

Policy Policy 01

Name The Clouds Partnership

Objector Ref 398a

Representation

The Cairngorms National Park Deposit Local Plan 2007

5.1 The Clouds Partnership supports the removal of the general policies from the Cairngorms National Park Deposit Local Plan, and the revision of the topic policies.

5.2 Policy 1 — Development in the Cairngorms National Park.

As set out in our original submission, The Clouds Partnership would maintain an objection to Policy 1 in that Section B “any significant adverse effects and equalities for which the Park has been designated are clearly outweighed by social and economic benefits of national importance and will be mitigated at the satisfaction of the Planning Authority by the enhancement qualities of features of equal importance to the National Park”.

Comment - The Clouds Partnership would maintain its objection to Policy 1 — Development in the Cairngorms National Park, on the basis that quantification of “significant adverse effects” needs to be quantified. It remains an open ended statement of policy intent which could have an impact on every planning proposal made in the National Park and therefore clarity is required in terms of its application.

Conclusion

7.1 The Clouds Partnership continue to object to the over-reliance of the Cairngorms National Park Deposit Local Plan on An Camas Mor for the provision of housing numbers at Aviemore, and would urge the Cairngorms National Park Authority to allocate land at Kinakyle, Aviemore as an effective housing site in the emerging Local Plan.

Summary

para b requires quantification of 'significant adverse effects'. The statement is open ended which could impact on every planning proposal made. Clarification is therefore required.

CNPA analysis

The comments regarding the clarity of the wording are noted and the appropriate changes will be made to ensure policies and supporting text are clear, understandable and are not subjective in their implementation.

Policy Policy 13

Name The Clouds Partnership

Objector Ref 398b

Representation

5.3 Policy 13— Water resources

Comments were made by The Clouds Partnership to former Policies 13 and 14 of the consultation version of the Cairngorms National Park Local Plan, and we would support particularly Policy 13b, where development in areas susceptible to flooding will require developer funded flood risk assessment.

5.4 In relation to Section 5 Living and Working in the Park, The Clouds Partnership generally supports Policy 17 — Sustainable Development, Policy 18 — Design Standards for New Development and Policy 19— Developer Contributions.

Summary

The revised Policy 13 is supported particularly section b. Also support policies 17, 18 and 19.

CNPA analysis

The support is noted.

Policy Housing Table 4

Name The Clouds Partnership

Objector Ref 398c

Representation

Introduction

1.1 This is a written submission prepared by Strutt & Parker on behalf of The Clouds Partnership, who are the owners of the subject site at Kinakyle, Aviemore.

1.2 This written submission addresses the policy designations as contained in the Deposit Version of the Cairngorm National Park Local Plan, which have an impact on the land in his ownership, and proposes a number of changes to the Local Plan in relation to the settlement of Aviemore generally, and particularly to the subject site at Kinakyle.

1.3 Policies which are the subject of this written submission are as follows:

- Section 5 Living and Working in the Park, the housing land requirement and supply
- Table 4, Section 5
- Section 7 Settlement Proposals, strategic settlements, Aviemore
- Section 7 Settlement Proposals, strategic settlements, An Camus Mor

The Site

2.1 Kinakyle is located on the southern boundary of the settlement of Aviemore. The northern boundary of the site abuts the southern boundary of the settlement of Aviemore as identified in both the Adopted and Emerging Local Plans.

2.2 Kinakyle is currently used for agricultural purposes, and is generally devoid of prominent landscape features.

2.3 Kinakyle is approximately 60 hectares in total area, and subject to the flood map as produced by SEPA, the area available for residential and associated development is approximately twenty hectares.

Cairngorms National Park Plan 2007

3.1 The Cairngorms National Park Plan 2007 contains at Section 5.2.4 Strategic Objective relating to the provision of housing in the Park. The Park Plan Strategic Objectives for housing which are applicable to this submission are 5.2.4a - increase the accessibility of rented and owned housing to meet the needs of communities throughout the Park, and 5.2.4d — ensure there is effective land and investment for market and affordable housing to meet the economic and social needs of communities throughout the Park.

