownership of Accommodation Provision. Anecdotal Evidence suggests it is an average of approx 2-3 years.
- Life Style aspirations quickly become survival techniques

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the

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

available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and

international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

are included.

Proposed 1st Modification

Redraft policy to give a more supportive approach to tourism development. Within Supporting text confirm position regarding locational guidance.

In introduction to chapter 6 give more support to this sector.

Response to 1st modification objections

Objection withdrawn

CNPA analysis of objections to 1st modifications

No further action.

Objection withdrawn

Policy/site ref Policy 33

Agent Name

Objector Ref Name Dr A M Jones

400h(a) Badenoch and Strathspey Conservation Group
Fiodhag
Nethybridge
PH25 3DJ

Company Badenoch and Strathspey Conservation Group

Summary of objection to Deposit Local Plan

Para 6.0 and 6.4 – wording is too loose. There is over emphasis on ‘need’ and the requirement that such development “must also take into account” the impact of the development on the environment.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. The wording used within this policy will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

Proposed 1st Modification

Revise 6.4 to provide better support for sustainable tourism.

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 Policy 33

Agent Name

Objector Ref Name Jenny Smith

417d

Dellachupe
Corgarff
Strathdon
AB36 8YP

Company

Summary of objection to Deposit Local Plan

The policy may stifle business development and increase house prices even further.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the

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

available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and

international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

Proposed 1st Modification

Reword para 1 of the policy to better reflect the economic pressures faced, and the reality of investors, and the economy.

Amend introduction to section 6 to give greater support and understanding to the tourism sector and the part it plays in the economy of the Park.

Response to 1st modification objections

I am in agreement to the modifications made to the Deposit Local Plan:

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref Policy 33

Objector Ref Name John Anderson

463w 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

Support Alvie estate view on this policy.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. The issue will be considered under the Alvie representation. No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

No objection raised in response to modifications. Assume therefore objection resolved.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn**Policy/site ref Policy 33****Agent Name****Objector Ref****Name**

Robert Maund

4341

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 policies do not look at the wide range of recreational activities or demonstrate a clear understanding of the impact such development has on both visitors and

environment. A statement of intent to develop informally presented educational opportunities which go beyond the physical provision and management of facilities

on the ground would be appropriate here. The underlying approach to sustainability is supported.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the

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

available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and

international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

Proposed 1st Modification

Revise introduction to Chapter 6 to give greater support to the role tourism plays within the National Park and its economic growth.

Response to 1st modification objections

Objection maintained as in 434a.

CNPA analysis of objections to 1st modifications

Greater clarity has been added to the introduction of this section, and additional information in support of the policy. No further modifications are therefore

proposed.

Objection maintained

Policy/site ref Policy 33
Objector Ref Name Simon Blackett
442f The Estate Office
4 The Keiloch
Braemar
A835 51W

Agent Name

Company Invercauld Estate

Summary of objection to Deposit Local Plan

Well designed chalets, using local materials and based upon the local vernacular, which reflect the Plan's wider objective on design, countryside access and sustainability, should be considered compliant Tourism developments.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. The wording used within this policy will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance are included. Confirm that such developments would be considered on their merits under this policy.

Proposed 1st Modification

No modification proposed.

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 Policy 33
Objector Ref Name Ian Kirk
386 Auchendean
Lodge Hotel
Dulnain Bridge
PH26 3LU

Agent Name

Company

Summary of objection to Deposit Local Plan

The policy which aims to stop changes of use away from tourism facilities is more likely to have a negative impact. It may be applicable to large developments such as hotels, but when applied to small facilities it could adversely effect the future of the operation and act as a disincentive to those wishing to come into the tourism sector. This is particularly true when considering the impact the policy would have on small operators seeking to invest in their properties, or accessing the value amassed in their business for such things as retirement. The policy should instead encourage new and enhanced facilities particularly small businesses.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. The wording used within this policy will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

Proposed 1st Modification

Reword para 1 to be more supportive for developments.

Amend introduction to section 6 to give greater support and understanding to the tourism sector and the part it plays in the economy of the Park.

Response to 1st modification objections

I am happy to withdraw my objection.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref Policy 33

Objector Ref Name Alison Hogg

473z
Aberdeenshire Council, Planning and Development
Woodhill House
Westburn Road
Aberdeen, AB16 5GB

Agent Name

Company Aberdeenshire Council

Summary of objection to Deposit Local Plan

Would like to see reference to links to public transport networks.

Concerns over the ease of getting permission for tourism related development, and the option people then have to run the business badly in the short term, in order

to argue it isn't viable and hence seek to turn it into a private home.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. The wording used within this policy will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance are included. Confirm Policy 33 is intended to protect uses which support tourism such as small hotels and B&Bs

Proposed 1st Modification

No modification 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	Policy 33	Agent Name
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Objector Ref	Name	
477j	Dr Alister Scott University of Aberdeen Department of Geography and Environment Elphinstone Road Aberdeen	

		Company
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Summary of objection to Deposit Local Plan

To deliver sustainable tourism objectives the policy could focus on spreading the benefits of tourism across different areas of the Park as a material consideration.

The Plan could contribute more to this if sites were identified on proposal maps.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. The wording used within this policy will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with

national and

international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

are included. Confirm sites have not been specifically on the proposals maps as they are so numerous and in some cases very small in scale, but key to the tourism

sector in that area. The policy is therefore worded to ensure that all tourism developments are considered equally and throughout the plan and all its policies, the

objectives of the Park Plan and the aims of the Park are key in decision making and underlined through policy 1.

Proposed 1st Modification

No modification proposed.

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	Policy 33	Agent Name Steve Crawford
Objector Ref 425s	Name Rona Main Scottish Enterprise Grampian 27 Albyn Place Aberdeen AB10 1DB	Halliday Fraser Munro 8 Victoria Street Aberdeen AB10 1XB Company Scottish Enterprise Grampian

Summary of objection to Deposit Local Plan

There seems to be a contradiction between policy 33 and Policy 1. This should be reconciled.

CNPA analysis of objection to Deposit Local Plan

Throughout the plan further cross referencing will be made to ensure that policies are consistent within themselves and when compared to others. 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.

Confirm all policies should be read together - and that the amended policy 1 should be complied with as well as policy 33.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

Policy 1 has been completely redrafted and there is not now considered to be any contradiction between the policies. No further modifications are proposed.

Objection maintained

Policy/site ref Policy 33

Objector Ref Name Reidhaven Estate
457 Seafield Estate Office
Cullen
Buckie
AB56 4UW

Agent Name Roy Stirrat

Stirrat Planning Consultancy
39 Dalraddy Park
Alvie, Aviemore
PH22 1QB

Company Reidhaven Estate

Summary of objection to Deposit Local Plan

The plan should be amended to make provision for a tourist information and national park interpretative facility in line with a longstanding planning policy and

support to such a provision within the Park Plan.

Supporting information is provided to justify the need for such a facility and to link the development to the policies in the Plan, PAN 73 and the Park Plan. The plan

however does not contain a policy in support of the A9 nor Blackmount site. The site is outwith a settlement boundary but is close to Carr-bridge and will impact

beneficially on the village as well as the Park. The site should therefore be specifically cited as a Proposal. It is also suggested that the importance of the A9 as key

tourist artery, and of Blackmount as the northern gateway to the Park warrants specific mention in Section 6. Enjoying and Understanding the Park.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the

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

available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and

international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance

are included. Confirm that proposals such as the one mentioned will be considered on their merits, and judged against all policies in the Plan. A site has not been

specifically identified as the Plan does not wish to hamper the selection of a site for any such development. The wording of the policy is therefore

considered suitably
supportive to assist in the development of the project if it comes forward.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Badenoch and Strathspey local plan 1997 –

1 – in the estate's initial objection of 26 September 2008 it was noted that the site at Blackmount was specifically identified as a key tourist information site:

Badenoch and Strathspey local plan 1997 page 12: Tourism Promotion – A9(2)T

The Council recognises the benefit of key gateway information sites promoting bypassed communities, alternative tourist routes, visitor facilities and attractions, at the

following strategic points adjoining the A9; 2 Blackmount ... facilities at the latter may be provided by the Local Tourist Board and District Council and will

supplement area information offices and TIPs in the main and outlying communities respectively.

2 – Blackmount has thus been statutorily designated as a key gateway information site for 11 years since local plan adoption in September 1997. This long period of

designation is presumably even longer taking account of the perhaps 2-4 years of the local plan's adoption procedures. This total period is, indeed, a substantial

period of time over which Blackmount has maintained a specific designation as a key tourist information site.

3 – Reidhaven Estate has maintained awareness and valuation consideration of this long standing site designation in their internal property planning considerations.

The Estate sees no reason for the site to now be ignored in its role and status, especially as they assume there will not be an enhanced need for visitor information

with establishment of the National Park.

4 – Blackmount is one remaining identified site on the A9 within the National Park which remains undeveloped. It also has a special status both in terms of its

location close to the northern Park boundary, at the joining of key cross park routes.

5 – Reidhaven Estate thus reaffirm the validity of the Badenoch and Strathspey Local Plan 1997 comments made in our original objection. The Estate therefore

reasserts that these comments provide a continuing and valid basis for Blackmount to be maintained as a specifically designated tourist information site.

Cairngorms National Park Literature

6 – The need for tourism information is well recognised:
is an important aim;

Cairngorms National Park Plan Summary (12 Page A4 leaflet) Enjoying and Understanding the Park 25 Year Outcomes: There will be a high level of understanding and widespread responsible behaviour in the Cairngorms. Interpretation of the national Park will be of an internationally high standard; the Park will be a significant national learning resource

- Cairngorms National Park Plan Summary (12 Page A4 leaflet) residents and visitors will appreciate the special qualities of the Park... everyone will know when they have arrived ... and have a positive feeling about arriving in it.

- Local Plan page 5 1.15 'The site specific proposals of the Local Plan are provided on a settlement by settlement basis in chapter 7.' There is also much general

advice about proposing and implementing development projects

- Local Plan page 55 'The policies should encourage tourism developments which relate to the special qualities of the area'.

Deposit Local Plan Enjoying and Understanding the Park

7 – Revised Policy 33, Tourism Development derives from the above and in its revised form continues to be supported in principle by Reidhaven Estate. It is noted

that an important additional phrase has been included in the 1st sentence, emphasising the importance of proposals which support the development of tourism-related facilities/attractions.

8 – The whole of revised Section 6 Enjoying and Understanding the Park emphasises the role and importance of key locations, sites and facilities in meeting strategic

aims. There can be no doubt that the Blackmount site maintains its location in a key position on the Park's northern boundary and at a joining to two key cross park routes.

9 – para 6.10 provides a sound basis for considering development proposals including Blackmount. However, in view of the site's location and longstanding policy

designation, the Estate considers that Policy 33 requires to be amended. It is submitted that it should specifically note Blackmount as a key and unique site offering

the potential to fill the gap in tourist information sites at this key northern location.

10 – Reidhaven Estate therefore maintains its objection and submits that Blackmount's historic designation as a key information tourist site should continue to be

specifically recognised in the Cairngorms National Park Local Plan.

- Park Plan Quick Guide extract – Priorities for Action 2007-2012 notes in a programme of work (key areas 7) that raising awareness and understanding of the Park **CNPA analysis of objections to 1st modifications**

Additional clarity and information has been included within the Economic Development and Enjoying and Understanding sections of the plan to ensure a more

appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a

and widespread responsible behaviour in the Cairngorms. Interpretation of the national Park will be of an internationally high standard; the Park will be a significant National Park. The wording of policy 33 would therefore support appropriately sited and designed development . A proposal for a development such as that mentioned would therefore be considered against all the relevant policies of the Plan. A site has not been

specifically identified as the Plan does not wish to hamper the selection of a site for any such development. The wording of the policy is therefore considered suitably supportive to assist in the development of the project if it comes forward. No further modifications are therefore proposed .

Objection maintained

Policy/site ref **Policy 33** **Agent Name**

Objector Ref **Name** Ian Francis

424p RSPB Scotland
East Regional Office
10 Albyn Terrace
Aberdeen, AB10 1YP

Company RSPB Scotland

Summary of objection to Deposit Local Plan

Para 1 should explain that proposals will be favourable where they "conserve and enhance the natural and cultural heritage" rather than are without adverse impacts.

CNPA analysis of objection to Deposit Local Plan

The intention throughout the plan is that all policies should be taken into account when considering any development proposal. The wording within the Introduction

will be amended to clarify this position. The impact of developments on natural and cultural heritage is therefore considered under other policies in the Plan.

Confirm the need for all proposals to comply with all policies of the plan where relevant therefore the impact on natural and cultural heritage would be covered

under policies in 'conserving and enhancing' section.