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National Planning Policy and Guidance

4.1 As set out in the original submission to the Cairngorms National park Local Plan Consultation Draft October 2005 on behalf of The Clouds Partnership, we would reiterate the provisions of SPP3 — Planning for Housing (February 2003) which requires Local Plans to contain a five year supply of effective housing land. SPP3 also provides for the provision of sustainable settlement strategies, through the provision of certainty and variety for both developers and the local community.

4.2 SPP15 — Planning for Rural Development (February 2005). The provisions of SPP15 apply to Aviemore in that it is a smaller settlement in a rural context. SPP15 identifies the scope for considerable small scale rural housing development, to be expressed in development plans either as part of settlement policies or separate subsets on rural housing policy.

4.3 There are numerous planning advice notes prepared by the Scottish Government which relate to the provision of housing in small towns and to the housing quality in general.

The Cairngorms National Park Deposit Local Plan 2007

5.5 Table 4 - Phased Land Supply by Local Authority Area

The Clouds Partnership would object to Table 4 Phased Land Supply by Local Authority Area, particularly in relation to the proposed land supply for Aviemore, as the proposed land supply is not in accordance with the Adopted Cairngorms National Park Plan which encourages the proactive growth of the mains settlements including Aviemore, and for the provision of land for housing growth to meet the social and economic needs of other settlements and communities.

5.5.1 The 0 to 5 year target numbers of units for Aviemore in the Deposit Local Plan is 250. The indicative 5 to 10 year target numbers of units in the Deposit Local Plan for Aviemore is 50, and the identified capacity for medium to long term numbers of housing units is 0.

5.5.2 Therefore, in Aviemore, the Deposit Local Plan does not accord with SPPI in that it does not secure an ongoing five year land supply in Aviemore during the lifetime of the Local Plan.

Conclusion

7.1 The Clouds Partnership continue to object to the over-reliance of the Cairngorms National Park Deposit Local Plan on An Camas Mor for the provision of housing numbers at Aviemore, and would urge the Cairngorms National Park Authority to allocate land at Kinakyle, Aviemore as an effective **Summary**

housing site in the emerging Local Plan. Table 4 is not in accordance with the Park Plan which encourages the proactive growth of the main settlements including Aviemore, and for the provision of land for housing growth to meet the social and economic needs of other settlements and communities. The 0-5 year target for Aviemore is 250 and the indicative target for 5-10 year is 50. The long term numbers are 0. The Local Plan does not therefore comply with SPP1 which requires an ongoing 5 year land supply for Aviemore during the lifetime of the Plan.

CNPA analysis

The details of Table 4 and the background to housing land requirement calculations and land supply requirements will be reviewed to ensure compliance with SPP1 and the National Park Plan. This will impact on the future modifications of the Housing land allocations, and policies regarding land for

Policy Policy 24

Name The Clouds Partnership

Objector Ref 398d

Representation

5.6 Policy 24— Contributions to Affordable Housing

The Clouds Partnership objects to Policy 24, in particular to the requirement for the developer to provide all of the affordable housing on a site with target of 30%.

The Scottish Executive produced Planning Advice Note 74: Affordable housing in March 2005 and at Section 34 it specifically addresses the nature of the affordable housing contribution. The maximum benchmark figure identified in PAN 74 is that each site should contribute a maximum of 25% of the total number of units as affordable housing. The Plan continues at section 35 to state that “the Local Authority may also seek a higher percentage on a specific site but this will only be appropriate in exceptional circumstances, for example linked to a substantial lease of Green field land or on a site owned by the Local Authority or another public agency which is being released for development’ The Deposit Version of the Cairngorms National Park Local Plan does not contain any policy justification for the variation to PAN 74.

The Clouds Partnership would submit that Policy 24 should reflect national planning policy, and require a maximum provision of 25% of on-site affordable housing provision.

Summary

Object to policy 24 and the requirement to provide all of the affordable housing on a site with target of 30% PAN 74 indicates a benchmark of a maximum of 25%. Any higher rate should be exceptional only, and examples of such circumstances are given. The policy does not include any justification for the variation to the benchmark.

CNPA analysis

Further analysis of the impacts of the approach taken to affordable housing will be undertaken to ensure it is workable, realistic and will deliver the level of affordable houses required in the area. Further clarification is also needed to ensure housing delivered meets the needs of local people. The policy review will take into account national advice on affordable housing delivery and match it against the local situation, and additional information will be supplied to clarify the background being taken to justify the level of affordable housing required. (WORK WITH DEVELOPERS, HOUSING ASSOCIATIONS, GOVERNMENT AGENCIES, LOCAL AUTHORITY HOUSING SECTIONS, CNPA ECONOMIC DEVELOPMENT SECTION AND OTHERS TO ENSURE WIDEST AGREEMENT ON APPROACH BEING TAKEN)

Policy Settlements - Aviemore

Name The Clouds Partnership

Objector Ref 398e

Representation

Settlement Proposals

6.1 The Clouds Partnership wish to strongly object to the proposed alteration to the identified settlement boundary for the Strategic Settlement at Aviemore. The Deposit Local Plan proposes a change to the settlement boundary for Aviemore, moving the previously identified boundary northwards to the north of the B970 and the Speyside Leisure Park. The southern boundary of Aviemore had previously been identified as lying on the southern extremity of the Speyside Leisure Park and to the east of the B9152. The Clouds Partnership request that the settlement boundary of Aviemore be reinstated to that set out in the consultation version of the Cairngorm National Park Local Plan.

6.2 The Clouds Partnership wish to object to the following proposals as set out in Section 7 Strategic Settlements, Aviemore of the Cairngorm National Park Deposit Local Plan.

- Site ABIH1 — This site lies within the SEPA Flood Risk Area, and although the site already has Outline Planning Consent for 120 dwellings this housing allocation should not be considered wholly effective for the five year plan period.
- Site ABIH2 — This site lies partially within the identified SEPA Flood Risk Area. It has an identified Local Plan capacity for approximately 10 dwellings, and cannot be considered wholly effective in the five year plan period.
- Site AV/H3 — This site has an identified Local Plan capacity for approximately 70 dwellings. Part of the site lies within the SEPA Flood Risk Area, and therefore cannot be considered wholly effective during the plan period.

Comment

6.2.1 The Local Plan has identified a five year target of 250 housing units. Table 4 in the Local Plan has identified that there are approximately 220 units with consent but not yet built in Aviemore, and an indicative capacity of 80 units on sites identified in the Local Plan, giving a total capacity of 300 units in Aviemore. However, as each of the sites with either consent or indicative capacity is subject to Flood Risk Analysis, none of them can be considered wholly effective. On that basis, and in order to provide an ongoing five year supply of housing land during the lifetime of the Local Plan further housing sites should be identified in, or adjacent, to the strategic settlement of Aviemore.

6.2.2 On the basis that each and every site with either planning consent or capacity for residential development in Aviemore is subject to the SEPA Flood Risk Area and detailed flood risk assessments will be required. It would be prudent to assume that not every one of the 300 housing units identified will be delivered during the 0 to 5 year period. Additional housing land could, and should be identified to ensure that effective sites are available to provide the required housing units in the 0 to 5 year plan period.

6.2.3 The Clouds Partnership would submit that land at Kinakyle is available and effective with a 0 to 5 year plan period requirement, and thus the subject site at Kinakyle could and should be identified as an effective housing site in the Deposit Local Plan.

Although itself subject to the SEPA Indicative Flood Risk Area, there is approximately 20 hectares of flat accessible land available for residential and associated development.

Land at Kinakyle is capable of being an integral part of the town of Aviemore as opposed to a separate village and is less sensitive in terms of visual impact.