Proposed 1st Modification

No modification.

Response to 1st modification objections

No further comments added.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **Policy 33** **Agent Name**

Objector Ref **Name** Hebe Carus

024g The Mountaineering Council of Scotland
The Old Granary
West Mill Street
Perth, PH1 5QP

Company The Mountaineering Council of Scotland

Summary of objection to Deposit Local Plan

Tourism Development policies must also recognise the large numbers of people who visit the NP and who find way marking / surfaced paths detracting from their visitor experience.

CNPA analysis of objection to Deposit Local Plan

Modifications will endeavour to ensure a more appropriate balance is struck between development opportunities for business and tourism and the protection of the special qualities of the area as identified as a National Park. The wording used within this policy will be clarified to ensure the appropriate level of guidance is available for developers, and the Plan is easy to understand and use together with ensuring the appropriate level of protection and compliance with national and international obligations placed on the CNPA. The approach taken in the proposals maps will also be reviewed to ensure appropriate levels of clarity and guidance are included. Confirm way marked paths are considered in policy 34 where they form part of the core path network.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Thanks for the details of the modifications to the local plan. I agree with the modifications to Policies 1,2,3,4,6, 33

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	Policy 33,34	Agent Name
Objector Ref	Name	
011g	Colonel F.M.K. Tuck Allargue Corgarff, Strathdon Aberdeenshire AB36 8YP	Company

Summary of objection to Deposit Local Plan

Building for tourist accommodation should be included as well as facilities and attractions. Specific mention of car parking, toilets and information points would help.

CNPA analysis of objection to Deposit Local Plan

The policies have been worded to support as wide a range of facilities as possible and also to facilitate the development of appropriate new provision in locations which are complementary to the aims of the Park. To ensure the wording is not restrictive, specific mention of particular provisions for tourists has deliberately been left out. Policy 33 would include proposals for tourist accommodation as well as other forms of tourist related provision. No modification considered necessary as a

result of this representation.

Proposed 1st Modification

Clarify wording in Policy 33 and 34 regarding support for tourism development.

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 Policy 33-36

Objector Ref Name North East Mountain Trust
443g Burnhead Farmhouse
Raemoir
Banchory
AB31 4EB

Agent Name

Company North East Mountain Trust

Summary of objection to Deposit Local Plan

Support policies 33, 34, 35 and 36

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modification proposed.

Objection maintained

Policy/site ref Policy 33-36

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

Agent Name

Company Aberdeenshire Council

Summary of objection to Deposit Local Plan

Welcome policies 33 to 36

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modification 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 Policy 33-36

Objector Ref Name The Cairngorms Campaign
448g PO Box 10037
Alford
AB33 BWZ

Agent Name

Company The Cairngorms Campaign

Summary of objection to Deposit Local Plan

Support policies 33,34,35,36

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

No additional comments

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref Policy 34

Objector Ref Name Strathspey Railway Co Ltd
449a Aviemore Station
Dalfaber Road

Agent Name Mr J Partridge
Elsfleth
Kincraig
PH21 1QA

Aviemore
PH22 1PY

Company Strathspey Railway Co Ltd

Summary of objection to Deposit Local Plan

The core path plan should not include any path across or on the trackbed. The proposals maps should be amended accordingly.

CNPA analysis of objection to Deposit Local Plan

The proposals maps included proposed core paths which were, at the time under consultation through the core path planning process. The finalised core paths will

be included within the local plan maps for information only, and any comments regarding their route must be considered under the core path planning process. The

issue has already been raised by the representative with staff within CNPA. Confirm that core paths were added to proposals map for info only, and are the subject

of a separate legal process to get adopted. Once the core path plan is adopted the routes will be added to the local plan proposals maps for info only and can not be

amended through it

Proposed 1st Modification

No modification considered necessary as a result of this representation.

Response to 1st modification objections

Thank you for your letter of 22 May. On the basis of the route through our proposed car park and then down the side of our land southwards we are supportive

and look forward to negotiating with you over the details.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref Policy 34

Objector Ref Name M T Collings

395a Birchfield

Nethybridge

PH25 3DD

Agent Name

Company

Summary of objection to Deposit Local Plan

Outdoor access can have a detrimental impact on the wild places of the Park, and such places should be protected from disruptive intrusion.

CNPA analysis of objection to Deposit Local Plan

The policy has been worded the underlying aims regarding access which are to protect public access rights, the core path network and wider path network, and

other rights of way. Connected with this is the need to protect natural heritage across the park, and in this regard any proposal must also take into account the

other policies of the Plan. Additional information will be included to ensure that users of the local plan are clear that all policies must be taken into account in all

applications for development. Confirm policy supports access strategy which refers directly to impact of access on the landscape.

Proposed 1st Modification

No modification considered necessary as a result of this representation.

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.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref Policy 34

Agent Name

Objector Ref Name Susan Davies

465v Scottish Natural Heritage
Great Glen House
Leachkin Road
Inverness

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Seek additional element in this policy that promotes provision of paths to important local public spaces and places as an integral part of new housing developments.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy and the references made to an open space strategy will be revisited to ensure it is reasonable, is not contradictory and will deliver the aims

of the policy, which are to protect public access rights, the core path network and wider path network, and other rights of way.

Proposed 1st Modification

Add reference to paths from housing developments in implementation para 6.16.

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 Policy 34

Agent Name

Objector Ref Name Dr A M Jones

400h(b)

Badenoch and Strathspey Conservation Group
Fiodhag
Nethybridge
PH25 3DJ

Company Badenoch and Strathspey Conservation Group

Summary of objection to Deposit Local Plan

Tone of these policies is too permissive and implies bypassing the planning process in parts. Object to the absence of reference to impact on natural and cultural heritage in these policies.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be revisited to ensure it is reasonable, is not contradictory and will deliver the aims of the policy, which are to protect public access rights, the core path network and wider path network, and other rights of way. The policy should be read in conjunction with the other policies in the plan, in particular those regarding cultural and natural heritage. Additional information will be included to ensure that users of the local plan are clear that all policies must be taken into account in all applications for development. Confirm the term does not imply permission as all policies of the plan where relevant must be complied with. The impact on natural and cultural heritage would be covered under policies in 'conserving and enhancing' section.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Object. Built development on greenfield sites without a curtilage reduces public access. We object to the general lack of acknowledgement of this within the mDLP.

Referring specifically to this policy, we object to the lack of qualification for encouraging developments in the first para. It should be made clear that development of outdoor access must take account of impacts on natural heritage e.g. biodiversity and disturbance.

Object to second para. We are concerned that as well as loss of public access, the CNPA should take into account reduction in the quality of experience. Should

insert words to the effect of 'or reduction in the quality of experience for users' after 'or loss of access to inland water'

6.16 Object to final two sentences.

Every housing development proposed in the mDLP reduces public outdoor access. It is misleading to simply claim that new housing developments will promote improved access.

CNPA analysis of objections to 1st modifications

The policy supports improved access. The impact of development on natural heritage will be considered under the policies previously in the plan relating to natural

heritage. The suggested wording regarding visitor experience would not be considered to provide adequate clarity to developers in line with government direction

for local plans, as this would be highly subjective. No further modifications are therefore proposed.

Objection maintained

Policy/site ref	Policy 34	Agent Name	
Objector Ref	Name		Company
437s	Mrs Jane Angus Darroch Den Hawthorn Place Ballater AB35 5QH		

Summary of objection to Deposit Local Plan

The growth in access will need to be carefully managed to ensure it does not result in disturbance for wildlife, especially water and natural interests.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be revisited to ensure it is reasonable, is not contradictory and will deliver the aims of the policy, which are to protect public access

rights, the core path network and wider path network, and other rights of way. The issue of repair and maintenance will continue to be addressed through the

Access staff within CNPA who work closely with the 4 local authorities. Confirm comment noted, but quality of work and weather cannot be controlled by planning policy.

Proposed 1st Modification

No modification considered necessary as a result of this representation.

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	Policy 34	Agent Name	
Objector Ref	Name		Company
056r	James and Evelyn Sunley 12 Lochnagar Way Ballater AB35 5PB		

Summary of objection to Deposit Local Plan

A road should be created between Braemar and Glen Feshie and on to Kingussie to link both sides of the Park to improve access.

CNPA analysis of objection to Deposit Local Plan

The policy is worded to consider applications for development which impact on outdoor access. Should a proposal come forward as mentioned in the representation

it would be considered on its merits and judged against this policy and the others of the local plan. No modification considered necessary as a result of this

representation. Confirm this would be considered on its merits if a proposal came forward but it would be unlikely to be supported due to the impact it would have

on landscape, wildness, etc.

Proposed 1st Modification

No modification considered necessary as a result of this representation.

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 option for such a road has not been raised by any other party and is highly unlikely to go forward without any demand. No further amendment is therefore

proposed.

Objection maintained

Policy/site ref Policy 34

Objector Ref Name John Anderson

463x 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

Generally support Alvie estate view on this policy. Replace the phrase '... improved alternative access solution can be secured to the satisfaction of the Planning

Authority and Access Authority', with '.. Planning, Authority, Access Authority and owners / occupiers affected by the proposal'.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be revisited to ensure it is reasonable, is not contradictory and will deliver the aims of the policy, which are to protect public access

rights, the core path network and wider path network, and other rights of way. It will also be reviewed in light of the comments to promote a more proactive

approach to access provision in new development. Confirm wording secures replacement paths and access in line with access legislation. Refer to need for

consultation with landowner and occupier.

Proposed 1st Modification

No modification considered necessary as a result of this representation.

Response to 1st modification objections

Outdoor access may have to be controlled in some instance, for example on the River Spey, in view of the conflict between boating in its various forms and fishing, the former having increased considerable compared to 20 years ago.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref Policy 34

Agent Name

Objector Ref Name Jamie Williamson
439z Alvie and Dalraddy Estate
Alvie Estate Office
Kincraig, Kingussie
PH21 1NE

Company Alvie and Dalraddy Estate

Summary of objection to Deposit Local Plan

The policy is too prescriptive particularly where there is a need to find other economic activities than tourism. Amended wording –

In para 2 replace ‘will only’ with ‘may’

In para 2 add ‘particularly’ after ‘permitted’

CNPA analysis of objection to Deposit Local Plan

The wording of the policy and the references made to an open space strategy will be revisited to ensure it is reasonable, is not contradictory and will deliver the aims

of the policy, which are to protect public access rights, the core path network and wider path network, and other rights of way. Confirm wording secures

replacement paths and access in line with access legislation.

Proposed 1st Modification

No modification proposed as result of this objection.

Response to 1st modification objections

Development proposals which improve opportunities for responsible outdoor access consistent with the Cairngorms Outdoor Access Strategy will be permitted.

Development proposals which would result in a significant loss to the public of access rights, or loss of linear access (such as core paths, rights of way, or other paths

and informal recreation areas, or loss of access to inland water) (will only) may be permitted particularly where an appropriate or improved alternative access

solution can be secured to the satisfaction of the planning authority and access authority.

This policy as stated is too prescriptive particularly where there is a need to find other economic activities than tourism.

Rights of Way and Core Paths are usually imposed and enforced by government with no compensation to the land occupier. There is a danger that

if land on which

such access is imposed then becomes sterilised and excluded from future development, this will devalue the land and persuade land occupiers to resist further access

and discourage land occupiers from allowing or promoting such access on their land.

CNPA analysis of objections to 1st modifications

The wording of the policy aims to give clarity to developers on the expectations of the policy. The wording proposed would undermine this clarity and therefore no

modification is proposed.

Objection maintained

Policy/site ref Policy 34

Agent Name

Objector Ref Name Ian Francis

424q RSPB Scotland
East Regional Office
10 Albyn Terrace
Aberdeen, AB10 1YP

Company RSPB Scotland

Summary of objection to Deposit Local Plan

There should be a reference to the imperative need not to cause adverse impact on natural heritage which underpins most tourism in the Park.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be revisited to ensure it is reasonable, is not contradictory and will deliver the aims of the policy, which are to protect public access

rights, the core path network and wider path network, and other rights of way. The policy should be read in conjunction with the other policies in the plan, in

particular those regarding landscape and visual setting, developments impacting on natural heritage etc. Additional information will be included to ensure that users

of the local plan are clear that all policies must be taken into account in all applications for development. Confirm all policies must be complied with so no cross

referencing has been included. Also policy supports access strategy which refers directly to impact of access on the landscape.

Proposed 1st Modification

No modification considered necessary as a result of this representation.

Response to 1st modification objections

No further comments added.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref Policy 34
Objector Ref Name Robert Maund
434m Scottish Council for National Parks
The Barony
2 Glebe Road
Kilbirnie, Ayrshire

Agent Name

Company Scottish Council for National Parks

Summary of objection to Deposit Local Plan

The wording of this policy may be problematic. The work on an open space strategy is also one to be watched in terms of implementation.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy and the references made to an open space strategy will be revisited to ensure it is reasonable, is not contradictory and will deliver the aims

of the policy, which are to protect public access rights, the core path network and wider path network, and other rights of way. Confirm ongoing work on both

these issues and approach to be adopted for the implementation of the plan once adopted.

Proposed 1st Modification

No modification considered necessary as a result of this representation.

Response to 1st modification objections

Objection maintained as in 434a.

CNPA analysis of objections to 1st modifications

The comments are noted and the ongoing work to develop a strategy for open space. No further modifications are therefore proposed.

Objection maintained

Policy/site ref Policy 34,35
Objector Ref Name Dr A Watson
020n Clachnaben
Crathes, Banchory
Kincardineshire
AB31 5JE

Agent Name

Company

Summary of objection to Deposit Local Plan

There is no mention of new paths, bridges, huts etc.

CNPA analysis of objection to Deposit Local Plan

The policy has been worded to consider all forms of recreational facility and does not therefore refer to specific forms of recreation. The policy should be read in

conjunction with the other policies in the plan, in particular those regarding landscape and visual setting, developments impacting on natural heritage etc. Additional

information will be included to ensure that users of the local plan are clear that all policies must be taken into account in all applications for

development.

Proposed 1st Modification

Amend policies 34-36 to clarify access issues.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

Additional paragraphs have been included to policy 34, 35 and 36 for clarity. Other forms of development associated with access and tourism will be considered

under the various other policies of the plan. No further modifications therefore proposed.

Objection withdrawn

Policy/site ref Policy 35

Objector Ref Name Glenmore Properties Ltd
453p 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 wording of the policy contradicts itself. Para b) requires that the total footprint remains the same but this cannot be if the proposal is an extension or additional

recreational facility. Part c) is superfluous, demand and supply of such facilities is a complex process and developing new facilities e.g. children's play barns, can

create the demand. The wording should therefore be amended to ensure it does not stand in the way of new recreational facilities.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be revisited to ensure it is reasonable, is not contradictory and will deliver the aims of the policy, which are to promote the best range

of facilities in the most appropriate locations to meet the aspirations of local communities and visitors to the Park.

Proposed 1st Modification

Delete b) from policy

Response to 1st modification objections

Suggest willingness to withdraw objection

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref Policy 35 **Agent Name**

Objector Ref Name DW and IM Duncan
037m Pineacre
West Terrace
Kingussie
PH21 1HA

Company

Summary of objection to Deposit Local Plan

The site of the old Aviemore ice rink should be used to benefit locals and visitors

CNPA analysis of objection to Deposit Local Plan

The comment is noted. The policy has been worded to support the widest range of facilities and ensure that they are located in the most appropriate locations

across the Park. Any proposal which would support the range of facilities in a settlement such as Aviemore would therefore be supported under the terms of the

policy. The CNPA will continue to work closely with partners and developers to encourage and facilitate the provision of such facilities in key settlements. No

modification considered necessary as a result of this representation. Confirm ongoing discussions regarding this and finding an appropriate site.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The policy would support such a development. CNPA continue to work to encourage and support development opportunities which support communities and this

is true for this particular project. No further modifications are therefore proposed.

Objection maintained

Policy/site ref Policy 35 **Agent Name**

Objector Ref Name John Anderson
463y 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

Generally support Alvie estate view on this policy. Para b) refers to '... the total footprint of the affected area remains the same as currently permitted'. This does

not allow for greater needs of an expanding community. These issues should be decided on individual merit.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be revisited to ensure it is reasonable, is not contradictory, provides users of the plan with an appropriate level of clarity, and will

deliver the aims of the policy, which are to promote the best range of facilities in the most appropriate locations to meet the aspirations of local communities and visitors to the Park.

Proposed 1st Modification

Delete b) from policy a

Response to 1st modification objections

Sport and recreational facilities should be encouraged in any of the communities showing an interest in developing and promoting such provision.

This includes

skiing which still provides employment and enjoyment, albeit for small numbers than previously – some people are not yet convinced that we will never see a return

to the winter conditions of old.

CNPA analysis of objections to 1st modifications

The policy encourages appropriate developments which add to the existing provision. No modification is therefore considered appropriate.

Objection maintained

Policy/site ref Policy 35

Objector Ref Name Susan Davies

465w Scottish Natural Heritage

Great Glen House

Leachkin Road

Inverness

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Recommend that paragraph a) is expanded slightly to ensure that only appropriately located and designed formal facilities are likely to be approved.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be revisited to ensure it is reasonable, is not contradictory and will deliver the aims of the policy, which are to promote the best range

of facilities in the most appropriate locations to meet the aspirations of local communities and visitors to the Park. The policy should also be read in conjunction

with the other policies in the plan, in particular those regarding landscape and visual setting, developments impacting on natural heritage etc.

additional information

will be included to ensure that users of the local plan are clear that all policies must be taken into account in all applications for development.

Proposed 1st Modification

Include reference to location in policy .

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 Policy 35
Objector Ref Name Rona Main
425t 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

The policy seems to contradict itself. The wording in b) and c) should therefore be clarified. Also the requirements on information to be supplied to justify a proposal must be reasonable.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be revisited to ensure it is reasonable, is not contradictory and will deliver the aims of the policy, which are to promote the best range of facilities in the most appropriate locations to meet the aspirations of local communities and visitors to the Park.

Proposed 1st Modification

Delete b) from policy

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The policy has been largely redrafted and any previous contradiction removed. No further modifications are therefore proposed.

Objection maintained

Policy/site ref Policy 35
Objector Ref Name Jamie Williamson
439za 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

If the Plan wishes to further develop tourism there may be a need for additional formal recreation facilities. The economic attributes of proposed facilities should be considered in balance with their environmental and cultural impact.

Amended wording –

In a) add 'unreasonable' before 'adverse'

In b) delete this section

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be revisited to ensure it is reasonable, is not contradictory, provides users of the plan with an appropriate level of clarity, and will

deliver the aims of the policy, which are to promote the best range of facilities in the most appropriate locations to meet the aspirations of local communities and

visitors to the Park. Any proposal for formal recreational facilities should also take into account the other policies in the plan, which include policies on tourism

development and economic growth. Additional information will be included to ensure that users of the local plan are clear that all policies must be taken into

account in all applications for development.

Proposed 1st Modification

Delete b) from policy

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 Policy 35

Agent Name

Objector Ref Name Campbell Gerrard
380c Sportscotland
Caledonia House
South Gyle
Edinburgh, EH12 9DQ

Company Sportscotland

Summary of objection to Deposit Local Plan

Further clarity is needed on what is meant by 'footprint' and 'affected area'. Throughout the policy wording is confusing and requires amendment.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be revisited to ensure it is reasonable, is not contradictory, provides users of the plan with an appropriate level of clarity, and will

deliver the aims of the policy, which are to promote the best range of facilities in the most appropriate locations to meet the aspirations of local

communities and
visitors to the Park.

Proposed 1st Modification

Delete b) from policy

Response to 1st modification objections

I am writing with sportscotland's response to the modifications proposed to the Cairngorms Local Plan and how these relate to the representations we made on the deposit Local Plan.

I can confirm that we are content with the modifications made in relation to our representation on Policy 35, Formal Recreation Facilities, clause (b).

We wish however to make further representation on the modified Policy 35 Sport and Recreation Facilities, as follows.

As drafted Policy 35 does not afford sufficient protection to playing fields and sports pitches. sportscotland considers that a new policy should be introduced which

provides specifically for playing fields and sports pitches and which is in full compliance with the guidance set out on playing fields in paragraph 46 of SPP 11.

CNPA analysis of objections to 1st modifications

Policy 35 ensures that provision such as playing fields will be protected unless they are ancillary to the principal use of the site as a sport and recreation facility, the

new use would not affect the use of the playing field, and a compensatory site is created. This is considered to provide considerable protection to the sites referred

to and no amendment is therefore proposed.

Objection maintained

Policy/site ref Policy 35

Agent Name

Objector Ref Name Alison Hogg

473zi
Aberdeenshire Council, Planning and Development
Woodhill House
Westburn Road
Aberdeen, AB16 5GB

Company Aberdeenshire Council

Summary of objection to Deposit Local Plan

Questions why the footprint of the affected area has to remain the same as currently permitted, and also if it is feasible for the policy to apply to extensions to existing businesses.

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be revisited to ensure it is reasonable, is not contradictory and will deliver the aims of the policy, which are to promote the best range of facilities in the most appropriate locations to meet the aspirations of local communities and visitors to the Park.

Proposed 1st Modification

Delete b) from policy

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 Policy 35,36

Agent Name

Objector Ref Name Mrs Jane Angus

437t Darroch Den
Hawthorn Place
Ballater
AB35 5QH

Company

Summary of objection to Deposit Local Plan

How will the development of a wide range of facilities be funded. Alternative forms of provision should be considered and backed up with adequate trainers.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and the CNPA continue to work closely with the 4 Local Authorities to provide and support an appropriate level of recreational provision

for communities across the Park. The policies have been worded to support as wide a range of facilities as possible and facilitate the development of appropriate new

provision in locations which are complimentary to the aims of the Park. No modification considered necessary as a result of this representation.

Confirm the

broader issues of open space and allocations will be addressed in the open space strategy, and will also come through community needs assessments. We will have

to work with the LAs on the funding issues.

Proposed 1st Modification

No modification proposed.

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

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 Policy 36

Agent Name

Objector Ref Name John Anderson

463z 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

Generally support Alvie estate view on this policy. No guidance is given as to how much a commuted sum might be.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and the CNPA continue to work closely with the 4 Local Authorities to provide and support an appropriate level of recreational provision

for communities across the Park. The policies have been worded to support as wide a range of facilities as possible and facilitate the development of appropriate new

provision in locations which are complimentary to the aims of the Park. However in light of the comments received, the wording will be reviewed to ensure that the

aims of the policy are deliverable and will ensure that open space is supported across the Park. In regard to the issue of commuted sums, additional supplementary

guidance will be prepared to support the local plan on a number of issues, including the calculations and expectations of commuted sum payments Confirm sums

would be based on policy 20 regarding developer contributions and would be based on the development proposed.

Proposed 1st Modification

Amend wording to clarify this is for allocated development sites, and not open space sites.

Response to 1st modification objections

Agree that open space provision should be central to significant new development and/or development which extends an existing settlement to the

extent that older facilities are no longer sufficient or readily accessible in the expanded situation.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref Policy 36
Objector Ref Name Reidhaven Estate
456j Seafield Estate Office
Cullen
Buckie
Banffshire

Agent Name Jill Paterson
Halliday Fraser Munro
8 Victoria Street
Aberdeen
AB10 1XB
Company Reidhaven Estate

Summary of objection to Deposit Local Plan

Public and amenity open space are not defined in the glossary. There should be an expectation that such space is maintained as such, perhaps by the local authority.

There is no standard or any commitment that any standard will be established in SPG.

The section regarding 'loss of existing provision' is poorly worded as 'existing provision' is both nondescript and subjective. There is no advice or guidance on how

to determine whether any piece of land is 'existing provision' or not.

The issue of maintenance is not covered. It should be clear that the maintenance will not fall to the developer.

CNPA analysis of objection to Deposit Local Plan

The comments are noted and the wording of the policy will be revised to ensure that it is clear, deliverable and provides the appropriate level of guidance to

developers in line with national guidance. Where the level of detail needed is inappropriate for the policy, a clear commitment to SPG will be included in the

supporting text. In regard to issues of maintenance the CNPA will continue to work closely with the 4 local authorities to ensure that policies are appropriate and

establish from the outset the expectations of the plan in regard to any particular development. Issue of management will be addressed on a case by case basis

depending on the nature of the proposal.

Proposed 1st Modification

Add definitions to glossary. Add better link to need for open space strategy.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

Open space has been added to the glossary. Reference has also been added to clarify the future production of an open space strategy.

Reference to maintenance has also been added to the policy. No further modifications are therefore proposed.

Objection maintained

Policy/site ref	Policy 36	Agent Name
Objector Ref	Name Mairi Maciver	
025v	Communities Scotland Urquhart House Beechwood Park Inverness, IV2 3BW	Company Communities Scotland

Summary of objection to Deposit Local Plan

Welcome policy regarding open space provision and proposed open space audit and open space strategy.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

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	Policy 36	Agent Name
Objector Ref	Name Susan Davies	
465x	Scottish Natural Heritage Great Glen House Leachkin Road Inverness	Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Clarification sought as to whether the 'strategic sites' referred to in the first paragraph comprise all the proposed allocations indicated on settlement maps, or just the open space allocations.