6.2.4 Kinakyle immediately adjoins an existing built element of Aviemore town despite the proposed change to the settlement boundaries set out in the Deposit Local Plan and thus is a logical extension to the existing built form of the town of Aviemore.

Conclusion

7.1 The Clouds Partnership continue to object to the over-reliance of the Cairngorms National Park Deposit Local Plan on An Camas Mor for the provision of housing numbers at Aviemore, and would urge the Cairngorms National Park Authority to allocate land at Kinakyle, Aviemore as an effective housing site in the emerging Local Plan.

Summary

Object to the proposed alteration to the identified settlement boundary for Aviemore which moves the previously identified boundary northwards to the north of the B970 and the Speyside Leisure Park. The southern boundary of Aviemore had previously been identified as lying on the southern extremity of the Speyside Leisure Park and to the east of the B9152. The settlement boundary should be reinstated to that set out in the consultation version of the Cairngorm National Park Local Plan.

In regard to the proposed housing allocations in Aviemore

- Site AB/H1 site lies within the SEPA Flood Risk Area, and although the site already has Outline Planning Consent for 120 dwellings this housing allocation should not be considered wholly effective for the 5 year plan period.
- Site AB/H2 lies partially within the identified SEPA Flood Risk Area. It has an identified Local Plan capacity for approximately 10 dwellings, and cannot be considered wholly effective in the 5 year plan period.
- Site AV/H3 has an identified Local Plan capacity for approximately 70 dwellings. Part of the site lies within the SEPA Flood Risk Area, and therefore cannot be considered wholly effective during the plan period.

The Plan has identified a five year target of 250 housing units and Table 4 has identified approximately 220 units with consent but not yet built in Aviemore, and an indicative capacity of 80 units on sites identified giving a total capacity of 300 units in Aviemore. However, as each of the sites with either consent or indicative capacity is subject to Flood Risk Analysis, none of them can be considered wholly effective. As a result and to provide an effective 5 year supply the Plan should identify further housing sites should be identified in, or adjacent, to the strategic settlement of Aviemore. The land at Kinakyle is available and effective with a 0 to 5 year plan period requirement, and thus the subject site at Kinakyle could and should be identified as
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an effective housing site in the Deposit Local Plan. Although itself subject to the SEPA Indicative Flood Risk Area, there is approximately 20 hectares of flat accessible land available for residential and associated development. Land at Kinakyle is capable of being an integral part of the town of Aviemore as opposed to a separate village and is less sensitive in terms of visual impact. It immediately adjoins an existing built element of Aviemore town despite the

proposed change to the settlement boundaries set out in the Deposit Local Plan and thus is a logical extension to the existing built form of the town of Aviemore.

CNPA analysis

CNPA will work closely with SEPA to establish the effectiveness of all sites within the Local Plan which are within the 1-200 year flood risk maps, and ensure that following such discussions, appropriate levels of land are allocated and effective to comply with the relevant requirements of effective land supply.

Policy Settlements - An Camas Mor

Name The Clouds Partnership

Objector Ref 398f

Representation

Settlement Proposals — Strategic Settlements —An Camas Mor

6.3.1 The Deposit Version of the Cairngorms National Park Local Plan contains a proposal for a new community at An Camas Mor. An indicative settlement boundary is identified for this site with an expectation that up to 1,500 homes could be developed over time. The Local Plan identifies a need for development to begin at An Camas Mor within the 0 — 5 year period of the Local Plan, and assumes that 100 homes will be provided within the next 5 years.

6.3.2 An Camas Mor (previously Cambusmore) was identified in the Badenoch and Strathspey Local Plan 1997 and the Highland Structure Plan 2001. Despite those allocations, An Camas Mor has not provided any housing units over the past ten years. The major infrastructure required to facilitate development at An Camas Mor will require major research prior to submission of any planning application. On that basis, The Clouds Partnership would question the ability of An Camas Mor to provide any effective housing numbers during the 0 to 5 year plan period and would therefore question its effectiveness in terms of housing allocations.