CNPA analysis of objection to Deposit Local Plan

The comment is noted, and the appropriate modifications will be made to the Proposals maps and supporting text to clarify this position.

Proposed 1st Modification

Amend wording to clarify this is for allocated development sites, and not open space sites.

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 Policy 36

Agent Name

Objector Ref Name Jamie Williamson

439zb Alvie and Dalraddy Estate

Alvie Estate Office

Kincraig, Kingussie

PH21 1NE

Company Alvie and Dalraddy Estate

Summary of objection to Deposit Local Plan

The policy is too prescriptive and will result in no additional provision. Amended wording –

In para 1 – delete final sentence

In para 2 – delete ‘only’

In a) replace ‘and’ with ‘or’

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and the CNPA continue to work closely with the 4 Local Authorities to provide and support an appropriate level of recreational provision

for communities across the Park. The policies have been worded to support as wide a range of facilities as possible and facilitate the development of appropriate new

provision in locations which are complimentary to the aims of the Park. However in light of the comments received, the wording will be reviewed to ensure that the

aims of the policy are deliverable and will ensure that open space is supported across the Park. Confirm the commuted sum would be assessed under policy 20

developer contributions. Take wording out of policy and into implementation section.

Proposed 1st Modification

No modification proposed as result of this objection .

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 **Policy 36**

Agent Name

Objector Ref **Name** Campbell Gerrard
380d Sportscotland
Caledonia House
South Gyle
Edinburgh, EH12 9DQ

Company Sportscotland

Summary of objection to Deposit Local Plan

The policy fails to provide adequately for the range of recreational provision it aims to address, does not make adequate protection for playing fields and is contrary

to NPPG11 and the emerging SPP11. The wording is too vague and in c) provides no timescale for the provision of replacement playing fields. The supporting text

seems to apply to a wide range of activities but the wording is not relevant to all of these, some of which could not be described as open space.

The Policy states that 'loss of existing provision will be resisted particularly where identified on proposals maps'. However no mountain bike or ski centres are

identified or have policy designations on the proposals maps which implies a reduced level of protection. Also within the proposals maps, within settlements some

sports pitches and golf courses are not protected as Open Space, thereby according them less protection. It is also noted that the football ground in Aviemore has

been identified as possible site for development of a new school and Sportscotland should be consulted on any such development. All sports pitches and golf courses

and easily identifiable sports sites in the countryside should be identified with the relevant policy on the proposals maps.

Proposed modifications are three separate policies are needed regarding the protection/provision for sports pitches; the protection/ provision of other open spaces;

and further a policy protecting other sports facilities and opportunities outwith settlement boundaries. This latter may be adequately covered by a general policy

referring to the need to make sport and recreation interests into account in any proposal which may affect a site in the countryside that is important for sport and

recreational purposes.

CNPA analysis of objection to Deposit Local Plan

The policy has been worded to support as wide a range of facilities as possible and facilitate the development of appropriate new provision in locations which are

complimentary to the aims of the Park. However in light of the comments received, the wording will be reviewed to ensure that the aims of the policy are deliverable

and will ensure that open space is supported across the Park. The wording of the policy will be reviewed to ensure that it takes appropriate

cognisance of national guidance on the topic. The comments regarding the proposals maps are also noted and the appropriate modifications will be made to the Proposals maps and supporting text to clarify this position.

Proposed 1st Modification

Revise policy to make better links with SPP11 and other government guidance and the requirements therein.

Response to 1st modification objections

No additional reference made to this policy in representation to the modifications. Assume issue resolved.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	Policy omission	Agent Name
Objector Ref 472a	Name Fred Mackintosh The Highland Council	

Company The Highland Council

Summary of objection to Deposit Local Plan

It is strongly recommended that the current Highland Council Policy with regard to road adoption, "the 4 house rule", is adopted by the Park Authority. Subject to the provision of a suitably robust management and maintenance agreement, a road serving a new development, particularly a smaller development, need not be adopted. However, for any development in excess of four dwellings the road serving the development should be designed and constructed to a generally adoptable standard, in compliance with the requirements of Highland Council's Road Guidelines for New Developments. Significant improvements to the existing public road network will be required to mitigate the impact of larger developments; whether residential, commercial or industrial, including mineral extraction sites and renewable energy schemes. Such improvements should ideally be carried out by the developer, to the satisfaction of the Roads Authority, but in certain circumstances financial contribution by the developer may be more appropriate. Account must also be taken of the cumulative impact of smaller scale rural developments, including conversion of redundant buildings or replacement of uninhabited dwellings. It is recommended that a suitable mechanism is established to deliver consistent and equitable levels of planning gain relative to such developments.

CNPA analysis of objection to Deposit Local Plan

The issue of the '4 house rule' is a technical one which can be addressed by way of planning condition where needed and appropriate. It is not

considered necessary

to include this level of detail and impose it across the 4 local authorities. Further information will however be added within the Plan to provide additional guidance

on roads issues, guiding developers on the expectations of the policies and work will continue with the 4 local authority road departments to ensure an appropriate

level of guidance is available for developers. Confirm impact of developments on roads will be assessed on application and in consultation with the relevant roads

authority. CNPA staff will continue to work with partner local authorities to achieve consistency across the Park.

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 Policy omission

Objector Ref Name Susan Davies

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

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Seek reinstatement of policy on Upland Vehicle Tracks, which was present in the Consultative draft local plan, subject to amendments recommended by SNH in letter of 28 Feb 2006.

CNPA analysis of objection to Deposit Local Plan

In regard to tracks the comment is noted. However it is considered that any application for such development will be judged against all the policies in the plan and

there is not a need to specifically highlight such developments within separate policies. The intention throughout the plan is that all policies should be taken into

account when considering any development proposal. The wording within the Introduction will be amended to clarify this position. Confirm the issue of tracks

would be considered under all policies of the plan including specifically those regarding 'conserving and enhancing' and not under a particular policy regarding

tracks. All policies of the plan must be complied with where relevant to gain permission, therefore a topic specific policy is not considered appropriate.

Proposed 1st Modification

No modification 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 Policy omission**

Objector Ref **Name** Reidhaven Estate
456b Seafield Estate Office
 Cullen
 Buckie
 Banffshire

Agent Name Jill Paterson

Halliday Fraser Munro
8 Victoria Street
Aberdeen
AB10 1XB

Company Reidhaven Estate

Summary of objection to Deposit Local Plan

Why was policy 39 of the Draft plan regarding the development of 8 houses off one road deleted? What is the current roads policy for such development?

CNPA analysis of objection to Deposit Local Plan

The comment is noted but the issue is a technical one rather than a local planning one, and any requirements placed on planning applications by the Roads

Authority can be added as planning conditions as necessary. It is not therefore considered necessary to have an additional policy to deal with this issue. Confirm

impact of developments on roads will be assessed on application and in consultation with the relevant roads authority. CNPA staff will continue to work with

partner local authorities to achieve consistency across the Park.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Maintain objection.

CNPA analysis of objections to 1st modifications

This technical approach to road standards will be addressed when considering applications rather than setting a roads standard across the National Park. The

advice of the Roads Authority will be sought in all cases. No modification is therefore proposed.

Objection maintained

Policy/site ref **Policy omission**
Objector Ref **Name** Rona Main
425a(e) 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

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, working closely with other agencies to meet the aims and vision for the National Park.

The Plan should evaluate transport and access issues, including the physical separation of the eastern and western areas of the Park. A review of how local populations and tourists arrive and circulate around the Park and the physical relationships between the east and west would be welcomed.

CNPA analysis of objection to Deposit Local Plan

The comments are noted and consideration will be given to the inclusion of a policy regarding strategic infrastructure provision across the Park to guide developers and promote a co-ordinated approach. Confirm that such developments would be considered under all the relevant policies of the Plan and the strategic support for such developments is given in the National Park Plan which gives the local plan its context.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

Such developments will be considered under all relevant policies of the plan and there is not therefore a need for a separate policy. No further modifications are therefore proposed.

Objection maintained

Policy/site ref **Policy omission**
Objector Ref **Name** Dr A Watson
020m Clachnaben
 Crathes, Banchory
 Kincardineshire

Agent Name

AB31 5JE

Company

Summary of objection to Deposit Local Plan

There is no policy on Vehicle tracks.

CNPA analysis of objection to Deposit Local Plan

In regard to tracks the comment is noted. However it is considered that any application for such development will be judged against all the policies in the plan and

there is not a need to specifically highlight such developments within separate policies. The intention throughout the plan is that all policies should be taken into

account when considering any development proposal. The wording within the Introduction will be amended to clarify this position.

Proposed 1st Modification

Clarify introduction to clarify role of all policies (para 1.20). No other modification proposed.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The issue of vehicle tracks will be considered against the various policies of the plan affecting landscape, including policy 7. There is not therefore considered to be a

need for a separate policy for this particular form of development. No further modification therefore proposed.

Objection withdrawn

Policy/site ref Policy omission

Objector Ref Name Dr A Watson

020p Clachnaben

Crathes, Banchory

Kincardineshire

AB31 5JE

Agent Name

Company

Summary of objection to Deposit Local Plan

There is no policy regarding signs or advertisements.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. However it is considered that any application for such development will be judged against all the policies in the plan and there is not a need

to specifically highlight adverts and signs within a separate policy. The intention throughout the plan is that all policies should be taken into account when

considering any development proposal. The wording within the Introduction will be amended to clarify this position.

Proposed 1st Modification

No modification proposed other than to clarify role of all policies in para 1.20.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

The issue of adverts will be considered against the various policies of the plan including policy 7, 17, 18, 33, amongst others. There is not therefore considered to be a need for a separate policy for this particular form of development. No further modification therefore proposed.

Objection withdrawn

Policy/site ref	Policy omission	Agent Name
Objector Ref 037u	Name DW and IM Duncan Pineacre West Terrace Kingussie PH21 1HA	Company

Summary of objection to Deposit Local Plan

There is a need for an additional policy regarding permitted developments in regard to agricultural and forestry operations, hill tracks and new paths and bridges.

CNPA analysis of objection to Deposit Local Plan

Permitted developments for all forms of development, as relevant are set out in separate legislation and regulation and developers should refer to the appropriate

document to consider whether their proposal does or does not fall within the permitted development rights. To repeat these regulations here would be to add a

level of duplication which the Plan is endeavouring to steer away from.

In regard to hill tracks, and other operations referred to the comment is noted. However it is considered that any application for such development will be judged

against all the policies in the plan and there is not a need to specifically highlight them within separate policies. The intention throughout the plan is that all policies

should be taken into account when considering any development proposal. The wording within the Introduction will be amended to clarify this position. Confirm the

issue of tracks and agricultural operations would be considered under all policies of the plan including specifically those regarding 'conserving and enhancing' and

not under a particular policy regarding tracks. All policies of the plan must be complied with where relevant to gain permission, therefore a topic specific policy is

not considered appropriate.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

Objection maintained.

CNPA analysis of objections to 1st modifications

Where developments such as those listed require planning permission they will be considered under all relevant policies of the plan. Where they fall outside the planning system and are permitted development, the local plan cannot place any control over them. No further modifications are therefore proposed.

Objection maintained

Policy/site ref Policy omission

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

Agent Name

Company Scottish Government

Summary of objection to Deposit Local Plan

The previous policy regarding gypsies/travellers and residential caravans should be retained or reference made in the housing section.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. However it is considered that any application for such development will be judged against all the policies in the plan and there is not a need

to specifically highlight gypsy/traveller sites within a separate policy. The intention throughout the plan is that all policies should be taken into account when

considering any development proposal. The wording within the Introduction will be amended to clarify this position. Confirm the issue of gypsy/traveller

developments would be considered under all policies of the plan including specifically those regarding 'conserving and enhancing' and 'living and working' and not

under a particular policy regarding gypsy/traveller developments. All policies of the plan must be complied with where relevant to gain permission, therefore a topic

specific policy is not considered appropriate.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

The Plan should identify suitable locations for sites for Gypsies and Travellers and set out policies for dealing with planning applications for small, privately-owned

CNPA analysis of objections to 1st modifications

An additional policy will be added in 2nd modifications to address the need for accommodating gypsies.

Objection maintained

Policy/site ref **Policy omission**
Objector Ref **Name** Nicola Abrams
399p SEPA

Agent Name

Greyhope House
Greyhope Road
Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

There is an omission of a policy which safeguards existing strategic waste management facilities and identifies and safeguards all sites required to fulfil the

requirements of the Area Waste Plan. Key waste management sites to deliver the Area Waste Plan requirements and/or for the required move to sustainable waste

management have not been identified within the plan in either text or proposals maps. The plan does not therefore accord with SPP10 which requires development

plans to provide for the spatial dimension of the Area Waste Plans, to identify sites for community waste infrastructure and for larger installations and to protect

existing waste management installations from inappropriate development. It also does not comply PAN 63 (paragraph 8) which requires Local Plans to provide for

the waste management facilities required by the Area Waste Plans.

The aim of identification and safeguarding of such sites is to protect the functioning of existing waste management facilities by discouraging neighbouring

development which could prejudice the continued operation or intensification of existing processes.

For example and specifically within the National Park, there may be a need for sites for composting facilities in Aviemore and potential industrial estates which could

be highlighted. Please refer to research for the Office of the Depute Prime Minister on Planning for Waste Management Facilities, and SEPA info leaflets on major

waste management facilities.

Existing strategic and proposed sites for waste management facilities should be identified on the proposals maps and policy wording included in order to safeguard

them to fulfil the requirements of the Area Waste Plan.

CNPA analysis of objection to Deposit Local Plan

The reference to the scale and nature of development in the representation is noted, and consideration will be given to the inclusion of a policy regarding strategic

forms of development which may occur within the Park to the benefit of the wider Highland region.

Proposed 1st Modification

Amend policy 32 to include for such developments.

Response to 1st modification objections

SEPA welcomes the inclusion in Policy 32 of a requirement to safeguard existing strategic waste management facilities and all sites required to fulfil

the requirements

CNPA analysis of objections to 1st modifications

An additional para has been added to policy 32 to presume in favour of strategic waste management facilities. Many of these sites do not fall within settlement

boundaries and are therefore not included within the Proposals maps which focus on settlements and development opportunities within them. No further

modification is therefore proposed.

Objection maintained

Policy/site ref **Policy omission**

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

Agent Name

Company The Highland Council

Summary of objection to Deposit Local Plan

The Cairngorms National Park Local Plan is the appropriate framework within which to convey the Park Authority's strategic approach and planned response to the

provision of A9 services and to have due regard to national safety aspects and the implications for communities and the economy. It is recommended that

consideration should be given to reflecting the principle and an acceptable scale of development at key locations namely, at Dalwhinnie to coincide with the planning

permission to 05/331 FULBS for tourist information, restaurant and shop (March 2006); at Ralia, where refreshments are presently available and at Carrbridge.

CNPA analysis of objection to Deposit Local Plan

The reference to the scale and nature of development in the representation is noted, and consideration will be given to the inclusion of a policy regarding strategic

forms of development which may occur within the Park to the benefit of the wider Highland region. Confirm that proposals such as the one mentioned will be

considered on their merits, and judged against all policies in the Plan. A site has not been specifically identified as the Plan does not wish to hamper the selection of

a site for any such development. The wording of the policy is therefore considered suitably supportive to assist in the development of the project if it

comes forward.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

We had suggested that the Local Plan should set out CNPA's strategic approach and planned response to the provision of A9 services, having regard to key issues

and we suggested some amendments. We note that whilst not including a specific policy on this in the Modifications, CNPA has sought to set out a general policy framework within which proposals for facilities may be considered. Proposals will therefore be considered on their merits and judged against all policies in the Plan.

CNPA considers that policy is suitably supportive to assist in the development of such a project if it comes forward. A site has not been specifically identified as

CNPA does not wish the Plan to hamper the selection of a site for any such development.

There may be a need for A9 Policy relating to services provision to be looked at in due course at a strategic level involving liaison between the Highland Council,

CNPA and Perth & Kinross Council. The Highland Council will need to consider its own position on the matter, including revisiting the Highland Structure Plan

Policy TC8, as part of preparing the forthcoming Highland Local Development Plan. This will need to take into account any planned improvements of the A9 trunk road itself.

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	Policy omission	Agent Name
Objector Ref 399q	Name Nicola Abrams SEPA Greyhope House Greyhope Road Torry, Aberdeen	Company SEPA

Summary of objection to Deposit Local Plan

The local plan does not contain a policy providing locational and directional guidance for waste management facilities. SPP10 recognises that industrial and

employment land is suitable for waste management uses and provides a model planning policy. PAN 63 also recognises that waste facilities can be readily accommodated on industrial land, degraded land, co-located with existing facilities etc with detailed advice provided. Policy 20 as currently written would exclude waste management proposals, as waste management does not fall within these use classes, being a "sui generis" land use. The policy could be amended to include waste management thus recognising the role of waste management as a business opportunity and waste as a potential "resource" - this would accord with SPP10. Alternatively, a Policy could be included to set out the potential criteria for the siting of waste management facilities. PAN 63 contains advice in this regard.

CNPA analysis of objection to Deposit Local Plan

The comments are noted and consideration will be given to the inclusion of a policy regarding strategic infrastructure provision across the Park to guide developers and promote a co-ordinated approach.

Proposed 1st Modification

Amend policy 32 to include for such developments.

Response to 1st modification objections

SEPA objects to the omission of a policy in the Local Plan to provide locational and directional guidance for waste management facilities. Reason for objection - SEPA notes that para 1 of policy 32 refers to a sequential approach but it is not clear what this refers to. SEPA notes that para 5.106 indicates that the principle of waste transfer stations will be supported in industrial areas, while SEPA welcomes this reference, SEPA considers that this does not provide clear and positive guidance for developers, and the community on all types of waste management facility. It is recognised in SPP10 that industrial and employment land is suitable for waste management uses with a model planning policy suggested. Also it is recognised within PAN 63 that waste facilities can be readily accommodated on industrial land, degraded land, co-located with existing facilities etc with detailed advice provided. Suggested modification - The current policy for business development (policy 20) would exclude waste management proposals, as waste does not fall within these use classes being a sui generis land use. A potential way to provide the necessary direction may be to simply include waste management within this policy thus recognising the role of waste management as a business opportunity and waste as a potential 'resource'. This promotion of business land would accord with National Policy as contained in SPP10 and its model planning policy (para 26). Alternatively a policy could be developed to set out the potential criteria for the siting of waste management facilities. Planning Advice Note 63 contains advice in this regard and if this would be helpful SEPA would be happy to provide web links showing how other local plans in Scotland have approached this.

CNPA analysis of objections to 1st modifications

The policy gives guidance on how best to assess the impact of a proposed development in terms of sequential testing. The para will be set out in bullet points for

clarity. Policy 27 does not highlight any particular uses for business development and the development of waste management which supported economic prosperity

would therefore be considered under policy 27. Policy 17 may also be relevant. No further modifications are therefore proposed.

Objection maintained

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

Summary of objection to Deposit Local Plan

Delivery of the National Park Plan objectives and actions concerned with raising awareness and understanding of the Park would be enhanced by policies and/or

proposals that support developments that would deliver Park Plan Awareness and Understanding Actions 2b, and 2d (and probably 1a – 1d).

CNPA analysis of objection to Deposit Local Plan

The comments are noted but the reference to Park Plan outcomes is for information only and cannot be modified through this process. Confirm that the local plan

is intended to achieve the aims of the Park and the objectives of the Park Plan and this underlies all the policies, there is no need therefore for a specific policy to state this.

Proposed 1st Modification

No modification proposed.

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	Policy omission	Agent Name
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Objector Ref	Name Mairi Maciver	
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025t	Communities Scotland Urquhart House Beechwood Park Inverness, IV2 3BW	
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Company	Communities Scotland
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Summary of objection to Deposit Local Plan

The policy regarding gypsy/traveller sites should be retained.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. However it is considered that any application for such development will be judged against all the policies in the plan and there is not a need

to specifically highlight gypsy/traveller sites within a separate policy. The intention throughout the plan is that all policies should be taken into account when

considering any development proposal. The wording within the Introduction will be amended to clarify this position. Confirm the issue of gypsy/traveller

developments would be considered under all policies of the plan including specifically those regarding 'conserving and enhancing' and 'living and working' and not

under a particular policy regarding gypsy/traveller developments. All policies of the plan must be complied with where relevant to gain permission, therefore a topic

specific policy is not considered appropriate.

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

Company Aberdeenshire Council

Summary of objection to Deposit Local Plan

The plan would benefit from a general development policy dealing with parking, servicing and accessibility. This would help to ensure interpretation of the policies is consistent.

The plan also needs guidance on infill developments/feu splits.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. However it is considered that any application for such development will be judged against all the policies in the plan and there is not a need to specifically highlight such developments within separate policies. The intention throughout the plan is that all policies should be taken into account when considering any development proposal. The wording within the Introduction will be amended to clarify this position. Further work is also 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. Confirm that protocol guidance will be produced to support the local plan on issues such as those raised.

Proposed 1st Modification

Add additional policy 22 in housing section regarding development within settlements.

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	Policy omission
Objector Ref 003b	Name Mr & Mrs Rimmell Broomlea Newtownmore PH20 1AT

Agent Name

Company

Summary of objection to Deposit Local Plan

Additional explanation should be included to explain the significance of the settlement boundary, and there should be a presumption against development outside the line,

CNPA analysis of objection to Deposit Local Plan

The comment is noted and additional information will be added to clarify the meaning of such proposal lines, and the impact this will have on development proposals both within and outwith the line.

Proposed 1st Modification

Include additional para in intro to cpt 7 to clarify the position of sites inside and outwith boundaries

Response to 1st modification objections

Thank you for your letter of 22 may 2008. It answers our objections in a constructive way. We think this will benefit our community. We withdraw our objection, on the understanding that the amendments you have made will be part of the Local Plan. We would also like to express our appreciation of the way in which you have taken forward the stages of the Plan, and kept us informed.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn**Policy/site ref Policy omission****Agent Name**

Objector Ref **Name** Anne MacNamara, Planning Directorate
423d Scottish Government
 Victoria Quay
 Edinburgh
 EH6 6QQ

Company Scottish Government

Summary of objection to Deposit Local Plan

There is a lack of clarity in relation to public transport. Greater prominence should be given to this in accordance with SPP17.

CNPA analysis of objection to Deposit Local Plan

The comments are noted and consideration will be given to the inclusion of a policy or subdivision of an existing policy to allow the full consideration of public transport in line with SPP17.

Proposed 1st Modification

Amend policy 30 regarding integrated and sustainable transport networks.

Response to 1st modification objections

Transport Scotland confirms that objection ref. TS/Obj/4 is withdrawn, but does, however, request that the Plan is modified to provide greater clarity on policies

directly related to public transport.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref Policy omission

Objector Ref Name Ian Francis

424b RSPB Scotland
 East Regional Office
 10 Albyn Terrace
 Aberdeen, AB10 1YP

Agent Name

Company RSPB Scotland

Summary of objection to Deposit Local Plan

The overarching policy is weaker than in the consultative draft plan.

CNPA analysis of objection to Deposit Local Plan

The comment is noted but it is hoped to be able to modify the Deposit Plan to retain the concise nature of policies which should all be taken into consideration for all planning proposals, whilst ensuring an appropriate level of robust and strong plan which delivers the aims of the Park, the Park Plan and the vision of the Local Plan. Confirm amendments to policy 1 which now stands as the over arching policy against which all proposals will be judged.

Proposed 1st Modification

No modification proposed.

Response to 1st modification objections

No further comments added.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref Policy omission

Objector Ref Name Susan Davies

465y Scottish Natural Heritage
 Great Glen House
 Leachkin Road
 Inverness

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Policy gap: awareness and understanding - Delivery of the National Park Plan objectives and actions concerned with raising awareness and understanding of the Park

would be enhanced by policies and/or proposals that support developments that would deliver Park Plan Awareness and Understanding Actions 2b, and 2d (and probably 1a – 1d).

CNPA analysis of objection to Deposit Local Plan

The links between the Park Plan and its objectives and the Local Plan are highlighted within the justification for each policy. The approach taken will however be

reviewed to ensure the links between the documents is clear enough. Confirm that the local plan is intended to achieve the aims of the Park and the objectives of the

Park Plan and this underlies all the policies, there is no need therefore for a specific policy to state this.

Proposed 1st Modification

No modification 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	Policy omission	Agent Name
Objector Ref 4771	Name Dr Alister Scott University of Aberdeen Department of Geography and Environment Elphinstone Road Aberdeen	Company

Summary of objection to Deposit Local Plan

Climate change should have a separate policy and the plan should use the Merton Rule.

CNPA analysis of objection to Deposit Local Plan

The Merton Rule is currently under review and although a commendable approach is not appropriate in this situation. The CNPA will however continue to work

with building standards officers to raise standards, and will also produce the design guide through policy 18 to raise the bar on this issue. Confirm the issue of

climate change will be considered under policies 17/18 and will be inherent in the Sustainable design guide.