6.3.3 Table 4 of the Deposit Version of the Local Plan does not provide for any housing unit provision in Aviemore beyond the ten year indicative target, with all capacity for Aviemore apparently being accommodated at An Camas Mor.

Whilst An Camas Mor could be a sustainable and viable new settlement, it cannot and should not accommodate all housing options in the Aviemore housing market area.

6.3.4 SPP3 — Planning for housing clearly states that a choice of residential environment is desirable. The Clouds Partnership would object to the over-reliance on An Camas Mor for the provision of all housing numbers in the Aviemore area.

Conclusion

7.1 The Clouds Partnership continue to object to the over-reliance of the Cairngorms National Park Deposit Local Plan on An Camas Mor for the provision of housing numbers at Aviemore, and would urge the Cairngorms National Park Authority to allocate land at Kinakyle, Aviemore as an effective housing site in the emerging Local Plan.

Summary

The local plan makes an assumption that development at An Camas Mor will commence within the 0-5 period and assumes that 100 homes will be provided within this. Despite being allocated in the 1997 Highland Council Local Plan no houses have been provided in the past ten years. The necessary infrastructure required will require major research prior to the submission of a planning application. Therefore the objection questions the

ability of the site to provide any effective housing land during the 0-5 year timeframe. The housing allocations are therefore questioned. Together with the Table 4 indicates that any development for Aviemore beyond the 10 year period will be accommodated in An Camas Mor. The site cannot accommodate all the housing options in the Aviemore housing market area.

SPP3 clearly states that a choice of residential environment is desirable. The objection therefore states that there is an over-reliance on An Camas Mor for the provision of all housing numbers in the Aviemore area.

The CNPA should therefore consider including alternative land at Kinakyle, Aviemore as an effective housing site in the emerging Local Plan.

CNPA analysis

The development of the site will require many detailed assessments including the preparation of a masterplan to establish the break down of various land uses within the settlement, and a transport assessment to assess the impact on the surrounding area. The CNPA will continue to work closely with the developers of An Camas Mor to ensure realistic timeframes for delivery of the site.

Policy General

Name Dr Alister Scott

Objector Ref 477a

Representation

para 1.5 - This paragraph places insufficient emphasis on the Local Plan's role in the primary purpose of conserving and enhancing the Park's natural and cultural heritage. We recommend that this element of the Plan's purpose is listed first, in accordance with the Park aims.

Para 1.21 - It is necessary to consider how the Plan covers issues and developments outside CNPA that could affect/impact upon the special qualities. In particular landscape issues (wind farms) are apparent as are species (birds of prey) with long ranges that don't recognise administrative boundaries

Summary

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

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

CNPA analysis

The role of the local plan will be clarified in terms of its role in delivering the 4 aims of the Park. Within the introduction the wording will be clarified to ensure the appropriate level of consideration is given to all forms of development which affect the Park and its special qualities. However clarify that the local plan could not be used to impact on developments over which we have no control. In providing advice to neighbouring authorities on applications which affect the special qualities the 4 aims of the Park and the special qualities themselves are paramount.

Policy General - Context

Name Dr Alister Scott

Objector Ref 477b

Representation

It is necessary to explain in more detail the national planning context set by key documents such as NPPG 14 and the emergent National Planning Framework. This is important and statements/policies in the plan should be cross referenced to specific guidance in NPPG14 in justification.

Summary

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

CNPA analysis

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

Policy General - Vision

Name Dr Alister Scott

Objector Ref 477c

Representation

The vision statements in both boxes refer to ‘sustainable development’, and the phrase appears in many other places throughout the Plan – most notably in Policy 17. People can and do interpret this phrase in a number of different ways, so for clarity, it would be useful to include a definition that reflects the CNPA viewpoint. At present the implication from reading the plan is a focus on economic and social sustainability which actually is, in my view, flawed. Ideally there is a need to consider the triple bottom line but to go beyond the rather clichéd “balance” to assessments based on the opportunities and costs in each situation.