Proposed 1st Modification

No modification proposed.

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	Policy omission	Agent Name
Objector Ref	Name	
020k	Dr A Watson Clachnaben Crathes, Banchory Kincardineshire AB31 5JE	Company

Summary of objection to Deposit Local Plan

There should be greater control over the change of use both in forestry and agriculture. Where activities which cause an impact cannot be controlled by the planning system the CNPA should be requesting control from Government.

CNPA analysis of objection to Deposit Local Plan

Where such operations are covered by planning legislation the policies of the local plan would apply as with any other form of development. However where such operations are not covered by planning legislation the local plan would not apply and such operations would be dealt with under separate control or guidance as relevant to that industry. The CNPA will however continue to work to ensure the most appropriate level of control operates in the Park area. 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

The CNPA continue to work closely with the Scottish Government to try and influence policy and direction in relation to National Parks. No further modification

therefore proposed.

Objection maintained

Policy/site ref	SEA	Agent Name
Objector Ref	Name	
437v	Mrs Jane Angus Darroch Den Hawthorn Place Ballater AB35 5QH	
		Company

Summary of objection to Deposit Local Plan

Methodology – the background information is lacking and detailed studies of particular sites may be needed to avoid mistakes. Strategic

Monitoring - how will this be done and by whom.

Section 5 - also uses the flawed baseline information.

Para 5.11 – clarification needed on the ‘deprivation indices’.

Para 5.3 – concern regarding deer culling. The background information provided by SNH is also unclear regarding forests and fires, soil erosion, and ramsar sites.

SEA Indicators and Targets –

Para 6.2-6.7 – consideration for habitat networks which have already been modified;

Para 4.7 – there seems to be an understanding of animal behaviour etc.

Sec 6 – geological impacts should be recognised

Sec 5 – every effort should be made to retain run-off, also at 9.3 p.41

The impacts of climate change and development on the floodplain which is also the key agricultural land should be recognised.

Strategic Alternatives – support this section but is the scoring approach the best one.

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. In regard to the detailed comments made, the environmental report, baseline information and indicators, the

comments are noted, and in further working on the SEA for the local plan refinements will be made to inform the process.

Proposed 1st Modification

A number of changes have been made to the SEA environmental report which address the concerns expressed.

Response to 1st modification objections

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

The problem of balancing the various aims must be remembered.

CNPA analysis of objections to 1st modifications

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

Policy/site ref	SEA		Agent Name
Objector Ref	Name	George Hogg	
465 (SEA01)		Scottish Natural Heritage Dingwall Business Park Fodderty Way Dingwall	Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

The environmental report is good, and the assessment methods clear and broadly sound. We note that an appropriate assessment will be undertaken in line with the legislation on particular sites, and until this is done, the integrity of Natura Sites cannot be ascertained. SNH are happy to help in this work.

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 and before any modifications are finalised and published for consultation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	SEA		Agent Name
Objector Ref	Name	Susan Davies	
465z-c		Scottish Natural Heritage Great Glen House Leachkin Road Inverness	Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

The SEA Environmental Report identifies a number of instances where mitigation will be needed to minimise or avoid negative environmental effects, and we strongly recommend indicating clearly in the settlement statements what mitigation will be needed in which locations.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and better links and cross referencing will be undertaken to ensure the local plan takes full and proper account of the findings of the SEA.

The wording within the local plan also be amended to highlight the findings of the SEA and any actions needed as a result of it during the delivery of the local plan.

Work is ongoing and will be finalised before the Local plan is adopted.

Proposed 1st Modification

work is progressing on this, and will be finalised before the Local Plan is adopted.

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 SEA Allocations

Objector Ref Name Nicola Abrams

399SEA(p)

SEPA

Greyhope House

Greyhope Road

Torry, Aberdeen

Agent Name

Company SEPA

Summary of objection to Deposit Local Plan

The assessment matrices and supporting tables are clear and useful.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

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 SEA An Camas Mor

Objector Ref Name George Hogg

Agent Name

465(SEA16)

Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

In view of the range of negative and uncertain environmental effects identified, recommend further emphasis on, and explanation of, the role of a detailed master plan

for the new settlement, and this should incorporate measures to minimise and mitigate negative environmental effects.

CNPA analysis of objection to Deposit Local Plan

The comment regarding An Camas Mor is noted, and the wording of the proposal will be amended to clarify the role of the masterplan, and the links which should

be taken into account as a result of the SEA.

Proposed 1st Modification

Comments noted, work is progressing and changes will be made before the plan is formally adopted.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA An Camas Mor

Agent Name

Objector Ref Name Lily Linge
467f

Historic Scotland
Longmore House
Salisbury Place
Edinburgh, EH1 1SH

Company Historic Scotland

Summary of objection to Deposit Local Plan

Seeks clarification that potential impacts on the historic environment have been considered in the assessment of An Camas Mor. Also seeks inclusion as a mitigation

measure impacts on Rothiemurchus scheduled ancient monument.

CNPA analysis of objection to Deposit Local Plan

The comment regarding An Camas Mor is noted, and the wording of the assessment will be amended to clarify the position on the historic environment.

Proposed 1st Modification

Comments noted and assessment ammended to address this.

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 SEA An Camas Mor

Agent Name

Objector Ref Name Nicola Abrams

399SEA(q)

SEPA

Greyhope House

Greyhope Road

Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

An Camas Mor – although outwith the indicative limits of the floodplain, SEPA has concerns about the alignment of the access roads through the flood plain. The

recognition in the ER of the issue and need for a FRA to be produced to support any proposals is welcomed, but the requirement of a FRA is not included in the

Local Plan.

CNPA analysis of objection to Deposit Local Plan

The comment regarding An Camas Mor is noted, and the wording of the proposal will be amended to clarify the position on the comments made and the impact any

FRA might have.

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

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 SEA Appendix 1

Agent Name

Objector Ref Name Ian Francis

424z

RSPB Scotland
East Regional Office
10 Albyn Terrace
Aberdeen, AB10 1YP

Company RSPB Scotland

Summary of objection to Deposit Local Plan

There are a number of errors:

- typographic errors in Appendix I — column 2 of the table showing other relevant plans/programmes incorrectly describes the Birds and Habitats Directives
- Nature Conservation Bill (Scotland) 2004— should be Nature Conservation (Scotland) Act 2004
- NPPG6 - now SPP6, NPPG4 - now SPP4.
- There is no reference in Appendix I to The Water Environment and Water Services (Scotland) Act — the CNPA is a Responsible Authority under the Act and must exercise its functions, including its local planning function, to promote sustainable development and contribute to the achievement of sustainable development.

CNPA analysis of objection to Deposit Local Plan

The corrections are noted, and the appropriate alterations will be made in future work on the SEA

Proposed 1st Modification

modifications beinf proposed to rectify errors pointed out.

Response to 1st modification objections

No further comments added.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref **SEA Assessment**

Objector Ref **Name** George Hogg
465(SEA15) Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Question the use of '?'s in the table, as the negative effects are sufficiently probable in many cases, in particular in relation to loss of priority habitats and disturbance to priority species at Boat of Garten and An Camus Mor.

Note that in many instances the impact minimisation and mitigation proposals in the Environmental Report are not reflected in the Local Plan itself,

and so strongly

advise remedying this. Local Plan proposals that should incorporate the findings of the SEA in terms of mitigation include AV/H3, GS/H2, BL/H1, KC/H1 and KC/H2.

The appropriate assessment of the Local Plan needs to consider the effects on the River Spey and Dee SACs both from disposal of waste waters, and from increased

abstraction for water supplies to meet the needs of the plans proposals. It should also consider cumulative effects and not just abstraction related to proposals in the

CNPA analysis of objection to Deposit Local Plan

The assessments will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects. In regard to the policy wording in the

plan, the comments are noted, and better links and cross referencing will be undertaken to ensure the local plan takes full and proper account of the findings of the

SEA. The wording within the local plan also be amended to highlight the findings of the SEA and any actions needed as a result of it during the delivery of the local

plan. 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

Comments noted, work is progressing and changes will be made before the plan is formally adopted.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Local Plan.

Policy/site ref **SEA Assessment**

Objector Ref **Name** George Hogg

465(SEA14) Scottish Natural Heritage

Dingwall Business Park

Fodderty Way

Dingwall

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Question the significant positive scores allocated as feel the policy provides little additional protection for water bodies than the current legislative framework that

applies across Scotland.

Concerned about the definition of 'best practice standards' and 'unreasonable', also about the potential for an increased number of private sewage treatment systems

in the catchments of the River Spey and Dee SACs, and the associated potential for increased pollution. Advise that CNPA should consider the cumulative effects of

existing and potential future private waste water systems in the appropriate assessment of the local plan.

CNPA analysis of objection to Deposit Local Plan

The approach taken will be reviewed to ensure that future work on the SEA takes proper account of an appropriate scoring mechanisms. In terms of the wording of

the policy, the text will be reviewed to improve clarity, and ensure that the wording is in line with national guidance whilst also providing an appropriate level of guidance to developers.

Proposed 1st Modification

Comments noted and wording of policy reviewed to address these and other concerns.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	SEA Assessment	Agent Name
Objector Ref 465(SEA13)	Name George Hogg Scottish Natural Heritage Dingwall Business Park Fodderty Way Dingwall	Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Welcome the detail contained in Appendix 2, and are pleased to see that the cumulative effects are predicted to be positive. Point out it is perhaps disappointing

that there are no significant positive cumulative effects predicted.

CNPA analysis of objection to Deposit Local Plan

The comment is noted and the findings will be reviewed to ensure that appropriate analysis has been undertaken and that future work on the SEA is not informed by misinformation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Assessment of policies

Agent Name

Objector Ref Name Lily Linge

467d Historic Scotland
Longmore House
Salisbury Place
Edinburgh, EH1 1SH

Company Historic Scotland

Summary of objection to Deposit Local Plan

Welcome methodology applied and how described in the environmental report.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

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 SEA Assessment Process

Agent Name

Objector Ref Name Nicola Abrams

399SEA(f) SEPA
Greyhope House
Greyhope Road
Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

The assessment process is clear and robust. The approach gives a clear indication of the reasoning behind the CNPA's judgement as to whether

something has a significant effect, and highlights particular areas of relevance.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

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 SEA Aviemore H3

Agent Name

Objector Ref Name Nicola Abrams

399SEA(r)

SEPA

Greyhope House

Greyhope Road

Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

H3 – the ER recognises that the sites are potentially affected by flooding and a FRA is required, however it is not clear how the allocation of a site which is

potentially at risk of flooding can have an unknown or neutral effect on catchment processes and hydrological systems. The consideration the potential for persons

and property to be at risk from flooding to be a minor negative environmental effect as set out in the detailed assessment form does not seem correct. Flood risk

should be raised as an issue in the text in the ER (9.14-9.16) for Aviemore housing.

CNPA analysis of objection to Deposit Local Plan

The assessments will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects which will then be used to inform future

work on the SEA. The issue of FRA assessments will also be more clearly highlighted in the wording of the proposals relating to development sites.

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

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 SEA Ballater

Agent Name

Objector Ref Name Lily Linge

467g
Historic Scotland
Longmore House
Salisbury Place
Edinburgh, EH1 1SH

Company Historic Scotland

Summary of objection to Deposit Local Plan

SEA should note that Ballater Old School is C (S) Listed, and that all of the proposals for Ballater are within the Conservation area, and so all development of these sites should be in keeping with the character of the area.

CNPA analysis of objection to Deposit Local Plan

The listing of the building will be included along with the existence of the conservation area in future work on the SEA.

Proposed 1st Modification

comments noted and modifications proposed to rectify concerns.

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 SEA Ballater H1

Agent Name

Objector Ref Name Nicola Abrams

399SEA(s)
SEPA
Greyhope House
Greyhope Road
Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

The allocation of sites known to be at risk of flooding would have a negative affect on catchment processes and hydrological systems rather than unknown.

CNPA analysis of objection to Deposit Local Plan

The assessments will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects which will then be used to inform future work on the SEA. The issue of FRA assessments will also be more clearly highlighted in the wording of the proposals relating to development sites.

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

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 SEA Ballater H1

Agent Name

Objector Ref Name Lily Linge

467h Historic Scotland
Longmore House
Salisbury Place
Edinburgh, EH1 1SH

Company Historic Scotland

Summary of objection to Deposit Local Plan

Seek inclusion in the Masterplan for H1 of mitigation for adverse effects on B Listed Monaltrie House.

CNPA analysis of objection to Deposit Local Plan

The impact on the listed building will be highlighted in future work on the SEA and also within any masterplanning work carried out for H1.

Proposed 1st Modification

comments noted and modifications proposed to address concerns,

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 SEA Baseline Environment

Agent Name

Objector Ref 399SEA(d)
Name Nicola Abrams
SEPA
Greyhope House
Greyhope Road
Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

The baseline information presented is thorough and detailed, but Figure 5.2 does not include waste which is identified later as an SEA objective. In Table 5.1 the

section on air could be refined with relevant data used to support the assertion of 'relatively low atmospheric pollution'. Despite previous recommendations that

additional datasets be used to inform the assessment, (including groundwater issues, flooding, contaminated land, waste management etc) these have not been

incorporated into the Key Baseline Facts section of the ER, although flood management has been identified in the key trends and issues section (figure 5.2). Now that

the State of the Park Report has been published will additional datasets and information included within it be incorporated into the assessment?

Additional datasets

should have been used and also it would be helpful to outline what the issues and trends are in relation to waste management in the Park, particularly as it is later

outlined as an SEA objective (Figure 6.1 and 6.2)

CNPA analysis of objection to Deposit Local Plan

The omission of waste will be rectified in future amendments and will inform alterations to the local plan policy wording.

Proposed 1st Modification

Comments noted and ongoing work progressing on this. Issue will be dealt with before Local plan is adopted.

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 SEA Baseline facts

Objector Ref 465(SEA08)
Name George Hogg
Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Recommend adding 2 additional points:

- Extensive areas where the special quality of wildness can be experienced.

• Alongside the point about the 'coherent identify' it would also be worth explaining that the Park's landscapes have a distinctive character, and that they are an integral part of outstanding national importance and value of the Park.

Recommend mentioning that there are 3 river SAC systems in the National Park in the water section.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and will be fed into future work on the SEA process to ensure adequate and appropriate consideration of the key issues.

Proposed 1st Modification

Comments noted and will feed into future SEA work.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Boat of Garten

Agent Name

Objector Ref Name George Hogg

465(SEA17) Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Given the nature conservation and landscape constraints associated with the proposed, and previously proposed housing sites, surprised that the alternative of 'no

local land allocation' was not considered, along with links to An Camus Mor and better public transport links.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and a review of the assessment will be revisited as work on the SEA continues to inform the development of local plan sites.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Braemar

Agent Name

Objector Ref Name Lily Linge

467i
Historic Scotland
Longmore House
Salisbury Place
Edinburgh, EH1 1SH

Company Historic Scotland

Summary of objection to Deposit Local Plan

Seek avoidance of significant adverse impacts from H2 and H3 on both the Braemar conservation area and key listed buildings in the village by ensuring development

complies fully with local plan policies and sustainable design guide / checklist.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and a review of the assessment will be revisited as work on the SEA continues to inform the development of local plan sites. H3 has been removed.

Proposed 1st Modification

Comments noted and modifications proposed to deal with the issues raised.

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 SEA Braemar

Agent Name

Objector Ref Name George Hogg

465(SEA22)
Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Agree H2 will have negative effects on SEA objective 6, and also think that H1 will have negative effects on SEA objective 2 unless the ancient woodland on the site is

protected during development.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and a review of the assessment will be revisited as work on the SEA continues to inform the development of local plan sites.

Proposed 1st Modification

Comments noted. Planning applications already submitted for sites H1 and H2.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	SEA Braemar H2	Agent Name
Objector Ref	Name Nicola Abrams	
399SEA(t)	SEPA	
	Greyhope House	
	Greyhope Road	
	Torry, Aberdeen	Company SEPA

Summary of objection to Deposit Local Plan

The allocation of sites known to be at risk of flooding would have a negative affect on catchment processes and hydrological systems rather than unknown or neutral.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and a review of the assessment will be revisited as work on the SEA continues to inform the development of local plan sites.

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

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	SEA Chapter 1	Agent Name
Objector Ref	Name Ian Francis	
424u	RSPB Scotland	
	East Regional Office	
	10 Albyn Terrace	
	Aberdeen, AB10 1YP	Company RSPB Scotland

Summary of objection to Deposit Local Plan

Page 4 - what is the timescale for this? Is this the same as the Appropriate Assessment? Will it also consider impacts of the plan on other Natura sites?

CNPA analysis of objection to Deposit Local Plan

The work on the appropriate assessment continues and will inform the modifications to the plan in line with corresponding legislation and before the plan is adopted.

The assessment will take into account all those factors required by legislation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

Response to 1st modification objections

No further comments added.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Chapter 4

Agent Name

Objector Ref Name Ian Francis

424v RSPB Scotland
East Regional Office
10 Albyn Terrace
Aberdeen, AB10 1YP

Company RSPB Scotland

Summary of objection to Deposit Local Plan

The state of the Park report is inadequate to use a baseline information.

Para 4.35 - At what stage will any modifications be made as result of that Appropriate Assessment and how will the results of this process be made known to consultees?

Para 4.10 - Have the presence of protected species or habitats been correctly identified on allocated sites.

CNPA analysis of objection to Deposit Local Plan

CNPA will continue to work on the adequacy and detail of baseline information used to inform both SEA and local plan development. 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. Work will also continue with specialists on the identification of species within allocated sites.

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

No further comments added.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Chapter 6

Agent Name

Objector Ref Name Ian Francis

424w RSPB Scotland
East Regional Office
10 Albyn Terrace
Aberdeen, AB10 1YP

Company RSPB Scotland

Summary of objection to Deposit Local Plan

There should be an SEA objective specifically concerned with climate change. The SEA and the Plan do not generally consider climate change fully.

CNPA analysis of objection to Deposit Local Plan

The issue of climate change will be included in future work on the SEA and is key to the sustainable design guide being prepared to support the local plan policies on design.

Proposed 1st Modification

Modifications are proposed including the addition of a new policy specifically relating to carbon emissions from new developments. No changes proposed to SEA at this stage, but the issues raised will be considered in future SEA work.

Response to 1st modification objections

No further comments added.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Chapter 8

Agent Name

Objector Ref Name Ian Francis

424x RSPB Scotland
East Regional Office
10 Albyn Terrace
Aberdeen, AB10 1YP

Company RSPB Scotland

Summary of objection to Deposit Local Plan

The assessment here is flawed and could be improved. There appears to have been no environmental assessment of alternative policy wording.

CNPA analysis of objection to Deposit Local Plan

The assessments will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects which will then be used to inform future work on the SEA.

Proposed 1st Modification

Comments noted.. No modifications needed at this stage.

Response to 1st modification objections

No further comments added.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Chapter 9

Agent Name

Objector Ref Name Ian Francis

424y RSPB Scotland
East Regional Office
10 Albyn Terrace
Aberdeen, AB10 1YP

Company RSPB Scotland

Summary of objection to Deposit Local Plan

Para 9.19 should mention the existing Ballater waste water treatment works which has been designed to discharge to an enhanced wetland area with nature

conservation benefits. This benefit should be protected.

CNPA analysis of objection to Deposit Local Plan

Future references to Ballater will include these references to ensure clarity and possible constraints to development.

Proposed 1st Modification

modifications being proposed for Ballater to take into account the issues raised.

Response to 1st modification objections

No further comments added.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Criteria

Agent Name

Objector Ref Name Nicola Abrams

399SEA(e) SEPA

Greyhope House
Greyhope Road
Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

While this section has been improved since the scoping stage, there is scope for further improvements particularly to targets and indicators set.

Eg objective 4 is "to protect and where appropriate improve, waterbody statues with or related to the Cairngorms National Park area" - the lined targets and

indicators should be more specific in order to be more effective, and while supporting the target of "all developments consented with SUDS" this is not the only way

for water body status to be maintained or improved, and reference could also be made to the need to minimise impacts from, for example, foul drainage systems and engineering works in and around water bodies.

While noting that other targets and indicators will be identified in the CNPA Sustainable Design Guide, it is not clear when this guide will be developed (will it fall

within the Local Plan timetable or will it be developed as Supplementary Planning Guidance and included as a Plan alteration at a later stage?) Any targets or

indicators must be precise and measureable and have clear linkages to relevant plans and programmes; e.g. while welcoming the inclusion of targets and indicators

relating to the reduction of waste, SEA objective 13 could have clearer links to targets and indicators in the National Waste Plan and relevant Area Waste Plans.

SEA Objective 9 – sustainable use of resources would benefit from criteria which relate to sustainable waste management.

How will the many targets and indicators be achieved. E.g. the target for SEA Objective 9 is that 'all development heated without fossil fuels'. How will all

development be heated without fossil fuel. Will permissions include conditions that only biomass/wood (i.e. no coal) be burnt on open fires and that there is no oil

storage containers? Reliance on electricity (of which much is from fossil fuels) may also result in problems with grid capacity. This issue should be further clarified.

CNPA analysis of objection to Deposit Local Plan

The comments are noted. The future work on SEA and its impact on the Local Plan development will be informed by these comments, and greater links will be

included within the Local Plan to ensure proper links with the SEA and its findings.

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

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 SEA Cromdale

Agent Name

Objector Ref Name George Hogg

465(SEA18) Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

As part of H1 is an area of lowland heath, a BAP habitat, this should have a negative score against SEA objective 2, and consideration of options for mitigating this effect, for example, protecting the area of lowland heath from development should be considered.

CNPA analysis of objection to Deposit Local Plan

The assessment will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects which will then be used to inform future work on the SEA.

Proposed 1st Modification

Comments noted, and assessment for Cromdale H1 revised.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Cumulative Effects

Agent Name

Objector Ref Name George Hogg

465(SEA23) Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Possible Cumulative Effects

- State that there will be significant cumulative effects on SEA objectives 1 and 2.
- Particular concerns about cumulative effects on Caledonian pine woodland and lowland heath habitats and species from proposals at An Camus

Mor, Boat of

Garten, Carrbridge and Nethy Bridge. Due to proximity, suggest considering the combined effects of these proposals on the scale, function and connectivity of pinewood and heath habitats and species, and whether any effects can be mitigated.

CNPA analysis of objection to Deposit Local Plan

The assessments will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects which will then be used to inform future work on the SEA.

Proposed 1st Modification

comments noted and work progressing on assessments. This will be completed before the Local plan is adopted.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Dalwhinnie

Agent Name

Objector Ref Name George Hogg

465(SEA19)

Scottish Natural Heritage

Dingwall Business Park

Fodderty Way

Dingwall

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

H1 would have negative landscape effects o SEA objective 6 unless accompanied by screening planting.

CNPA analysis of objection to Deposit Local Plan

The assessment will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects which will then be used to inform future work on the SEA.

Proposed 1st Modification

Comments noted and requirement for screening planting will be addressed priir to Local Plan adoption.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Dalwhinnie

Agent Name

Objector Ref Name Nicola Abrams

399SEA(u)

SEPA

Greyhope House

Greyhope Road

Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

The allocation of sites known to be at risk of flooding would have a negative affect on catchment processes and hydrological systems rather than unknown or neutral.

CNPA analysis of objection to Deposit Local Plan

The assessment will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects which will then be used to inform future work on the SEA.

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

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 SEA Development

Agent Name

Objector Ref Name George Hogg

465(SEA05)

Scottish Natural Heritage

Dingwall Business Park

Fodderty Way

Dingwall

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Welcome fact that all policies apply to development proposals, and that policies are assessed on this basis in the SEA.

Questions whether or not CNPA staff other than Planners were involved in providing advice to help make assessment decisions.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and work within the CNPA endeavours always to call on the wide expertise that exists within its staff. This approach will continue

throughout the Local Plan development and its SEA.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Energy Generation

Agent Name

Objector Ref Name Lily Linge

467e Historic Scotland
Longmore House
Salisbury Place
Edinburgh, EH1 1SH

Company Historic Scotland

Summary of objection to Deposit Local Plan

Seek reassurance that the supplementary guidance produced on small scale and microgeneration schemes will address the potential effects of the developments on the historic environment.

CNPA analysis of objection to Deposit Local Plan

The comment regarding policy 16 is noted, and the wording of the SPG on renewable energy will clarify the position on the historic environment.

Proposed 1st Modification

Comments noted and will be taken into account in future work on SEA.

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 SEA Future Developments

Agent Name

Objector Ref Name Lily Linge

4671 Historic Scotland
Longmore House

Salisbury Place
Edinburgh, EH1 1SH

Company Historic Scotland

Summary of objection to Deposit Local Plan

Note that the SEA will be integrated into the remaining steps of the Local Plan process.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

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 SEA Grantown on Spey

Objector Ref Name George Hogg
465(SEA20) Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

AS H1 contains paths used by residents, the likely effect on SEA objective 7 of the proposals is likely to be negative unless the effects are mitigated and specified as such is the GS/H1 local plan proposal.