The vision statement is at present too limited in scope. It needs to include environment explicitly. Currently it is excluded and this is an error. “an exemplar of SD where people, place and environment thrive together”

Summary

The vision statements for the Park Plan and Local Plan refer to sustainable development but there is no clarity on the term. The plan as written is too focused on economic and social sustainability and there should be a better balance on the opportunities and costs of such an approach. The Vision is too limited and should include the environment explicitly.

CNPA analysis

A review of the Vision will be undertaken to ensure that it gives an appropriate level of imaginative and coherent guidance for the future of the Park, and promotes a level of partnership working which is accepted by all.

Policy Policy 04

Name Dr Alister Scott

Objector Ref 477d

Representation

para 4.14, 4.15 - It would be helpful to refer here to the statement in the Park Plan that 'an equivalent level of NATIONAL consideration [to that in NSAs] will be given to landscape throughout the Park'. This raises the wider issue of having an NSA designation within the park which is afforded the highest level of protection implying that the rest of the landscape is of less value. This is counter to the whole park designation as we see it. There is concern that the statement here allowing these features could be outweighed by the social and economic benefits to the aim of the National park is too vague. More precise wording is needed to reflect Section 9(6) of the Act.

Summary

para 4.14/15 - Reference should be made to the Park Plans reference to NSAs. The wording should also be revised as currently it allows social and economic benefit to override in the decision making process. The wording should better reflect section 9(6) of the Act.

CNPA analysis

The para on NSAs will be clarified to ensure the level of protection if offered. The reference to social and economic benefit within the policy will also be removed.

Policy Policy 07

Name Dr Alister Scott

Objector Ref 477e

Representation

The policy on landscape is relatively weak when compared to biodiversity. The same criticism is made again of the vague and ambiguous reference to the aims of the National Park. We would argue that the benefits have to be of National importance in order for the landscape qualities to be overridden. We also argue that the NSA designation is unhelpful and allows a 2 tier landscape system to evolve in the mindset of planners and developers. Moreover the recent signing of the European Landscape Convention suggests that developments should be based on social and economic benefits of national importance against a detailed assessment of landscape character. This meets the 9 (6) focus as landscape is one of the special qualities. However the new landscape strategy referred to in the Park Plan would need to have updated LCA guidance in order for this to work effectively as current LCA material is hopelessly outdated.

Para 4.37 - This could usefully explain about the work underway and proposed to update the LCA and HCLA, and prepare a landscape management plan. The Park Plan indicates that the landscape management plan 'will form the basis of decisions related to planning control', so it would be useful to refer to it here.

Summary

The policy is weak when compared to policy 6. There should be a focus that developments must be of national importance to override this policy. Also the previous reference to NSAs is unhelpful and creates a two tier system for the landscape. The role of landscape character assessments should be clarified.

4.37 refer to ongoing work to update the LCA and HCLA and preparation of landscape management plans. Also this should refer to the Park Plans reference to management plans.

CNPA analysis

The wording of the supporting text and the policy will be clarified to ensure the landscape is seen in its correct context as a special quality. Also the work on LCAs and management plans will be included.

Policy Policy 16

Name Dr Alister Scott

Objector Ref 477f

Representation

The policy needs clarification of terms. There needs to be definitions of large scale commercial; small scale community; and micro-scale domestic renewable energy generation schemes in terms of number and height. This would also better reflect SPP6.

The issue of small scale schemes needs to be clearer in the policy and supporting justification. The numbers 1-3 are stated but the height of turbines is a key consideration. Does the park want 80m, 100m or 150 m turbines. My view is that 80m are fine in small groups; higher turbines even stand alone would have significant landscape impacts although they might appear to be small scale development. The current lack of guidance on small scale turbines is a major problem.

Summary

Definitions need to be included for clarity, which should reflect SPP6. Greater clarification also needs to be included regarding small scale schemes. The Park needs to state what form of development it would want.