CNPA analysis of objection to Deposit Local Plan

The assessment will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects which will then be used to inform future work on the SEA.

Proposed 1st Modification

Comments noted and changes made to assessment of GS/H1.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	SEA Indicators and targets	Agent Name
Objector Ref 465(SEA11)	Name George Hogg Scottish Natural Heritage Dingwall Business Park Fodderty Way Dingwall	Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

SEA Objective 4 - Recommend linking wording of target more closely to the requirement under the Water framework directive for all water bodies to meet 'Good ecological Status' by 2015.

CNPA analysis of objection to Deposit Local Plan

The comments are noted. The future work on SEA and its impact on the Local Plan development will be informed by these comments, and greater links will be included within the Local Plan to ensure proper links with the SEA and its findings.

Proposed 1st Modification

Comments noted and will feed into future SEA work.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	SEA Key trends	Agent Name
Objector Ref 465(SEA09)	Name George Hogg Scottish Natural Heritage Dingwall Business Park Fodderty Way Dingwall	Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Disappointed that most of comments made by SNH at the scoping stage have not been incorporated into this summary.

CNPA analysis of objection to Deposit Local Plan

The comment is noted. The future work on the SEA and its role with the Local Plan will endeavour to take full account of the comments received and,

where this is

not the case, fully explain why the action taken has been so.

Proposed 1st Modification

comments noted and will feed into future SEA work.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Kincaig

Agent Name

Objector Ref Name George Hogg

465(SEA21) Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

The proposal to incorporate the wetland area within H1 into its sustainable urban drainage system deserves a negative score.

Recommend that due to negative impacts on landscape, the mitigation required should be explained in the local plan proposals. Options include guidance on

landscaping and design, and adjusting the straight boundaries of H1 and H2 to better reflect the local landform.

CNPA analysis of objection to Deposit Local Plan

The assessment will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects which will then be used to inform future

work on the SEA. Site H2 removed and mitigation information provided for H1 in line with the comments made.

Proposed 1st Modification

Comments noted and changes made to H1 as a result.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Local Plan

Agent Name

Objector Ref 465(SEA02)
Name George Hogg
Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Seek inclusion of an explanation of the new development plan arrangements that will come into place in the Park as a result of Modernising the Planning System.

CNPA analysis of objection to Deposit Local Plan

The introduction of the local plan will provide additional guidance on the current situation regarding any of the aspects of 'modernising planning' which will have an impact on the plan and its adoption.

Proposed 1st Modification

Comments noted and modifications being proposed to take account of the views expressed.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref 399SEA(x)
SEA Mitigation
Objector Ref Name Nicola Abrams
SEPA
Greyhope House
Greyhope Road
Torry, Aberdeen

Agent Name

Company SEPA

Summary of objection to Deposit Local Plan

No mitigation is considered necessary for policies and proposals at this stage although further mitigation may be identified as part of the appropriate assessment.

However, consideration needs to be given to mitigation in relation to flood risk (such as complete avoidance of allocation at risk of flooding or as an alternative a clearer indication of the extent of flood risk based on all available information including in some cases specific pieces of work).

CNPA analysis of objection to Deposit Local Plan

The comments regarding mitigation are noted and links and cross referencing will be included in the appropriate assessment. Further work will also be carried out

to ensure the appropriate account is taken of flood risk and amendments to the plan made accordingly.

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

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	SEA Mitigation measures	Agent Name
Objector Ref 467k	Name Lily Linge Historic Scotland Longmore House Salisbury Place Edinburgh, EH1 1SH	Company Historic Scotland

Summary of objection to Deposit Local Plan

It would be helpful if the SEA Adoption Statement clearly identifies the environmental issues that require further consideration as the Local Plan is implemented, and

provides details of the proposed mitigation measures, such as the sites for which Masterplans / development briefs will be required to give further detail about

historic environment issues and others.

CNPA analysis of objection to Deposit Local Plan

The comment is noted and will be fed into the ongoing work towards adoption of the SEA.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

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	SEA Monitoring	Agent Name
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Objector Ref 399SEA(w)
Name Nicola Abrams
SEPA
Greyhope House
Greyhope Road
Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

While the monitoring aspects of the ER are supported, there is scope for the indicators to be made more specific to be more effective

CNPA analysis of objection to Deposit Local Plan

The indicators will be reviewed and any changes necessary will be included in ongoing work on the SEA and the development of the Local Plan.

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

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 SEA Monitoring
Objector Ref 465(SEA06)
Name George Hogg
Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Note that monitoring significant environmental effects will be finalised later.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Natura sites

Agent Name

Objector Ref Name George Hogg
465(SEA07) Scottish Natural Heritage
Dingwall Business Park
Fodderty Way
Dingwall

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Welcome addition of information about Natura issues.

Note the final report on findings of appropriate assessment will be published when the local plan is adopted.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref SEA Nethybridge H1

Agent Name

Objector Ref Name Nicola Abrams
399SEA(v) SEPA
Greyhope House
Greyhope Road
Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

The allocation of sites known to be at risk of flooding would have a negative affect on catchment processes and hydrological systems rather than unknown or neutral.

CNPA analysis of objection to Deposit Local Plan

The assessments will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects which will then be used to inform future work on the SEA.

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

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	SEA objectives	Agent Name
Objector Ref 465(SEA10)	Name George Hogg Scottish Natural Heritage Dingwall Business Park Fodderty Way Dingwall	Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Welcome the addition of new criterion about minimising impacts on wildness qualities.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	SEA objectives	Agent Name
Objector Ref 467c	Name Lily Linge Historic Scotland Longmore House Salisbury Place Edinburgh, EH1 1SH	Company Historic Scotland

Summary of objection to Deposit Local Plan

Pleased to note that our comments made on the indicators included in the previous draft of the Environmental Report have been incorporated into the set of

indicators in Figure 6.3. We are content with the indicators that are relevant to the historic environment (SEA objectives 6, 10 and 14).

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

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	SEA Omissions	Agent Name
Objector Ref	Name Nicola Abrams	
399SEA(o)	SEPA	
	Greyhope House	
	Greyhope Road	
	Torry, Aberdeen	Company SEPA

Summary of objection to Deposit Local Plan

A number of other issues are not addressed in the plan, including air quality which is not considered to be a major issue in the Cairngorms National Park. Given the nature of the area, it is recognised that the SEA is the most appropriate forum for consideration of air quality as it should be inherent in the commitment to sustainability in all development decisions. However there is minimal recognition of air quality in wider context of the Policies considered in the SEA. It is noted however that consideration has been given to the contribution made by car travel and by emissions from domestic and commercial premises. Local air quality will also be affected by transboundary pollutants such as ground level ozone and acidifying gases.

CNPA analysis of objection to Deposit Local Plan

The comment regarding air quality is noted, and future work on the SEA and local plan development will be informed by this comment.

Proposed 1st Modification

Comments noted and will feed into future SEA work

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 SEA Policy 01 **Agent Name**

Objector Ref Name BMS Dunlop
358b Ben A'an
Lynemacgregor
Grantown-on-Spey
PH26 3PR

Company

Summary of objection to Deposit Local Plan

The level of proposed development, particularly housing, is not in accordance with the aims of the Park as originally designated, and the level of development should

therefore be controlled to provide housing for local people at affordable cost without any associated open market housing .

CNPA analysis of objection to Deposit Local Plan

The wording of the policy will be reviewed to ensure that its requirements are in line with the Park Plan and the aims of the Park established in the National Parks

(Scotland) Act 2000 and are clear and reasonable. Any amendments to draw the wording in line with these will be made by way of modification

Proposed 1st Modification

Policy 1 has been modified so as to better reflect the National Parks Scotland Act 2000.

Response to 1st modification objections

Regarding 2), I do not consider the modifications reduce the over-development of unsustainable speculative building, which will encourage excessive in-migration, to

the detriment of the outstanding environment, enjoyment of the park, and quality of life.

CNPA analysis of objections to 1st modifications

The allocation of housing land is in response to work carried out to assess housing need within the National Park and to provide sufficient land to meet this need, as

is required of the Planning Authority through its local plan. The allocations and proposed developments are also in support of the 4th aim of the National Park. No

additional modifications or amendments are therefore proposed.

Objection maintained

Policy/site ref SEA Purpose **Agent Name**

Objector Ref Name Nicola Abrams
399SEA(b) SEPA
Greyhope House
Greyhope Road
Torry, Aberdeen

Company SEPA

Summary of objection to Deposit Local Plan

While welcoming many aspects of the environmental report, specific links could also have been made to the National Waste Strategy, and relevant

Local Authority

Waste Plans or Strategies (rather than just in generic terms in 3.17 "waste management plans")

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and the links will be made more explicit in the wording of the text in the local plan.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

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.

Proposed 2nd modifications **Objection withdrawn** **Objection maintained**

Policy/site ref **SEA Report**

Objector Ref **Name** Lily Linge

467b Historic Scotland
 Longmore House
 Salisbury Place
 Edinburgh, EH1 1SH

Agent Name

Company Historic Scotland

Summary of objection to Deposit Local Plan

In general, and as noted in part 1 of this letter, we are content that adverse effects on the historic environment can be avoided through the application of the

protective policies in the Local Plan to development proposals and through the detailed design process. We understand that a Masterplan and Development Briefs

will be prepared for some of the proposals included in the Local Plan and we consider that historic environment issues should be carefully addressed in these

documents and in any other relevant supplementary guidance.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

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 SEA Scoping

Objector Ref Name Nicola Abrams

399SEA(c)

SEPA

Greyhope House

Greyhope Road

Torry, Aberdeen

Agent Name

Company SEPA

Summary of objection to Deposit Local Plan

Welcome the ER taking on board the issues raised at scoping stage.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

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 SEA Scoping

Objector Ref Name George Hogg

465(SEA04)

Scottish Natural Heritage

Dingwall Business Park

Fodderty Way

Dingwall

Agent Name

Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Consider the inclusion of detailed assessment criteria to underpin the scoring system in future SEAs.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted and will feed into future SEA work,

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	SEA Scoring	Agent Name
Objector Ref	Name George Hogg	
465(SEA03)	Scottish Natural Heritage Dingwall Business Park Fodderty Way Dingwall	Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Recommend explaining how the individual scores were used to predict cumulative effects.

CNPA analysis of objection to Deposit Local Plan

The comment is noted and the methods of scoring will be reviewed to ensure that future work is clear and understandable.

Proposed 1st Modification

Comments noted and will feed into future SEA work,

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	SEA Strategic Alternatives	Agent Name
Objector Ref	Name Lily Linge	
467d	Historic Scotland Longmore House Salisbury Place Edinburgh, EH1 1SH	Company Historic Scotland

Summary of objection to Deposit Local Plan

Note that few significant strategic alternatives were considered in the development of the finalised Local Plan, and have no detailed comments to offer on this section.

CNPA analysis of objection to Deposit Local Plan

No modification considered necessary as a result of this representation.

Proposed 1st Modification

Comments noted. No modifications needed at this stage.

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	SEA Strategic Alternatives	Agent Name
Objector Ref	Name George Hogg	
465(SEA12)	Scottish Natural Heritage	
	Dingwall Business Park	
	Fodderty Way	
	Dingwall	Company Scottish Natural Heritage

Summary of objection to Deposit Local Plan

Surprise expressed that the effects of the strategic housing alternatives on waste water treatment and water supply, and consequential environmental effects were not considered and reported on here. Would be helpful to explain the alternative approaches to identifying settlement boundaries for smaller settlements and consider their environmental effects.

CNPA analysis of objection to Deposit Local Plan

The comments are noted, and future work on the SEA and the plan will take this into full account to ensure clarity.

Proposed 1st Modification

chnages have been made to section 7 of the environetnal report to address the issues raised.

Response to 1st modification objections

No further representation received from SNH regarding the SEA.

CNPA analysis of objections to 1st modifications

No further action required.

Objection withdrawn

Policy/site ref	SEA Tomintoul	Agent Name
Objector Ref	Name Lily Linge	

467j

Historic Scotland
Longmore House
Salisbury Place
Edinburgh, EH1 1SH

Company Historic Scotland

Summary of objection to Deposit Local Plan

Seek to see adverse effects of H3 on the setting of St Michael's Roman Catholic Chapel avoided through the detailed design process.

CNPA analysis of objection to Deposit Local Plan

The assessment will be revisited to ensure that a consistent and clear approach has been taken to the assessment of effects which will then be used to inform future work on the SEA.

Proposed 1st Modification

Comments noted and change made to assessment to reflect concerns raised.

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