CNPA analysis

The approach to renewable energy production will be reviewed in light of comments received. Any proposals must be assessed against the policies in the Local Plan and the Park Plan and also the aims of the Park and the policy regarding energy production must be worded to ensure that this is done correctly.

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

Policy Policy 17

Name Dr Alister Scott

Objector Ref 477g

Representation

SD needs to be defined with a CNPA flavour.

The policy here is too general. I would argue that as an exemplar the Park should be taking a lead by implementing and reinterpreting the Merton Rule to a rural situation. <http://www.themertonrule.org/what-is-the-merton-rule>. In addition the policy should talk about the need to make a positive contribution on the social and economic needs of the community thereby acting as a bridge for section 75 agreements or other benefits in kind.

Summary

The policy is too vague. The Park should take a lead by implementing and reinterpreting the Merton Rule to a rural situation. The policy should also include making a contribution to social and economic needs of the community thus acting as a bridge for Sec 75 agreements or other benefits in kind.

CNPA analysis

The comment is noted. The wording of the policy will be reviewed to ensure it is clear, and delivers the underlying aims of promoting sustainable communities and development.

Policy Housing (general)

Name Dr Alister Scott

Objector Ref 477h

Representation

The other policies in the plan are not supported by such a detailed justification as this rationale for the housing policies. It might be simpler to place this material in an Annex. I would also argue that ALL the other policies should have data available in a technical set of appendices that show similar evidence informing across the gamut of policies they are making policy on. This will help reduce spurious objections and improve clarity.

Summary

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

CNPA analysis

The level of detail included in the supporting text will be reviewed and the appropriate changes made to better the balance. Where information is available in support of other policies this will be included or referred to.

Policy Policy 31

Name Dr Alister Scott

Objector Ref 477i

Representation

It would be useful to refer to the need for developers to consider outstanding and significant designs that could be used as exemplars for rural development. All too often rural development are cited in terms of concealment, camouflage and disguising techniques. Good design can make a key contribution to the future rural landscapes and contribute to the exemplar role the park wants.

Summary

There should be a reference to the need for developers to consider outstanding and significant designs that could be used as exemplars for rural development. Rural development need not be concealment, camouflage and disguising since good design can make a key contribution to the future rural landscapes and contribute to the exemplar role the park wants.

CNPA analysis

The wording of the policy will be reviewed to ensure that it is in line with national guidance on the topic, as well as striking an appropriate balance between development opportunities and protecting the special qualities of the area as identified as a National Park. The wording of the policy will be reviewed to ensure that it does deliver the aim of the policy, and is not overly restrictive or onerous, but also provides an appropriate level of guidance for developers and people using the policy. Any amendments will be made as appropriate to ensure the underlying aim of the policy is achieved.

Policy Policy 33

Name Dr Alister Scott

Objector Ref 477j

Representation

In order 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 Local Plan could contribute even more to the delivery of this Strategic Objectives if sites suitable for tourist development were identified on maps of settlements in less-visited parts of the Park. The approach of Loch Lomond is a useful case study here.

Summary

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

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. (WORK WITH NATURAL HERITAGE SECTION, ECONOMIC AND SOCIAL DEVELOPMENT SECTION, LOCAL CHAMBER OF COMMERCE AND TOURIST BODIES)

Policy Policy omission

Name Dr Alister Scott

Objector Ref 477k

Representation

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).

Summary

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

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

Policy Policy omission

Name Dr Alister Scott

Objector Ref 4771

Representation

Policy Gap - Climate Change This needs to be an explicit policy area. One key goal would be for CNPA to reinterpret the Merton Rule.

Summary

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

CNPA analysis

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.

Policy Settlements - Aviemore

Name Dr Alister Scott

Objector Ref 477m

Representation

P62 Aviemore - It would be useful to explain more clearly what the role of the Aviemore Masterplan will be in relation to development planning and control.

Summary

P62 Aviemore - It would be useful to explain more clearly what the role of the Aviemore Masterplan will be in relation to development planning and control.

CNPA analysis

Clarify the role of the Masterplan as SPG in the decision making process.